

CD#H

Tinti, Elisa

From: Starodaj, Bartek
Sent: Friday, March 22, 2024 3:40 PM
To: Shaut, Andrea
Cc: Tinti, Elisa; Graves-Poller, Barbara
Subject: Communication to Council: Rent Guidelines Board Vacancy

Dear President Shaut,

On February 16, the City of Kingston opened applications to fill the current vacancy on the Rent Guidelines Board. We received 9 applications to fill this vacancy for the public member slot. The Common Council must provide a recommendation to DHCR with an appointment recommendation. Please note that to qualify for the position, an applicant has to have at least five years of experience in finance, economics, or housing and be a resident of the City of Kingston.

I am requesting placement on the appropriate Committee to move forward with this recommendation. I will forward all the applications received to the Common Council prior to the Committee meeting.

Thank you,
Bartek

-

Bartek Starodaj

Director of Housing Initiatives
City of Kingston
420 Broadway
Kingston, NY 12401

Office: 845-334-3928
Mobile: 860-670-8535
bstarodaj@kingston-ny.gov
Exempt304236

kingston-ny.gov/housing

CD+H

CITY OF KINGSTON
Office of Community Development
abruck@kingston-ny.gov

Amanda L. Bruck, Director



Steven T. Noble, Mayor

March 26, 2024

Council President, Andrea Shaut
City of Kingston Common Council
420 Broadway
Kingston, NY 12401

Dear President Shaut,

The Office of Community Development is requesting the Office of Community Development - Citizen Participation Plan, Community Development Block Grant Five Year Consolidated Plan and Analysis of Impediments to Fair Housing Choices be placed on the agenda of the appropriate committee (most likely the Standing Committee on Community Development and Housing Initiatives) as well as the full Common Council for consideration.

Each of these draft plans will be put on public display beginning April 1, 2024. The public comment period for The Five Year Consolidated Plan and the Analysis of Impediments to Fair Housing will both be on display and available for public comment for a period of 30 days. The Citizen Participation Plan will be on display and available for public comment for a period of 15 days per HUD regulations and guidelines.

On April 16, 2024 there will be a public hearing to solicit public comments on each of the aforementioned plans as required by HUD and per our Citizen participation Plan.

Attached you will find each of the plans as well as a committee report.

Respectfully submitted,

Amanda L. Bruck
Director, Office of Community Development

City of Kingston, NY

CITIZEN PARTICIPATION PLAN

**RELATING TO THE ADMINISTRATION OF
THE COMMUNITY PLANNING & DEVELOPMENT PROGRAMS
OF THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)**

Adopted by City of Kingston Common Council on _____

City of Kingston, NY

**CITIZEN PARTICIPATION PLAN
RELATING TO THE ADMINISTRATION OF THE COMMUNITY PLANNING &
DEVELOPMENT PROGRAMS OF THE U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT (HUD)**

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**CITY OF KINGSTON, NY
CITIZEN PARTICIPATION PLAN
RELATING TO THE ADMINISTRATION OF THE COMMUNITY PLANNING &
DEVELOPMENT PROGRAMS OF THE U.S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT (HUD)**

A. Introduction

Purpose

Pursuant to the citizen participation requirements of 24 CFR Section 91.105 and 24 CFR Part 5, the City of Kingston, NY (referred to as the “City”) sets forth the following amended Citizen Participation Plan (the “Plan”) as it relates to the administration of the Community Planning and Development (CPD) programs funded by the U.S. Department of Housing and Urban Development (HUD). The Plan presents the City’s plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption, and implementation of:

- 1) The Citizen Participation Plan
- 2) The Consolidated Plan (CP)
- 3) The Annual Action Plan (AAP)
- 4) Analysis of Impediments to Fair Housing Choice (AI)
- 5) The Consolidated Annual Performance and Evaluation Report (CAPER), and
- 6) The Section 108 Loan Guarantee Program

Lead Agency

The Office of Community Development of the City is the lead agency responsible for the administration of the Community Development Block Grant (CDBG) Program.

Effective Date

Subsequent to approval of this Citizen Participation Plan by City of Kingston Common Council and HUD, this Plan shall be effective until it is amended or otherwise replaced.

B. Encouragement of Citizen Participation

General

The City provides for and encourages citizens to participate in the development, revision, amendment, adoption and implementation of the Citizen Participation Plan, the Consolidated Plan, the Annual Action Plan, the Analysis of Impediments to Fair Housing Choice (AI), the CAPER, and the Section 108 Loan Guarantee Program. The City encourages participation by low- and moderate-income persons, particularly those living in areas designated as revitalization areas or in slum and blighted areas and in areas where HUD funds are proposed to be used, and by residents of predominantly low- and moderate- income neighborhoods. With respect to the public participation initiatives included in this Plan, the City will take appropriate actions to encourage the participation of all of its citizens, including minorities, non-English speaking persons, and persons with disabilities, as described below.

Non-English Speakers

The City has determined that, based on 2021 American Community Survey data, about ten percent of residents speak Spanish. Upon request, materials may be provided in Spanish.

Persons with Disabilities

To encourage the participation of persons with disabilities, the City will include the following language in all public meeting notices published in local newspapers:

The City of Kingston will make reasonable accommodations and services necessary for sensory-impaired and disabled citizens at the public meeting. Additionally, translation services may be offered upon request and availability. Persons requiring such accommodations/services should contact the City of Kingston's Clerk/Registrar Office at least five working days in advance of the meeting at emtinti@kingston-ny.gov or by Phone: (845) 334-3914

The City will conduct all public meetings in locations that are handicapped-accessible, when available.

Low- and Moderate-Income Persons

Citizens, public agencies and other interested parties, including low-income groups most affected by HUD funding allocations, will have the opportunity to receive information, review and submit comments on any proposed submission concerning the amount of funds available, including the estimated amount proposed to benefit low, very low, and extremely low-income residents. The City will conduct at least one public meeting in a neighborhood that contains at least 51% low- and moderate-income residents, based on current HUD data, during the development of the Consolidated Plan and the Annual Action Plan.

Organizations and Agencies

The City encourages the participation of local and regional institutions, the Continuum of Care, businesses, developers, nonprofit organizations, philanthropic organizations, and community-based

and faith-based organizations in the process of developing, revising, amending, adopting and implementing all documents covered by this Plan. This will be achieved through stakeholder interviews, focus groups and/or public meetings.

Local Public Housing Authority

The City, in consultation with Kingston Housing Authority, encourages the participation of residents of any public housing developments located within the City in the process of developing, revising, amending, adopting and implementing the documents covered by this Plan. The City will provide information to the Kingston Housing Authority about the Consolidated Plan activities related to the public housing developments and communities so that Kingston Housing Authority can make this information available at board meetings required for its 5-Year Plan.

Public Notices

The City will publish notices in the Kingston *Daily Freeman*, on the City of Kingston website, Community Access media channels, and on the City of Kingston’s Facebook page at least five days prior to the scheduled hearings/meetings. A comprehensive Consolidated Plan mailing list will be developed and maintained by the City and the Office of Community Development . Members of this list will be sent direct mailings and public notices about the Consolidated Planning process. Common Council Members will be forwarded all public notices and meeting mailings as well. Future participation is promoted in the Consolidated Planning process through information dissemination at public meetings, neighborhood work sessions, printed and voice media, and to individuals, groups, and organizations on the Consolidated Plan mailing list. The City will ensure that all meetings/hearings associated with the Consolidated Planning process, will be held in locations that are considered accessible.

Public Hearings

All public hearings will be scheduled at times and locations that are convenient for potential and actual program beneficiaries, and with accommodation for persons with disabilities and non-English speakers in accordance with this Plan.

Technical Assistance

The City’s Office of Community Development staff are available to assist organizations and other eligible individuals that are interested in submitting a proposal to obtain funding through the CDBG program. All potential applicants are strongly encouraged to contact the Office of Community Development for technical assistance before initiating a funding request application.

Online Access

The City will post draft copies and final copies of all documents covered by this Plan on its website accessible at <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>.

Other Engagement Techniques

The Plan may be amended as the City continues to gain access to technology that improves the avenues of participation by its residents.

City Contact Person

All communication regarding the Plan, the Consolidated Plan, the Annual Action Plan, the CAPER, comments, complaints, reasonable accommodation for disabled persons, translation services, or other elements shall be directed to: The City of Kingston, Director of Community Development, City Hall 420 Broadway Kingston, NY 12401, Phone: (845) 334-3930

C. The Citizen Participation Plan

Citizen Participation Plan Development

The City shall follow the following procedure when developing its Citizen Participation Plan.

a. Public Review of the Draft Plan

The draft Citizen Participation Plan will be made available for public review for a 15-day period prior to City of Kingston Common Council consideration and adoption, and may be done concurrently with the public review and comment process for the Consolidated Plan. Copies of the draft Citizen Participation Plan will be made available for review at the following locations:

- City of Kingston, City Hall; 420 Broadway Kingston, NY 12401
- Office of Community Development; City Hall 420 Broadway Kingston, NY 12401
- Kingston Housing Authority; 132 Rondout Drive Kingston, New York 12401
- Kingston Library; 61 Crown St, Kingston, NY 12401
- City of Kingston website:<https://kingston-ny.gov/content/8399/8469/8547/default.aspx>

b. Comments Received on Draft Amended Plan

Written comments will be accepted by the City's Director of Community Development, or a designee, during the 15-day public review period.

c. Public Hearing

The City will conduct a public hearing to review and accept public comments on the draft Amended Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

d. City of Kingston Common Council Action

Following the public hearing, the Plan will be presented to City of Kingston Common Council for consideration and formal action.

e. Submission to HUD

A copy of the Citizen Participation Plan, including a summary of all written comments and those received during the public hearing as well as the City's responses and proof of compliance with the minimum 15-day public review and comment period requirement, will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

Amendments to the Approved Citizen Participation Plan

The City shall follow the following procedure to amend its approved Citizen Participation Plan, as needed

a. **Amendment Considerations**

The City will amend the Plan, as necessary, to ensure adequate engagement and involvement of the public in making decisions related to its federal funding programs. Substantial amendments to the Citizen Participation Plan may be required should a provision of the Plan be found by the City to conflict with HUD regulations, or when changes in HUD regulations occur, or based on current HUD guidance. Edits to the Plan that only include updated contact information or editorial changes for clarity will not be released for public review and comment.

b. **Draft Amended Plan Review**

The draft Plan will be made available for public review for a 15-day period prior to City of Kingston Common Council consideration and adoption and may be done concurrently with the public review and comment process for the Consolidated Plan. Copies of the draft Amended Plan will be made available for review at the following locations:

- City of Kingston, City Hall; 420 Broadway Kingston, NY 12401
- Office of Community Development; City Hall 420 Broadway; Kingston, NY 12401
- Kingston Library; 61 Crown St, Kingston, NY 12401
- Kingston Housing Authority; 132 Rondout Drive; Kingston, New York 12401
- City of Kingston website: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>

c. **Comments Received on Draft Amended Plan**

Written comments will be accepted by the Director of the City's Office of Community Development, or a designee, during the 15-day public review period.

d. **Public Hearing**

The City will conduct a public hearing to review and accept public comments on the draft Amended Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

e. **City of Kingston Common Council Action**

Following the public hearing, the Plan will be presented to City Council for consideration and formal action.

f. **Submission to HUD**

A copy of the Amended Citizen Participation Plan, including a summary of all written comments and those received during the public hearing as well as the City's responses and proof of compliance with the minimum 15-day public review and comment period requirement, will be submitted to HUD. A summary of any comments or views not accepted and the reasons therefore shall be supplied to HUD as well.

Plan Access

The approved Citizen Participation Plan, and any amendments, will be kept on file in the Office of Community Development, City Hall 420 Broadway Kingston, NY 12401.

The Plan can be accessed online at: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>.

Hard copies can be made available to those requesting the Plan by contacting the City's Director of Community Development, or a designee.

In the Event of an Emergency

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the City may opt to forgo the public hearing for amendments to its Citizen Participation Plan. The length of public comment for amendments to the Citizen Participation Plan shall be no less than five (5) days. Draft documents for public comment and review will be made available on the City's website at <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>. Copies of the draft documents will be mailed or e-mailed upon request, if possible

D. The Consolidated Plan (CP)

Plan Development

The City will follow the process and procedures described below in the development of its Consolidated Plan (CP)

Stakeholder Consultation and Citizen Outreach

In the development of the CP, the City will consult with other public and private agencies including, but not limited to, the following:

- Kingston Housing Authority
- Other assisted housing providers
- Social service providers including those focusing on services to minorities, people with low-and moderate household income, families with children, the elderly, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and other protected classes
- Continuum(s) of Care that serve(s) the jurisdiction
- Community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws
- Regional government agencies involved in metropolitan-wide planning and transportation responsibilities
- Business and civic leaders
- Broadband internet service providers and organizations engaged in narrowing the digital divide
- Agencies whose primary responsibilities include the management of flood prone areas, public land or water resources
- Emergency management agencies.

When preparing the portion of the CP concerning lead-based paint hazards, the City shall consult with local or state health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead-poisoned.

When preparing the description of priority non-housing community development needs, the City will notify adjacent units of local government, to the extent practicable. This shall involve, at a minimum, the City sending a letter to the chief elected official of each adjacent unit of government notifying them of the draft CP and how to access a copy online for review and comment.

A variety of mechanisms may be utilized to solicit input from these persons/service providers/agencies/entities. These include written letters, telephone or in-person interviews, mail surveys, internet-based feedback and surveys, focus groups, and/or consultation workshops.

a. Public Hearings

The City will conduct at least two public hearings in the development of the CP. The first public hearing will be conducted before the draft CP is published for public comment, during which the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the City will address identified housing and community development needs and proposed eligible activities.

b. Potential Displacement of Persons

Although the City does not anticipate any residential displacement to occur in the foreseeable future, it is required to describe its plans to minimize the displacement of persons and to assist any persons displaced. When displacement is unavoidable on a temporary or permanent basis, the City will comply with the federal Uniform Relocation Act.

Should displacement of residents be necessary as a result of the use of funds covered by this Plan, the City shall compensate residents who are actually displaced in accordance with *HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition*.

This resource is accessible online at: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>.

c. Public Display and Comment Period

The draft CP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary and purpose of the CP; the anticipated amounts of funding (including program income, if any); proposed activities likely to result in displacement, if any; plans for minimizing the displacement of persons as a result of CDBG activities, if any; plans to assist persons actually displaced by the project, if any; the dates of the public display and comment period; the locations where copies of the draft CP can be examined; how comments will be accepted; when the document will be considered for action by City Council; and, the anticipated submission date to HUD. Copies of the draft CP will be made available for review at the following locations:

- City of Kingston, City Hall; 420 Broadway Kingston, NY 12401
- Office of Community Development; City Hall 420 Broadway Kingston, NY 12401
- Kingston Housing Authority; 132 Rondout Drive Kingston, New York 12401
- Kingston Library; 61 Crown St, Kingston, NY 12401
- City of Kingston website: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>

d. Comments Received on the Draft Consolidated Plan

Written comments will be accepted by the Director of the City's Office of Community Development, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at the public hearings, in preparing the final CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CP for submission to HUD.

e. City Council Action

Following the public hearing, the CP will be presented to City of Kingston Common Council for consideration and formal action.

f. Submission to HUD

The CP will be submitted to HUD no less than 45 days before the start of the City's five-year program cycle, or at such time as instructed by HUD.

Revisions to the Consolidated Plan

The City shall follow the following procedure to revise its CP, as needed.

a. Revision Considerations

There are two types of amendments that may occur with the CP: minor amendments and substantial amendments. An amendment to the approved CP is considered substantial under the following circumstances:

- When an eligible activity is added
- When there is a change in the priorities identified in the CP

All other changes that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by the City Manager and will not be subject to public comments. These changes will be fully documented and signed by the City Manager.

All amendments, substantial and minor, will be submitted to HUD via the IDIS.

b. Public Display and Comment Period

The draft Revised CP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the revisions, the dates of the public display and comment period, the locations where copies of the proposed revised CP can be examined, how comments will be accepted, when the document will be considered for action by City Council, and the anticipated submission date to HUD. Copies of the draft Revised CP will be made available for review at the following locations:

- City of Kingston, City Hall; 420 Broadway Kingston, NY 12401
- Office of Community Development; City Hall 420 Broadway Kingston, NY 12401
- Kingston Housing Authority; 132 Rondout Drive Kingston, New York 12401
- Kingston Library; 61 Crown St, Kingston, NY 12401
- City of Kingston website: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>

c. Public Hearing

The City will conduct a public hearing to review and accept public comments on the draft Amended Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

d. Comments Received on the Draft Revised Consolidated Plan

Written comments will be accepted by the City's Director of Community Development, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at public hearings, in preparing the final Revised CP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised CP for submission to HUD.

e. City of Kingston Common Council Action

Following the public hearing, the Revised CP will be presented to City of Kingston Common Council for consideration and formal action.

f. Submission to HUD

The Revised CP/Amendment will be submitted to HUD following the end of the public display and comment period and adoption by City Council.

In the Event of a Disaster or Emergency

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the City may opt to conduct public hearings and meetings virtually via conference call or live web-streaming with the ability to provide comment and ask questions and receive a response in a timely manner. Accommodations will be made for persons with disabilities and non-English speaking persons upon request. Documents for public review will be shared via the City's website. This provision shall apply to all documents covered by this Plan.

In the event of an emergency, the following alternatives may be instituted by the City:

- a. The length of the public comment and display period for the Consolidated Plan or Annual Action Plan and Substantial Amendments shall be no less than five (5) days.
- b. Draft documents for public comment and review will be made available on the City's website at <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>. Copies of the draft documents will be mailed or e-mailed upon request, if possible.
- c. Public meetings may be held as virtual meetings using local cable access television or other online platforms for public viewing with the option to provide comment and questions ahead of time or during the meeting, and responses will be provided in a timely manner.
- d. The City may opt to hold one public hearing during the Consolidated Plan/Annual Plan process and its second required public hearing during the CAPER process for the same program year.

Plan Access

The Revised CP will be kept on file at the Office of Community Development, City Hall 420 Broadway Kingston, NY 12401

The Plan can be accessed online at: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>.

Hard copies can be made available to those requesting the Plan by contacting the City's Director of Community, or a designee.

E. The Annual Action Plan (AAP)

The Annual Action Plan (AAP) is a component of the Consolidated Plan, and it describes the City's proposed use of available federal and other resources to address the priority needs and specific objectives in the CP for each program year; the City's method for distributing funds to local non-profit organizations; and, the geographic areas of the City to which it will direct assistance.

Plan Development

The City will follow the process and procedures described below in the development of its AAP.

a. Public Hearings

The City will conduct at least two public hearings during the development of the AAP. The first public hearing will be conducted before the AAP draft is published for public comment. During the first public hearing, the City will address housing and community development needs, development of proposed activities, the amount of assistance the City expects to receive (including grant funds and program income), the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income residents, and a review of program performance.

The second public hearing will be conducted during or after the 30-day public comment period during which the City will address identified housing and community development needs, proposed eligible activities, and proposed strategies and actions for affirmatively furthering fair housing, consistent with the Analysis of Impediments to Fair Housing.

Both public hearings conducted for the Year 1 AAP may be conducted concurrently with the required public hearings for the five-year Consolidated Plan.

b. Public Display and Comment Period

The draft AAP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the AAP, the anticipated amounts of funding (including program income, if any), the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by City Council, and the anticipated submission date to HUD. Copies of the draft AAP will be made available for review at the following locations:

- City of Kingston, City Hall; 420 Broadway Kingston, NY 12401
- Office of Community Development; City Hall 420 Broadway Kingston, NY 12401
- Kingston Housing Authority, 132 Rondout Drive Kingston, New York 12401
- Kingston Library; 61 Crown St, Kingston, NY 12401
- City of Kingston website: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>

c. Comments Received on the Draft Annual Action Plan

Written comments will be accepted by the City's Director of Community Development, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing or orally at the public hearings in preparing the final AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final AAP for submission to HUD.

d. City of Kingston Common Council Action

Following the public comment period, the AAP will be presented to City of Kingston Common Council for consideration and formal action.

e. Submission to HUD

The AAP will be submitted to HUD no less than 45 days before the start of the City's annual program year, or at such time as instructed by HUD.

Revisions to the Annual Action Plan

The City shall follow the following procedure to revise its AAP, as needed.

a. Revision Considerations

There are two types of amendments that may occur with the AAP: minor amendments and substantial amendments. An amendment to the approved AAP is considered substantial under the following circumstances:

- When there is a change in allocation priorities
- When there is a change in method of distribution of funds
- When an activity that has not been previously identified in an action plan is added
- When a change occurs in the purpose of an activity
- When there is a twenty-five percent (25%) or more increase in an activity's originally approved budget
- When there is a change in scope, location or beneficiaries of an activity.

All other changes to funding allocations or approved eligible activities that do not meet the criteria defined above will be considered minor amendments, will be reviewed and approved by the City's Office of Community Development and will not be subject to public comments. These changes will be fully documented and signed by the Director of Community Development.

The City may choose to submit a copy of each substantial amendment to the AAP to HUD as it occurs, or at the end of the program year. Letters transmitting copies of amendments will be signed by the Director of Community Development.

b. Public Display and Comment Period

The draft Revised AAP will be placed on display for a period of no less than 30 days to encourage public review and comment. The public notice shall include a brief summary of the

revisions, the dates of the public display and comment period, the locations where copies of the draft AAP can be examined, how comments will be accepted, when the document will be considered for action by City Council, and the anticipated submission date to HUD. Copies of the draft Revised AAP will be made available for review at the following locations:

- City of Kingston, City Hall; 420 Broadway Kingston, NY 12401
- Office of Community Development; City Hall 420 Broadway Kingston, NY 12401
- Kingston Housing Authority; 132 Rondout Drive Kingston, New York 12401
- Kingston Library; 61 Crown St, Kingston, NY 12401
- City of Kingston website:<https://kingston-ny.gov/content/8399/8469/8547/default.aspx>

c. Public Hearing

The City will conduct a public hearing to review and accept public comments on the draft Amended Plan prior to its approval and submittal to HUD. This public hearing may be held concurrently with the public hearing held in conjunction with the Consolidated Plan.

d. Comments Received on the Draft Revised Annual Action Plan

Written comments will be accepted by the City Contact Person, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing, or orally at public hearings, in preparing the final Revised AAP. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final Revised AAP for submission to HUD.

e. City of Kingston Common Council Action

Following the public hearing, the Revised AAP will be presented to City of Kingston Common Council for consideration and formal action.

f. Submission to HUD

The Revised AAP will be submitted to HUD following the end of the public display and comment period.

In the Event of a Disaster or Emergency

In the event of a local, state or federally declared disaster or emergency where public places may be closed to the public or in-person participation may not be feasible or large gatherings may be considered a public health risk, the City may opt to conduct public hearings and meetings virtually via conference call or live web-streaming with the ability to ask questions and provide comment in real time where public comment is required to be heard. Accommodations will be made for persons with disabilities and non-English speaking persons upon request. Documents for public review will be shared via the City's website. This provision shall apply to all documents covered by this Plan.

In the event of an emergency, the following alternatives may be instituted by the City:

- a. The length of the public comment and display period for the Consolidated Plan or Annual Action Plan and Substantial Amendments shall be no less than five (5) days.

- b. Draft documents for public comment and review will be made available on the City's website at <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>. Copies of the draft documents will be mailed or e-mailed upon request, if possible.
- c. Public meetings may be held as virtual meetings using local cable access television or other online platforms for public viewing with the option to provide comment and questions ahead of time or during the meeting, and responses will be provided in a timely manner.
- d. The City may opt to hold one public hearing during the Consolidated Plan/Annual Plan process and its second required public hearing during the CAPER process for the same program year.

Plan Access

The Revised AAP will be kept on file at the Office of Community Development, City Hall 420 Broadway Kingston, NY 12401

The Plan can be accessed online at: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>.

Hard copies can be made available to those requesting the Plan by contacting the City's Director of Community Development, or a designee.

F. Consolidated Annual Performance and Evaluation Report (CAPER)

Report Development

The City shall follow the following procedure in the drafting and adoption of its Consolidated Annual Performance and Evaluation Report (CAPER).

- a. **Report Considerations**

The Office of Community Development will evaluate and report the accomplishments and expenditures of the previous program year for CDBG funds and draft the CAPER in accordance with HUD requirements.

- b. **Public Display and Comment Period**

The draft CAPER will be placed on display for a period of no less than 15 days to encourage public review and comment. Public notice of the display and comment period will be published in the *Daily Freeman* no less than two weeks before the comment period begins with accommodation for persons with disabilities and non-English Spanish speakers in accordance with this Plan. The public notice shall include a brief summary and purpose of the CAPER, a summary of program expenditures, a summary of program performance, the dates of the public display and comment period, the locations where copies of the draft CAPER can be examined, how comments will be accepted, and the anticipated submission date to HUD. Copies of the draft CAPER will be made available for review at the following locations:

- City of Kingston, City Hall; 420 Broadway Kingston, NY 12401
- Office of Community Development; City Hall 420 Broadway Kingston, NY 12401
- Kingston Housing Authority; 132 Rondout Drive Kingston, New York 12401
- Kingston Library; 61 Crown St, Kingston, NY 12401

- City of Kingston website:<https://kingston-ny.gov/content/8399/8469/8547/default.aspx>

c. Comments Received on the Draft CAPER

Written comments will be accepted by the City's Director of Community Development, or a designee, during the 15-day public display and comment period. The City will consider any comments or views of City residents received in writing in preparing the final CAPER. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final CAPER for submission to HUD.

d. Submission to HUD

The CAPER will be submitted to HUD within 90 days following the last day of the City's annual program year.

Plan Access

The CAPER will be kept on file at the Office of Community Development, City Hall 420 Broadway Kingston, NY 12401

The Plan can be accessed online at: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>.

Hard copies can be made available to those requesting the Plan by contacting the City's Director of Community Development, or a designee.

G. Section 108 Loan Guarantee Program

Development of Section 108 Loan Guarantee Application

Applications for assistance filed by the City for Section 108 Loan Guarantee assistance authorized under HUD regulation 24 CFR Part 570, Subpart M, are subject to all provisions set forth within this Plan. Such applications for Section 108 assistance may be included as part of the Consolidated Planning process or may be undertaken separately anytime during the City's program year.

Before the City submits an application for Section 108 loan guarantee assistance, the City will make available to citizens, public agencies and other interested parties information that includes the amount of assistance the City expects to be made available (including program income), the range of activities that may be undertaken, the estimated amount that will benefit persons of low- and moderate-income, and any activities likely to result in displacement.

Public Display and Comment Period

The City will publish its proposed Section 108 loan application for review and comment. The public notice shall include a summary describing the contents and purpose of the application and listing the locations where the entire application may be examined. An application for Section 108 Loan Guarantee funding shall be made available for public review for a 30-day period prior to consideration and submission to HUD and may be done concurrently with the public review and comment process for the Consolidated Plan.

Copies of the proposed Section 108 loan application will be made available for review at the following locations:

- City of Kingston, City Hall; 420 Broadway Kingston, NY 12401
- Office of Community Development; City Hall 420 Broadway Kingston, NY 12401
- Kingston Housing Authority; 132 Rondout Drive Kingston, New York 12401
- Kingston Library; 61 Crown St, Kingston, NY 12401
- City of Kingston website: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>

Comments Received on the Proposed Section 108 Application

Written comments will be accepted by the City's Director of Community Development, or a designee, during the 30-day public display and comment period. The City will consider any comments or views of City residents received in writing in preparing the final application. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons why, will be attached to the final application for submission to HUD.

Submission to HUD

The Section 108 Loan Application will be submitted to HUD.

H. Complaints

Residents may register complaints regarding any aspect of the CDBG program by contacting the City's Director of Community Development, or a designee. All written complaints received will be addressed in writing within 15 days.

Residents wishing to object to HUD approval of the final Consolidated Plan, Annual Action Plan or any other documents identified in this Plan may send written objections to the HUD Field Office at:

U.S. Dept of Housing & Urban Development
New York Field Office
26 Federal Plaza #3541, New York, NY 10278

Any written objections should be made within 30 days after the City has submitted any of the documents covered by this Plan to HUD. Any objections made will only be submitted to HUD for the following reasons:

- The applicant's description of needs and objectives is plainly inconsistent with available facts and data
- The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant
- The application does not comply with the requirements of the CDBG program or other applicable laws
- The application's proposed activities which are otherwise ineligible under the program regulations.

Objections shall include both an identification of requirements not met and available facts and data.



The City of
Kingston, NY

**2024-2028 Consolidated Plan &
2024 Annual Action Plan**

Draft for Public Display

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Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Kingston is a federal entitlement community under the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) Program. As a HUD entitlement community, the City is required to prepare a Five-Year Consolidated Plan (CP) to implement any federal programs that fund housing, community development and economic development within the community. The lead entity responsible for the preparation of the CP is the City of Kingston Office of Community Development (OCD).

The City of Kingston has, through the CP, developed a single, consolidated planning and application document in consultation with public and private agencies. The CP for the City will serve the following functions:

- a. A planning document that enables the City to view its HUD funding, not in isolation, but as one tool in a comprehensive strategy to address housing, community development, and economic development needs;
- b. An application for CDBG funds under HUD's formula grant;
- c. A strategy document to be followed in carrying out HUD programs; and
- d. An action plan that provides a basis for assessing performance in the investment of CDBG funds.

The purpose of the CP is to guide federal funding decisions in the next five years. The CP is guided by three overarching goals that are applied according to a community's needs. The goals are:

- To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
- To improve the quality of life and living environments for people with low- to moderate incomes through community reinvestment and improvements to public facilities and infrastructure.
- To generate economic opportunities by supporting sustainable development activities that promote long-term community viability and the empowerment of people with low to moderate incomes to achieve self-sufficiency.

The overall priority for the investment of federal funds is to increase self-sufficiency and

economic opportunity for lower income residents and individuals with special needs so that they can achieve a reasonable standard of living.

The City of Kingston anticipates receiving the following federal resources in FY 2024; estimated projections for five years follow in parentheses:

- CDBG \$650,000 (\$3,250,000)

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The Strategic Plan provides a framework to address the needs of the City for the next five years using CDBG funds. The three overarching objectives guiding the proposed activities are:

- Providing Decent Affordable Housing
- Creating Economic Opportunities
- Provide Social Services to Populations in Need

Outcomes show how programs and activities benefit a community or the people served. The three outcomes that will illustrate the benefits of each activity funded by the CDBG programs are:

- Improve Availability/ Accessibility
- Improve Affordability
- Improve Quality

All future activities funded in the next five years will support at least one objective and one outcome. The City's framework for realizing the objectives and outcomes include the following goals:

- Provide Decent, Affordable Housing
- Provide a Suitable Living Environment
- Increase Job Opportunities
- End Chronic Homelessness

3. Evaluation of past performance

The following evaluation of past performance is from the Program Year 2022 (July 1, 2022 – June 30, 2023) Consolidated Annual Performance and Evaluation Report (CAPER). The accomplishments that follow are those achieved through the expenditure of CDBG funds.

During PY 2022 the City undertook the following activities:

CDBG: A total of \$159,695.26 in CDBG funds was expended on the following priority needs in 2022:

- Housing Rehabilitation,
- Youth & Community Services,
- Parks & Recreation Master Plan Improvements
- Improvements to Public Facilities.

4. Summary of citizen participation process and consultation process

The City of Kingston Office of Community Development (OCD) developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, published meeting notices, and stakeholder meetings. A complete summary of Citizen Participation, including comments, is included in the Citizen Participation Appendix attached to this Plan.

5. Summary of public comments

Citizen comments will be included in the Citizen Participation Appendix attached to the final version of this Plan.

6. Summary of comments or views not accepted and the reasons for not accepting them

There were no comments that were not accepted by the City of Kingston. A complete summary of Citizen Participation is included in the Citizen Participation Appendix attached to the final version of this Plan.

7. Summary

This plan outlines the goals of the City of Kingston for its CDBG funds. Following extensive outreach and public input, the Consolidated Plan and Annual Action Plan outline programs and activities that will address the identified needs. Despite the number of needs identified by stakeholders and the public, the City's CDBG programs are limited in funding. This document outlines the City's plans to maximize the investment of federal resources.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	KINGSTON	
CDBG Administrator	KINGSTON	Office of Community Development
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

Contact Information:

Amanda L. Bruck,
Director Office of Community Development
City of Kingston
420 Broadway Kingston, NY 12401
(845) 334-3930
abruck@kingston-ny.gov

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The City of Kingston's Office of Community Development (OCD) developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, published meeting notices, and stakeholder/focus group meetings meant to engage a broad variety of stakeholders and City residents.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

OCD actively consulted with a variety of non-profits, social service providers, community residents, and governmental agencies to determine the needs of the City of Kingston and better allocate entitlement resources. Stakeholder meetings were held during the weeks of February 5 and February 12, 2024, with affordable/special needs housing and service providers, homeless service agencies, economic development and planning officials, local businesses, and elected officials. In addition, public hearings were held on February 6 and April 8, 2024, at City of Kingston City Hall. These public hearings were advertised in *Daily Freeman* in accordance with the City's approved Citizen Participation Plan.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

Cares of NY, Inc. is a non-profit that coordinates amongst 11 Continuum of Care (CoC) across the state of NY. Their planning department helps each CoC develop strategic plans, consolidates each CoC's Point-In-Time (PIT) and Housing Inventory Count (HIC) data, and sets up workshops to aid practitioners understand issues which intersect with homelessness. Cares of NY Inc. works with Ulster County CoC (UCCoC) to collect data and develop strategies to address homelessness in Ulster County. Additionally, the UCCoC oversees the response to homelessness in 20 towns and 3 villages. The UCCoC is comprised of 2 consolidated jurisdictions, Ulster County and Kingston MSA. The City of Kingston participates in the UCCoC.

The City relies on data captured and provided by the UCCoC to evaluate the number of City residents experiencing or at risk of homelessness. Representatives of the UCCoC participated in the City's stakeholder workshops.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Nonprofits, such as RUPCO, Family of Woodstock, and Catholic Charities provide services to homeless persons in the City of Kingston. They also provide data to UCCoC to complete the PIT and HIC counts. This data tracks trends of homeless populations and subpopulations in the City. Additionally, service providers use this data to determine which homeless populations are in most need of programs and resources. The City does not receive ESG funds from HUD.

The Ulster County CoC participates in the CARES of NY, Inc. Collaborative Homeless Management Information System (CCHMIS). With input from all participating CoCs, CCHMIS has established administrative policies and procedures and systems performance measures that each CoC uses to track progress and performance of the homeless system, including CoC-funded programs.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

A wide variety of stakeholders were consulted to determine the City of Kingston's housing and community development needs. The parties consulted included members of local government, housing and social service agencies and private nonprofit organizations whose missions include the provision of affordable housing and human services to low- and moderate- income residents.

1	Agency/Group/Organization	City of Kingston Office of Community Development
	Agency/Group/Organization Type	Other government-local Services- Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Office of Community Development served as a primary contact for questions and concerns relating to the drafting of the 2024-2028 Consolidated Plan.
2	Agency/Group/Organization	City of Kingston Office of Housing Initiatives
	Agency/Group/Organization Type	Other government-local Services – Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Homeless Special Needs Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Office of Housing Initiatives was consulted via an interview with the Director. The goal of the interview was to obtain information on the affordable housing needs of the City and current initiatives designed to address affordable housing shortages in the City. .
3	Agency/Group/Organization	City of Kingston Human Right Commission
	Agency/Group/Organization Type	Housing Other government-local Services- Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Market Analysis Poverty Strategy Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Office of Housing Initiatives was consulted via an interview with the Director. The goal of the interview was to obtain information on the Fair Housing issues within the City and any education, outreach and enforcement activities the City undertakes. .
4	Agency/Group/Organization	City of Kingston Mayor's Office
	Agency/Group/Organization Type	Other government-Local Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Homeless Special Needs Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Office was consulted via an interview with the Mayor of the City of Kingston. The goal of the interview was to obtain information on the needs of the residents served by the City.
5	Agency/Group/Organization	City of Kingston Planning Department
	Agency/Group/Organization Type	Other government-Local
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Homeless Special Needs Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Planning Department was consulted via an interview with the Planning Director. The goal of the interview was to obtain information on the affordable housing and public infrastructure needs of the residents served by the City.
6	Agency/Group/Organization	Kingston Housing Authority
	Agency/Group/Organization Type	PHA Agency – Management of Public Land or Water Resource

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via an interview. The goal of the interview was to obtain information on the public housing needs of the residents served by the agency.
7	Agency/Group/Organization	Ulster County Continuum of Care
	Agency/Group/Organization Type	Other government-County
	What section of the Plan was addressed by Consultation?	Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via stakeholder workshop. The goal of the workshop was to obtain information and data on the needs of individuals and households experiencing or at risk of homelessness in the City.
8	Agency/Group/Organization	RUPCO
	Agency/Group/Organization Type	Services – Housing Services – Children Services – Person with Disabilities Services – Victims of Domestic Violence Services – Homeless
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless Strategy Non- Homeless Special Needs Economic Development Anti-Poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via stakeholder engagement meeting. The goal of the meeting was to obtain information on the housing, homeless, non-homeless and economic development needs of the residents served by the agency.
9	Agency/Group/Organization	Ulster County Community Action
	Agency/Group/Organization Type	Services – Housing Services – Children Services – Person with Disabilities Services – Victims of Domestic Violence Services – Homeless Health Agency Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless Strategy Non- Homeless Special Needs Economic Development Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via stakeholder engagement meeting. The goal of the meeting was to obtain information on the housing, homeless, non-homeless, and economic development needs of the residents served by the agency.
10	Agency/Group/Organization	Partners for Progress
	Agency/Group/Organization Type	Services – Housing Services – Children Services – Person with Disabilities Services – Victims of Domestic Violence Services – Homeless Health Agency Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless Strategy Non- Homeless Special Needs Anti-Poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via stakeholder engagement meeting. The goal of the interview was to obtain information on the housing, homeless, non-homeless and economic development needs of the residents served by the agency.
11	Agency/Group/Organization	Family of Woodstock
	Agency/Group/Organization Type	Services – Housing Services – Children Services – Person with Disabilities Services – Victims of Domestic Violence Services – Homeless
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homeless Needs – Chronically Homeless Homeless Needs – Families and Children Homeless Strategy Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via stakeholder engagement meeting. The goal of the interview was to obtain information on the needs of individuals and households experiencing or at risk of homelessness in the City.
12	Agency/Group/Organization	Midtown Arts District/Midtown Business Alliance
	Agency/Group/Organization Type	Other Government – County Business Leaders Business and Civic Leaders Services- Broadband Internet Service Providers Services- Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Homeless Special Needs Market Analysis Economic Development

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via stakeholder engagement meeting. The goal of the interview was to obtain information on the economic development needs of the residents served by the agency.
13	Agency/Group/Organization	Ulster County Department of Planning
	Agency/Group/Organization Type	Other government-County Services- Broadband Internet Service Providers Services- Narrowing the Digital Divide Agency – Managing Flood Prone Areas
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Non-Homeless Special Needs Market Analysis Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via stakeholder engagement meeting. The goal of the interview was to obtain information on the housing, non-homeless and economic development needs of the residents served by the agency.
14	Agency/Group/Organization	Ulster County Industrial Development Agency
	Agency/Group/Organization Type	Other Government – County Business Leaders Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Economic Development Market Analysis Other
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted via stakeholder engagement meeting. The goal of the interview was to obtain information on the housing, non-homeless and economic development needs of the residents served by the agency.

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

Broadband providers did not participate in the consultation process. Information about broadband needs within the City was provided by other stakeholders in the City during public meetings.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
The City of Kingston Comprehensive Plan	The City of Kingston Office of Community Development	Goals and Strategies identified in the Comprehensive Plan are consistent with the Strategic Plan
The City of Kingston Strategic & Economic Development Plan	The City of Kingston	Goals and Strategies identified in the Economic Development Plan are consistent with the Strategic Plan
Kingston Climate Action Plan 2030	The City of Kingston	Kingston Climate Action Plan informed the Natural Disaster Risk section of the Housing Market Analysis.
Multi-Jurisdictional Hazard Mitigation Plan Ulster County, New York (2017)	Ulster County Department of Emergency Communications/ Division of Emergency Management	Multi-Jurisdictional Hazard Mitigation Plan informed the Natural Disaster Risk section of the Housing Market Analysis.
Parks & Recreation Master Plan	Kingston Park and Recreation	Parks & Recreation Master Plan informed the Priority Needs section of Strategic Plan

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

In accordance with 24 CFR 91.100(4), the City of Kingston will notify adjacent units of local government of the non-housing community development needs included in its CP. The City will continue to interact with public entities at all levels to ensure coordination and cooperation in the implementation of the Consolidated Plan and thereby maximize the benefits of the County’s housing and community development activities for the residents being served.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The City of Kingston’s goal for citizen participation is to ensure broad participation of City residents, housing, economic, and service providers, City departments, nonprofit organizations, and other stakeholders in the planning and implementation of community development and housing programs.

For the development of the 2024-2028 Consolidated Plan and the FY 2024 Action Plan, the City held two public meetings. The meetings were advertised in the *Daily Freeman*. Affordable Housing, Homelessness/Special Needs, Economic Development and Fair Housing meetings were held on February 6, 2024. A second public meeting was held on April 8, 2024, to present a summary of the City’s draft FY 2024 – FY 2028 Consolidated Plan, to present the City’s proposed allocations of FY 2024 CDBG funds, and to review the City’s past program performance.

A complete summary of citizen participation, including public meeting minutes, attendance sheets, notices and citizen comments received are included in the Citizen Participation Appendix attached to this document.

Copies of the FY 2024 – 2028 Consolidated Plan and FY 2024 Annual Action Plan were distributed to various public locations for review and comment. A summary of the FY 2024 Annual Action Plan was published in the on April 1, 2024, alerting interested persons to the availability of the Annual Action Plan for public review. The proposed Plan was on public display from April 1 through April 30, 2024. A copy of the FY 2024 – 2028 Consolidated Plan and the FY 2024 Annual Action Plan was placed on the City’s website and at the following locations in the City for public review:

- City of Kingston, City Hall; 420 Broadway Kingston, NY 12401
- Office of Community Development; City Hall 420 Broadway Kingston, NY 12401
- Kingston Housing Authority; 132 Rondout Drive Kingston, New York 12401
- Kingston Library; 61 Crown St, Kingston, NY 12401
- City of Kingston website: <https://kingston-ny.gov/content/8399/8469/8547/default.aspx>

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Citywide	The meeting was attended by residents and representatives of local and county human service organizations.	Residents who attended the Public Meeting spoke about the need for affordable housing in the City of Kingston, and programs for children and young adults.	N/A	
2	Public Hearing	Citywide	Will update after second Public Hearing	Will update after second Public Hearing	N/A	

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Housing

Housing problems include cost burden (paying more than 30% of monthly income towards monthly housing costs), severe cost burden (paying more than 50% of monthly income towards monthly housing costs), overcrowding, and low-quality housing stock. The most common housing problem is cost burden. Black/African American, Hispanic, and Asian households experienced these problems at disproportionate rates. Stakeholders repeatedly reported that access to affordable housing is a significant need in the City of Kingston. Without adequate housing, residents struggle in other aspects of life, such as finding employment.

Disproportionately Greater Need

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate greater than 10% more than for the income level as a whole. Disproportionately greater need was identified among moderate-income and lower-income Asian households, Hispanic households, and Black/African Americans households. The results of this data for Asian households should be used with caution considering the small numbers in these minority groups, the age of the data, and the limited sample size in the City of Kingston.

Non-Homeless Special Needs Populations

According to 2022 ACS estimates, about 26.1% of households in the City of Kingston consist of at least one person aged 65 or over. In addition, the Census reported that 70% of persons 65 years and over had at least one disability in 2022. Within this population, 6.5% experienced independent living difficulty and 2.7% experienced a self-care disability. Individuals with ambulatory disabilities generally require accessible housing units, and individuals with independent living disabilities may require assisted living facilities. Data from the 2022 ACS indicates that 8.1% indicated an ambulatory difficulty; 7.8% reported a cognitive difficulty. For those with a disability, 5.8% live below the poverty line. Substance Abuse and Addiction are issues for municipalities within Ulster County. Based on a 2022-2024 Mid-Hudson Region Community Health Assessment 63.2% of individuals surveyed in Ulster County were "highly impacted" by challenges related to mental health and substance use. The survey also found that Drug and/or Alcohol use was considered the greatest barrier to people achieving better health in Ulster

County. The Ulster County Department of Mental Health has established a Single Point of Access (SPOA) that provides access to care management and additional supportive services for adults, youth, and families.

Non-Housing Community Development

Stakeholders identified a variety of non-housing community development activities that are essential to improving the wellbeing of residents living in the City of Kingston. These activities include workforce education, business development, increasing broadband access, access to public transportation, increasing the availability of affordable food options, and better community engagement. Additionally, stakeholders reported that there is a need for comprehensive public infrastructure reform in the city. Reforms should target sewer/water lines, storm water drainage systems, addition of bike lanes, and improved street design which is ADA compliant. Stakeholders also reported that a lack of available infrastructure in the City could be a barrier to businesses locating in certain areas of the City. There is a business park with available space, but depending on the business and its proposed use of utilities, there may not be capacity to serve new businesses.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The Housing Needs Assessment is based on data provided by HUD through the Comprehensive Housing Affordability Strategy (CHAS) data, with supplemental data used when available. Although the CHAS data is dated, it provides insight into the housing needs within the City. This data, in combination with supplemental data and interviews with agencies and housing providers in the region provide a snapshot of the housing needs.

Data depicted below is for the City of Kingston only, unless otherwise specified. The City of Kingston is the county seat of Ulster County, New York.

Housing needs in the City of Kingston include:

- More affordable, accessible housing, particularly for the following populations: Asian and Hispanic households, individuals with disabilities, and seniors.
- Home repair programs for seniors and low/mod income residents.
- Housing with supportive services for individuals with disabilities and seniors.

High housing costs reduce economic opportunities and access to prosperity, especially among lower- income households in the City of Kingston. According to 2022 ACS five-year estimates for the City, median home values have decreased by .5% and median gross rents have risen by 5.6% after adjusting for inflation, since 2009. During this same time period, median household income increased by less than 1%, and stakeholders still reported challenges low-income renters face when identifying housing opportunities.

The following are HUD-generated tables using 2013-2017 CHAS data that are part of the Consolidated Plan tool. These tables are automatically generated when creating the Consolidated Plan. Please note that HAMFI refers to “HUD Adjusted Median Family Income,” which is the median family income calculated by HUD for each jurisdiction, to determine Fair Market Rents and income limits for HUD programs. HAMFI will not necessarily be the same as other calculations of median incomes such as a simple Census number due to a series of adjustments that are made. Where the HUD tables below report AMI (Area Median Income), they refer to HAMFI.

Demographics	Base Year: 2009	Most Recent Year: 2017	% Change
Population	22,599	23,420	4%
Households	9,410	9,460	1%
Median Income	\$45,714.00	\$45,487.00	-0%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	1,855	1,650	1,735	945	3,280
Small Family Households	425	720	620	455	1,505
Large Family Households	95	95	125	30	230
Household contains at least one person 62-74 years of age	460	390	235	100	880
Household contains at least one person age 75 or older	270	250	205	110	205
Households with one or more children 6 years old or younger	284	329	340	134	324

Table 6 - Total Households Table

Data Source: 2013-2017 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	45	0	0	0	45	0	10	0	0	10
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	10	40	110	10	170	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	60	20	65	0	145	10	0	4	10	24
Housing cost burden greater than 50% of income (and none of the above problems)	880	330	25	0	1,235	230	195	160	10	595

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	245	495	495	75	1,310	115	120	220	155	610
Zero/negative Income (and none of the above problems)	110	0	0	0	110	45	0	0	0	45

Table 7 – Housing Problems Table

Data 2013-2017 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	995	390	200	10	1,595	240	205	160	15	620
Having none of four housing problems	345	755	885	510	2,495	115	300	485	405	1,305
Household has negative income, but none of the other housing problems	110	0	0	0	110	45	0	0	0	45

Table 8 – Housing Problems 2

Data 2013-2017 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	365	400	125	890	15	150	185	350
Large Related	85	65	40	190	14	29	45	88
Elderly	355	245	114	714	275	100	80	455
Other	415	175	290	880	60	45	75	180
Total need by income	1,220	885	569	2,674	364	324	385	1,073

Table 9 – Cost Burden > 30%

Data 2013-2017 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	330	165	10	505	15	90	80	185
Large Related	75	40	0	115	10	25	20	55
Elderly	185	105	4	294	160	55	25	240
Other	375	70	15	460	60	35	35	130
Total need by income	965	380	29	1,374	245	205	160	610

Table 10 – Cost Burden > 50%

Data 2013-2017 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	70	60	125	10	265	10	0	4	0	14

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	0	0	4	0	4	0	0	0	10	10
Other, non-family households	0	0	45	0	45	0	0	0	0	0
Total need by income	70	60	174	10	314	10	0	4	10	24

Table 11 – Crowding Information – 1/2

Data 2013-2017 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

According to the 2022 ACS 5-year estimates, 3,653 households in the City of Kingston were comprised of people living alone. The median income of nonfamily households was \$42,513. An affordable rent at this level would be roughly \$1063. There are at least 3775 renters paying more than 30% towards housing costs. These households are likely in need of housing assistance. Stakeholders reported that elderly residents required more housing assistance due to the lack of affordable and accessible housing in the City.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

2022 ACS 5-year estimates report that there were 3,705 individuals with a disability living in the City of Kingston. A majority of the individuals with disabilities living in the City are 65 years and over. Stakeholders reported that there is a need for more accessible housing for elderly individuals and individuals with disabilities. The New York State Division of Criminal Justice Services reported that in 2022 there were 149 individuals who had reported being a Victim of Domestic Violence in the City. According to Ulster County Continuum of Care (UCCoC) 2023 Point-in-Time (PIT) counts there were 17 Victims of Domestic Violence experiencing homelessness in the City.

Stakeholders reported that there is a need for more family housing for victims of domestic violence experiencing homelessness.

What are the most common housing problems?

For homeowners and renters, the most common housing problem is a focusing cost burden greater than 30% of income. This problem primarily impacts homeowners and renter earning between >50-80% AMI. Stakeholders reported that there are accessibility issues in the City's housing stock which cause problems for elderly residents and residents with disabilities. This demographic struggles without assistance provided by care workers and has difficulty accessing certain parts of the City due to a lack of appropriate transportation. The City's housing stock is old with most homes being developed before the 1950's. This means that most homes in the City might have been built with lead paint and lead pipes. The City will need to rehabilitate its older housing stock in order to prevent future cases of lead poisoning.

Are any populations/household types more affected than others by these problems?

Based on 2013-2017 ACS data Black/ African American, Hispanic, and Asian households are disproportionately impacted by cost burden in the City of Kingston. These households live in homes with one or more housing problems. Additionally, these demographics tend to reside in neighborhoods which require more public services, such as access to public transportation.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

No specific data is available on the characteristics and needs of low-income individuals and families with children who are currently housed but are at imminent risk of homelessness. However, it can reasonably be assumed households that are already cost-burdened and have low incomes are going to be the first to be forced from the housing market by escalating housing costs. Those threatened with eviction, unemployment, foreclosure, or termination of utilities could become homeless when they no longer afford the rising costs of living. Stakeholders reported an increase in utility arrears and shut offs during the COVID pandemic. Utility shutoffs are a risk factor for eviction among renters. Some working poor families may only be able to pay the rent because they have two wage earners, or because the primary wage earner works two jobs. Other families may deal with the problem of high housing costs by doubling up. Such arrangements can be unstable and temporary in nature. Stakeholders identified low-income earning families and victims of domestic violence as populations that were at high-risk of becoming homeless.

Most commonly, “at-risk” families live paycheck to paycheck without any savings for emergencies. If a family experiences a lost paycheck, a small rent increase, one incident of mental or physical illness, or a temporary layoff from work, it can result in a loss of housing. A common scenario is eviction from rental housing due to nonpayment of rent. Unemployment or underemployment results in a lack of sufficient income to meet the costs of food, housing, transportation, and childcare.

Additionally, individuals or families who fall into one or more of the following categories are most likely to become homeless:

- Persons leaving institutions such as mental hospitals or prisons.
- Young adults aging out of the foster care system.
- Households with incomes less than 30% of the median family income
- Households paying in excess of 50% of income for housing costs.
- Victims of domestic violence
- Special needs populations such as persons with AIDS, disabilities, drug and/or alcohol addictions
- Single parent households who are unemployed
- Large low-income families
- Renters facing eviction.
- Homeowners facing foreclosure.
- Households with catastrophic medical expenses
- Households experiencing physical hardships, i.e. flooding or fire.

Formerly homeless persons who receive rapid re-housing assistance, and are nearing termination of their funds, are at risk of becoming homeless. However, this risk can be reduced by case management, budget counseling and other social services that are offered to address risks to stability when they received funding. There has not been any systematic effort to track individuals receiving funding to determine how many experienced multiple episodes of homelessness, though the CoC performance measures do capture returns to homelessness each year.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The City of Kingston uses the definition of at-risk homeless populations found at 24 CFR Part 91.5 and included below:

An individual or family who:

- (i) Has an annual income below 30% of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter; and
- (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.

Persons on fixed incomes and those with mental illness are the most difficult to house and keep housed. These households require support to remain in their housing which is often not available. In dealing with social service providers, these at-risk households may seem uncooperative and lose the services that are vital to their housing stability. The lowest income households also tend to be the highest concentrations of minorities that experience challenges accessing healthcare, housing, and services. There remains a strong need for decent, affordable housing. High-cost housing, particularly for households living paycheck to paycheck and experiencing cost-burden, is a risk factor for households to experience homelessness. Further, overcrowding, a lack of affordable housing, and lack of job skills and transportation to work are some of the key factors in instability and an increased risk of homelessness. Substance abuse, mental health diagnoses, untreated trauma victims, and unaccompanied youth, are also often identified as populations at greater risk of homelessness.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has a disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing housing problems by HUD Adjusted Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI. Housing problems include:

- Lacks complete kitchen facilities.
- Lacks complete plumbing facilities.
- Is overcrowded with more than one person per room in the unit.
- Experiences cost burden between 30-50%

In general, the percentage of households with a housing problem is highest for the lowest income brackets (0-30% AMI) and decreases as income increases. According to the above definitions, Asian and Hispanic households between 0-30% AMI in Kingston experienced one or more housing problems at a disproportionate level. Table A below summarizes data in Tables 13-16 and showcases the percentage of households with one or more housing problems. Highlighted in orange are the percentage of households of a particular racial or ethnic group that experiences housing problems at a disproportionate rate.

Table A

	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
Racial/ Ethnic Group	% with one or more housing problems			
White	92.1%	71.5%	60.4%	32.0%
Black/ African American	95.8%	69.4%	69.8%	17.6%
Asian	100.0%	87.9%	100.0%	25.0%
Hispanic	100.0%	86.1%	75.0%	54.7%
Jurisdiction as a Whole	94.1%	73.3%	62.5%	27.5%

Source: CHAS 2013-2017

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,600	100	155
White	990	85	115
Black / African American	340	15	15
Asian	19	0	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	155	0	20

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,205	440	0
White	765	305	0
Black / African American	250	110	0
Asian	29	4	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	124	20	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,085	650	0
White	755	495	0
Black / African American	150	65	0
Asian	35	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	135	45	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	260	685	0
White	205	435	0
Black / African American	15	70	0
Asian	10	30	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	35	29	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

As AMI increases there is an expectation that there will be less housing problems due to additional income. However, Asian and Hispanic Household experience disproportionately face one or more housing problems at higher Area Median Income (AMI) levels. Asian households at 30-80% AMI and Hispanic households between 30-100% AMI experience one or more housing problems at a disproportionate level.

When considering the jurisdiction as a whole, 94.1% of households earning 0-30% AMI experience one or more housing problems. 100% of Asian and Hispanic households at this AMI level experience one or more housing problems. Additionally, 95.8% of Black/ African American households sampled at 0-30% AMI experience one or more housing problems. While this is not considered “disproportionate” by definition, this descriptive statistic is worth noting.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing housing problems by HUD Adjusted Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI. Housing problems include:

- Lacks complete kitchen facilities.
- Lacks complete plumbing facilities.
- Is overcrowded with more than 1.5 person per room in the unit.
- Experiences cost burden above 50%

In general, the percentage of households with a severe housing problem is highest for households earning 0-30% AMI. According to the above definitions, the following racial/ethnic groups experiences one or more severe housing problems at a disproportionate level:

- Asian households at 0-30% AMI
- Asian households at 50-100% AMI
- Black/ African American at 50%-80% AMI
- Hispanic households at all income tiers

Table B below summarizes data in Tables 17-20 and showcases the percentage of households with one or more housing problems. Highlighted in orange are the percentage of households of a particular racial or ethnic group that experience severe housing problems at a rate over 10 percentage points than that of the jurisdiction as a whole.

Table B

Racial/ Ethnic Group	0-30%	30-50%	50-80%	80-100%
	AMI	AMI	AMI	AMI
	% with one or more severe housing problems			
White	69.0%	37.9%	15.1%	1.6%
Black/ African American	69.4%	12.3%	31.8%	0.0%
Asian	100.0%	28.6%	50.0%	25.0%
American Indian, Alaska Native	0.0%	0.0%	0.0%	0.0%
Pacific Islander	0.0%	0.0%	0.0%	0.0%
Hispanic	90.3%	66.4%	50.3%	15.4%
Jurisdiction as a Whole	72.9%	36.1%	20.8%	2.7%

Source: CHAS 2009-2013

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,235	460	155
White	745	335	115
Black / African American	250	110	15
Asian	19	0	0
American Indian, Alaska Native	4	0	0
Pacific Islander	0	0	0
Hispanic	140	15	20

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	595	1,055	0
White	405	665	0
Black / African American	45	320	0
Asian	8	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	99	50	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	360	1,370	0
White	190	1,065	0
Black / African American	70	150	0
Asian	20	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	90	89	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	25	915	0
White	10	630	0
Black / African American	0	90	0
Asian	10	30	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	0	0
Hispanic	10	55	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2013-2017 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

In general, households earning 0-30% of the Area Median Income (AMI) tend to experience the highest percentage of housing problems. According to the provided definitions, most Asian and Hispanic households disproportionately face severe housing problems. Black/ African American households earning 50-80% AMI experience severe housing problems at a disproportionate rate. Even at higher income levels, there are severe housing issues. This points to certain issues regarding housing equity within the City of Kingston which can be addressed through the development of more affordable housing and rehabilitating existing housing stock.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

HUD identifies a significantly higher housing need when a racial or ethnic group encounters housing issues at a rate exceeding 10 percentage points compared to the overall corresponding income level. "Cost-burdened" is characterized by paying more than 30% of household income on housing, while "severely cost-burdened" is defined as paying over 50% of household income on housing.

The data table below outlines the percentages of each racial/ethnic group experiencing cost burden at different levels. Based on these definitions, Hispanic households disproportionately experience severe cost-burden. About 32.3% of Hispanic households pay more than 50% of their income on housing costs. Black African American households earning between 30 and 50% AMI in the City of Kingston are disproportionately cost-burdened. 34.5% of Black/African American households in this income tier pay more than 30% of their income on housing costs. Table C below adds additional analytic clarity to data provided by Table 21 by showcasing the percentage of households that are cost burdened.

Table C

	Less than 30% (No Cost Burden)	30-50%	More than 50%	No/ negative income (not computed)
Racial/ Ethnic Group	% with housing cost burden			%
White	57.6%	23.6%	18.8%	1.7%
Black/ African American	40.6%	34.5%	24.9%	1.2%
Asian	47.9%	31.3%	20.8%	0.0%
Hispanic	53.0%	14.6%	32.3%	2.4%
Jurisdiction as a Whole	54.9%	23.7%	21.4%	1.7%

Source: CHAS 2009-2013

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	5,110	2,210	1,990	155
White	3,840	1,575	1,250	115
Black / African American	505	430	310	15

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Asian	115	75	50	0
American Indian, Alaska Native	4	0	4	0
Pacific Islander	0	0	0	0
Hispanic	435	120	265	20

Table 21 – Greater Need: Housing Cost Burdens AMI

Data 2013-2017 CHAS
Source:

Discussion:

Looking at the City of Kingston as a whole, about 23.7% of households pay between 30% and 50% of their income on housing (cost-burdened). 21.4% of households spend more than 50% of their income on housing (severely cost-burdened). 34.5% of Black/African American households and 31.3% of Asian households are cost burdened. Additionally, 32.3% of Hispanic households and 24.9% of Black/African American households are severely cost burdened.

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The impact of housing problems in the City of Kingston varies primarily by income level. Hispanic and Asian household experience disproportionate levels of housing problems. However, based on the information provided by 2013-2017 CHAS data, households earning less than 50% AMI experience high levels of housing problems, and are cost burdened. This points to the need for more high-quality affordable housing in the City of Kingston. The following income tiers experienced problems at a disproportionate rate:

Housing Problems

- Asian households at 30-80% AMI experience one or more housing problems at a disproportionate level.
- Hispanic households sampled at 30-1000% AMI experience one or more housing problems at a disproportionate level.

Severe Housing Problems

- Asian households at 0-30% and 50-100% AMI disproportionately experience severe housing problems.
- Hispanic households at all income tiers disproportionately face severe housing problems.

Cost Burden

- For the jurisdiction as a whole, 23.7% of households are cost-burdened.
- For the jurisdiction as a whole, 21.4% of households are severely cost-burdened.
- 34.5% of Black/African American households and 31.3% of Asian households are cost burdened.
- 32.3% of Hispanic households and 24.9% of Black/African American households are severely cost burdened.

If they have needs not identified above, what are those needs?

The needs among race/ethnicities are indicated above. Income categories have more general needs as described in NA-10 and the Housing Market Analysis.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

According to the City of Kingston's 2024-2028 Analysis of Impediments to Fair Housing Choice (AI), There are no areas of concentration for Black residents, Asian residents, American Indian/Alaskan Native residents, Native Hawaiian/Other Pacific Islander residents, or "Some

other race” residents. Black residents were 12.3% of the population in 2020 but were not concentrated within the 8 census tracts which make up the City. Hispanic residents are the only racial/ethnic group that have areas of concentration. An area of concentration for the City’s Hispanic population would be where the percentage of Hispanic residents is 21.4% or higher. Two areas in the City meet that criteria, census tracts 9520 and 9521. These two census tracts make up the City’s Midtown area.

NA-35 Public Housing – 91.205(b)

Introduction

The Kingston Housing Authority (KHA) is the primary public housing provider in the City of Kingston. KHA completed a Streamlined Voluntary Conversion (Section 22), converting 161 public housing units (131 units Rondout Gardens, 25 units Leonard & Vera Van Dyke Apartments, and 6 units from Brigham Senior Housing). Residents of these units were given Tenant Protection Vouchers (TPV) to use for rental payments, and could stay at these units or take the vouchers elsewhere. Additionally, KHA is responsible for administering the City's Section 8 Housing Choice Voucher (HCV) program. KHA has provided 180 HCVs to residents. KHA has established HCV preference for residents who live within the 12401 Zip Code, followed by Ulster County residents. Preferences for the KHA owned/managed physical units include those for elderly, people with disabilities, and/or Veterans. VanDyke Apartments has a preference for ELI residents, as there are project-based vouchers attached to those units. KHA also established a displacement preference for households that are displaced by natural disaster or other national emergency declaration.

KHA is governed by a Finance Committee which reports to a Board of Directors. The Board consists of seven members, five of which are appointed by the Mayor of Kingston, and the other two are required to be current tenants. KHA conducts regular tenant meetings to ask for feedback on services provided and to inform tenants about changes in administration and maintenance issues. According to their previous five-year plan, KHA has made an amendment to its accommodation policy to align with the Violence Against Women Act. This allows KHA to deal with incidents of domestic violence and any form of threatening behavior directed against female residents of KHA public housing. This highlights the importance of safe living conditions within public housing to address supportive housing needs.

Other organizations in the City, such as RUPCO, provide state-issued HCVs to residents in need. KHA works with these organizations to ensure that residents have access to affordable and safe housing. Additionally, KHA works with landlords who provide housing to HCV holders to ensure that their properties meet basic housing quality standards based on HUD 24 CFR Part 982. However, even with payment standards set at 110% Fair Market Rent, voucher holders struggle to find housing opportunities due to the short supply of affordable housing in the City.

The information generated by the eCon tool in IDIS is insufficient to adequately describe the City of Kingston's Public Housing;

therefore, the supplemental tables in the following sections were populated using data that was gathered from the KHA.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	180	0	231	0	0	0

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	14,306	13,530	0	13,530	0	0	
Average length of stay	0	0	5	4	0	4	0	0	
Average Household size	0	0	2	2	0	2	0	0	
# Homeless at admission	0	0	29	0	0	0	0	0	
# of Elderly Program Participants (>62)	0	0	41	58	0	58	0	0	

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program
# of Disabled Families	0	0	65	79	0	79	0	0
# of Families requesting accessibility features	0	0	156	231	0	231	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	102	137	0	137	0	0	0
Black/African American	0	0	53	92	0	92	0	0	0
Asian	0	0	1	1	0	1	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	1	0	1	0	0	0

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	10	18	0	18	0	0	0
Not Hispanic	0	0	146	213	0	213	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

During public stakeholder sessions, representatives from the City government and nonprofits within the City of Kingston repeatedly reported that there was a lack of affordable housing in the City. During the COVID pandemic, individuals from the state of New York's metropolitan areas moved to the City of Kingston. This has led to an increased demand for rental properties within the City, and as a result has raised the price of rents. There were reports that market rents exceeded Fair Market Rent of the City, and in some situations was more costly than other residents' monthly mortgage payments.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

Stakeholders reported that there are insufficient housing opportunities for the population of housing choice voucher holders in the City of Kingston, and that any given time, 100 housing choice voucher holders do not have access to housing in the City due to lack of inventory. Without appropriate housing options, voucher holders had to seek assistance from the various homeless shelters, resulting in more administrative and operational issues for these shelters as they struggle to assist this population with limited resources.

How do these needs compare to the housing needs of the population at large

A substantial requirement exists for decent, secure, and reasonably priced housing among numerous low- and moderate-income households. Additionally, the non-housing requirements of public housing residents and Housing Choice Voucher holders, such as employment opportunities, better workforce development programs, affordable childcare programs, and transportation, align with the broader needs of the general population, particularly those with lower and moderate incomes.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

Cares of NY, Inc. is a non-profit that coordinates amongst 11 Continuum of Care (CoC) across the state of NY. Their planning department helps each CoC develop strategic plans, consolidates each CoC's Point-In-Time (PIT) and Housing Inventory Count (HIC) data, and sets up workshops to aid practitioners understand the causes and resources for homelessness. Cares of NY Inc. works with Ulster County Continuum of Care (UCCoC) to collect data and develop strategies to address homelessness in the City of Kingston. Additionally, UCCoC oversees the response to homelessness in 20 towns and 3 villages. The UCCoC is comprised of 2 consolidated jurisdictions, Ulster County and Kingston MSA.

The UCCoC is designed to foster a collective dedication within the Ulster County community to end homelessness. This involves employing a community-driven approach to identify essential needs, establish, and maintain a housing and service infrastructure, and implement a comprehensive, system-wide strategy to effectively eliminate homelessness. Nonprofit organizations that provide homelessness services within the City include Family of Woodstock, RUPCO, and Catholic Charities.

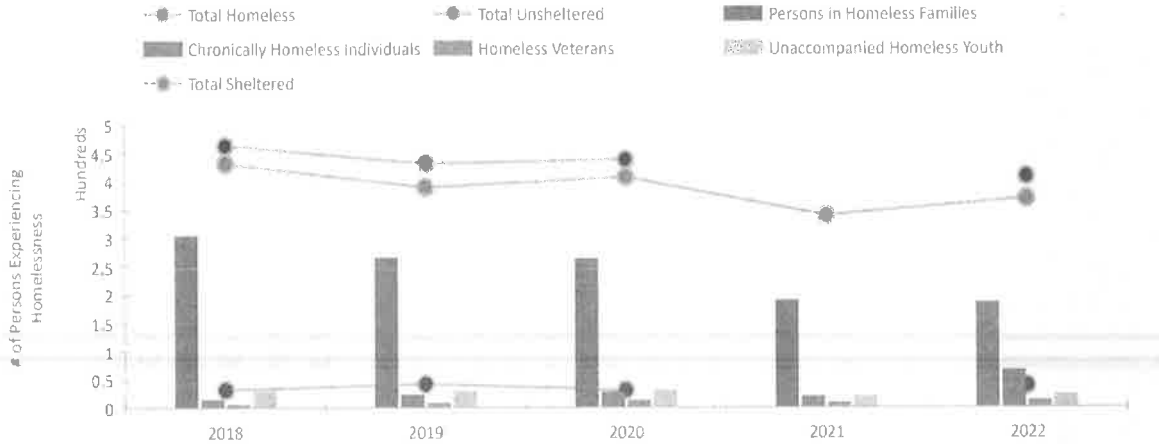
If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

In the City of Kingston, on the night of the PIT count there were 435 people counted as experiencing homelessness. Of those 163 were families in an emergency shelter situation, 6 children of parenting youth in a sheltered situation, and 266 adult-only households, 12 were veterans, 30 were an unaccompanied Child, 140 had a severe mental illness, 93 were chronic substance abusers, and 96 were chronically homeless.

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	163	0	495	345	252	311 Days
Persons in Households with Only Children	6	0	33	31	31	47 Days
Persons in Households with Only Adults	198	68	676	659	301	102 Days
Chronically Homeless Individuals	40	56	31	22	17	219 Days
Chronically Homeless Families	8	0	8	7	8	390 Days
Veterans	9	3	23	21	4	48 Days
Unaccompanied Child	26	4	80	72	49	78 Days
Persons with HIV	0	0	4	3	4	60 Days
Severely Mentally Ill	90	50	310	229	209	192 Days
Chronic Substance Abuse	44	49	169	131	143	135 Days
Victims of Domestic Violence	10	7	106	81	62	175 Days

2023 Point in Time data entered into the chart above was obtained from the Ulster County Continuum of Care. 2022 data was utilized to determine trend in overall performance of homeless services in the City of Kingston. According to UCCoC System Performance Measures, 761 persons in the City became homeless for the first time in 2022. The average length of time individuals experienced homelessness in 2022 was 198 days. In 2022, 729 exited shelters, of which 186 exited into permanent housing destinations. The graph below was obtained from HUD's 2022 CoC Performance Profile for Kingston/Ulster County CoC. The graph used PIT data to showcase the number of individuals experiencing homelessness from 2018-2022. Since 2018, there has been a rise in the number of chronic homeless persons in the City, a fact which was confirmed by stakeholders.

Homeless Population – Point-in-Time (PIT) Count*



*In 2021, HUD gave communities the option to cancel or modify the unsheltered survey portion of their counts based on the potential risk of COVID-19 transmission associated with conducting an in-person survey. As a result, HUD has excluded the unsheltered population sub-totals and all unsheltered sub-population data for this reporting period. The user is cautioned that the unsheltered and total homeless counts reported here may be missing data.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	224	55
Black or African American	115	7
Asian	1	0
American Indian or Alaska Native	5	1
Native Hawaiian or Other Pacific Islander	0	0
Multiple Races	22	5
Ethnicity:	Sheltered:	Unsheltered (optional)
Non-Hispanic/Non-Latino	319	58
Hispanic/Latino	48	10

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

During the first public meeting on February 6th, 2024, stakeholders reported that there is a growing population of homeless persons in the City of Kingston. Specifically, since the COVID-19 pandemic, there has been a rise in the number of homeless families and chronic homeless persons. The children of families experiencing homelessness stay in unsafe housing for longer periods of time, which has a negative impact on their development. The growing homeless population within the City was attributed to a lack of affordable housing, funding for social services, and jobs opportunities. Based on data collected from 2023 PIT Count by UCCoC, there are about 50 families with children that experienced sheltered homelessness. Among veterans, 12 people in total experienced homelessness, of which 3 experienced unsheltered homelessness.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Based on data collected from 2023 PIT and HIC Count by UCCoC, about 279 people experiencing homelessness in the City of Kingston were White, and 122 people were Black or African American.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Based on data collected from 2023 PIT and HIC Count by UCCoC, most people experiencing homelessness in the City of Kingston were sheltered. The largest ethnic and racial group experiencing unsheltered homelessness were white people. Among unsheltered homeless populations in the City, 50 homeless persons were severely mentally ill and 49 experienced chronic substance abuse.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

Individuals with special needs include the elderly and frail elderly, individuals with severe mental illness, developmental disabilities, physical disabilities, and/or alcohol/other drug addictions. Additionally, the majority of these individuals with special needs have very low incomes which negatively impacts their quality of life in the City of Kingston.

Describe the characteristics of special needs populations in your community:

Elderly

Elderly residents are more likely to live on fixed, very low incomes or require special supportive service to complete their daily routines. This means elderly residents need affordable housing options and easy access to service providers. According to 2022 ACS estimates, about 26.1% of households in the City of Kingston consist of at least one person aged 65 or over. In addition, the Census reported that 32.7% of persons 65 years and over had at least one disability in 2022. Within this population, 6.5% experienced independent living difficulty and 2.7% experienced a self-care disability.

Persons with Disabilities

In 2022, 15.7% of the population had a disability. Individuals with ambulatory disabilities generally require accessible housing units, and individuals with independent living disabilities may require assisted living facilities. Data from the 2022 ACS indicates that 8.1% indicated an ambulatory difficulty; 7.8% reported a cognitive difficulty. In the City of Kingston, 18.8% of adults aged 18-64 live below the poverty line. Of the 12,943 people without a disability between ages 18-64, 13.6% live below the poverty line. Of the 2186 people with a disability between ages 18-64, 49.6% live below the poverty line.

Substance Abuse and Addiction

The Ulster County Department of Mental Health is part of Single Point of Access (SPOA), a New York State Office of Mental Health initiative. It provides access to care management, coordinates amongst healthcare providers and additional supportive services for adults, youth, and families. SPOA services aim to foster recovery and are customized to be personally responsive to individual needs and preferences. Specialized coordinators are tasked with supervising Adult, Child & Family, and Residential Services. Each coordinator manages a respective SPOA committee, ensuring that residents can access any service within Ulster County's care system.

Individuals with special needs are typically extremely low income and face tremendous challenges finding housing that they can afford. Individuals with special needs also require supportive services in addition to housing that they can afford. Public and private sources have limited funds available for these purposes, making it difficult for non-profit organizations to develop and operate housing and supportive service programs.

What are the housing and supportive service needs of these populations and how are these needs determined?

Summarizing the above estimates and input received during stakeholder interviews held in preparing the Five-Year Consolidated Plan, the most significant needs for these populations are:

- Safe, affordable housing, including rental vouchers.
- Public transit that is employment supportive and would allow individuals to easily access job opportunities and food services.
- Designated Supportive Housing units for elderly residents, people with severe mental illness and people discharging from substance abuse treatments.
- Permanent supportive housing.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Based on information from AidsVu, in 2021, 350 of every 100,000 people were living with HIV/AIDS in Ulster County. The City of Kingston does not receive funding from HOPWA. However, the Rural Ulster Preservation Company (RUPCO), a non-profit based in Kingston NY, provides long-term rental assistance and short-term back rent, back mortgage payments, and back utility payments for individuals with HIV/AIDS using HOPWA funding for residents living in Ulster and Dutchess Counties.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

N/A

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

Through CDBG funds, the City of Kingston can fund the construction, rehabilitation, or installation of public facilities. Eligible public facilities include neighborhood facilities (such as educational centers, parks, recreation centers, and libraries) and facilities for special needs populations (such as homeless shelters, elderly facilities, or centers for people with disabilities).

Public Facilities needs include:

- Transitional Housing services
- Homeless Shelters
- Food banks
- Community centers for arts programming and education
- Community spaces for children and young adults
- Maker spaces for creative workers

How were these needs determined?

The City of Kingston facilitated a series of stakeholder interviews and public meetings and received feedback regarding the needs across the community. In addition, the City issues a request for applications from developers, nonprofits, municipalities and other community entities to determine needs and requests for the program year.

Describe the jurisdiction’s need for Public Improvements:

Through CDBG funds, the City of Kingston can fund the construction, rehabilitation, or installation of public improvements. Public improvements include, but are not limited to, street and sidewalk improvements, water and sewer installation, and maintenance and ADA compliance construction and rehabilitation.

Public Improvement needs include:

- Street and sidewalk improvements in low-moderate income areas.
- Sewer and waterline installation and/or replacement
- Access to broadband in areas that lack broadband services.
- ADA compliant construction and rehabilitation benefitting low-moderate income persons.

How were these needs determined?

The City of Kingston facilitated a series of stakeholder interviews and public meetings and received feedback regarding the needs across the community. In addition, the City issues a

Request for Applications from developers, nonprofits, municipalities and other community entities to determine needs and requests for the program year.

Describe the jurisdiction’s need for Public Services:

Through CDBG funds, the City of Kingston can fund an array of public services. Eligible public services include, but are not limited to, homeless services, education and workforce development programs, homebuyer counseling, elderly care and programs, and childcare and health services for low- moderate-income households.

Public Services needs include:

- Access and development of affordable housing
- Rental Assistance for low- and moderate-income earning residents
- Services supporting individuals and families experiencing homelessness.
- Workforce development programs
- Affordable and accessible childcare programs
- Supportive services for persons recently released from a correctional facility.
- Mental health and substance abuse services
- Health services for the disabled
- Assisted living facilities for elderly residents.
- Access to public transportation in the evening
- Transportation services to and from employment centers
- Access to food banks and other affordable food providers
- Increased access to public broadband services for low- and moderate-income residents

How were these needs determined?

The City of Kingston facilitated a series of stakeholder interviews and public meetings and received feedback regarding the needs across the community. In addition, the City issues a Request for Applications from developers, nonprofits, municipalities and other community entities to determine needs and requests for the program year.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

This Market Analysis identifies the need to preserve existing affordable housing opportunities while advancing efforts to create a diverse supply of additional affordable units. Ideally, the City of Kingston will have a mix of housing types to accommodate households of all types and income levels. The City of Kingston's housing strategies will be especially guided by the increasing mismatch between incomes and housing costs and the specific accommodations necessary to ensure that certain populations have adequate affordable housing options with appropriate supportive services where needed.

General conclusions about the market, as described in the following pages, include:

- There are slightly more renters than homeowners in the City of Kingston.
- The vacancy rate decreased from 11.6% in 2017 to 9.9% in 2022.
- The Fair Market Rent (FMR) for a two-bedroom unit in the City of Kingston is \$1,498 per month. To avoid being cost burdened, a household needs to earn \$4,993 per month.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

The housing stock in the City of Kingston is primarily multi-family and rental. Among renter-occupied units, 35% have one bedroom and 33% consist of 2 bedrooms (based on 2013-2017 ACS data below). Of the nearly 4,415 owner-occupied units in the City of Kingston, 73% consist of three or more bedrooms. Single family units – which tend to be larger than multi-family units – comprise over 48% of the housing stock. There is a need for more multi-family housing units which tend to be more affordable, particularly for small families with children and single person households, demographic groups particularly prone to cost burden and severe cost burden. The vacancy rate decreased from 11.6% in 2017 to 9.9% in 2022, according to ACS data.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	5,125	48%
1-unit, attached structure	430	4%
2-4 units	3,120	29%
5-19 units	1,520	14%
20 or more units	505	5%
Mobile Home, boat, RV, van, etc	0	0%
Total	10,700	100%

Table 26 – Residential Properties by Unit Number

Data Source: 2013-2017 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	40	1%	535	11%
1 bedroom	125	3%	1,765	35%
2 bedrooms	1,005	23%	1,665	33%
3 or more bedrooms	3,245	73%	1,080	21%
Total	4,415	100%	5,045	100%

Table 27 – Unit Size by Tenure

Data Source: 2013-2017 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

According to the 2022 HUD Picture of Subsidized Housing for the City of Kingston there are 1344 subsidized housing units in the City. Within the City there are two HUD Multifamily properties which utilize Section 8 and Section 202 funding respectively. Stuyvesant Charter Property consists

of 24 units. Community Residence for the Handicapped of Ulster consists of 10 Assisted Units. Seven Greens and Landmark Apartments provides subsidized housing for residents living in the City of Kingston. However, they are not HUD financed.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Stuyvesant Charter Property consists of 24 units that have an overall affordability expiration date of 03/31/2039. Community Residence for the Handicapped of Ulster consists of 10 Assisted Units which reached their affordability expiration date on 10/31/2023. With the loss of 10 units from the affordable inventory, the City realizes this adds to the housing gap, and further supports the need for additional affordable units within the City.

Does the availability of housing units meet the needs of the population?

Based on a housing survey conducted by the City of Kingston, the City has not declared a housing emergency. However, there is still a lack of affordable housing in the City. About 23.7% of households spend between 30% and 50% of their income on housing (cost-burdened). 21.4% of households spend more than 50% of their income on housing (severely cost-burdened). Most of the rental properties, about 3500 units, are affordable for renters earning 80% AMI. Renters earning 0-30% and 30-50% AMI have fewer rental opportunities than renters earning 80% AMI. There is a 1,060 rental unit gap between the 1,455 renters earning 0-30% HAMFI and 395 units available to rent. Similarly, there is a 145 rental unit gap and a 240 housing-unit gap, respectively, for the 1,145 renters and 505 homeowners earning 30-50% AMI.

Describe the need for specific types of housing:

Housing is needed at all income levels to further the goals of the City's Fair Housing Plan. According to the ACS 2022 5-year Survey 10% of housing in the City is vacant, and 45.2% of housing is single unit, detached. More than half of the housing units in the city were built before 1939. 52.3% of individuals living in the City of Kingston are renters. Stakeholders reported that there is huge demand for affordable housing in the City. Based on the 2019-2023 5-year Consolidated Plan, the City was interested in supporting owner occupied housing units to stabilize neighborhoods. Specifically, there is more demand for multifamily housing, and supportive housing for elderly individuals and residents with special needs. The City's Form Based Code has legalized the development of Accessory Dwelling Units in the City. Stakeholders and the City believe that development of these types of units can be useful in addressing the demand for affordable housing in the City.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

The HUD-provided table below indicates the number of affordable units available to households with various income levels.

The housing stock in the City of Kingston is primarily multi-family and rental. Data from the 2022 ACS indicates that 18.8 % of all adults aged 18-64 live below the poverty line. Among the entire population, 18.4% live below the poverty line. Among children under the age of 18 and seniors over the age of 65, approximately 23.4% and 9.4%, respectively, live below the poverty line. Of adults aged 18-64 with disabilities, 49.6% earn income below the poverty level. The high incidence of poverty among households with children and persons with disabilities points to the need for more affordable housing, and homeownership opportunities.

In Kingston in 2023, the FMR for a two-bedroom apartment was \$1,498. In order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn \$59,940 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$28.81—the hourly rate required to afford a two-bedroom rental unit at the HUD FMR of \$1,498

In Ulster County, a minimum-wage worker earns an hourly wage of \$15.00. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work 76.8 hours per week, 52 weeks per year. Or a household must include 1.9 minimum-wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

Monthly Supplemental Security Income (SSI) payments for an individual are \$1,030 in Ulster County and across New York. If SSI represents an individual's sole source of income, \$309 in monthly rent is affordable, while the FMR for a one-bedroom is \$1,155.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2017	% Change
Median Home Value	195,200	165,400	(15%)
Median Contract Rent	766	858	12%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2013-2017 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	823	16.3%

Rent Paid	Number	%
\$500-999	2,760	54.7%
\$1,000-1,499	1,320	26.2%
\$1,500-1,999	135	2.7%
\$2,000 or more	0	0.0%
Total	5,038	99.9%

Table 29 - Rent Paid

Data Source: 2013-2017 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	395	No Data
50% HAMFI	1,100	265
80% HAMFI	3,500	1,475
100% HAMFI	No Data	1,945
Total	4,995	3,685

Table 30 – Housing Affordability

Data Source: 2013-2017 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,089	1,155	1,498	1,961	2,185
High HOME Rent	1,089	1,155	1,464	1,684	1,859
Low HOME Rent	890	953	1,143	1,321	1,473

Table 31 – Monthly Rent

Data Source: 2023 HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

There is insufficient housing for households earning 0-30% AMI and 30-50% AMI in the City of Kingston. According to the CHAS data below, there is a 1,060 rental unit gap between the 1,455 renters earning 0-30% HAMFI and 395 units considered affordable to this population in the City. Similarly, there is a 145 rental unit gap and a 240 housing-unit gap for the 1,145 renters and 505 homeowners earning 30-50% AMI. There is a surplus of housing for renters and owners earning 50-80% AMI and 80-100% AMI. The City has 1,520 housing units available for homeowners earning 80-100% AMI.

Income Distribution Overview	Renter	Owner
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<= 30% HAMFI	1,455	400
>30% to <=50% HAMFI	1,145	505
>50% to <=80% HAMFI	1,085	650
>80% to <=100% HAMFI	520	425
>100% HAMFI	835	2,445
Total	5,045	4,420

How is affordability of housing likely to change considering changes to home values and/or rents?

As depicted in Table 33, the cost of rent has increased 12% from 2009 to 2017. According to 2022 ACS, median contract rent in Kingston was \$1,232. Adjusting for inflation, rent increased by 20% from 2017 to 2022. It is likely that rents will remain high or continue to rise given the steadily increasing mortgage rates. With fewer homeowners selling and more renters remaining renters, demand will continue to outpace the supply meaning that housing affordability in the City of Kingston will remain a challenge and likely worsen.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The HOME rents and Fair Market Rents for the City of Kingston are slightly higher than the Area Median Rent. The maximum HOME rents are the lesser of a) The fair market rent for existing housing for comparable units in the area; or b) A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the median income for the area. However, during stakeholder sessions, representatives from nonprofits reported that Fair Market Rent is still unaffordable for renters in the City. Additionally, there are certain residents who pay more for rent than homeowners pay for their monthly mortgage payments. This points to a need to develop more affordable housing options that offer Fair Market Rent to the City's residents.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

Housing conditions in the City of Kingston differ based on their location. Most homes surveyed had one selected housing condition. However, the aging housing stock might develop more than one select housing condition in the future.

Definitions

Standard Condition: No major structural defects; adequate plumbing and kitchen facilities; appearance which does not create a blighting influence; and the house meets additional, more stringent, local standards and building codes, including lead-based paint clearance.

Substandard Condition but Suitable for Rehabilitation: The nature of the substandard condition makes rehabilitation both financially and structurally feasible.

Housing Conditions: Condition of units is assessed using the same criteria as in the Needs Assessment. This includes: 1) lacks complete plumbing facilities, 2) lacks complete kitchen facilities, 3) more than one person per room, 4) cost burden (amount of income allocated to housing) is greater than 30%, and 5) complies with applicable building code standards.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	1,445	33%	2,770	55%
With two selected Conditions	20	0%	190	4%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	2,955	67%	2,085	41%
Total	4,420	100%	5,045	100%

Table 32 - Condition of Units

Data Source: 2013-2017 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	155	4%	314	6%
1980-1999	280	6%	175	3%
1950-1979	1,195	27%	1,860	37%
Before 1950	2,780	63%	2,695	53%
Total	4,410	100%	5,044	99%

Table 33 – Year Unit Built

Data Source: 2013-2017 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	3,975	90%	4,555	90%
Housing Units build before 1980 with children present	190	4%	55	1%

Table 34 – Risk of Lead-Based Paint

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

Vacant Units

In 2020, there were 1,133 vacant housing units in Kingston. Of those 1,133 units, 188 were for rent and 125 were rented, but not occupied. Also, 19 units were for sale, 60 were sold, but not occupied. There were 91 units that were categorized as being for seasonal, recreational, or occasional use. Lastly, 605 vacant units were categorized as “other”.

The City of Kingston conducted a Vacant Property Study in 2020 to better develop strategies for addressing the housing needs of the City. One of the most significant findings of the survey is that the majority of vacant buildings appear to be in generally good condition in Kingston. It is important to note that the condition of the interior of these buildings is unknown. However vacant buildings with an exterior in good condition are not generally considered sources of visible neighborhood blight.

The vacant properties are relatively evenly distributed throughout Kingston. However, there is one significant cluster located in census tract 9521 just south of Broadway. There are 60 vacant properties in this census tract including four properties with 4-6 visible issues, and seven properties with 2-3 visible issues. As of 2018, this census tract had the second highest individual poverty rate (23%) in the City of Kingston, and the second highest unemployment rate (9.9%).

In 2022, The City of Kingston performed a housing vacancy analysis during April and May 2022. The analysis is intended to help the City determine whether it may declare a housing emergency regarding available apartments, as defined in the New York State Emergency Tenant Protection Act (ETPA) of 1974. An emergency is defined as a vacancy rate of less than 5 percent for all or any class or classes of rental housing accommodations within a locality’s jurisdiction.

The survey evaluated 59 property owners representing a total of 1270 housing units. The survey determined a net vacancy rate of 1.57% in Kingston. This vacancy rate was below the threshold to declare a housing emergency.

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units			
Abandoned Vacant Units			
REO Properties			
Abandoned REO Properties			

Table 35 - Vacant Units

The table above populated null in the IDIS eCON Planning Suite and cannot be changed manually. 2022 ACS data indicates there are 1,088 vacant units in the City of Kingston, or roughly 10%.

Need for Owner and Rental Rehabilitation

The City of Kingston’s housing stock is very old, with most of the properties being built before the 1980s. Stakeholders reported that the aging housing stock presents issues regarding accessibility and safety for residents of the City, elderly residents in particular. Additionally, according to information from planning documents and stakeholder sessions, the City is in need of more affordable housing development. The Department of Housing Initiatives has established a goal to add 1,000 new housing units to the City’s housing stock by 2029. Alongside developing new housing units, the City is committed to rehabilitating older housing units to address issues with accessibility and safety.

Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards

According to the Ulster County government, the City of Kingston has the highest annual incidence of Elevated Blood Lead Level (EBLL) in Ulster County. This can be attributed to the City’s old housing stock. Based on 2022 ACS Data there are about 1,987 housing units that were built between 1940 and 1959, and 4,946 housing units were built during or before 1939. Most of the housing units in the City of Kingston were built before the 1950s, when lead paint was still being used in the development of housing. Most of these older homes are located in neighborhoods where low- and moderate-income residents live.

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

The Kingston Housing Authority (KHA) is the primary Public Housing Authority in the City of Kingston. KHA is responsible for administering the City’s Section 8 Housing Choice Voucher (HCV) program, after having converted all public housing under Section 22 Voluntary Conversion. The information generated by the eCon tool in IDIS is insufficient to adequately describe the City’s Public Housing; therefore, the supplemental tables in the following sections were populated using data gathered from KHA.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	180	0		180	0	180	0	0	0
# of accessible units									

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 36 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

KHA’s portfolio includes:

Rondout Gardens: 131 units of studio, one, two, three, four and five-bedrooms of families, seniors, veterans, individuals with disabilities.

Colonial Gardens: 98 units of families, senior, handicapped, and disabled housing.

Colonial Gardens Addition: 32 units of senior and disabled housing

Wiltwyck Gardens: 60 units of senior and disabled housing.

Leonard & Vera Van Dyke Apartments: 120 units of families, seniors, veterans, and individuals with disabilities.

Brigham Senior Housing: 40 units for seniors and individuals with disabilities.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Kingston Housing Authority (KHA) is the primary public housing provider in the City of Kingston. KHA completed a Streamlined Voluntary Conversion (Section 22), converting 161 public housing units (131 units Rondout Gardens, 25 units Leonard & Vera Van Dyke Apartments, and 6 units from Brigham Senior Housing). Residents of these units were given Tenant Protection Vouchers (TPV) to use for rental payments, and could stay at these units or take the vouchers elsewhere. Additionally, KHA is responsible for administering the City’s Section 8 Housing Choice Voucher (HCV) program. KHA has provided 180 HCVs to residents. KHA has established HCV preference for residents who live within the 12401 Zip Code, followed by Ulster County residents. Preferences for the KHA owned/managed physical units include those for elderly, people with disabilities, and/or Veterans. VanDyke Apartments has a preference for ELI residents, as there are project-based vouchers attached to those units. KHA also established a displacement preference for households that are displaced by natural disaster or other national emergency declaration.

Public Housing Condition

Public Housing Development	Average Inspection Score
Rondout Gardens Rondout Dr Kingston, NY 12401	37c*
Stuyvesant Charter Apartments 132 Rondout Dr, Kingston, NY 12401	89b*

Table 37 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

KHA plans to engage in multiple phases of renovations to its properties. Currently, 80 of the 120 Leonard & Vera Van Dyke Apartments have been renovated and are being converted into a LIHTC property. During Phase 2 renovations, 107 units at Rondout Gardens, 98 units at Colonial Gardens, and 60 units at Wiltwyck Gardens will be rehabilitated. KHA has requested 103 Project Based Vouchers from the State of New York to provide additional assistance to residents who are searching for housing in the City. 24 units from Rondout Gardens have been set aside for Phase 3 renovations that will be supported by the State of New York. According to stakeholders, the State of New York has displayed interest in creating more providing resources to expand the number of units in the Colonial Gardens Addition from 32 units to 80 units.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

Tenants with disabilities require additional assistance when engaging with other tenants and landlords. For this reason, KHA is planning on developing a position within the organization which deals with conflict resolution among tenants. With the rising number of homeless persons in the City, KHA has been exploring the possibility of providing some type of housing service for people experiencing homelessness in the City. KHA is active in developing new methods of determining the housing needs of low- and moderate-income residents.

According to their previous five-year plan, KHA has made an amendment to its accommodation policy to align with the Violence Against Women Act. This allows KHA to deal with incidents of domestic violence and any form of threatening behavior directed against female residents of KHA public housing. This highlights the importance of safe living conditions within public housing to address supportive housing needs.

Other organizations in the City, such as RUPCO, provide HCVs to residents in need. KHA works with these organizations to ensure that residents have access to affordable and safe housing. Additionally, KHA works with landlords who provide housing to HCV holders to ensure that their properties meet basic housing quality standards based on HUD 24 CFR Part 982. Even with payment standards set at 110% Fair Market Rent, voucher holders struggle to find housing opportunities due to the short supply of affordable housing in the City.

Stakeholders reported that most of the units provided for voucher holders meet basic housing quality standards. Most landlords who provide housing for voucher holders are willing to update their units to meet basic housing standards.

MA-30 Homeless Facilities and Services – 91.210©

Introduction

Data in the chart below was collected from the 2023 Housing Inventory Chart (HIC) data collected from the Ulster County Continuum of Care (UCCoC) website. Data is limited to what is collected for the annual Point in Time Count submitted to the Department of Housing and Urban Development. The data in the below chart includes all jurisdictions served within the UCCoC. Based on the 2023 HIC, there were 265 Overflow/Voucher beds and 35 Seasonal beds in the City of Kingston. However, there is insufficient information to determine the allocation Overflow and Seasonal beds for the homeless subpopulations below.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	39	0	5	133	
Households with Only Adults	23	1	7	102	
Chronically Homeless Households	N/A	N/A	N/A	59	
Veterans	0	1	0	20	
Unaccompanied Youth	14	0	0	5	

Table 38 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The City of Kingston offers various programs and services to complement those targeted for the homeless population. The Ulster County Department of Mental Health administers the Single Point of Access (SPOA) program, providing residential services for the seriously mentally ill, including a 24-hour Community Residence Program, Apartment Treatment Program, and long-term/permanent housing. Ulster County's alcohol and substance misuse service provider system caters to children, adolescents, and adults with services such as outpatient clinic treatment, inpatient detoxification, outpatient detoxification, inpatient rehabilitation, methadone maintenance, and residential programs.

The mental health service provider system in Ulster County covers a broad range of services for all age groups, with services subcontracted to outside agencies. The Ulster County Office of Employment and Training (UCOET) focuses on creating a skilled workforce by providing job training for various groups. The county coordinates initiatives, including a sequential intercept mapping initiative, to keep justice-involved individuals with behavioral health issues out of jail and in treatment. Recent closures of local social security offices in Kingston have posed challenges, with efforts underway to engage the Social Security Administration for easier access to benefits. Additionally, the Institute for Family Health administers a Health Homes program, offering care management and coordination of health services for individuals with chronic conditions in Ulster County.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Within the City of Kingston there are homeless shelters that address the needs of homeless people residing in Kingston. The Family of Kingston is an emergency shelter that offers case management services, housing services, and mental health counseling. Family of Woodstock also works with the Family Inn to provide services to individuals experiencing homelessness. The Family Inn provides emergency shelter for families (up to 90 days), and services for single female residents with special needs. Family of Woodstock also provides shelter for unaccompanied youth. Their residential children program offers services and advocacy for children experiencing homelessness and their parents. The Darmstadt Shelter provides emergency shelter (up to 90 days) for about 46 individuals experiencing homelessness. Additionally, they provide supervision and services to individuals experiencing homelessness with substance abuse and/or mental health issues. The Veterans Administration for Albany provides services to Veterans experiencing

homelessness. They provide information and resources to stakeholders who wish to provide or refer housing, healthcare, mental health, and employment services to veterans experiencing homelessness.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

Special needs populations include, but are not limited to, persons who are mentally ill, mentally disabled, physically disabled, are substance abusers/addicts, have AIDS, are homeless, and are elderly and in need of supportive housing. The City of Kingston has a system of service providers which address the needs of these populations. However, they lack sufficient resources to provide housing or shelter to the residents in need. Most supportive services in Ulster County are located in the City of Kingston.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Elderly

According to the 2022 ACS 5-Year Survey for the City of Kingston, about 26.1% of households in the City of Kingston consist of at least one person aged 65 or over. 9.4% of residents who at 65 years or older are below the poverty level. 32.7% of persons 65 years and over had at least one disability in 2022. Within this population, 6.5% experienced independent living difficulty and 2.7% experienced a self-care disability. Stakeholders reported that this portion of the population has difficulties finding safe and affordable housing within the City of Kingston.

Persons with Disabilities

In 2022, 15.7% of the population in the City of Kingston had a disability. Individuals with ambulatory disabilities generally require accessible housing units, and individuals with independent living disabilities may require assisted living facilities. Data from the 2022 ACS 5-Year Survey indicates that 8.1% indicated an ambulatory difficulty; 7.8% reported a cognitive difficulty. In the City of Kingston, 18.8% of all adults aged 18-64 live below the poverty line. For those with a disability between ages 18-64, around 2186 people, 49.6% live below the poverty line. Having a disability impacts the quality of life of individuals who require safe and affordable housing. These impacts are compounded by living below the poverty level. According to stakeholders, there is a lack of accessible units for people with disabilities in the City. Older housing needs to be rehabilitated to accommodate residents who require supportive living arrangements or improve the overall accessibility of these housing units.

Substance Abuse

Based on a 2022-2024 Mid-Hudson Region Community Health Assessment 63.2% of individuals surveyed in Ulster County were "highly impacted" by challenges related to mental health and substance use. The survey also found that Drug and/or Alcohol use was considered the greatest barrier to people achieving better health in Ulster County. New York State has recognized the opioid burden both at the state and county levels, encompassing outpatient Emergency Department visits, hospital discharges related to non-fatal opioid overdose, abuse, dependence, and unspecified use, as well as opioid overdose deaths. According to the assessment, Ulster County exhibited the highest opioid burden among the seven counties in the Mid-Hudson Region. It was reported that 62.5% of people surveyed believe finding access to affordable, decent, and safe housing affects health outcomes for individuals living in Ulster County.

HIV/AIDS

According to a 2022-2024 Mid-Hudson Region Community Health Assessment, 39.5% of people surveyed in Ulster County are impacted by preventable communicable diseases such as HIV/AIDS. Individuals without stable living conditions have worse health outcomes than individuals with stable living conditions. Individuals with HIV/AIDS who lack safe and affordable housing are less likely to seek care or adhere to the treatment prescribed by doctors.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Ulster County Department of Mental Health offers a variety of services and programs for individuals recovering from mental health issues. The Department of Mental Health has established a Single Point of Access (SPOA) that provides access to care management, coordinates amongst healthcare providers and additional supportive services for adults, youth, and families. The following programs are offered by different healthcare providers and are coordinated through SPOA. The Department of Mental Health provides Community Residences, Apartment Treatment Programs, and Supportive Scatter Sites all offer housing and support services for individuals impacted by mental health issues. For Adults, the Department of Mental Health provides Assertive Community Treatment, State Intensive Care Management, Home Care Management, Non-Medicaid Care Coordination, Peer Services, and support from a High-Risk Mitigation Team. Child and Family Services provided by the Department of Mental Health include Health Home Care Management, Non-Medicaid Care Management, Serious Emotional Disturbance (SED) Getting Ahead & Transitions Programs, Family Peer Support, and Home & Community Based Services.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The City of Kingston administers CDBG grant funds for agencies throughout the City to modify, rehabilitate, and develop housing opportunities and supportive services for the residents of the City who are not homeless.

The City of Kingston partnered with RUPCO to offer a first-time homebuyer program. The Kingston Housing Authority (KHA) offers services to residents who need financial aid and a housing voucher program for low-income residents who are seeking affordable housing.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

The City of Kingston continues to update its pedestrian infrastructure by improving the conditions of sidewalks and roadways. The City has already completed the Citywide “ADA Ramps Project” and installed 136 ADA-compliant curb ramps at intersections and crosswalks throughout the City.

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

The City of Kingston has completed the 2024-2028 Analysis of Impediments to Fair Housing Choice (AI), which documents the various impediments to fair housing choice. The preparation of this Analysis of Impediments to Fair Housing Choice (AI) serves as a component of the City of Kingston's efforts to satisfy the requirements of the Housing and Community Development Act of 1974, as amended, which requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. While fair housing and affordable housing are different from each other, there is an inextricable link between the two as the majority of affordable housing is located in neighborhoods with lower access to opportunities such as education, public transportation, job centers, etc.

According to the City of Kingston's 2024-2028 Analysis of Impediments (AI), the following impediments were identified:

1. A general lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes.
2. Overall low incomes and high poverty rates across various racial/ethnic groups and household types in the City, thus limiting their housing choice.
3. The age and size of housing units in the City. Over half of the units in the City were built prior to 1939 and are deteriorating and unsafe. Due to age many of the units cannot accommodate larger families, thus limiting their fair housing choice.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

The largest number of workers who live in the City of Kingston, according to the Business Activity table below, are employed in the Education and Health Care Services, Retail Trade, and Arts, Entertainment, Accommodations sectors.

According to the data by occupation, the Sales and Office sector is the largest, with 33% of the City’s residents working in this sector. This is followed by occupations in the Management, Business and Financial sector, with 31% of the City’s residents.

Economic Development Market Analysis

The following HUD-generated tables contain data pertinent to economic development in the City of Kingston. Discussion and analysis of the data follows the Educational Attainment table.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	53	0	1	0	-1
Arts, Entertainment, Accommodations	1,231	899	12	8	-4
Construction	457	366	5	3	-1
Education and Health Care Services	3,054	5,002	30	44	14
Finance, Insurance, and Real Estate	586	1,063	6	9	4
Information	280	315	3	3	0
Manufacturing	601	628	6	6	0
Other Services	518	646	5	6	1
Professional, Scientific, Management Services	625	730	6	6	0
Public Administration	0	0	0	0	0
Retail Trade	1,406	808	14	7	-7
Transportation and Warehousing	339	229	3	2	-1
Wholesale Trade	337	186	3	2	-2

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Total	9,487	10,872	--	--	--

Table 39 - Business Activity

Data Source: 2013-2017 ACS (Workers), 2017 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	12,680
Civilian Employed Population 16 years and over	11,700
Unemployment Rate	7.63
Unemployment Rate for Ages 16-24	19.23
Unemployment Rate for Ages 25-65	5.41

Table 40 - Labor Force

Data Source: 2013-2017 ACS

Occupations by Sector	Number of People
Management, business and financial	2,680
Farming, fisheries and forestry occupations	425
Service	1,345
Sales and office	2,820
Construction, extraction, maintenance and repair	815
Production, transportation and material moving	545

Table 41 – Occupations by Sector

Data Source: 2013-2017 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	7,815	73%
30-59 Minutes	2,045	19%
60 or More Minutes	915	8%
Total	10,775	100%

Table 42 - Travel Time

Data Source: 2013-2017 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,030	195	530

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
High school graduate (includes equivalency)	2,700	230	1,120
Some college or Associate's degree	2,930	225	625
Bachelor's degree or higher	3,130	65	350

Table 43 - Educational Attainment by Employment Status

Data Source: 2013-2017 ACS

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	30	205	80	185	220
9th to 12th grade, no diploma	260	320	255	705	375
High school graduate, GED, or alternative	520	1,095	840	2,115	1,420
Some college, no degree	515	820	650	1,005	465
Associate's degree	215	485	250	565	225
Bachelor's degree	165	650	390	985	335
Graduate or professional degree	50	380	410	730	470

Table 44 - Educational Attainment by Age

Data Source: 2013-2017 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	21,690
High school graduate (includes equivalency)	26,880
Some college or Associate's degree	31,365
Bachelor's degree	41,265
Graduate or professional degree	64,875

Table 45 – Median Earnings in the Past 12 Months

Data Source: 2013-2017 ACS

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the Business Activity table above the major employment sectors within the City of Kingston are Education and Health Care Services, Retail Trade, and Arts, Entertainment,

Accommodations.

Describe the workforce and infrastructure needs of the business community:

During stakeholder sessions, representatives of local businesses and nonprofits based in the City of Kingston reported that there is need for more affordable workforce housing and workforce training programs in the City. Affordable workforce housing provides opportunities for low- and moderate-income earners to live in the City and participate in the local economy. Low- and moderate-income residents lack certain skills that new industries require. This hurts their chances of finding employment and prevents new industries from setting up facilities and job opportunities in the City. More workforce training would provide this demographic with more job opportunities. Representative of nonprofits which provide services to the City's homeless population reported that there are not enough job opportunities for persons experiencing homelessness. Creative workers struggle to navigate the job market due to lack of sufficient workforce training and access to broadband services. Stakeholders reported that the City lacks sufficient and accessible public transportation services for workers who work evening shifts. This causes additional problems for residents who live further away from job opportunities and lack their own private means of transportation.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Since the COVID-19 pandemic, residents from New York's large metropolitan areas have been moving into the City of Kingston. This population consists of remote workers who are not employed by local businesses within the City. The lack of affordable housing for low- and moderate-income residents, coupled with the influx of high-income remote workers has priced-out these residents, exacerbating the current issues with affordability in the City. The City needs workforce development programs to develop the skills of low- and moderate-income residents. This will incentivize new business development and provide resources to residents to stay competitive in the growing local economy.

In 2023, the City of Kingston adopted a Form Based Code (FBC) which legalized a variety of different land-uses which were previously difficult to support in the City. The FBC offers an opportunity for the City to expand the location of businesses within the City as well as develop more affordable housing for new and current residents.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Stakeholders reported that the City of Kingston has a lack of necessary workforce education programs. Additionally, creative workers struggle in the City of Kingston due to lack of workforce education and broadband services. These public services can help creative workers start and maintain their own business as well as learn other skills which help them transition into other industries. People experiencing homelessness require workforce development programs to have steady employment and income to afford housing and other necessities, such as food and transportation.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Ulster County's educational institutions work closely with the business community to develop a skilled and well-trained workforce. SUNY New Paltz, a public university, and SUNY Ulster, a local community college, provide educational opportunities for individuals living in the City of Kingston. Additionally, Vassar, Bard College, Marist, and Culinary Institute of America offer degrees and educational opportunities for individuals living in Ulster County. Ulster BOCES (Board of Cooperative Educational Services) offer technical educational programs to adults hoping to gain additional work-related skills. Ulster County Office of Employment and Training assists individuals living in Ulster County with finding work and providing job training.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Ulster County, in which the City of Kingston resides, is part of the Hudson Valley Regional Council (HVRC). As a recipient of grant funding from the US Department of Commerce Economic Development Administration, HVRC has developed a CEDS for Dutchess, Orange, Putnam, Rockland, Sullivan, Ulster, and Westchester counties. The priorities for recipients of EDA funding are infrastructure construction and improved economic assets that allow regional economies to prosper.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Through the CEDS, Ulster County is undertaking multiple projects that aim at revitalizing urban areas, redevelop public facilities, increase tourism, and address infrastructure issues. According to the 2019-2023 Hudson Valley Region Comprehensive Economic Development Strategy there

are no new priority projects occurring within the City of Kingston. However, projects that occur at the county level can potentially impact the City of Kingston's economy. The City of Kingston published the Strategic Community and Economic Development Plan (SCED Plan) in 2020 to provide an overview of what the City accomplished since adopting its 2025 Comprehensive Plan. The following planning efforts related to economic development have been undertaken by the City of Kingston.

- Downtown Revitalization Initiative (DRI) – Using funds to from the Regional Economic Development Council DRI investments are directed at projects that will preserve the historic and cultural identity of the Stockade Business District, while improving the local economy.
- Brownfield Opportunity Area Program – According to the SCED “a 20-year vision for the redevelopment of Kingston’s waterfront including part of the Roundout and sections of Ponckhockie and Roundout neighborhoods.”
- Uptown Stockade Area Transportation Plan – The proposed plan involved modifying parking arrangements, signal timing, traffic flow design, accommodations for bicycles and pedestrians, and safety enhancements. The overall goal was to have improved economic activity in the area.
- City of Kingston Five-Year Consolidated Plan, Fair Housing Plan and Annual Action Plan – Using HUD funding the City of Kingston will address different priority needs including expanding economic opportunity.
- The Establishment of the Kingston City Landbank – According to the SCED, “returns vacant buildings to the tax rolls and helps with neighborhood improvements. The HUD Consolidated Plan also supports the goals of the Kingston City Land Bank.”

Beyond following through with the goals and initiatives articulated in their 5-year comprehensive plan, the City of Kingston also participates in regional partnership with other municipalities in Ulster County to develop a "people-centered local economy". This approach to economic development aims to utilize the City of Kingston's business development to address social and economic issues which were exacerbated by the aftermath of COVID-19 pandemic and rising cost of living. The proposed economic development strategy aims to address social and economic issues by supporting these four “industrial clusters”: Health, Wellness and Care industries, Agriculture, Food, and Beverage industries, Clean Energy and Environmental industries, and Maker and Creator industries.

MA-50 Needs and Market Analysis Discussion

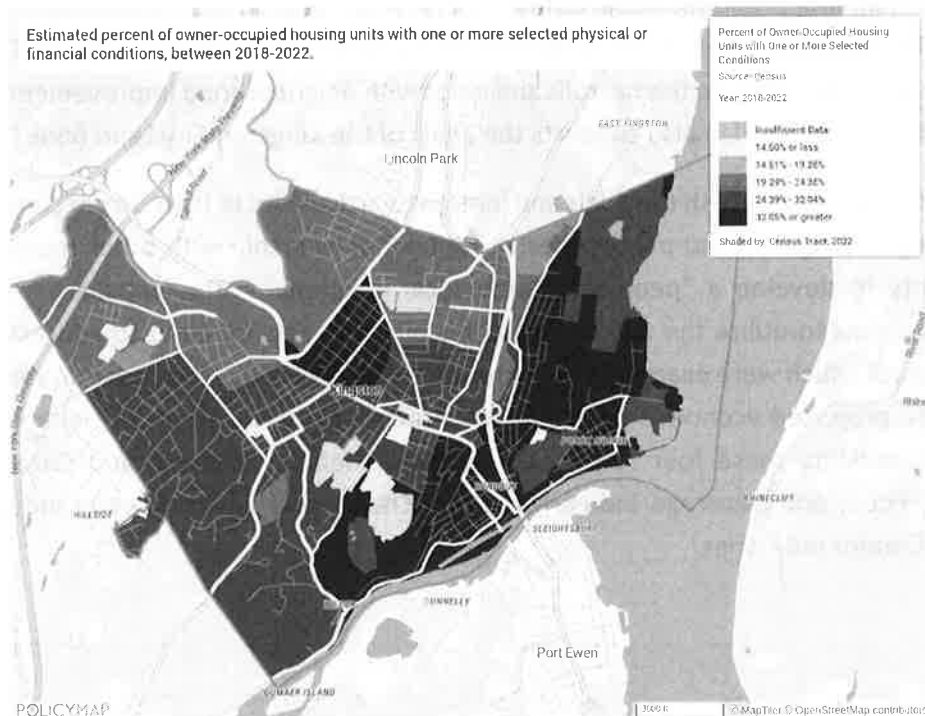
Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

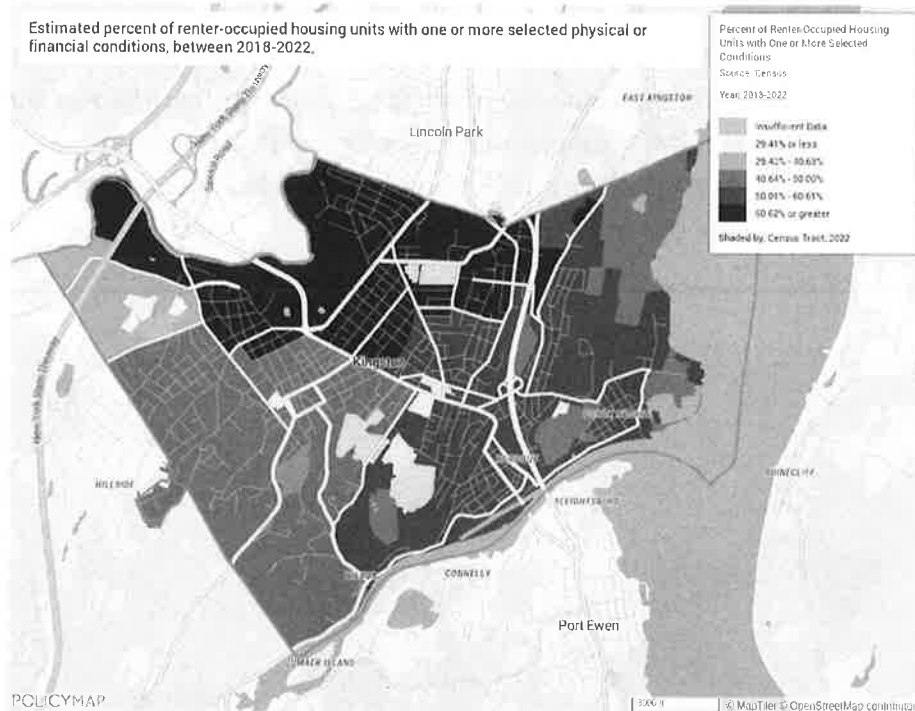
The City of Kingston's 2024-2028 Consolidated Plan defines areas of concentration as areas where 25% or more of the units in a census tract are in substandard condition.

Showcased by the maps below, renters and homeowners that face one or more housing problems are concentrated in certain areas in the City. Areas with concentrations of housing problems, for renters and owners, are in areas with high populations (51% or higher) of Low Moderate Income (LMI) residents. The data mapped below by census tract is based on housing quality indicators (selected conditions).

Selected conditions are similar to housing problems in the Needs Assessment Section of this Consolidated Plan and include the following:

- Lacks complete kitchen facilities.
- Lacks complete plumbing facilities.
- Is overcrowded with more than one person per room in the unit.
- Experiences cost burden between 30-50%





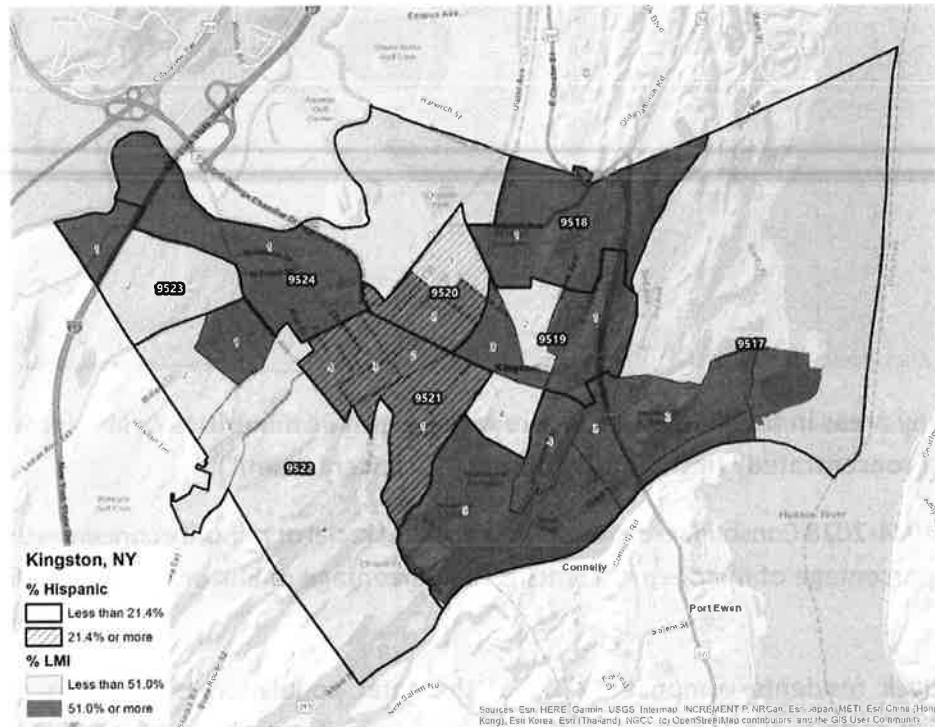
Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Kingston’s 2024-2028 Consolidated Plan defines areas of racial or minority concentration as those where the percentage of minority residents is ten percentage points or more than the Citywide rate.

In 2020, Black residents comprise 12.3% of the total population in Kingston. An area of concentration of Black residents would include any Census Tract where the percentage of Black residents is 22.37% or higher. Of the 8 Census Tracts within the City, none meet this criterion. Additionally, there are no areas of concentration for Asian residents, American Indian/Alaskan Native residents, Native Hawaiian/Other Pacific Islander residents, or “Some other race” residents. In fact, Hispanic residents are the only racial/ethnic group that have areas of concentration. An area of concentration for the City’s Hispanic population would be where the percentage of Hispanic residents is 21.4% or higher. Two areas in the City meet that criteria, census tracts 9520 and 9521. These two census tracts make up the City’s Midtown area.

Areas in Kingston where LMI block groups and areas of minority concentrations coincide are identified for the purposes of this report as areas of concentration of minority and LMI residents. The map below illustrates the locations of both areas of concentration on Hispanic residents and areas where the percentage of LMI persons is 51% or higher. The areas of ethnic concentration of Hispanic residents coincide with census block groups that are at least 51% LMI areas. This

demonstrates that Hispanic residents in the City are more likely than any other racial/ethnic group in the City to be experiencing low-to-moderate incomes. Additionally, this data shows how Hispanic residents could be facing issues regarding fair housing choice. The fact that there are two census tracts of Hispanic ethnic concentration that align with LMI block groups suggests that this ethnic group is most likely unable to afford housing in any other areas of the City and is being limited to housing only in the LMI neighborhoods.



What are the characteristics of the market in these areas/neighborhoods?

Midtown has a variety of amenities, drawing younger demographics who appreciate the diversity and convenience of living near the urban center. However, Midtown has experienced population decline over the last decade due to a lack of affordable housing. Key institutions like hospitals, City Hall, schools, and recreational facilities are situated in the Midtown area. Additionally, Midtown has a variety of businesses including theaters, creative spaces, multicultural eateries, and local shops, making it a vibrant hub for residents and visitors alike.

Geographic areas of concentrations of minorities or low-income families are primarily located in the City’s Midtown and Downtown/Waterfront areas. In 2010, Black and Hispanic residents had low to moderate levels of segregation in the City of Kingston. However, by 2020 those levels of

segregation decreased greatly and now there are very low levels of segregation in the City for the Black and Hispanic population.

Are there any community assets in these areas/neighborhoods?

According to the City of Kingston’s Comprehensive Plan, *Kingston 2025*, there are important community assets within Midtown and Downtown/Waterfront area. These assets include the Ulster Performing Arts Center, Andy Murphy Midtown Neighborhood Center, the Kingston Midtown Arts District, the Sixteen-mile National Register District, Estates District Area, and the Mid-Hudson Historic Shorelands Scenic District. The Midtown area has a large concentration of racial and ethnic minorities and LMI families.

Are there other strategic opportunities in any of these areas?

The Midtown area has received various types of investments and is a geographic priority of the City of Kingston. In 2023 the City won a Brownfield Opportunity Area (BOA) grant for \$238,559 to redevelop a parcel located in the Midtown Area. The work will focus on vacant and abandoned properties within a 270-acre area that runs along the Broadway corridor. In addition, the Kingston Land Bank is in the process of acquiring 7 new properties from the City of Kingston. The Kingston Housing Authority is in the process of renovating all their properties.

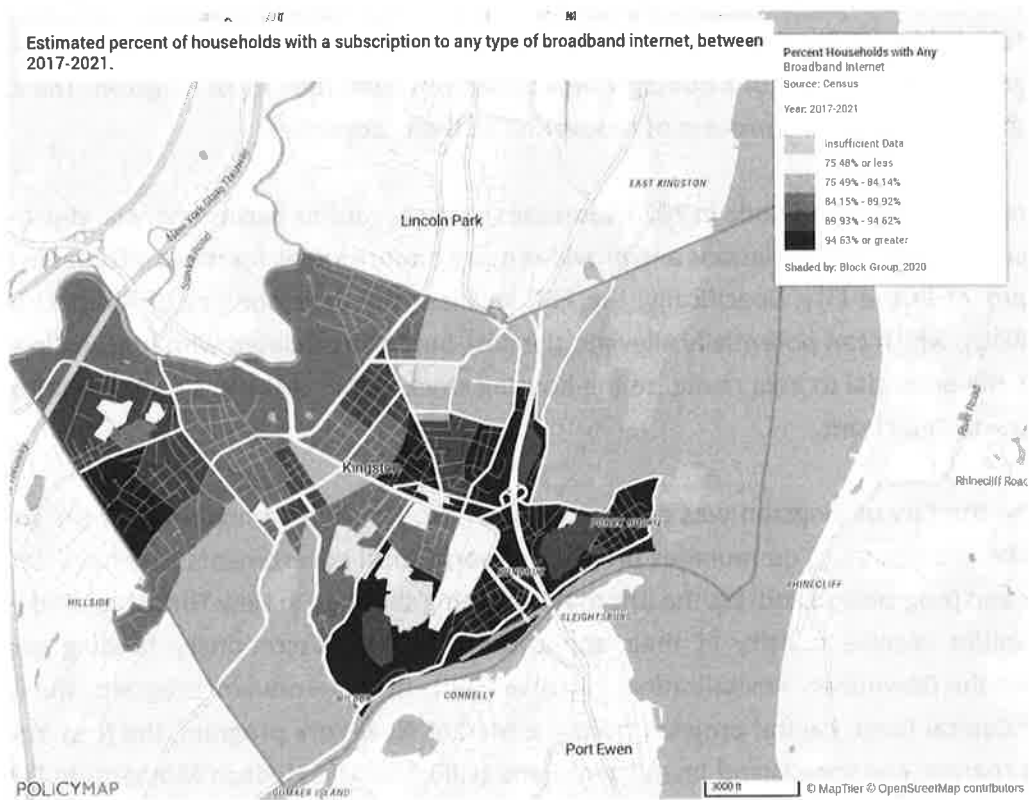
The adoption Form Based Code in 2023 addresses issues regarding exclusionary land-use policies of the previous zoning regulations and provides more opportunities for more affordable housing development in the City. Specifically, the FBC legalizes the development of Assisted Dwelling Units (ADU), which can potentially alleviate the cost-burden associated with housing in the City. FBC has the potential to help revitalize the housing stock within LMI areas such as Midtown and Downtown/Waterfront.

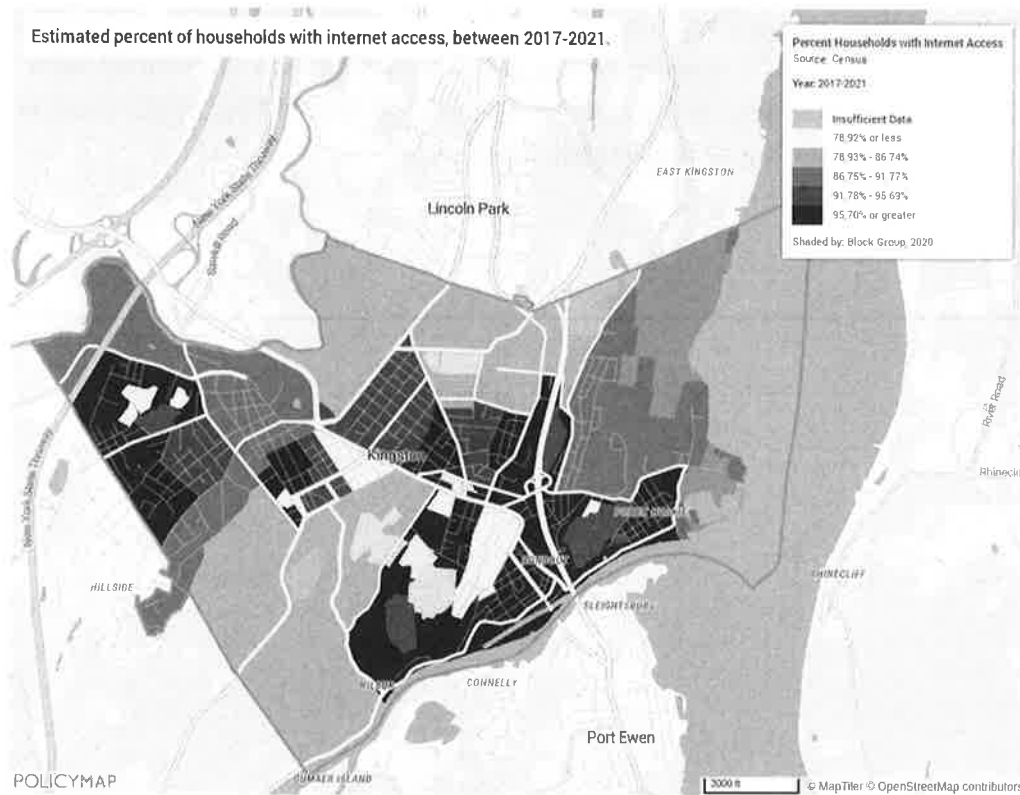
Recently, the City of Kingston was designated as a “Pro-Housing Community” by the New York State. The Pro-Housing Communities program rewards local governments that have developed policies and programs to address the affordable housing shortage in New York State. Pro-Housing Communities receive priority in their applications for key discretionary funding programs, including the Downtown Revitalization Initiative (DRI), the NY Forward program, the Regional Council Capital Fund, capital projects from the Market New York program, the New York Main Street program, the Long Island Investment Fund (LIIF), the Mid-Hudson Momentum Fund, and the Public Transportation Modernization Enhancement Program (MEP).

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

As shown on the following map generated by PolicyMap, broadband access is concentrated in certain parts of the City. The Northern and southern regions of Kingston have less access to Broadband services. Based on the second map, the distribution of broadband services impact internet access for resident of Kingston. During stakeholder consultations, representatives from nonprofit organization and city government reported that certain parts of the City have inadequate access to broadband services. This hurts small businesses, creative workers, young adults, and children within the City. Without adequate access to broadband services these demographics struggle to work and live in the City.





Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Within the City of Kingston there are 10 major broadband providers. These include Verizon, Spectrum, HughsNet, Viasat, Optimum, Fronteir, Starlink, AlwaysOn, DIRECTV, and EarthLink. According to the Ulster County Citizens Commission for Digital Inclusion, there are 1070 properties in Ulster County that do not have access to broadband. This number is down from 1300 properties in 2022. The City participates in The Affordable Connectivity Program, administered by the FCC, which provides a \$30/month discount for broadband service, \$75/month discount for households on qualifying Tribal lands; and discount of \$100 for a laptop, desktop computer, or tablet purchased through a participating provider. To qualify for this program a household must have an income at or below 200% of the Federal Poverty Guidelines, or have a single family member that participates in a government subsidized assistance program.

On November 21st, 2023, the City of Kingston, in partnership with Archtop Fiber, announced a new, 100% fiber, multi-gig Internet service that will provide faster connections for residents. The first phase of installation began with the utilization of 74 existing Central Hudson utility poles for aerial fiber deployment. The second phase of installation included microtrenching, a minimally

intrusive process that enabled fiber lines to run through very narrow underground trenches. This phase commenced in the following weeks. Microtrenching was performed with special equipment and did not require street closings. Up to 1,500 feet of fiber optics could be laid in one day in trenches measuring approximately 1 inch wide.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Climate change has the potential to exacerbate the impacts of climate hazards in the City of Kingston. The 2017 Ulster County Multi-jurisdictional Natural Hazard Mitigation Plan contains information pertaining to the potential hazard risks associated with climate change for Ulster County. This plan found that due to climate change communities within Ulster County, such as the City of Kingston, have higher probability of being impacted by hurricanes, winter storms, extreme temperatures, large-scale extratropical cyclones ("Nor'easters"), intense precipitation, flooding, and wildfires. Climate change poses a challenge to the City's aging public infrastructure. Increased precipitation and flooding can overburden stormwater systems, and winter storms coupled with extreme cold temperatures can negatively impact public transportation in the City. Due to the City's location on the Hudson River, there is a higher probability of land loss due to submergence and erosion. The negative impact of climate change on the City's environment and public infrastructure can hurt the local economy by disrupting tourism and the operations of local businesses.

The Common Council of the City of Kingston adopted the *Kingston Climate Action Plan* on October 2, 2012. The plan offered a summary of local energy assessments and greenhouse gas (GHG) emissions inventory. Additionally, a GHG emissions forecast and GHG reduction goals are proposed by the plan. The overarching objective was to achieve "20 by 20", a 20% reduction in both energy usage and greenhouse gas (GHG) emissions by the year 2020. The Government Operations Committee of the Council collaborated with the City's Conservation Advisory Council and the Energy and Sustainability Task Force to determine cost-effective measures for implementing the plan. Additionally, they outlined a strategic plan to enact the recommendations of the plan as resources become accessible.

The plan recommends that these reduction goals can be achieved if the City focuses on the following:

- a. Energy and Renewables: Buildings and Facilities
- b. Land Use and Transportation
- c. Materials Management: Waste Reduction & Recycling
- d. Sustainable Resource Management
- e. Outreach, Education & Training, and
- f. Climate Adaptation.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

The Kingston Climate Action Plan offers recommendation for the City on how they can develop climate and energy policies that help low- and moderate-income households. This plan recommends offering “Energy Assistance for Low- and Moderate-Income Households” to reduce the energy burden on households that are impacted by high and fluctuating energy costs. Additionally, the plan recommends the City invest in local food production to provide healthy, affordable, and accessible food sources for low- and moderate-income households. As temperatures fluctuate residents utilize more energy consuming products like air conditioning and portable heaters. Additionally changes in weather conditions require improvements in physical infrastructure which consume more energy to implement. Higher usage means higher energy costs that can be attributed to climate change at the local level, disproportionately impacting low-income populations.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The City of Kingston anticipates receiving \$650,000 per year in CDBG funding over the next five years. The purpose of the Strategic Plan is to guide the use of these funds over the next five years. The plan is guided by three overarching goals that are applied according to the City of Kingston's needs. The goals are:

- To provide decent housing by preserving the affordable housing stock in both the rental and homeowner markets, increasing the availability of affordable housing by reducing barriers, and increasing the number of accessible units.
- To improve the quality of life and living conditions for low- and moderate-income persons through improvements in public facilities and infrastructure and the removal of slum/blighting influences.
- To expand economic opportunities through more jobs paying self-sufficient wages, homeownership opportunities, development activities that promote long-term community viability, and the empowerment of low- and moderate- income persons to achieve self-sufficiency.

The City of Kingston developed this plan using citizen participation and stakeholder input generated by several stakeholder consultations and public meetings.

Based on these items the City of Kingston established the following list of priorities:

- Access to Affordable Housing
- Improve Public Facilities
- Improve, Maintain and Expand Public Infrastructure
- Provide Public Services
- Increase Economic Development

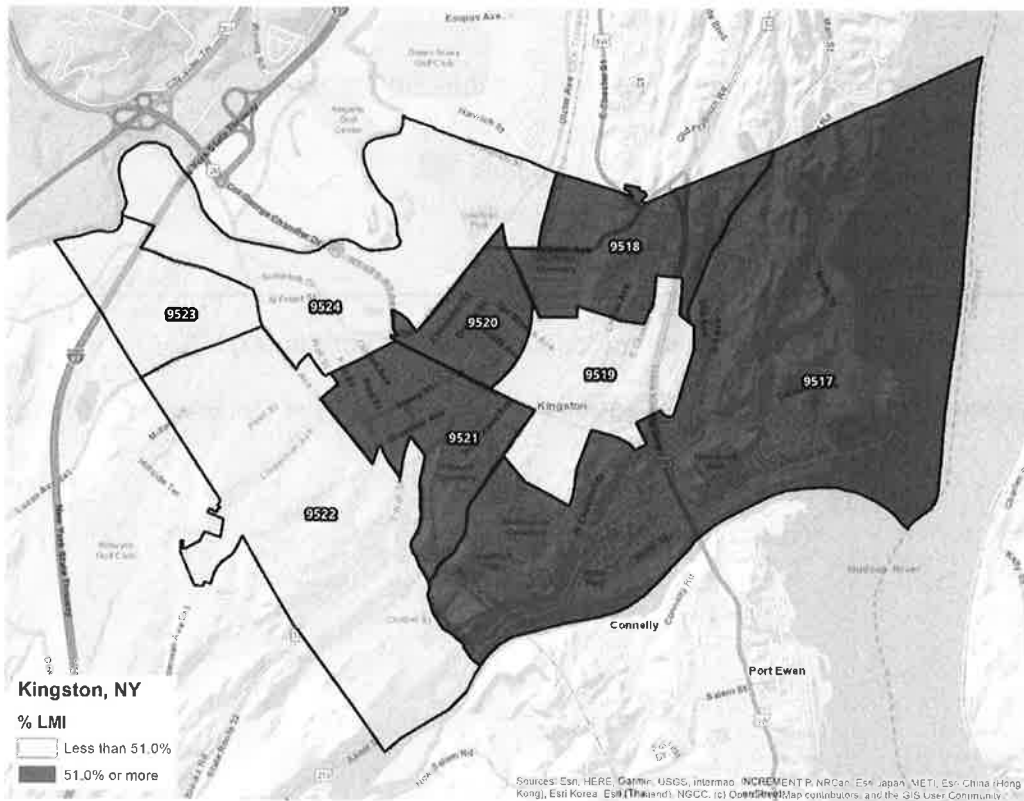
SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

1	Area Name:	Midtown Area
	Area Type:	Local Target Area
	Identify the neighborhood boundaries for this target area.	The Midtown area in the City of Kingston is comprised of Census Tracts 9520 and 9521, with a small portion located in Census Tract 9519.
2	Area Name:	Downtown/Waterfront Area
	Area Type:	Local Target Area
	Identify the neighborhood boundaries for this target area.	The Downtown neighborhood is located along the Hudson River and Rondout Creek waterfronts.
3	Area Name:	Citywide
	Area Type:	Comprehensive
	Identify the neighborhood boundaries for this target area.	This geographic target area encompasses the entirety of Kingston city, with a specific focus on census tracts characterized by low to moderate income, excluding those already designated for targeted interventions.

Table 46 - Geographic Priority Areas

The City of Kingston plans to use its CDBG funds and other resources to develop and rehabilitate various areas throughout the City. The City of Kingston has identified the “Midtown” area as a geographic priority. Based on research collected from past planning efforts, it was reported that the Midtown area contains the poorest neighborhoods in the City. Block groups within this area had the highest poverty and unemployment rates in the City. Additionally, the largest concentration of non-white racial and ethnic groups, live in the Midtown area. Recently, the City was awarded a Brownfield Opportunity Area (BOA) grant by the State of New York to redevelop vacant properties within the Midtown Neighborhood of Kingston. The City will also support affordable housing development in the Downtown/Waterfront area as this area has relatively high concentration of low- and moderate- income residents. Additionally, the City will provide funds to any Low Moderate Income (LMI) area in the City which requires immediate assistance or is later identified as an area in need. The map below illustrates the LMI areas within the City of Kingston.



General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Federal CDBG funds are intended to provide low and moderate income (LMI) households with viable communities, including decent housing, a suitable living environment and expanded economic opportunities. Eligible activities include community facilities and improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration.

The system for establishing the priority for the selection of these projects in the City of Kingston

is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program
- Meeting the needs of LMI residents
- Focusing on LMI areas or neighborhoods
- Coordinating and leveraging of resources
- Responding to expressed needs-
- Sustainability and/or long-term impact
- The ability to demonstrate measurable progress and success.

Priority CDBG funding areas include areas where the percentage of LMI persons is 51% or higher.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

The following is a framework for priorities, needs and goals to address the City of Kingston's identified needs during the next five years. The final determination on funded activities will occur during the annual review process for the prioritization of projects.

The priorities presented were developed by:

- Weighing the severity of the need among all groups and sub-groups
- Analyzing current social, housing, and economic conditions
- Analyzing the relative needs of low- and moderate-income families
- Assessing the resources likely to be available over the next five years, and
- Evaluating input from focus group sessions, interviews, service provider surveys, City department staff and public hearings.

Priorities were established using the following definitions:

- **High** priorities are those activities that will be considered first for funding with CDBG resources.
- **Low** priorities are those activities that will be considered after high-priority projects if CDBG resources are available, or priorities for which the City does not intend to provide CDBG funding.

Low priority activities are still important and are not meant to be understood as being unnecessary in the City. The City has identified a limited number of priorities to provide a focus for activities that will be funded in the next five years. If additional funding becomes available, low priority activities will be considered.

For projects that address a high priority need, the City will base funding decisions on the capacity and past performance of the sub-recipient, the type of project, the potential to leverage federal funds with other resources, the anticipated impact of the project and the reasonableness of the proposed budget and timeline for completion. Once projects that address high priorities are acted upon, the City will then review projects and activities to meet low priorities.

1	Priority Need Name	Increase Access to and Quality of Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Persons with Disabilities Victims of Domestic Violence. Homeless Individuals Homeless Families with Children
	Geographic Areas Affected	Citywide
	Associated Goals	Affordable Housing Development Housing Rehabilitation
	Description	There is a high demand for the development of new affordable within the City of Kingston. The City is encouraging the development of ADUs and multi-family housing units. Further, affordable rental units are in short supply in the City; coupled with the aged housing stock, improvements can be made to existing units or new units be developed to relieve cost burden faced by so many individuals and families in the City.
	Basis for Relative Priority	Needs were identified based on ACS Census data, 2019-2023 Consolidated Plan, Strategic Community and Economic Development Plan, and Stakeholder Consultations.
2	Priority Need Name	Improve Public Facilities and Infrastructure
	Priority Level	High
	Population	Non-Housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	Improve Public Infrastructure Lead Hazard and Prevention Improve Environment

	Description	Public infrastructure and facilities in various income-eligible areas of the City are inadequate for current demands. Priority projects in the infrastructure category include street improvements, accessible and safe sidewalks, sewer and waterline installation and/or replacement, more green spaces, and improvements to public parks.
	Basis for Relative Priority	Needs were identified based on ACS Census data, 2019-2023 Consolidated Plan, Strategic Community and Economic Development Plan, Parks & Recreation Master Plan and Stakeholder Consultations.
3	Priority Need Name	Provide Public Services
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Persons with Mental Disabilities Persons with Alcohol or Other Addiction Victims of Domestic Violence Non-Housing Community Development
	Geographic Areas Affected	Citywide
	Associated Goals	Improve Public Services Economic Development Transportation Services Food Services
	Description	Ensure quality public services for low-income individuals and families. Activities include providing healthcare, childcare, support for the elderly, childhood literacy and other educational programs, civic education, youth and community services, and access to broadband.
	Basis for Relative Priority	Needs were identified based on ACS Census data, 2019-2023 Consolidated Plan, Strategic Community and Economic Development Plan, and Stakeholder Consultations.
4	Priority Need Name	Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents

	Geographic Areas Affected	Citywide
	Associated Goals	Economic Development
	Description	The City needs to develop local business and attract new industries. To accomplish this the city wishes to invest in workforce and skill development programs, provide affordable workforce housing, provide public transportation for night shift workers, develop “maker spaces” for creative workers, and increase access to broadband.
	Basis for Relative Priority	Needs were identified based on ACS Census data, 2019-2023 Consolidated Plan, Strategic Community and Economic Development Plan, and Stakeholder Consultations.
5	Priority Need Name	Planning/ Administration
	Priority Level	High
	Population	Other
	Geographic Areas Affected	Citywide
	Associated Goals	Planning/ Administration
	Description	Administrative and planning costs to operate the CDBG, and other funding programs.
	Basis for Relative Priority	Needs were identified based on Consolidated Plan, Strategic Community and Economic Development Plan, and Stakeholder Consultations. Effective and efficient implementation of CDBG funding in accordance with federal regulations requires adequate resources for program planning and administration.
6	Priority Need Name	Provide Homeless Housing and Services
	Priority Level	Low
	Population	Extremely Low Low Families with Children Homeless Individuals Homeless Families with Children Unaccompanied Youth Persons with Mental Disabilities Persons with Alcohol or Other Addictions
	Geographic Areas Affected	Citywide
	Associated Goals	Homeless Prevention and Care

	Description	The City of Kingston an active and coordinated Continuum of Care system to address the needs of the City’s homeless and “at risk” populations. The City strives to meet the needs of various homeless sub-populations, continued integration of resources and programming and the development of additional housing accommodations are needed to meet the demands.
	Basis for Relative Priority	Needs were identified based on ACS Census data, HUD PIT and HIC data, data collected by the Ulster County Continuum of Care, and Stakeholder Consultations.

Table 47 – Priority Needs Summary

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	As shown in the Needs Assessment and Market Assessment, there is a need for rental housing assistance throughout the City. The housing market does not provide a sufficient amount of affordable housing to meet the needs of all the households that require it. Organizations within the City, such as Family of Woodstock, Catholic Charities, and RUPCO inc. have provided TBRA in the past.
TBRA for Non-Homeless Special Needs	As shown in the Needs Assessment and Market Analysis, as well as feedback from stakeholder interviews, there is a need for non-homeless special needs rental housing assistance throughout the City. There is high demand for housing assistance for the City's elderly population. The majority of this population has disabilities and require affordable and accessible living spaces. The City's housing market does not provide sufficient affordable, accessible rental housing to elderly and non-elderly persons with disabilities or supportive housing for persons with HIV/AIDS, persons with substance abuse and mental health diagnoses, the elderly and persons with disabilities.
New Unit Production	There is a substantial need for affordable housing in the city of Kingston. The City's housing stock is very old and there are few new developments in general and specifically that can meet the needs of low- and moderate-income households and households with a person with a disability. The City will continue to support efforts to increase the supply of single family and multi-family affordable housing units by both private sector and public sector entities. An example of this support is the City's adoption of a Form Based Code (FBC) in 2023. This change in zoning laws will allow the City to advance the development of multi-family affordable housing units and accessory dwelling units (ADUs).
Rehabilitation	Owner-occupied rehabilitation assistance is an effective way to preserve the City's affordable housing inventory, particularly if the market value of the home is such that the cost and extent of rehabilitation does not exceed the value that can be achieved. The housing stock in the City is old and deteriorating/deteriorated. The City of Kingston has a high number of properties that were built with lead paint. Rehabilitation efforts should also include the ability to make upgrades to the home to allow for aging in place as well as provide for lead/asbestos abatement.
Acquisition, including preservation	Acquisition, including preservation, can be influenced by the market value of the structure. With home purchases by private individuals, low interest rates off-set increases in the market value of the housing stock. Monthly housing costs of higher priced homes at lower interest rates approximate the monthly housing costs of lower priced homes at higher interest rates. In the case of a non-profit organization buying housing stock for rehabilitation and resale or for preservation, the costs of purchasing a home outright at higher prices can reduce the number of homes that can be purchased or reduce the funds available for rehabilitation activities. Further, limiting the costs of homeownership, including financing, production, and transaction costs and fees, makes homeownership more affordable, makes financing more available and simplifies the home buying process. Streamlining transaction costs, expanding creative financing and public gap financing, and making technological improvements in loan underwriting will reduce the costs of homeownership.

Table 48 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City of Kingston receives Federal CDBG funding from the US Department of Housing and Urban Development on an annual basis. For the purpose of this Strategic Plan, the City assumes its allocations each year over the five-year period will remain approximately the same and in line with the 2024 program year allocation. The Annual Action Plans submitted in each of the subsequent years will reflect actual allocation amounts received. CDBG funding will be expended during the 2024-2028 Consolidated Plan period, however, is not reflected in the Priority Table below.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public-Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$650,000			\$650,000	\$2,600,000	Funds for housing and non-housing community development needs.

Table 49 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City receives and utilizes a variety of resources including general and capital funds to meet its housing and community development needs either directly or indirectly. In some instances, federal CDBG funds are used to leverage private resources, state funding and other resources for specific projects and help the City provide much needed services and program assistance to some of its lowest income residents. Further, the nonprofit organizations receiving CDBG funding have additional financial capacity through foundations and fundraising campaigns. Federal funds provide these organizations with the opportunity to expand their services to benefit more low- and moderate-income persons.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

In 2023 the City won a Brownfield Opportunity Area (BOA) grant for \$238,559 to redevelop a parcel located in the Midtown Area. The work will focus on vacant and abandoned properties within a 270-acre area that runs along the Broadway corridor. In addition, the Kingston Land Bank is in the process of acquiring 7 new properties and the Kingston Housing Authority is renovating all their properties.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Family of Woodstock, Inc.	Subrecipient	Family of Woodstock, Inc. Subrecipient Homelessness Non-homeless special needs Planning Rental public services Region	Region
Rural Ulster Preservation Co. (RUPCO)	Subrecipient	Ownership	Region
Catholic Charities	Non-Profit	Homelessness Public Services	Jurisdiction
Kingston Local Development Corporation	Subrecipient	Economic Development neighborhood improvements public facilities	Jurisdiction
Ulster County Business Services	Government	Economic Development Planning	Region
Health Alliance of the Hudson Valley	Private Industry	Economic Development Non-homeless special needs public facilities	Region
Parks and Recreation	Subrecipient	public services	Jurisdiction
YMCA of Kingston & Ulster County	Subrecipient	Ownership public facilities public services	Jurisdiction
City of Kingston Office of Engineering	Government	neighborhood improvements public facilities	Jurisdiction
Kingston Housing Authority	PHA	Public Housing Rental	Jurisdiction
Kingston Land Trust, Inc.	Subrecipient	Ownership	Jurisdiction

Table 50 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Kingston has a comprehensive delivery structure for providing services to homeless and special needs populations within the City. Nonprofit organization such as Family of Woodstock, RUPCO, and Catholic Charities play an important role in the provision of services for these populations. However, the City lacks resources to adequately fund and support this delivery structure. The City of Kingston partners with Ulster County Government and Ulster County Community Action to provide additional services to homeless and special needs populations, however this presents some logistical challenges as the providers of these services are not part of City’s government. Better coordination between local and county services must be achieved to address the various issues within the City. The City aims to develop more affordable housing, improve public infrastructure and facilities, and deliver better public services, such as transportation. Additionally, the city aims to foster economic development within the City to attract new industries, address the needs of local businesses, and provide more job opportunities for residents.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X		
Street Outreach Services			
Law Enforcement			
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	X
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	X
HIV/AIDS	X		X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X

Other			
Other			

Table 51 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Multiple service delivery points have improved the overall effectiveness of providing public services to specific need groups. The City of Kingston’s Office of Community Development collaborates with the other Departments including the Departments of Health and Wellness, Housing Initiatives, and Planning. The City also partners with Ulster County government which offers homelessness, substance abuse, public health and related services. The City of Kingston also participates in the Ulster County Continuum of Care (UCCoC) network. UCCoC collects Point-in-Time (PIT) and Housing Inventory Chart (HIC) data from the City to provide non-profits and City government officials with the information necessary to deal with homelessness in the City. Homeless prevention and support services are provided by the Family of Woodstock, RUPCO, and Catholic Charities. The City also participates with the Ulster County Department of Mental Health Single Point of Access (SPOA) to provide mental health services to their residents.

Interagency collaboration related to the availability and use of CDBG funds, as well as providing incentives for private sector and nonprofit partners, has improved the ability of the Department of Community Development to account for results and outcomes.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The City of Kingston lacks sufficient resources to provide services to special needs populations and people experiencing homelessness. Despite this, service providers have showcased resilience and creativity in providing services to special needs populations and persons experiencing homelessness. They are committed to working with the City to provide better services to these populations. During stakeholder sessions, the biggest gap in services was the lack of safe and affordable housing. This exacerbates other issues faced by special needs populations and people experiencing homelessness. Beyond this need for more affordable housing, the following gaps of the service delivery system were identified:

- Lack of Family Housing for victims of domestic abuse.
- Lack of affordable and accessible food options for individuals and families experiencing homelessness.
- Lack of childcare programs.
- Lack of job opportunities for people experiencing homelessness.

- Need for flexible rules concerning the use of public funds.
- Lack of access to transportation services for persons experiencing homelessness.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Due to these gaps related to provision of services, the City will continue to support homeless agencies and service providers to leverage federal and non-federal funding sources to expand services. The City will also continue to support and encourage the development of new affordable housing units.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Access to & Quality of Affordable Housing	2024	2028	Affordable Housing	Citywide	Increase Access to and Quality of Affordable Housing	CDBG \$100,000	Homeowner Housing Rehabilitated: Household Housing Unit Rehabilitated: 10
2	Economic Development	2024	2028	Non-Housing Community Development	Citywide	Economic Development	CDBG \$100,000	Businesses Assisted: 5
3	Improve Public Services	2024	2028	Homelessness Non-Homeless Special Needs Transportation Environment	Citywide	Provide Homeless Housing and Services Provide Public Services	CDBG \$487,500	Public services activities other than Low/Moderate Income Housing Benefit Persons Assisted: 15,000
4	Improve Public Facilities and Infrastructure	2024	2028	Non-Housing Community Development Transportation Environment	Citywide	Improve Public Facilities and Infrastructure	CDBG \$1,912,500	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit Persons Assisted: 25,000
5	Planning/ Administration	2024	2028	Other-Admin	Citywide	Planning/ Administration	CDBG \$650,000	Other: 5

Table 52 – Goals Summary

Goal Descriptions

	Goal Name	Goal Description
1	Improve Access to & Quality of Affordable Housing	The City of Kingston will engage in the rehabilitation of existing rental or homeownership units of which some may be for special needs populations, including but not limited to, the homeless/at-risk of homelessness, elderly resident, and individuals with disabilities.
2	Economic Development	Support small business development in the City and provide opportunities for new and current industries to thrive in the City. Additionally, provide workforce and skills development programs for residents, and support services for creative workers in the City.
3	Improve Public Services	Ensure quality public services that support low-income individuals, including support for facilities that provide services for adults. Services include, but are not limited to, healthcare, childcare, education, civic education, youth and community services, and access to broadband, improve access to public transportation, administrative and financial support for food banks, address changes in climate, and wildlife and plant life protection. Additionally, support for the City of Kingston's emergency shelters will be provided. Activities include transitional housing, healthcare, affordable food services, tenant-rights counselling, and coordination among different service providers to assist the City's homeless population.
4	Improve Public Facilities and Infrastructure	Support public infrastructure and facility improvements, including water, sewer, streets, stormwater drainage, sidewalk and curb cut improvements for ADA accessibility, parks improvements, adding trees and other greenspace along sidewalks, and use of sustainable materials in public works projects.
5	Planning/ Administration	Funds to administer and implement the CDBG and other programs in accordance with federal regulations.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

The City of Kingston's Department of Housing Initiatives set a goal of adding 1,000 new units to the City's housing stock by 2029. This housing is being developed to provide more accessible and affordable options for low-to moderate income households in the City. Many of these units will not be developed using CDBG funds.

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Kingston Housing Authority operates independently from the City of Kingston. The KHA is not under a Section 504 Voluntary Compliance Agreement.

Activities to Increase Resident Involvements

KHA is governed by a Finance Committee which reports to a board of commissioners. The board consists of seven members, five of which are appointed by the Mayor of Kingston, and the other two are required to be current tenants. KHA conducts regular tenant meetings to ask for feedback on services provided and to inform tenants about changes in administration and maintenance issues. Resident involvement is typically associated with specific changes to a building, project or initiative.

Is the public housing agency designated as troubled under 24 CFR part 902?

No, the PHA is not troubled.

Plan to remove the ‘troubled’ designation

Not applicable; the PHA is not troubled.

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

The City of Kingston has completed the 2024-2028 Analysis of Impediments to Fair Housing Choice (AI), which documents the various impediments to fair housing choice. The preparation of this Analysis of Impediments to Fair Housing Choice (AI) serves as a component of the City of Kingston’s efforts to satisfy the requirements of the Housing and Community Development Act of 1974, as amended, which requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. While fair housing and affordable housing are different from each other, there is an inextricable link between the two as the majority of affordable housing is located in neighborhoods with lower access to opportunities such as education, public transportation, job centers, etc.

According to the City of Kingston’s 2024-2028 Analysis of Impediments (AI), the following impediments were identified:

1. A general lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes.
2. Overall low incomes and high poverty rates across various racial/ethnic groups and household types in the City, thus limiting their housing choice.
3. The age and size of housing units in the City. Over half of the units in the City were built prior to 1939 and are deteriorating and unsafe. Due to age many of the units cannot accommodate larger families, thus limiting their fair housing choice.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

The following table lists of actions the City of Kingston will take to remove or ameliorate barriers to affordable housing:

Actions	Entities Responsible	Benchmark	Time to Complete
Impediment A: A general lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes			
Facilitate the development of new affordable and preservation of existing affordable housing for members of the protected classes (race, color, religion, sex, disability, familial status, national origin, creed, sexual orientation, military status, age, marital status)	Kingston Office of Community Development Kingston Department of Housing Initiatives Affordable housing developers and builders including those building new units under the inclusionary zoning ordinance, local and regional supportive service	Number of affordable units built by income level; number of affordable units preserved through rehabilitation and weatherization; number of households assisted by race, ethnicity, disability status, familial status; number of households provided	2024-2028

Actions	Entities Responsible	Benchmark	Time to Complete
<p>Conduct paired testing in order to reveal possible housing discrimination based on race, disability, familial status, lawful source of income, and other grounds.</p> <p>Preparation of an Anti-Displacement Plan to protect long-term residents from displacement due to rising rents and home prices</p>	<p>agencies, Kingston Housing Authority</p>	<p>supportive services to maintain housing by race, ethnicity, disability status, familial status</p> <p>Work towards reaching the City-wide goal of approving 1,000 new housing units by 2029</p>	
<p>Impediment B: Overall low incomes and high poverty rates across various racial/ethnic groups and household types, thus limiting their housing choice</p>			
<p>Provide targeted financial education to members of the protected classes including the Hispanic and female-headed households subpopulations who both experience high levels of poverty</p> <p>Provide resources to single parent with children households (Single mother homes make up 83.1% of all people living in poverty in the City)</p> <p>Provide job training opportunities to help lower income residents increase their skills and employment opportunities</p> <p>Draft a language access plan to assist racial/ethnic minorities</p>	<p>Office of Community Development Nonprofit organizations that provide job training and related services to lower income residents, Local and regional HUD-certified housing counselors</p>	<p>Number of people participated in financial education programs; number of homebuyers assisted by race, ethnicity, income, disability</p> <p>Number of persons who participated in job training programs</p> <p>Language Access Plan for LEP populations approved by Common Council</p>	<p>2024-2028</p>
<p>Impediment C: The age and size of housing units in the City. Over half of the units in the City were built prior to 1939 and are deteriorating and unsafe. Due to age many of the units cannot accommodate larger families or individuals with disabilities, thus limiting their fair housing choice.</p>			
<p>Use new form-based code to support higher density housing, infill housing, multifamily housing.</p> <p>Fund housing rehabilitation programs to bring available units up to safe standards.</p>	<p>Office of Community Development Department of Housing Initiatives Zoning Advisory Board Affordable housing developers and builders including those building new units under the inclusionary zoning ordinance, local and</p>	<p>Number of large (3+ bedroom) housing types approved and developed</p> <p>Number of high density, multi-family, and infill housing units developed</p> <p>Number of housing units rehabilitated and preserved.</p>	<p>2024-2028</p>

Actions	Entities Responsible	Benchmark	Time to Complete
Invest in the development of 3+ bedroom housing types in the City.	regional supportive service agencies, Kingston Housing Authority		

SP-60 Homelessness Strategy – 91.215(d)

Describe how the jurisdiction's strategic plan goals contribute to:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Kingston is part of the Ulster County Continuum of Care (UCCoC) system which engages and reaches out to the City's homeless and "at risk" populations. The UCCoC leads the effort in implementing the Coordinated Entry System (CE) to provide a single point of access to determine the housing and social service needs of homeless persons. Additionally, the City participates with the Ulster County Department of Mental Health Single Point of Access (SPOA) to provide mental health services to their residents. Although a variety of housing resources and programs are offered to meet the needs of various homeless sub-populations, continued integration of resources and programming and the development of additional housing accommodations are needed.

The CoC has found several areas of need regarding homelessness. Shelters and other organizations that provide services to various homeless populations require more resources to provide for homeless families. Examples of services needed for this population include better childcare, job skills training, and access to affordable food sources. Transportation is also an area of need because individuals experiencing homelessness living within the city often must choose between work and housing as job opportunities exist away from affordable housing and supportive services.

Each year, the UCCoC conducts a Point-in-Time count of the persons residing in emergency shelters, transitional housing facilities and places not meant for human habitation. This information is used to understand the emergency needs of homeless persons so that they can be addressed adequately and efficiently. The City will use the information generated by the PIT and other studies conducted by the UCCoC to inform its budget and planning process.

Addressing the emergency and transitional housing needs of homeless persons

The UCCoC captures Point in Time data, Systems Performance Measures and Coordinated Entry data to evaluate and understand the emergency needs of persons in the City experiencing homelessness. Kingston does not receive Emergency Solutions Grant funding from HUD to directly support emergency shelter and transitional housing needs in the City.

While no longer a priority at the federal level, there are transitional housing needs that still exist in the City, in addition to robust case management services.

The City of Kingston partners with nonprofit and regional bodies to address the emergency and transitional housing needs of individuals experiencing homelessness. Recently the City has received a \$15 million Homeless Housing Assistance Program (HHAP) grant from the New York State Office of Temporary and Disability Assistance (OTDA). HHAP grant funding is provided to projects that provide emergency, transitional, or permanent supportive housing for homeless households in New York State. This funding will be used to help develop affordable housing opportunities in the City. The UCCoC leads the effort in implementing the Coordinated Entry System (CE) to provide a single point of access to determine the housing and social service needs of homeless persons. Further, the City will utilize its CDBG dollars to support emergency shelter, rapid rehousing and homeless prevention activities to meet the needs of the homeless in the City.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The City's homeless services providers aim to shorten a household's time experiencing homelessness and/or in an emergency shelter by providing access to rapid rehousing and developing more affordable housing opportunities.

Increasing the inventory of permanent housing with supportive services is a priority for the City of Kingston. Most people experiencing chronically homeless have severe mental illness and/or substance abuse issues. They require long-term, affordable housing options with supportive services to make the transition to residential stability. The City's strategy for ending chronic homelessness addresses the high prevalence of substance abuse and mental illness among chronically homeless individuals, inadequate education and/or job skills among many homeless persons, and the shortage of affordable housing in the City.

The City will continue to use CDBG funds for support services for the homeless through various programs. These services will range from direct counseling at homeless facilities to employment and educational counseling. The Ulster County Department of Social Services will provide a variety of support services to homeless families and individuals who receive housing assistance.

The primary needs identified have been the need to address the root causes of homelessness such as lack of affordable housing, job skills, substance abuse, mental illness and domestic violence. By dealing with these issues, the number of people returning to homeless facilities can

be reduced thereby increasing the capacity of existing facilities to accommodate additional homeless families and individuals.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

The City of Kingston will consider using its CDBG dollars for homelessness prevention activities such as rental assistance and utility arrearage payments, as well as support the existing agencies that provide such resources like RUPCO, Family of Woodstock, and Catholic Charities.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards.

The City of Kingston coordinates with New York States Department of Health's Lead Prevention Program and the Ulster County Department of Health to address the issues that rise from lead poisoning. The Ulster County Department of Health (UCDOH) was awarded the Childhood Lead Poisoning Primary Prevention Program Grant (CLPPPP) by New York State to deal with the high rates of lead poisoning in Ulster County. The City provides Lead Abatement Training and certification to contractors and/or site supervisors. The training and certification provide instruction on the various techniques of abatement, site preparation, project management, proper disposal, and record management. Additionally, Lead Worker Training is also provided to lead-based paint abatement workers. This training covers the different types of contamination, health effects, personal protection, abatement techniques, clean up, disposal and record keeping ensuring compliance with EPA guidelines. The City utilizes code enforcement to facilitate housing rehabilitation and lead remediation of their CDBG program. The City's housing rehabilitation program, when active, requires appropriate evaluation of lead hazards in the home to be rehabilitated, up to and including full abatement.

How are the actions listed above related to the extent of lead poisoning and hazards?

According to the Ulster County government, the City of Kingston has the highest annual incidence of Elevated Blood Lead Level (EBLL) in Ulster County. This can be attributed to the City's old housing stock. Most of the housing in Kingston was built before 1950, so the potential for lead exposure is high. Additionally, the City of Kingston Water Department estimates that 59% of the City's water service lines may contain lead pipes. Kingston does have high quality drinking water, but the presence of lead pipes in their water system poses a threat to residents, especially young children.

How are the actions listed above integrated into housing policies and procedures?

UCDOH provides free home lead inspections to anyone in Kingston. Appointments can be scheduled by landlords, tenants, or private homeowners. Tenants are eligible for free cleaning supplies valued up to \$75 during home inspections; if lead hazards are identified, wet cleaning will temporarily mitigate the risks until remediation is completed. UCDOH provides free training sessions tailored for building owners, homeowners, and contractors seeking certification in safe lead removal practices. Additionally, the City administers a Lead Service Line Replacement Program to replace supply-side lead water pipes in the homes of residents. Residents are placed

on a waitlist of homeowners who require their pipes to be replaced.

As of April 22, 2010, all contractors in the nation who work in homes constructed prior to 1978 must have an EPA Certification and have at least one person on each job site that has taken the EPA Certification 8-hour class on lead-based paint safety. The City will make available through the Building Code office the EPA Paint, Renovate, Repair, and Painting booklet available for interested residents.

The City's housing rehabilitation guidelines provide for the administration of the housing program in a manner consistent with the regulations. The City incorporated the EPA Paint and Renovation guidelines into its program as well. While the program is currently not active, if reinstated, Lead-Based paint will be part of it.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The Ulster County Department of Social Services offers a variety of programs to assist the residents of the City of Kingston who live below the poverty line. However, there is still a great need for more programs and services to assist this population. According to 2022 ACS data, 18.4% of the population of the City lives in poverty and an unemployment rate of 6%. New York state 14.3% of the population of New York State lives in poverty and has an unemployment rate 5.1%. Unemployment is related to Poverty. Residents who are unemployed struggle to find affordable housing, transportation, and food within the City. Additionally, even with jobs, low and moderate-income residents lack the ability to afford the necessary resources to thrive and participate in the City of Kingston. For these reasons, the City's plans for economic development contribute to their Anti-Poverty Strategy.

During stakeholder sessions, representatives from the City government and nonprofit organizations reported that the lack of affordable housing and job opportunities within the City negatively impacted low- and moderate-income residents. The migration of wealthier remote workers into the City has raised the cost of living for residents. Local businesses, such as restaurants, find it difficult to cater to the needs of residents when tourists are better able to afford their services. Additionally, stakeholders reported that there was a lack of job training programs for residents. This contributes to local businesses struggling to find qualified staff and for residents to find suitable and stable employment.

The City recognizes the best way to assist people in improving their economic positions is to provide employment opportunities and stable housing. Therefore, through its policies and planning, the City will continue to encourage business growth and the availability of workforce training and educational opportunities in the community. Specifically, the City will provide assistance to low- and moderate-income residents through the following goals:

- Improve Access to & Quality of Affordable Housing
- Homeless Prevention and Care
- Economic Development
- Improve Public Services
- Improve Public Infrastructure
- Lead Hazard and Prevention
- Planning/ Administration

Through the initiatives described above, and in cooperation with the agencies and non-profit organizations noted, the City aims to reduce poverty by assisting low- and moderate-income residents over the next five years.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

Reducing poverty enables families to move towards self-sufficiency and increases their ability to afford housing. The City's anti-poverty strategy and this Consolidated Plan both work towards a shared goal of enabling every family to afford decent housing in suitable living environments. As noted in the Needs Assessment of this Consolidated Plan, cost burden (paying more than 30% of household income for housing) is the most common housing problem for low- and moderate-income residents and is especially common among extremely low-income residents.

To the extent possible given its limited resources, the City will continue to support organizations that provide supportive services to encourage local economic development, and to preserve and improve affordable housing options as part of its strategy to prevent and alleviate poverty.

The provision of affordable housing through the creation of new units, development of Accessory Dwelling Units, and the provision of rental assistance or project-based assistance is intended to provide a decent living environment while the household is striving to achieve a generally higher standard of living. While the City's CDBG funds cannot support the entire need for additional affordable housing units, this plan will leverage other resources in the City to increase the inventory of safe, affordable housing in the City. The provision of these services will also include homeless and special needs housing programs where persons are also assisted with supportive services to enable them to transition to permanent housing and a more stable environment. Housing programs for the fixed income elderly and disabled are intended to control housing costs to maximize the impact of a limited income on the household's standard of living.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The City of Kingston's Office of Community Development is responsible for monitoring community development projects, and the use of CDBG funding. The Department's performance monitoring activities include on-site monitoring, desk review, and technical assistance for sub-recipients. Risk assessments are conducted for program funding requests to ensure that these projects comply with federal CDBG and state regulations.

The Office of Community Development also monitors all housing efforts to assure compliance with applicable rules and regulations. The Office conducts a single monitoring visit for each funded project. Additional monitoring is conducted for projects they deem "a higher risk" to the safety and wellbeing of residents. The aim of these monitoring visits is to determine areas of non-compliance and offer assistance to program recipients or sub-recipients on how to better comply with rules and regulations.

If the need arises, the City will hire an independent third-party auditing firm to monitor a program for compliance. All expenditures made by a particular program will be assessed by the Community Development Director, an office administrator, and the City Comptroller.

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$650,000.00			\$650,000.00	\$2,600,000	Funds for housing and non-housing community development needs.

Table 53 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City of Kingston receives and utilizes a variety of other funds to either directly or indirectly meet its housing and community development needs. The City will use resources provided by New York State’s Lead Based Paint Hazard and Control grants to fund Lead Abatement activities. Public Facilities and Improvements initiatives are usually supported either by allocations from the City's capital budget for municipal projects or by fundraising endeavors for events facilitated by non-profit such as Family of Woodstock,

RUPCO, and Catholic Charities. Additionally, Ulster County Community Action and Ulster County Department of Health provide staff expertise, administrative support, and funding to support programs and projects within the City.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Certain properties within the Midtown area are partially owned by the City. These properties have been or are in process of being assessed for the purposes of redevelopment. Recently, the City of Kingston received a Brownfield Opportunity Area grant from the New York Department of State which will be used to fund redevelopment of mixed-use housing and business areas in the Midtown area. Additionally, within the Midtown area, there are vacant areas between Greenkill Avenue and Pine Grove, south of Broadway, which can potentially be used to provide open spaces and recreational opportunities to residents. Areas between Cornell and Grand, north of Broadway, contain more than 50 acres of low-density industrial and transportation-commercial uses. These areas can be redeveloped to provide transportation and business development opportunities for the residents of the Midtown area.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve Access to & Quality of Affordable Housing	2024	2028	Affordable Housing	Citywide	Increase Access to and Quality of Affordable Housing	CDBG: \$20,000.00	Homeowner Housing Rehabilitated-Household Housing Unit: 2
2	Improve Public Services	2024	2028	Homelessness Non-Homeless Special Needs Transportation Environment	Citywide	Provide Homeless Housing and Services Provide Public Services	CDBG: \$97,500	Public services activities other than Low/Moderate Income Housing Benefit Persons Assisted: 3,108
3	Improve Public Facilities and Infrastructure	2024	2028	Non-Housing Community Development Transportation Environment	Citywide	Improve Public Facilities and Infrastructure	CDBG: \$402,500.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit-Persons Assisted: 6,095
4	Planning/ Administration	2024	2028	Other-Admin	Citywide	Planning/ Administration	CDBG: \$130,000.00	Other: 1

Table 54 – Goals Summary

Goal Descriptions

	Goal Name	Goal Description
1	Improve Access to & Quality of Affordable Housing	The City of Kingston will engage in the rehabilitation of existing rental or homeownership units of which some may be for special needs populations, including but not limited to, the homeless/at-risk of homelessness, elderly resident, and individuals with disabilities.
2	Improve Public Services	Ensure quality public services that support low-income individuals, including support for facilities that provide services for adults. Services include, but are not limited to, healthcare, childcare, education, civic education, youth and community services, and access to broadband, improve access to public transportation, administrative and financial support for food banks, address changes in climate, and wildlife and plant life protection. Additionally, support for the City of Kingston's emergency shelters will be provided. Activities include transitional housing, healthcare, affordable food services, tenant-rights counselling, and coordination among different service providers to assist the City's homeless population.
3	Improve Public Facilities and Infrastructure	Support public infrastructure and facility improvements, including water, sewer, streets, stormwater drainage, sidewalk and curb cut improvements for ADA accessibility, parks improvements, adding trees and other greenspace along sidewalks, and use of sustainable materials in public works projects.
4	Planning/ Administration	Funds to administer and implement the CDBG and other programs in accordance with federal regulations.

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects

#	Project Name
1	Boys and Girls Club of Ulster County - Weekend Warriors
2	Sunrays, Inc. - Midtown Summer Equine Program
3	Center for Holographic Arts (HoloCenter) – Summer Camp for Holograms & Holographic Art
4	Rebuilding Together Dutchess County - Housing Rehabilitation Program
5	Ulster Immigrant Defense Network, Inc. - Food Assistance
6	The Center for Photography at Woodstock – English as a New Language Stories
7	City of Kingston Midtown Sewers Phase 3 – Capital Infrastructure Project
8	Point God Academy Inc. – 2024 Amateur Athletic Union (AAU) Season
9	YMCA - Walk With Ease
10	Read and Write Program
11	Planning and Administration

Table 55 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The allocations were selected based on eligibility of the activity, its ability to meet a national objective and the evidence of need in the community. Further consideration was given to the past expenditures of CDBG funds by the community. The ability of the community to complete projects in a timely manner was given a high priority.

The City of Kingston allocated its entitlement funds to provide assistance with activities that meet the underserved needs of the communities participating in the program.

AP-38 Project Summary

Project Summary Information

1	Project Name	Boys and Girls Club of Ulster County - Weekend Warriors
	Target Area	Midtown Area
	Goals Supported	Improve Public Services
	Needs Addressed	Provide Public Services
	Funding	CDBG: \$14,280.00
	Description	Project involves extending hours of operation and programming opportunities for high school students.
	Target Date	06/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	75 persons will benefit from the proposed activity.
	Location Description	139 Greenkill Ave Kingston NY 12401
	Planned Activities	The Boys & Girls Club will use CDBG fund to extend its hours of operation and availability of programming. will be open on Saturdays for high school students during the school year. Workforce development programs will be offered to these students. Additionally, during the week design studio, cooking, road code, community service, outdoor activities, and other programs will be offered to participants of The Boys & Girls Club. Matrix Code 05D
2	Project Name	Sunrays, Inc. - Midtown Summer Equine Program
	Target Area	Midtown Area
	Goals Supported	Improve Public Services
	Needs Addressed	Provide Public services
	Funding	CDBG: \$12,618.00

	Description	Project involves youth enrichment services for Midtown youth.
	Target Date	06/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	180 persons will benefit from the proposed activity.
	Location Description	6 Spruce Street, Kingston, NY 12401
	Planned Activities	Sunrays Inc will offer an Equine Summer Camp 2 days a week, for nine consecutive weeks, at the Community Urban Equine Center. The program will offer youth enrichment activities for Midtown youth. Matrix Code 05D
3	Project Name	Center for Holographic Arts (HoloCenter) – Summer Camp for Holograms & Holographic Art
	Target Area	Citywide
	Goals Supported	Improve Public Services
	Needs Addressed	Provide Public services
	Funding	CDBG: \$16,050.00
	Description	Project involves providing summer art camps for students in the City of Kingston.
	Target Date	06/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	60 individuals will benefit from the activity.
	Location Description	51B Broadway, Kingston, NY 12440
	Planned Activities	Center for Holographic Arts will offer 6 summer art camp sessions to students from 5th grade upwards. Each camp session lasts 1 week. Sessions will be held in the HoloCenter gallery space. Training and tools are provided to camp participants. Matrix Code 05D
	Project Name	Rebuilding Together Dutchess County - Housing Rehabilitation Program

4	Target Area	Citywide
	Goals Supported	Improve Access to & Quality of Affordable Housing
	Needs Addressed	Increase Access to and Quality of Affordable Housing
	Funding	CDBG: \$20,000.00
	Description	Project involves the rehabilitation of two homes.
	Target Date	06/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	2 low-income older adult homeowners will benefit from the activity.
	Location Description	City-wide
	Planned Activities	Rebuilding Together Dutchess County will use CDBG funds to complete essential housing rehabilitation for two elderly homeowners with limited income residing in the City of Kingston. All households benefiting from this funding request will have an annual household income equal to or below 80% AMI. Matrix Code 14A
5	Project Name	Ulster Immigrant Defense Network, Inc. - Food Assistance
	Target Area	Citywide
	Goals Supported	Improve Public Services
	Needs Addressed	Provide Public services
	Funding	CDBG: \$15,000.00
	Description	Project involves food assistance for underserved populations in the City of Kingston.
	Target Date	06/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	2500 persons will benefit from the activity.
	Location Description	30 Pine Grove Ave. Kingston, NY 12401
	Planned Activities	Ulster Immigrant Defense Network, Inc will provide food assistance for underserved populations in the City of Kingston. Matrix Code 05W
6	Project Name	The Center for Photography at Woodstock – English as a New Language Stories
	Target Area	Citywide
	Goals Supported	Improve Public Services
	Needs Addressed	Provide Public Services
	Funding	CDBG: \$10,000.00
	Description	Project involves public art project that support immigrant youth enrolled in the English as a New Language program
	Target Date	06/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	36 persons will benefit from the activity.
	Location Description	474 Broadway Kingston NY 12401
	Planned Activities	The Center for Photography at Woodstock (CPW) will use CDBG funds to support an educational public art project with immigrant youth enrolled in the English as a New Language program at the Kingston High School. The project will foster a wider civic discussion about immigration, belonging and language. Matrix Code 05D
7	Project Name	City of Kingston Midtown Sewers Phase 3 – Capital Infrastructure Project
	Target Area	Midtown Area

	Goals Supported	Improve Public Facilities and Infrastructure
	Needs Addressed	Improve Public Facilities and Infrastructure
	Funding	CDBG: \$402,500.00
	Description	Project involves sewer rehabilitation.
	Target Date	06/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	6095 persons will benefit from the activity.
	Location Description	Prospect Street from Greenkill Ave. to Henry St. and from Liberty St. to St. James St, Kingston NY
	Planned Activities	The project aims to address deteriorating and aging sewers in the City of Kingston, which are causing operational challenges, maintenance issues, and damage to streets. These sewers pose risks to any investments made in road and sidewalk infrastructure. Phase 3 targets sewers in Midtown along Prospect Street from Greenkill Ave. to Henry St. and from Liberty St. to St. James St. The City will hire engineering consultants to design new sewer systems, oversee construction, and procure contractors for implementation. Matrix Code 03J
8	Project Name	Point God Academy Inc. – 2024 Amateur Athletic Union (AAU) Season
	Target Area	Citywide
	Goals Supported	Improve Public Services
	Needs Addressed	Provide Public Services
	Funding	CDBG: \$15,000.00
	Description	Project involves youth sports training and programming.
	Target Date	06/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	60 persons are expected to benefit from the proposed activity.
	Location Description	Citywide
	Planned Activities	Point God Academy Inc. will used CDBG funds to provide individual and group basketball training sessions, manage 4 AAU Basketball teams, and college preparation program. Matrix Code 05D
9	Project Name	YMCA - Walk With Ease
	Target Area	Citywide
	Goals Supported	Improve Public Services
	Needs Addressed	Provide Public Services
	Funding	CDBG: \$2,552.00
	Description	Project involves wellness and fitness classes for elderly residents.
	Target Date	06/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	50 persons will benefit from the activity.
	Location Description	507 Broadway, Kingston, NY 12401
Planned Activities	YMCA of Kingston will used CDBG funds to provide programs that teach residents age 62 and over about successful arthritis self-management, physical activity for people with arthritis, and how to walk safely and comfortably. Matrix Code 05A	
10	Project Name	Read and Write Program
	Target Area	Citywide

	Goals Supported	Improve Public Services
	Needs Addressed	Provide Public services
	Funding	CDBG: \$12,000.00
	Description	Project involves providing literacy skills to children of LMI families living in the City of Kingston.
	Target Date	06/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	147 persons will benefit from the activity.
	Location Description	285 East Strand Kingston NY 12401
	Planned Activities	The Read and Write Program will provide literacy skills instruction, educational resources, and support services to children of LMI families living in the City of Kingston. Matrix Code 05D
11	Project Name	Planning and Administration
	Target Area	Citywide
	Goals Supported	Planning/ Administration
	Needs Addressed	Planning/ Administration
	Funding	CDBG: \$130,000.00
	Description	The administration of CDBG funds in accordance with all federal regulations.
	Target Date	06/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Citywide
	Planned Activities	The administration of CDBG funds in accordance with all federal regulations. Matrix Code 21A

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

Geographic Distribution

Target Area	Percentage of Funds
Midtown Area	66%
Downtown/Riverfront Area	0
Citywide	34%

Table 56 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

CDBG funds are intended to provide low and moderate-income households with viable communities, including decent housing, a suitable living environment, and expanded economic opportunities. Eligible activities to be funded with CDBG funds include public improvements, housing rehabilitation and preservation, affordable housing development activities, public services, economic development, planning, and administration.

The system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG program.
- Meeting the needs of very-low, low-, and moderate-income residents.
- Focusing on low- and moderate-income persons, areas, or neighborhoods.
- Coordinating and leveraging of resources.
- Responding to expressed needs.
- Achieving sustainability and/or long-term impact.
- Having the ability to measure or demonstrate progress and success.

Most of the proposed projects are located in areas of the City with concentrations of low- and extremely low-income households. In past planning documents and during current stakeholder sessions, the Midtown and Downtown/Waterfront areas were identified by the City as areas in need of services.

Discussion

The State of New York, through Climate Leadership and Community Protection Act, has identified Disadvantaged Communities (DAC) within the City of Kingston. DACs are census tracts that have been determined to have relatively higher health vulnerabilities, have been disproportionately

impacted by Climate Change, and contain households with annual income at or below 60% of State Median Income. The following census tracts within in the City are DACs:

- 36111951700
- 36111951800
- 36111952000
- 36111952100
- 36111952400

Stakeholders reported that DACs identified by the State of New York do not correspond exactly to low-income areas within the City of Kingston. Due to issues with the 2020 Census, certain low-income block groups within the Midtown area were merged with higher income block groups. As a result, certain areas which would be considered as economically disadvantaged have not been properly identified. The City continues to work with State officials to obtain resources and funding to aid low-income residents within the City's Midtown area.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	2
Special-Needs	0
Total	2

Table 57 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	2
Acquisition of Existing Units	0
Total	2

Table 58 - One Year Goals for Affordable Housing by Support Type

AP-60 Public Housing – 91.220(h)

Introduction

Actions planned during the next year to address the needs to public housing

KHA plans to engage in multiple phases of renovations to its properties. The Leonard & Vera Van Dyke Apartments are in the process of being converted into LIHTC properties. KHA plans to begin renovations of 107 units at Rondout Gardens, 98 units at Colonial Gardens, and 60 units at Wiltwyck Gardens. KHA has requested 103 Project Based Vouchers from the State of New York to provide additional assistance to tenants who are searching for housing in the City of Kingston.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

KHA is governed by a Finance Committee which reports to a board of commissioners. The board consists of seven members, five of which are appointed by the Mayor of Kingston, and the other two are required to be current tenants. KHA conducts regular tenant meetings to ask for feedback on services provided and to inform tenants about changes in administration and maintenance issues.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

No, the PHA is not troubled.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Kingston is part of the Ulster County Continuum of Care (UCCoC) system which addresses the needs of the City's homeless and "at risk" populations. Although a variety of housing resources and programs are offered to meet the needs of various homeless sub-populations, continued integration of resources and programming and the development of additional housing accommodations are needed.

The UCCoC has identified several areas of need regarding homelessness. Shelters and other organizations that provide services to various homeless populations require more resources to provide for homeless families. Examples of services needed for this population include better childcare and access to affordable food sources. Additionally, there is a need to develop more workforce development programs for individuals who have experienced homelessness. Transportation is also an area of need because individuals experiencing homelessness living within the city often must choose between work and housing as job opportunities exist away from affordable housing and supportive services.

Each year, the UCCoC conducts a Point-in-Time count of the persons residing in emergency shelters, transitional housing facilities and places not meant for human habitation. This information is used to understand the emergency needs of homeless persons so that they can be addressed adequately and efficiently. The City will use the information generated by the PIT and other studies conducted by the UCCoC to inform its budget and planning process.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Kingston partners with nonprofit and regional bodies to address the emergency and transitional housing needs of individuals experiencing homelessness. Recently the city has received a \$15 million Homeless Housing Assistance Program (HHAP) grant from the New York State Office of Temporary and Disability Assistance (OTDA). HHAP grant funding is provided to projects that offer emergency, transitional, or permanent supportive housing for homeless households in New York State. This funding will be used to help develop affordable housing opportunities in the City. The UCCoC leads the effort in implementing the Coordinated Entry System (CE) to provide a single point of access to determine the housing and social service needs of homeless persons. Further, the City will utilize its CDBG dollars to support emergency shelter,

rapid rehousing and homeless prevention activities to meet the needs of the homeless in the City.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The City's homeless services providers continue to move toward rapid rehousing and developing more affordable housing opportunities as an effective means of shortening a household's time experiencing homelessness and/or in an emergency shelter. A critical component is the wraparound services households need to be stable in housing.

Increasing the inventory of permanent housing with supportive services is a priority for the City. Most people experiencing chronically homeless have severe mental illness and/or substance abuse issues. They require long-term, affordable housing options with supportive services to make the transition to residential stability. In addition to permanent affordable housing, the City's strategy for ending chronic homelessness addresses each of the issues that most often cause this problem:

- The high prevalence of substance abuse and mental illness among chronically homeless individuals
- Inadequate education and/or job skills among many homeless persons
- The shortage of affordable rental housing in the City of Kingston

The City will continue to use CDBG funds for support services for the homeless through various programs. These services will range from direct counseling at homeless facilities to employment and educational counseling. The Ulster County Department of Social Services will provide a variety of support services to homeless families and individuals who receive housing assistance. Non-profit organizations such as the Family of Woodstock, RUPCO, and Catholic Charities serving the homeless individuals and families in the City.

The primary needs identified have been the need to address the root causes of homelessness such as lack of employment skills, substance abuse, mental illness and domestic violence. By dealing with these issues, the number of people returning to homeless facilities can be reduced thereby increasing the capacity of existing facilities to accommodate additional homeless families and individuals.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City of Kingston will consider using its CDBG dollars for homelessness prevention activities such as rental assistance and utility arrearage payments, as well as support the existing agencies that provide such resources like RUPCO, Family of Woodstock, and Catholic Charities. Further, the creation of new affordable units, Accessory Dwelling Units, and supportive housing will aid in preventing instances of homelessness for those exiting institutions or the criminal justice system by providing available units upon discharge.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City of Kingston has completed the 2024-2028 Analysis of Impediments to Fair Housing Choice (AI), which documents the various impediments to fair housing choice. The preparation of this Analysis of Impediments to Fair Housing Choice (AI) serves as a component of the City of Kingston’s efforts to satisfy the requirements of the Housing and Community Development Act of 1974, as amended, which requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. While fair housing and affordable housing are different from each other, there is an inextricable link between the two as the majority of affordable housing is located in neighborhoods with lower access to opportunities such as education, public transportation, job centers, etc.

According to the City of Kingston’s 2024-2028 Analysis of Impediments (AI), the following impediments were identified:

1. A general lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes.
2. Overall low incomes and high poverty rates across various racial/ethnic groups and household types in the City, thus limiting their housing choice.
3. The age and size of housing units in the City. Over half of the units in the City were built prior to 1939 and are deteriorating and unsafe. Due to age many of the units cannot accommodate larger families, thus limiting their fair housing choice.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The following table lists of actions the City of Kingston will take to remove or ameliorate barriers to affordable housing:

Actions	Entities Responsible	Benchmark	Time to Complete
Impediment A: A general lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes			
Facilitate the development of new affordable and preservation of existing affordable housing for members of the protected	Kingston Office of Community Development Kingston Department of Housing Initiatives	Number of affordable units built by income level; number of affordable units preserved through rehabilitation and	2024-2028

Actions	Entities Responsible	Benchmark	Time to Complete
<p>classes (race, color, religion, sex, disability, familial status, national origin, creed, sexual orientation, military status, age, marital status)</p> <p>Conduct paired testing in order to reveal possible housing discrimination based on race, disability, familial status, lawful source of income, and other grounds.</p> <p>Preparation of an Anti-Displacement Plan to protect long-term residents from displacement due to rising rents and home prices</p>	<p>Affordable housing developers and builders including those building new units under the inclusionary zoning ordinance, local and regional supportive service agencies, Kingston Housing Authority</p>	<p>weatherization; number of households assisted by race, ethnicity, disability status, familial status; number of households provided supportive services to maintain housing by race, ethnicity, disability status, familial status</p> <p>Work towards reaching the City-wide goal of approving 1,000 new housing units by 2029</p>	
<p>Impediment B: Overall low incomes and high poverty rates across various racial/ethnic groups and household types, thus limiting their housing choice</p>			
<p>Provide targeted financial education to members of the protected classes including the Hispanic and female-headed households subpopulations who both experience high levels of poverty</p> <p>Provide resources to single parent with children households (Single mother homes make up 83.1% of all people living in poverty in the City)</p> <p>Provide job training opportunities to help lower income residents increase their skills and employment opportunities</p> <p>Draft a language access plan to assist racial/ethnic minorities</p>	<p>Office of Community Development Nonprofit organizations that provide job training and related services to lower income residents, Local and regional HUD-certified housing counselors</p>	<p>Number of people participated in financial education programs; number of homebuyers assisted by race, ethnicity, income, disability</p> <p>Number of persons who participated in job training programs</p> <p>Language Access Plan for LEP populations approved by Common Council</p>	<p>2024-2028</p>
<p>Impediment C: The age and size of housing units in the City. Over half of the units in the City were built prior to 1939 and are deteriorating and unsafe. Due to age many of the units cannot accommodate larger families or individuals with disabilities, thus limiting their fair housing choice.</p>			
<p>Use new form-based code to support higher density housing, infill housing, multifamily housing.</p>	<p>Office of Community Development Department of Housing Initiatives Zoning Advisory Board</p>	<p>Number of large (3+ bedroom) housing types approved and developed</p>	<p>2024-2028</p>

Actions	Entities Responsible	Benchmark	Time to Complete
<p>Fund housing rehabilitation programs to bring available units up to safe standards.</p> <p>Invest in the development of 3+ bedroom housing types in the City.</p>	<p>Affordable housing developers and builders including those building new units under the inclusionary zoning ordinance, local and regional supportive service agencies, Kingston Housing Authority</p>	<p>Number of high density, multi-family, and infill housing units developed</p> <p>Number of housing units rehabilitated and preserved.</p>	

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

A major impediment to the City of Kingston's ability to meet underserved needs is the limited amount of funding to address identified priorities. The City will continue to seek public and private resources to leverage its entitlement funds in assisting with implementation of policies and programs.

Actions planned to foster and maintain affordable housing

The City of Kingston will continue to support its goals of maintaining and expanding affordable housing opportunities for residents. The City will allocate CDBG funds to support homebuyer programs and rental assistance provided by non-profit organizations.

Actions planned to reduce lead-based paint hazards

There is a continued need to provide education and outreach to prevent incidence of lead-poisoning. In cases where lead-poisoning has occurred there is a need to test for and abate lead hazards to create lead safe housing units. Additionally, due to the City of Kingston's old housing stock, rehabilitation efforts funded by the City will include removing lead-based paint from these homes.

Actions planned to reduce the number of poverty-level families

The City of Kingston will continue to administer CDBG fund to projects which address areas which have been determined to be a geographic priority, such as the Midtown Area and the Downtown/Waterfront Area. These areas have high concentrations of poverty and require further investment. For this reason, the City will continue to provide funds and services to the Midtown and Downtown/Riverfront areas.

Actions planned to develop institutional structure

The City of Kingston relies on a network of public sector, private sector, and non-profit organizations to deliver needed housing and community development services to City residents, particularly the homeless and special needs populations. The Office of Community Development (OCD) administers CDBG funds to this network and provides guidance on the appropriate uses of CDBG funds. The City will continue to strengthen its working relationships with local and regional social service agencies. Public and non-profit agencies that are critical to the institutional structure must work cooperatively, and OCD staff have the ability and expertise to deliver

services efficiently and effectively, often with years of expertise in their respective fields.

Actions planned to enhance coordination between public and private housing and social service agencies

The Office of Community Development (OCD) will continue to work with the Kingston Housing Authority and private housing developers to provide housing opportunities for low- and moderate-income residents in the City. Additionally, the City will work with UCCoC to identify homeless populations and subpopulations that are in need of housing and social services. The OCD will administer CDBG funds to address the shortage of affordable housing and the need for more comprehensive and adaptable social service programs within the City.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
Total Program Income	0

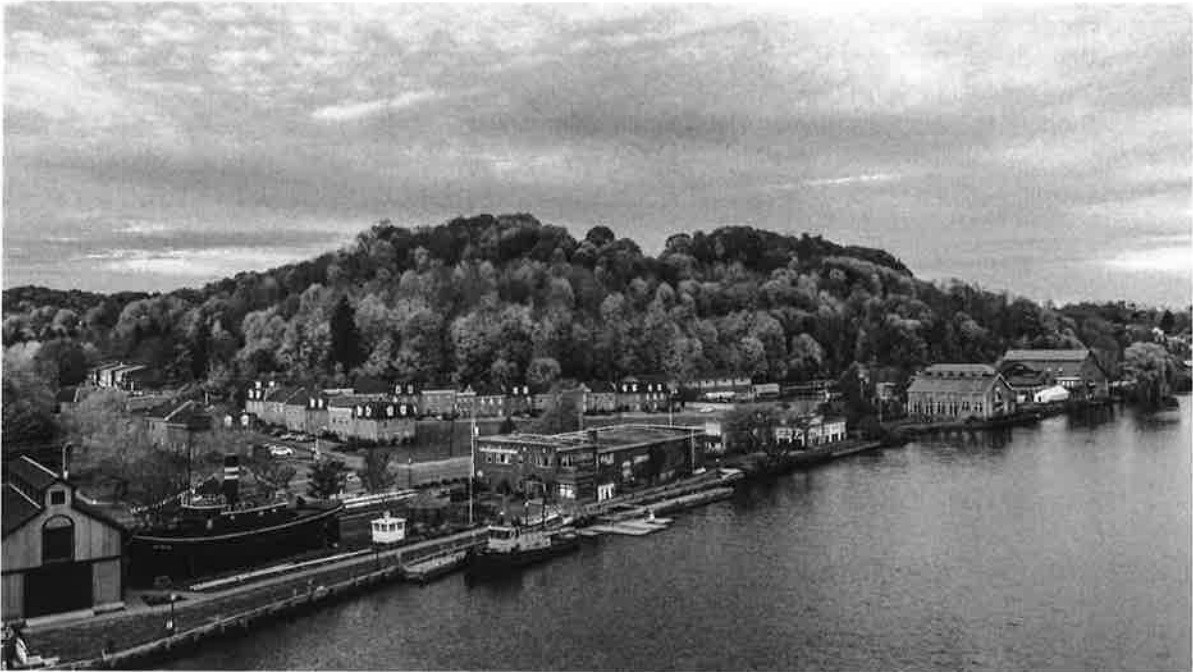
Other CDBG Requirements

1. The amount of urgent need activities	0
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Appendix - Alternate/Local Data Sources

Sort order	Type	Data Source Name	List the name of the organization or individual who originated the data set.	Provide a brief summary of the data set.	What was the purpose for developing this data set?	Provide the year (and optionally month, or month and day) for when the data was collected.	Briefly describe the methodology for the data collection.	Describe the total population from which the sample was taken.	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?	What time period (provide the year, and optionally month and day) is covered by this data set?	What is the status of the data set (complete, in progress, or planned)?
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CITY OF KINGSTON
2024-2028 Analysis of
Impediments to Fair
Housing Choice



Draft for Public Display

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EXECUTIVE SUMMARY

INTRODUCTION

The preparation of this Analysis of Impediments to Fair Housing Choice (AI) serves as a component of the City of Kingston's efforts to satisfy the requirements of the Housing and Community Development Act of 1974, as amended, which requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. The AI is a review of local regulations and administrative policies, procedures and practices affecting the location, availability and accessibility of housing, as well as an assessment of conditions, both public and private, that affect fair housing choice.

The stakeholder consultation and citizen participation processes for the AI were coordinated with the 2024-2028 Consolidated Planning activities. The AI describes a City where continued minority population growth has fueled an expansion in diversity and desegregation. Census data indicated that some racial and ethnic minorities and female-headed households with children were more likely to experience poverty and unemployment. Results of the dissimilarity index found that the City has very low levels of segregation. The City's new form-based code offers a creative approach to the removal of barriers for housing development including the inclusionary zoning ordinance and density increases for single family homes with attached units. Both of which will work towards the City's goal approving 1,000 new housing units by 2029.

The AI's review of public policy covered the aspects of local government most closely tied to housing, including Kingston's comprehensive planning, zoning, public housing, and transit. While room for improvement was found in a few areas, the vast majority of City policy and program administration was found to be consistent with fair housing goals. A review of mortgage application data suggested that minorities are more likely to experience loan denials than White applicants.

IMPEDIMENTS IDENTIFIED

Based on the qualitative and quantitative analyses conducted for the AI, three impediments to fair housing choice were identified. These include:

1. A general lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes
2. Overall low incomes and high poverty rates across various racial/ethnic groups and household types in the City, thus limiting their housing choice.
3. The age and size of housing units in the City. Over half of the units in the City were built prior to 1939 and are deteriorating and unsafe. Due to age many of the units cannot accommodate larger families, thus limiting their fair housing choice.

FAIR HOUSING ACTION PLAN

This section outlines actions to be taken, benchmarks, and a timeline associated with each action.

Actions	Entities Responsible	Benchmark	Time to Complete
Impediment A: A general lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes			
Facilitate the development of new affordable and	Kingston Office of Community Development	Number of affordable units built by income level;	2024-2028

Actions	Entities Responsible	Benchmark	Time to Complete
<p>preservation of existing affordable housing for members of the protected classes (race, color, religion, sex, disability, familial status, national origin, creed, sexual orientation, military status, age, marital status)</p> <p>Conduct paired testing in order to reveal possible housing discrimination based on race, disability, familial status, lawful source of income, and other grounds.</p> <p>Preparation of an Anti-Displacement Plan to protect long-term residents from displacement due to rising rents and home prices</p>	<p>Kingston Department of Housing Initiatives Affordable housing developers and builders including those building new units under the inclusionary zoning ordinance, local and regional supportive service agencies, Kingston Housing Authority</p>	<p>number of affordable units preserved through rehabilitation and weatherization; number of households assisted by race, ethnicity, disability status, familial status; number of households provided supportive services to maintain housing by race, ethnicity, disability status, familial status</p> <p>Work towards reaching the City-wide goal of approving 1,000 new housing units by 2029</p>	
<p>Impediment B: Overall low incomes and high poverty rates across various racial/ethnic groups and household types, thus limiting their housing choice</p>			
<p>Provide targeted financial education to members of the protected classes including the Hispanic and female-headed households subpopulations who both experience high levels of poverty</p> <p>Provide resources to single parent with children households (Single mother homes make up 83.1% of all people living in poverty in the City)</p> <p>Provide job training opportunities to help lower income residents increase their skills and employment opportunities</p> <p>Draft a language access plan to assist racial/ethnic minorities</p>	<p>Office of Community Development Nonprofit organizations that provide job training and related services to lower income residents, Local and regional HUD-certified housing counselors</p>	<p>Number of people participated in financial education programs; number of homebuyers assisted by race, ethnicity, income, disability</p> <p>Number of persons who participated in job training programs</p> <p>Language Access Plan for LEP populations approved by Common Council</p>	<p>2024-2028</p>
<p>Impediment C: The age and size of housing units in the City. Over half of the units in the City were built prior to 1939 and are deteriorating and unsafe. Due to age many of the units cannot accommodate larger families or individuals with disabilities, thus limiting their fair housing choice.</p>			

Actions	Entities Responsible	Benchmark	Time to Complete
<p>Use new form-based code to support higher density housing, infill housing, multifamily housing.</p> <p>Fund housing rehabilitation programs to bring available units up to safe standards.</p> <p>Invest in the development of 3+ bedroom housing types in the City.</p>	<p>Office of Community Development Department of Housing Initiatives Zoning Advisory Board Affordable housing developers and builders including those building new units under the inclusionary zoning ordinance, local and regional supportive service agencies, Kingston Housing Authority</p>	<p>Number of large (3+ bedroom) housing types approved and developed</p> <p>Number of high density, multi-family, and infill housing units developed</p> <p>Number of housing units rehabilitated and preserved.</p>	<p>2024-2028</p>

INTRODUCTION

INTRODUCTION TO THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The City of Kingston has prepared an Analysis of Impediments to Fair Housing Choice (AI) to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This Act requires that any community receiving Community Development Block Grant (CDBG) and other HUD funds affirmatively further fair housing (AFFH). As a result, the City is charged with the responsibility of conducting its CDBG program in a non-discriminatory way.

FAIR HOUSING CHOICE

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials and private citizens must embrace if equality of opportunity is to become a reality.

The federal Fair Housing Act prohibits discrimination in housing based on a person's race, color, religion, sex (including gender identity and sexual orientation), disability, familial status, national origin. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

The AI serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The elected governmental body is expected to use it for direction, leadership and resources for future fair housing planning.

METHODOLOGY

The firm of Mullin & Lonergan Associates, Inc. (M&L) was retained as consultants to conduct the AI. In all cases, the latest available data at the time the report was written was used to describe the most appropriate geographic unit of analysis. In most cases, 2018-2022 American Community Survey data was used as well as 2020 Decennial Census data and supplemented with 2020 Comprehensive Housing Affordability Strategy (CHAS) data.

DEVELOPMENT OF THE AI

LEAD AGENCY

The Kingston Office of Community Development was the lead agency for the preparation of the AI. The Office identified and invited numerous stakeholders to participate in the process for the purpose of developing a thorough analysis with a practical set of recommendations to eliminate impediments to fair housing choice, where identified.

AGENCY CONSULTATION

Kingston engaged key community stakeholders from City agencies, nonprofit organizations and other interested entities in an effort to develop a community planning process for the AI. On February 6th, 2024, a series of interviews was conducted to identify current fair housing issues impacting the various agencies and organizations

and their clients. Comments received through these meetings are incorporated throughout the AI, where appropriate. A list of the stakeholders identified to participate in the AI process is included in Appendix A.

PUBLIC MEETINGS

A public meeting was conducted during the development of the AI, in conjunction with the Consolidated Planning process. The meeting was held on February 6th, 2024, at 6:00 pm in Kingston City Hall. The meeting was recorded and broadcasted live on Youtube.

THE RELATIONSHIP BETWEEN FAIR HOUSING AND AFFORDABLE HOUSING

As stated in the Introduction, fair housing choice is defined as the ability of persons, regardless of race, color, religion, sex, disability, familial status, national origin, gender identity and other personal traits protected by law to access housing free from discrimination. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

The AI analyzes a range of fair housing issues regardless of a person's income. To the extent that members of the protected classes tend to have lower incomes, then access to fair housing is related to affordable housing. A primary impediment to fair housing is a relative absence of affordable housing. Often, however, public policies create, or contribute to, the lack of affordable housing in communities, thereby disproportionately affecting housing choice for members of the protected classes.

This document goes beyond an analysis of the adequacy of affordable housing in the City of Kingston. This AI defines the relative presence of members of the protected classes within the context of factors that influence the ability of the protected classes to achieve equal access to housing and related services.

DEMOGRAPHIC INFORMATION

DEMOGRAPHIC PROFILE

POPULATION TRENDS

Kingston, situated alongside the Hudson River, represents an urban area that has started to show an overall population decline in the past decade. The City's population decreased 4.25% between 2010 and 2020. As represented in the table below, many other cities in Ulster County in similar size to Kingston have experienced population loss over the past decade as well, except for New Paltz which shows a minor population increase. Kingston is the only City in, and the county seat of, Ulster County, New York., which demonstrates a population decline as well.

FIGURE 3-1 POPULATION TRENDS, 2010-2020

	2010	2015	2020	% Change 2010-2020
Kingston	23,975	23,625	22,954	-4.25%
Saugerties	19,471	19,319	19,058	-2.12%
Shawangunk	14,029	14,190	13,909	-.85%
New Paltz	13,909	14,193	14,117	1.49%
Ulster County	182,782	181,300	178,371	-2.41%
New York	19,229,752	19,673,174	19,514,849	1.48%

Source: American Community Survey 2010, 2015, 2020 (B01003)

FIGURE 3-2 POPULATION TRENDS BY RACE AND ETHNICITY, 2010-2020

	Total Population	White	Racial Minority Population				Total	Hispanic
			Black	Asian	Some Other Race*	All Other Races**		
2010								
Kingston	23,975	18,220	3,325	381	949	1,100	5,755	2,849
Ulster County	182,782	160,766	10,721	3,105	3,216	4,974	22,016	15,065
2015								
Kingston	23,625	16,719	3,936	630	399	1,941	6,906	3,750
Ulster County	181,300	157,076	10,631	3,408	3,085	7,101	24,225	17,292
2020								
Kingston	22,954	15,123	4,077	440	713	2,601	7,831	3,201
Ulster County	178,371	146,063	10,859	3,292	5,717	12,440	32,308	18,800

* "Some other race" refers to persons who report that they belong in none of the racial groups provided on the census form.

** All other races refers to Pacific Islanders, American Indian/Alaska Natives and persons of two or more races.

Source: 2010, 2015, and 2020 American Community Survey (P1, P3, P4), U.S. Census Bureau

The City is experiencing an overall population decline, especially through the White population. In 2010, White residents accounted for 75.9% of the total population. In 2020, that number decreased to 65.8%. In 2010, Black residents accounted for 57.7% of the City's racial minority, but in 2020 that number dropped to 52%. The Asian/Pacific Islander residents dropped from 6.6% in 2010 to 5.6% in 2020. Further, there was a large increase in the "all other races" category of the minority population, this group grew by more than 50%.

Additionally, number of Hispanic residents in the City grew from 2,849 in 2010, representing 11.8% of the total population, to 3,201 in 2020, representing 13.9% of the total population.

The City's overall minority population is growing, however since there was a big jump in the number of residents in the "some other race" category, it is lessening the percentage of the Black and Asian residents to the whole racial minority population, even though their populations have increased since 2010. Comparison between growth among minority groups in the City of Kingston and in Ulster County demonstrates fairly similar trends, with a few differences, as shown in the following figures. One of the differences between the City and Ulster County is that in Ulster County the "some other race" population grew between 2010 and 2020, and that population at the same time decreased in the City.

FIGURE 3-3 GROWTH ACROSS RACIAL AND ETHNIC GROUPS IN THE CITY OF KINGSTON, 2010-2020

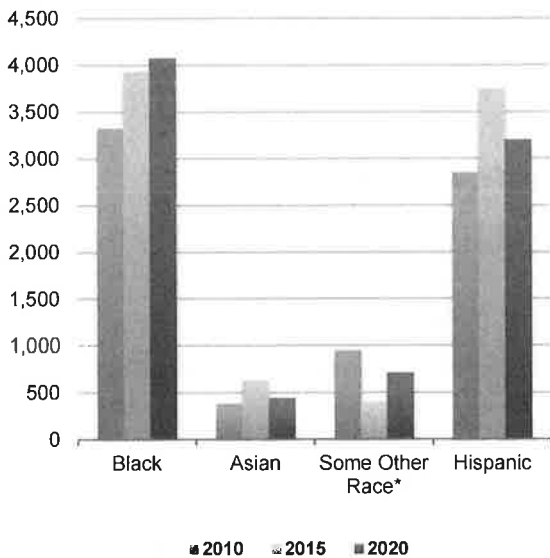
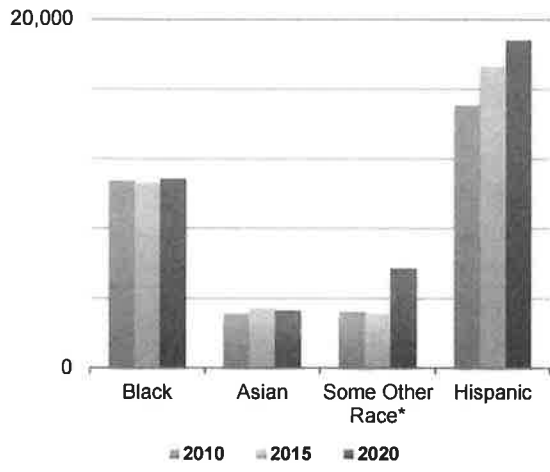


FIGURE 3-4 GROWTH ACROSS RACIAL AND ETHNIC GROUPS IN ULSTER COUNTY, 2010-2020



AREAS OF RACIAL AND ETHNIC MINORITY CONCENTRATION

Kingston’s 2024-2028 Consolidated Plan defines areas of racial or minority concentration as those where the percentage of minority residents is ten percentage points or more than the Citywide rate.

In 2020, Black residents comprise 12.3% of the total population in Kingston. An area of concentration of Black residents would include any Census Tract where the percentage of Black residents is 22.37% or higher. Of the 8 Census Tracts within the City, none meet this criterion. Additionally, there are no areas of concentration for Asian residents, American Indian/Alaskan Native residents, Native Hawaiian/Other Pacific Islander residents, or “Some other race” residents. In fact, Hispanic residents are the only racial/ethnic group that have areas of concentration. An area of concentration for the City’s Hispanic population would be where the percentage of Hispanic residents is 21.4% or higher. Two areas in the City meet that criteria, census tracts 9520 and 9521.

FIGURE 3-5 AREAS OF RACIAL AND/OR ETHNIC CONCENTRATION, 2020

	Total Population	White	Minority Residents					
			Black	Asian	Some Other Race	American Indian/Alaskan Native	Native Hawaiian / Other Pacific Islander	Hispanic
Citywide	24,069	60.8%	12.3%	2.6%	0.6%	0.1%	0.0%	11.4%
9524	2,690	72.3%	7.1%	3.3%	0.5%	0.1%	0.0%	11.4%
9523	1,717	65.2%	10.7%	4.8%	0.3%	0.0%	0.0%	13.9%
9522	3,761	78.3%	6.4%	2.8%	0.7%	0.2%	0.1%	7.3%
9521	3,687	47.8%	18.4%	1.3%	0.4%	0.2%	0.0%	25.8%
9520	2,815	41.0%	13.5%	5.2%	1.0%	0.0%	0.0%	34.2%
9519	2,848	59.3%	12.2%	2.3%	0.7%	0.1%	0.0%	17.6%
9518	1,839	61.2%	15.5%	1.7%	0.7%	0.3%	0.0%	12.3%
9517	4,712	61.2%	13.8%	1.3%	0.8%	0.1%	0.0%	13.7%

Note: Shaded rows indicate areas of minority concentration.

Source: 2020 Census

CONCENTRATIONS OF LMI PERSONS

The CDBG program includes a statutory requirement that at least 70% of funds invested benefit low and moderate income (LMI) persons. HUD provides the percentage of LMI persons in each census block group for entitlements such as Kingston. HUD 2020 LMI estimates reveal that there are a total of 14 census block groups in Kingston where at least 51% of residents meet the definition for LMI status, as listed in the following table.

FIGURE 3-6 LOW/MODERATE INCOME CENSUS BLOCK GROUPS

Census Tract	Block Group	Low/Moderate Income Persons		
		#	Universe	%
9517	1	250	650	38.5%
	2	1,140	1,465	77.8%
	3	330	625	52.8%
9518	4	1,140	1,755	65.0%
	1	1,155	1,735	66.6%
9519	1	385	750	51.3%
	2	395	920	42.9%
	3	310	400	77.5%
	4	140	520	26.9%
9520	1	570	1,195	47.7%
	2	885	1,165	76.0%
9521	1	395	750	52.7%
	2	880	1,250	70.4%
	3	690	1,065	64.8%
	4	475	670	70.9%
9522	1	550	875	62.9%
	2	240	620	38.7%
	3	370	1,065	34.7%
9523	4	390	975	40.0%
	1	365	640	57.0%
	2	505	1,085	46.5%
9524	1	995	1,355	73.4%
	2	275	1,405	19.6%

Source: U.S. Department of Housing & Urban Development, 2020 LMI estimates

Areas in Kingston where LMI block groups and areas of minority concentrations coincide are identified for the purposes of this report as areas of concentration of minority and LMI residents. The maps on the following pages illustrate the locations of both areas of concentration on Hispanic residents and areas where the percentage of LMI persons is 51% or higher. The areas of ethnic concentration of Hispanic residents coincide with census block groups that are at least 51% LMI areas. This demonstrates that Hispanic residents in the City are more likely than any other racial/ethnic group in the City to be experiencing low-to-moderate incomes. Additionally, this data shows how Hispanic residents could be facing issues regarding fair housing choice. The fact that there are two census tracts of Hispanic ethnic concentration that align with LMI block groups suggests that this ethnic group is most likely unable to afford housing in any other areas of the City and is being limited to housing only in the LMI neighborhoods.

FIGURE 3-7 LOW-MODERATE INCOME CENSUS TRACTS, 2020

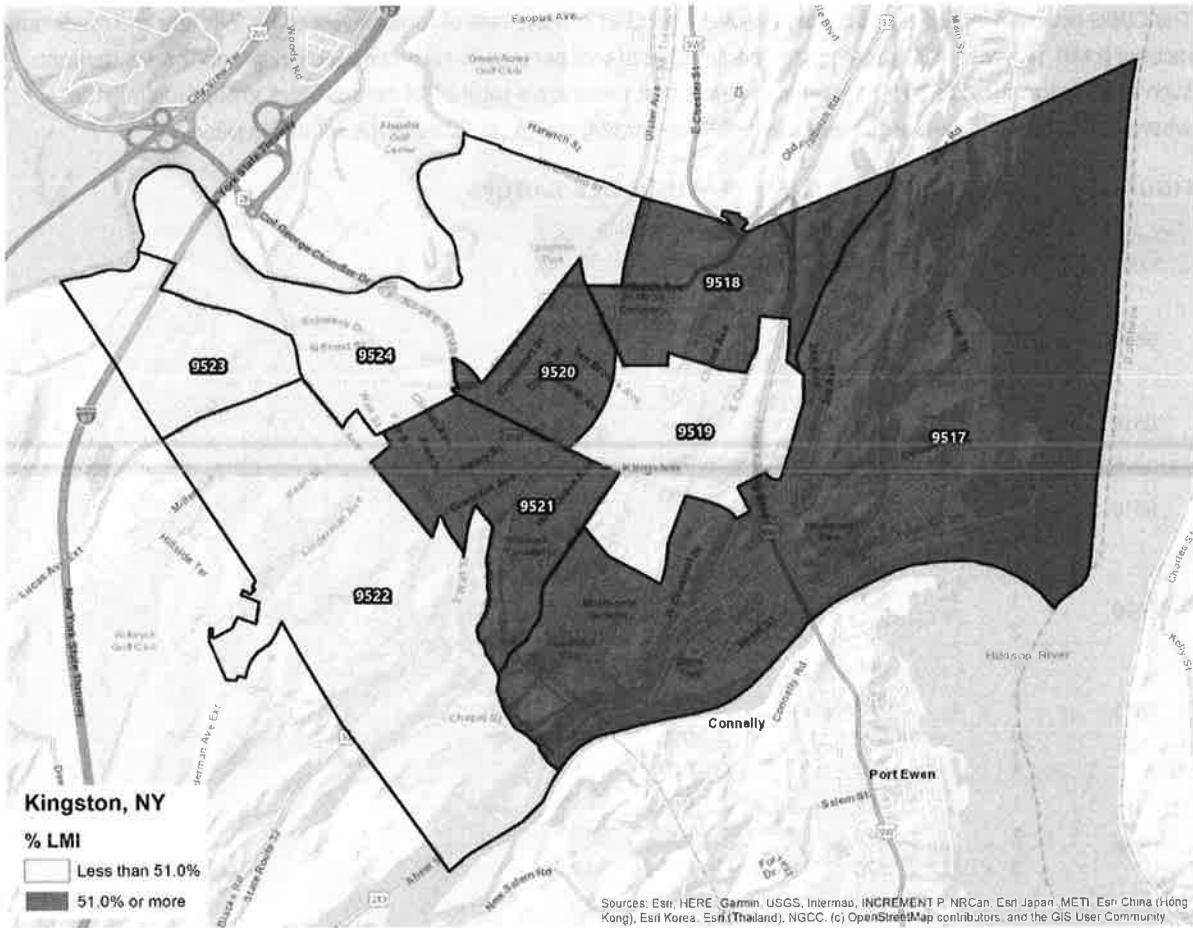
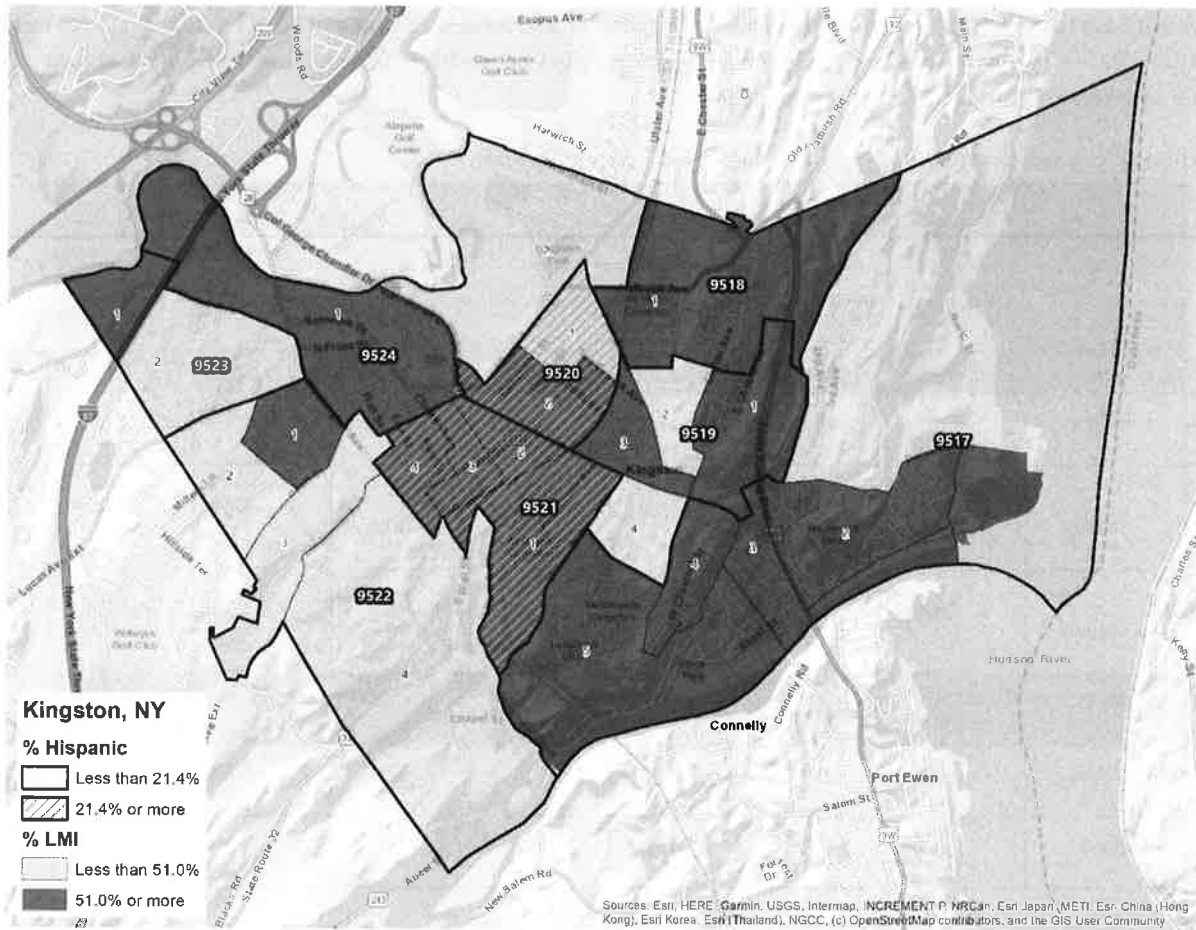


FIGURE 3-8 AREAS OF CONCENTRATION OF HISPANIC LMI RESIDENTS, 2020



RESIDENTIAL SEGREGATION PATTERNS

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and low-income minority inner-city neighborhoods. Latent factors, such as attitudes, or overt factors, such as real estate practices, can limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a

score of 0 corresponds to perfect integration and a score of 100 represents total segregation.¹ The index is typically interpreted as the percentage of the minority population (in this instance, the Black population) that would have to move in order for a community or neighborhood to achieve full integration. Values ranging between 40 and 50 are considered moderate levels of segregation; values below 30 are fairly low and values above 60 are considered to be fairly high levels of segregation.

FIGURE 3-9 KINGSTON DISSIMILARITY INDICES, 2010 AND 2020

	2010 DI with White Population	2010 Population	2010 % of Total Population	2020 DI with White Population	2020 Population	2020% of Total Population	Change in DI, 2010-2020
Ulster County							
White	-	160,766	87.9%	-	146,063	81.8%	-
Black	49.6	10,721	5.8%	42.0	10,859	6.0%	-7.6
Hispanic	38.5	15,015	8.2%	29.0	18,827	10.5%	-9.5
Kingston							
White	-	18,220	75.9%	-	15,123	65.8%	-
Black	33.0	3,325	13.8%	21.3	4,077	17.7%	-11.7
Hispanic	39.7	2,849	11.8%	26.8	3,201	13.9%	-12.0

Source: American Community Survey, 2010; American Community Survey, 2020, Calculations by M&L Associates.

Based on the data from the above chart, several conclusions can be made. In 2010, Black and Hispanic residents had low to moderate levels of segregation in the City of Kingston. However, by 2020 those levels of segregation decreased greatly and now there are very low levels of segregation in the City for the Black and Hispanic population. It can be concluded that with 2020 dissimilarity index scores of 21.3 (Black) and 26.8 (Hispanic) that the City of Kingston is well-integrated.

² The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to $1/2 \sum ABS [(b/B)-(a/A)]$, where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the City. ABS refers to the absolute value of the calculation that follows.

³ According to Douglas S. Massey, an index under 30 is low, between 30 and 60 is moderate, and above 60 is high. See Massey, "Origins of Economic Disparities: The Historical Role of Housing Segregation," in *Segregation: The Rising Costs for America*, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 41-42.

RACE/ETHNICITY AND INCOME

Household income is one of several factors used to determine a household’s eligibility for a home mortgage loan or apartment lease. Median household income (MHI) in Kingston was \$54,311 in 2020. In Ulster County the median household income was \$65,306 in 2020.

Across racial and ethnic groups in Kingston, Asians had the highest MHI at \$118,250. The MHI for Black households was \$57,773. Among White households, the MHI was \$54,419. Hispanic households had a MHI of \$38,409 in the City of Kingston.

While median household income is fairly similar between the White households and Black households, they have significantly different poverty rates. Black households experience poverty at nearly 10% greater than White households. The racial/ethnic group with the highest poverty rate in the City is Hispanics, a little over one-third (35.5%) of the Hispanic population in the City is experiencing poverty.

FIGURE 3-10 MEDIAN HOUSEHOLD INCOME AND POVERTY RATE BY RACE/ETHNICITY, 2020

	Median Household Income	Poverty Rate
Kingston	\$54,311	18.8%
Whites	\$54,419	15.0%
Blacks	\$57,773	24.6%
Asians	\$118,250	13.5%
Some Other Race	\$51,797	28.1%
Hispanics	\$38,409	35.5%
Ulster County	\$65,306	13.6%
Whites	\$67,452	11.7%
Blacks	\$43,180	26.6%
Asians	\$74,141	19.2%
Some Other Race	\$48,438	32.5%
Hispanics	\$52,065	28.6%

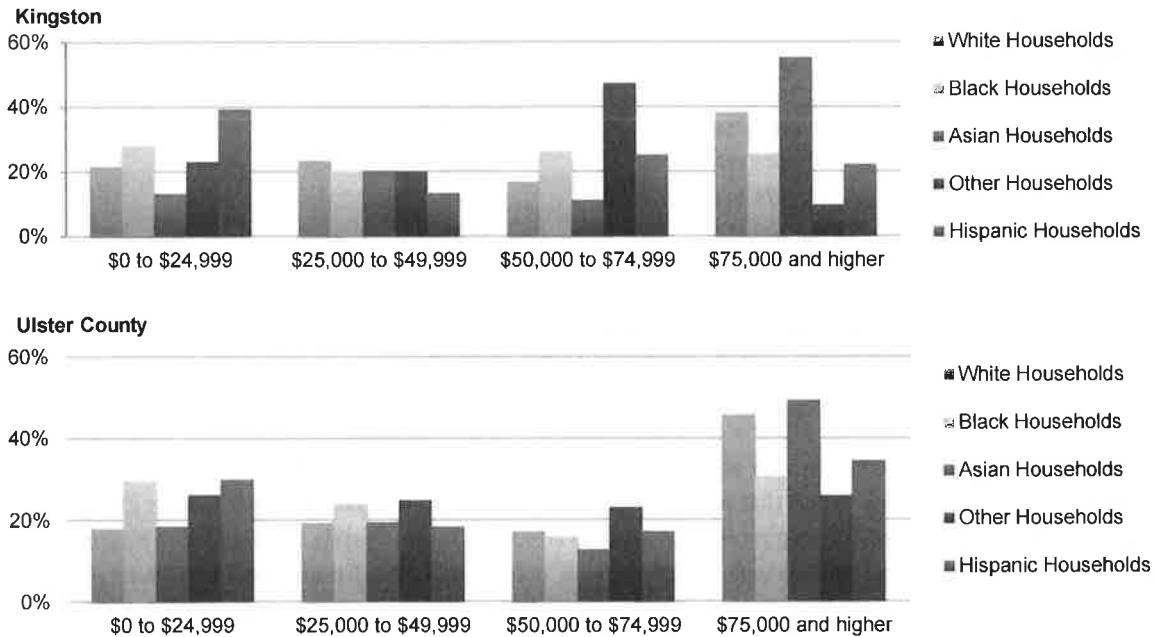
Source: U.S. Census Bureau, 2020 American Community Survey Five-Year Estimates (B19013, B19013A, B19013B, B19013D, B19013F, B19013I & B17001, B17001A, B17001B, B17001D, B17001F, B17001I)

Distribution of household income by race and ethnicity is comparable to the trends described above. A review of household income distribution shows that with the exception of Asian households, the racial/ethnic groups have low proportions of households earning more than \$75,000 annually. Approximately 55.2% of Asian households in the City earn over \$75,000 in income a year. By comparison, only 25.5% of Black households and 22.1% of Hispanic households earned at this level. White households are slightly above the City average of 35.3% when earning \$75,000 or above annual income with 38.1%. The figures below illustrate these differences. A similar trend was present at the County level, though incomes were generally higher in the County than in Kingston.

FIGURE 3-11 HOUSEHOLD INCOME DISTRIBUTION BY RACE AND ETHNICITY, 2020

	Total Households	\$0 to \$24,999	\$25,000 to \$49,999	\$50,000 to \$74,999	\$75,000 and higher
Kingston	8,952	23.6%	22.2%	18.8%	35.3%
White	6,715	21.6%	23.3%	16.8%	38.1%
Black	1,239	28.0%	20.2%	26.2%	25.5%
Asians	143	13.2%	20.2%	11.1%	55.2%
Some Other Race	165	23.0%	20.0%	47.2%	9.6%
Hispanic	826	39.3%	13.3%	25.1%	22.1%
Ulster County	70,088	18.7%	19.6%	17.1%	44.4%
White	61,987	17.8%	19.2%	17.1%	45.7%
Black	3,461	29.5%	23.8%	15.8%	30.6%
Asians	911	18.4%	19.4%	12.7%	49.3%
Some Other Race	1,185	26.1%	24.8%	23.0%	25.9%
Hispanic	4,564	29.9%	18.3%	17.1%	34.5%

FIGURE 3-12 HOUSEHOLD INCOME DISTRIBUTION BY RACE AND ETHNICITY, 2020



DISABILITY AND INCOME

As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental or emotional handicap, provided reasonable accommodation can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In Kingston, 14.6% of the population 5 years and older reported at least one type of disability in 2020.

According to the National Organization on Disabilities, a significant income gap tends to exist for persons with disabilities, given their lower rate of employment. Out of the 14,100 residents of Kingston that are between 20 to 64 years old, 6.5% are disabled and living in poverty, but 10.9% are not disabled living in poverty. Therefore, the data shows that in Kingston residents who are disabled do not experience poverty at a greater rate than those who are not disabled but living in poverty.

FAMILIAL STATUS AND INCOME

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families and other families comprised of related persons. Non-family households are either single people living alone, or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

In Kingston, female-headed households decreased slightly from 14.8% in 2010 to 14.2% in 2020, and female-headed households with children increased slightly from 8.0% to 8.7%. Married-couple family households with children decreased from 15.2% to 12.4% during the same period. Single-person and non-family households remained nearly the same at 45.8% in 2010 to 45.6% in 2020. Across the entirety of Ulster County, trends over time were similar, though married-couple families continue to represent a larger share of all households in the County than in Kingston.

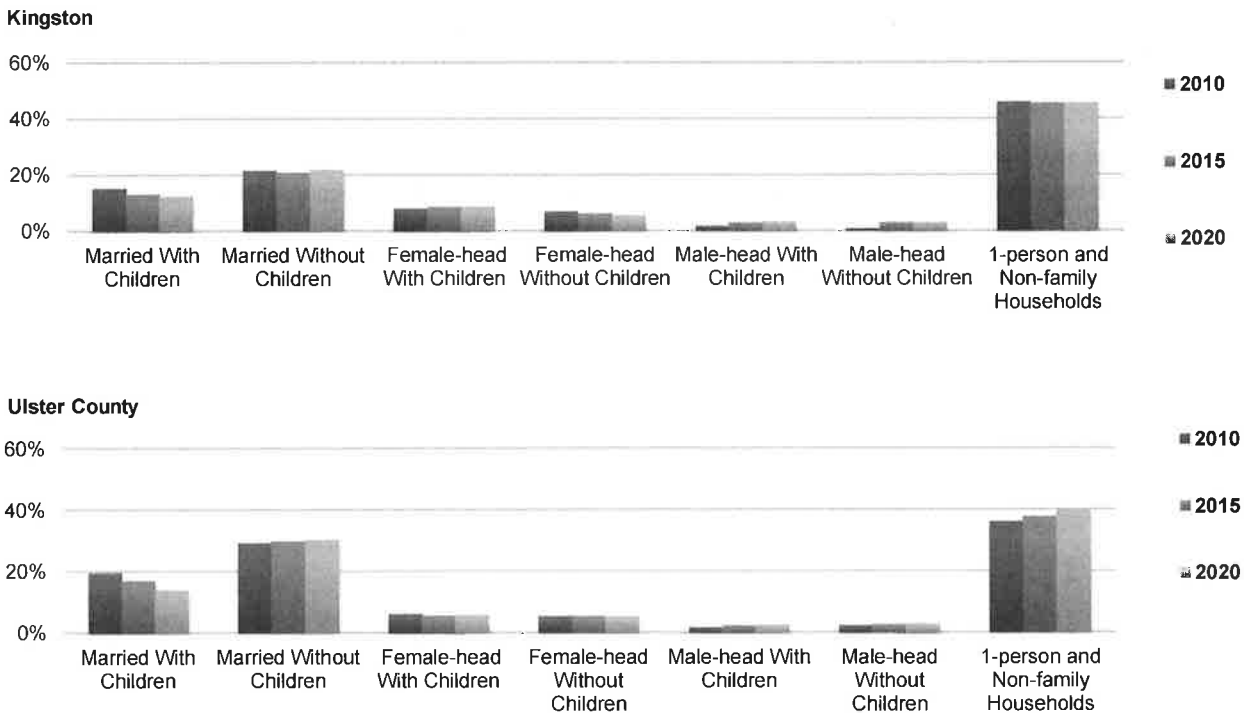
FIGURE 3-13 HOUSEHOLDS BY TYPE AND PRESENCE OF CHILDREN, 2010-2020

	Total Households	Family Households										Non-family and 1-person Households
		Family HHs as % of All HHs	Married-couple families			Female-headed Households			Male-headed Households			
			% of Total	With Children	Without Children	% of Total	With Children	Without Children	% of Total	With Children	Without Children	
2010												
Ulster County	70,691	63.9%	48.7%	19.6%	29.1%	11.4%	6.1%	5.3%	3.9%	1.7%	2.2%	36.1%
Kingston	10,076	54.2%	37.0%	15.2%	21.4%	14.8%	8.0%	6.8%	2.4%	1.6%	0.8%	45.8%
2015												
Ulster County	69,474	62.4%	46.7%	17.0%	29.8%	10.8%	5.5%	5.3%	4.8%	2.2%	2.6%	37.6%
Kingston	9,719	54.4%	33.9%	13.1%	20.8%	14.7%	8.5%	6.2%	5.8%	2.9%	2.9%	45.6%
2020												
Ulster County	70,088	60.3%	44.1%	13.9%	30.2%	10.9%	5.7%	5.2%	5.3%	2.5%	2.8%	39.7%
Kingston	8,952	54.4%	34.2%	12.4%	21.8%	14.2%	8.7%	5.5%	6.1%	3.2%	2.9%	45.6%

Source: U.S. Census Bureau, American Community Survey 2010, 2015, 2020 (B11001, B11003)

Female-headed households with children can experience difficulty in obtaining housing, primarily as a result of lower-incomes and the potential unwillingness of some landlords to rent their units to families with children. Although they comprised only 8.7% of all families in 2020, female-headed households with children accounted for 83.1% of all families living in poverty.

FIGURE 3-14 HOUSEHOLD TYPE AND PRESENCE OF CHILDREN, 2010-2020



ANCESTRY AND INCOME

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations reported that in 2020, 11.9% of all Kingston residents were foreign-born. By way of origin, the City's foreign-born population has been sourced from across the globe. The wide distribution of points of origin is similar for Ulster County.

FIGURE 3-15 COUNTRY OF ORIGIN FOR FOREIGN-BORN PERSONS BY SELECTED COUNTRIES, 2020

	Kingston		Ulster County	
	# Foreign-born Persons	% of Total City Population	# Foreign-born Persons	% of Total County Population
Total foreign-born	2,741	11.9%	13,708	7.7%
All other countries	773	3.4%	9,082	5.1%
Mexico	506	2.2%	1,340	0.8%
El Salvador	399	1.7%	699	0.4%
Hondorus	179	0.8%	308	0.2%
Guatemala	142	0.6%	256	0.1%
Jamaica	440	1.9%	918	0.5%
Haiti	166	0.7%	264	0.1%
China	136	0.6%	841	0.5%

Source: 2020 ACS (B05006)

Kingston's foreign-born population is exactly as likely to experience poverty as the rest of the City. According to the 2020 ACS Data, 18.8% of the foreign-born population for which poverty status is determined fell below the poverty line, compared to 18.8% of all persons Citywide.

Persons with limited English proficiency (LEP) are defined by the Federal government as persons who have a limited ability to read, write, speak or understand English. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

The Census Bureau reports on the non-English language spoken at home for the population five years and older. In 2015 (most recent data), 1,284 persons in Kingston spoke English less than "very well." This limited English proficient subpopulation constituted 5.8% of the City's population among persons aged 5 and older in 2015. While no individual language group included more than 1,000 persons, Spanish-speaking residents who spoke English less than "very well" constituted 60.4% of all speakers with limited English proficiency. To determine whether translation of vital documents would be required, a HUD entitlement community must first identify the number of

LEP persons in a single language group who are likely to qualify for and be served by the City’s programs. Currently, the City does not have a Language Access Plan to assist people with limited English proficiency (LEP persons).

FIGURE 3-16 LIMITED ENGLISH PROFICIENCY LANGUAGE GROUPS

	Number of LEP Persons	Percent of Total Population
Total LEP Persons	1,284	5.9%
Spanish	776	3.6%
Polish	59	0.3%
Gujarati	89	0.4%
Chinese	95	0.4%

Source: American Community Survey 2015 5-Year Estimates; B16001

PROTECTED CLASS STATUS AND UNEMPLOYMENT

In 2021, the unemployment rate in Kingston (6.6%) was the same as in Ulster County (6.6%), and both were lower than the state rate (8.7%). The unemployment rate for men is slightly higher than for women, men experienced unemployment at approximately 7.3% and the unemployment rate for women is approximately 5.2%. White residents (7.9%) are more likely to be unemployed than Black residents (3.2%). Hispanic residents (9.9%) are the most likely to experience unemployment than the rest of the racial/ethnic groups in the City.

FIGURE 3-17 CIVILIAN LABOR FORCE, 2021

Civilian Labor Force	New York		Ulster County		Kingston	
	Total	%	Total	%	Total	%
Total CLF	10,110,281	100%	93,353	100%	19,517	100%
Employed	9,226,373	91.3%	87,237	93.4%	18,229	93.4
Unemployed	883,908	8.7%	6,116	6.6%	1,288	6.6%
Male CLF (20-64 years old)	5,177,547	100%	47,453	100%	7886	100%
Employed	4,698,973	90.8%	44,390	93.5%	7,311	92.8%
Unemployed	478,574	9.2%	3,063	6.5%	575	7.2%
Female CLF (20-64 years old)	4,932,734	100%	45,900	100%	7144	100%
Employed	4,527,400	91.8%	42,847	93.3%	6773	94.8%
Unemployed	405,334	8.2%	3,053	6.4%	371	5.2%
White CLF	5,747,467	100%	70,059	100%	9,052	100%
Employed	5,368,703	93.4%	65,377	93.3%	8,335	92.1%
Unemployed	378,764	6.6%	4,682	6.7%	717	7.9%
Black CLF	1,373,157	100%	5,320	100%	1,969	100%
Employed	1,191,079	86.7%	5,040	94.7%	1,906	96.8%
Unemployed	182,078	13.3%	280	5.3%	63	3.2%
Asian CLF	904,729	100%	1,402	100%	294	100%
Employed	820,956	90.7%	1,348	96.1%	286	97.3%
Unemployed	83,773	9.3%	54	3.9%	8	2.7%
Some Other Race	882,284	100%	3,382	100%	367	100%
Employed	803,145	91.0%	3,217	95.1%	338	92.1%
Unemployed	79,139	9.0%	165	4.9%	29	7.9%
Hispanic CLF	1,899,058	100%	8,542	100%	1,638	100%
Employed	1,671,294	88.0%	8,085	94.6%	1,525	93.1%
Unemployed	227,764	12.0%	457	5.4%	113	9.9%

Source: U.S. Census Bureau, 2021 5 Year and 1 Year Estimates American Community Survey (C23001, C23002A, C23002B, C23002D, C23002F, C23002I), Supplemental Table S2301 (Total CLF, Male CLF, Female CLF for Kingston)

HOUSING MARKET

HOUSING INVENTORY

The housing stock in Kingston decreased by 916 units, or -8.3%, between 2010 and 2020. The figure below and the following map illustrate the change in the housing inventory that has occurred since 2010. In all of the Census Tracts, the number of housing units dropped between 2010 and 2020. Some tracts decreased more than others, like Census Tract 9524 lost 261 units while Census Tract 9520 lost 17 units.

FIGURE 3-18 TRENDS IN TOTAL HOUSING UNITS, 2010-2020

Census Tract	2010		2015		2020		Change 2010-2020	
	#	% of Total Housing Units	#	% of Total Housing Units	#	% of Total Housing Units	#	%
Citywide	11,001	100.0%	11,024	100.0%	10,085	100.0%	-916	-8.3%
9517	2,293	20.8%	2,324	21.1%	2,208	21.9%	85	-3.7%
9518	814	7.4%	787	7.1%	713	7.1%	101	-12.4%
9519	1,213	11.0%	1,277	11.6%	1,071	10.6%	142	-11.7%
9520	1,095	10.0%	1,072	9.7%	1,078	10.7%	17	-1.6%
9521	1,591	14.5%	1,540	14.0%	1,484	14.7%	107	-6.7%
9522	1,631	14.8%	1,648	14.9%	1,562	15.5%	69	-4.2%
9523	910	8.3%	886	8.0%	776	7.7%	134	-14.7%
9524	1,454	13.2%	1,490	13.5%	1,193	11.8%	261	-18.0%

Note: Shaded areas indicate tracts containing both minority/racial concentrations and LMI concentrations.

Sources: U.S. Census Bureau, 2020 American Community Survey (H1)

TYPES OF HOUSING UNITS

In 2020, single-family units comprised 48.8% of the housing stock in the City, and multi-family units comprised 51%. Multi-family units were the predominant housing type in five of the Census Tracts (9517, 9520, 9521, 9523, and 9524) while in three other tracts (9518, 9519, 9522), single-family homes were the predominant structure type. In tract 9519, there were 10 mobile homes (.87%) as well.

FIGURE 3-19 TRENDS IN HOUSING UNITS IN STRUCTURES, 2020

Census Tract	Total Units	Single-family units	Multi-family units				Total	Mobile home	Boat, RV, van, etc.
			2 to 4	5 to 9	10 to 19	20 or more			
Citywide	10,603	5,180	3,313	704	620	776	5,413	10	0
9517	2,208	933	828	148	81	218	1,275	0	0
9518	713	430	48	49	44	142	283	0	0
9519	1,144	772	326	17	19	0	362	10	0
9520	1,215	430	665	40	30	50	785	0	0
9521	1,564	668	742	32	105	17	896	0	0
9522	1,701	1,172	362	93	24	50	529	0	0
9523	798	300	65	163	138	132	498	0	0
9524	1,260	475	277	162	179	167	785	0	0

Note: Shaded areas indicate tracts containing both minority/ethnic concentrations and LMI concentrations.

Source: U.S. Census Bureau, Census 2020 (B25024)

In 2020, there were 1,133 vacant housing units in Kingston. Of those 1,133 units, 188 were for rent and 125 were rented, but not occupied. Also, 19 units were for sale, 60 were sold, but not occupied. There were 91 units that were categorized as being for seasonal, recreational, or occasional use. Lastly, 605 vacant units were categorized as "other".

FIGURE 3-20 AGE OF HOUSING STOCK, 2020

Age of Housing Stock	#
Built 2014 or later	38
Built 2010 to 2013	220
Built 2000 to 2009	242
Built 1990 to 1999	342
Built 1980 to 1989	411
Built 1970 to 1979	1212
Built 1960 to 1969	663
Built 1950 to 1959	1223
Built 1940 to 1949	622
Built 1939 or earlier	5112

Source: U.S. Census Bureau, Census 2020

Approximately half (50.6%) of all housing units in Kingston were built prior to 1939. It can be inferred that because of the age of the housing stock in the City, rehabilitation is needed in many units. Only 0.37% of the housing in the City has been built in the past ten years.

PROTECTED CLASS STATUS AND HOME OWNERSHIP

The value in home ownership lies in the accumulation of wealth as the owner’s share of equity increases with the property’s value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, “a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent.”²

Historically, minorities tend to have lower home ownership rates than Whites. In 2020 in Kingston, Whites had a home ownership rate of 51.03%. By comparison, Blacks owned their homes at a rate of 32.20% and Hispanics at 16.22%. Asians had a home ownership rate of 85.31%, the highest of any racial or ethnic group.

Minority home ownership by census tract widely varied. No Census Tract has a 100% homeownership rate.

As previously noted, median incomes for Hispanics are significantly lower than those of Whites. This is one of several factors that contribute to the generally lower rates of homeownership for minorities across the City.

FIGURE 3-20 HOUSING TENURE BY RACE AND ETHNICITY, 2020

	White		Black		Asian		Some Other Race		Hispanic	
	#	%	#	%	#	%	#	%	#	%
Citywide	3427	51.03%	399	32.20%	122	85.31%	48	29.09%	134	16.22%
9517	647	18.88%	59	14.79%	0	0.00%	13	27.08%	26	19.40%
9518	268	7.82%	19	4.76%	9	7.38%	0	0.00%	4	2.99%
9519	523	15.26%	32	8.02%	20	16.39%	0	0.00%	39	29.10%
9520	287	8.37%	114	28.57%	18	14.75%	0	0.00%	19	14.18%
9521	319	9.31%	116	29.07%	0	0.00%	0	0.00%	9	6.72%
9522	846	24.69%	52	13.03%	50	40.98%	35	72.92%	30	22.39%
9523	190	5.54%	7	1.75%	9	7.38%	0	0.00%	0	0.00%
9524	347	10.13%	0	0.00%	16	13.11%	0	0.00%	7	5.22%

Note: Shaded areas indicate tracts containing racial/ethnic concentrations and LMI concentrations.

Source: U.S. Census Bureau, Census 2020 (B25003A-I)

THE TENDENCY OF THE PROTECTED CLASSES TO LIVE IN LARGER HOUSEHOLDS

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, the restriction on the size of the unit will have a negative impact on members of the protected classes.

² Kathleen C. Engel and Patricia A. McCoy, “From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership,” in *Segregation: The Rising Costs for America*, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

In Kingston, minorities were more likely than Whites to live in families with three or more people. In 2020, out of 7,558 White households, 24.8 % had three or more people.³ By comparison, 39.1% of Black families were considered large and 54.4% of Hispanic households had three or more residents.

FIGURE 3-21 HOUSEHOLDS WITH THREE OR MORE PERSONS, 2020

	Households with Three or More Persons	
	Ulster County	City of Kingston
White	19,527	1,877
Black	1,299	464
Asian	488	90
Some Other Race	1,291	327
Two or More Races	1,970	352
Hispanic	2,918	645

Source: U.S. Census Bureau, Census 2020 (H12A-H)

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In Kingston, there are fewer options to rent a unit to accommodate large families. As suggested through the stakeholder consultation process, one of the major housing issues in the City is the lack of family housing. Much of the already extremely limited housing stock is comprised of studio, one bedroom, and sometimes two-bedrooms, but very rarely is there any available and affordable 3+ bedroom housing for larger families. This problem can be due in part to the increasing costs of construction, material, and contractors as well as the limited building space in the City for larger units.

Of the 4,860 rental units in 2020, only 54.8% had two or more bedrooms compared to 96.3% of the owner housing stock. In the remainder of Ulster County, only 61.4% of rental stock had two or more bedrooms compared to 95.6% of the owner housing stock.

FIGURE 3-22 HOUSING UNITS BY NUMBER OF BEDROOMS, 2020

	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	Number of Units	% Total Units	Number of Units	% Total Units
Kingston				
0-1 bedroom	2,199	45.2%	151	3.7%
2-3 bedrooms	2,393	49.2%	2,807	68.6%
4 or more bedrooms	268	5.5%	1,134	27.7%
Total	4,860	100.0%	4,092	100.0%
Ulster County*				
0-1 bedroom	8,488	38.6%	2,097	4.4%
2-3 bedrooms	11,886	54.1%	33,673	70%
4 or more bedrooms	1,606	7.3%	12,338	25.6%
Total	21,980	100.0%	48,108	100.0%

Source: U.S. Census Bureau, Census 2020 (SF 3, H42)

³ 2020 Census data is the most current source.

COST OF HOUSING

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods because of a lack of affordable housing in those areas.

From 2010 to 2020 median housing value decreased in the City of Kingston as well as the surrounding Ulster County (after inflation adjustments). Median gross rent has slightly increased for both the City and Ulster County. This means that people are starting to pay a little more in rent and utilities, but the value of the housing in the surrounding market is lessening. In addition, household income in Ulster County is decreasing, but slightly increasing in the City, which could affect residents' abilities to afford mortgages and rent.

FIGURE 3-23 TRENDS IN HOUSING VALUE, RENT AND INCOME, 2010-2020

	Median Housing Value (in 2020 \$)	Median Gross Rent (in 2020 \$)	Median Household Income (in 2020 \$)**
2010			
Kingston	\$232,985	\$1,081	\$54,880
Ulster County	\$288,225	\$1,117	\$68,555
2015			
Kingston	\$204,174	\$1,196	\$48,522
Ulster County	\$264,503	\$1,206	\$70,143
2020			
Kingston	\$186,500	\$1,087	\$54,311
Ulster County	\$239,400	\$1,119	\$65,306
% Change 2010-2020			
Kingston	-19.95%	.55%	1.03%
Ulster County	-16.93%	.17%	-4.73%

* All amounts adjusted to 2020 dollars

** Median income is calculated among all households sampled, regardless of size

Sources: U.S. Census Bureau, 2020 Census (STF3-H061A, H043A, P080A), Census 2010 (SF3-H76, H63, P53), 2020 5 Year Estimates American Community Survey (B25077, B25064, B19013)

RENTAL HOUSING

In sample data collected for 2020, a total of 4,675 renter households (80.5% of all renters) paid cash for their housing units. With a median household income of \$118,250, Asian households would have had many more affordable rental housing options than Black, Hispanic, or White households. At this median income level, White households could afford a monthly rent of up to \$2,965. Black households earning the next highest median household income of \$57,773, as 30% of this monthly income level would provide for a monthly rent up to \$1,444.

White households earning the median household income of \$54,419 and Hispanic households earning the median household income of \$38,409 have fewer affordable housing options. An affordable monthly rent price for the White household would be \$1,360 and an affordable monthly rent price for the average Hispanic household would be only \$960. Housing options are significantly more limited for Hispanic households compared to Asian, Black, and White households.

This analysis does not address the availability of rental housing units at these price ranges, but only the affordability of the existing rental housing stock based on the amount of actual rent paid by tenant households.

FIGURE 3-24 RENTER-OCCUPIED UNITS BY GROSS RENT PAID, 2020

Monthly Gross Rent	Units	%
Less than \$200	30	0
\$200 to \$299	281	6.0%
\$300 to \$399	166	3.6%
\$400 to \$499	180	3.9%
\$500 to \$599	113	2.4%
\$600 to \$699	136	2.9%
\$700 to \$799	145	3.1%
\$800 to \$899	416	8.9%
\$900 to \$999	399	8.5%
\$1,000 to \$1,249	1,356	29.0%
\$1,250 to \$1,499	686	14.7%
\$1,500 to \$1,999	682	14.6%
\$2,000 or more	85	1.8%
Total with Cash Rent	4,675	100.0%

Source: 2020 ACS
(B25063)

The number of affordable rental units in the City slightly increased between 2010 and 2020. The number of units rented for less than \$500 grew about 2.17%. During the same time, the number of units renting for more than \$1,000 per month increased from 1,805 to 2,809 or 55.62%. This measure includes any units that could have been physically lost from the inventory as well as those for which prices have increased during the last 10 years. In Ulster County, the number of affordable units decreased by 30.13%, while the number of units renting for more than \$1,000 per month increased by 46.72%. This suggests an increased burden on Kingston as a place where lower-income renters can locate affordable rental housing.

FIGURE 3-25 LOSS OF AFFORDABLE RENTAL HOUSING UNITS, 2010-2020

Units Renting for:	2010	2020	Change 2010-2020	
			#	%
Kingston				
Less than \$500	643	657	14	2.17%
\$500 to \$699	526	249	-277	-52.66%
\$700 to \$999	2,150	960	-1,190	-55.34%
\$1,000 or more	1,805	2,809	1,004	55.62%
Ulster County*				
Less than \$500	2,011	1,405	-606	-30.13%
\$500 to \$699	2,394	1,355	-1,039	-43.40%
\$700 to \$999	7,341	5,172	-2,169	-29.54%
\$1,000 or more	8,493	12,461	3,968	46.72%

Sources: U.S. Census Bureau, Census 2010 (SF3, H62), 2020 Five Year Estimates
American Community Survey (B25063)

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing for all counties in the U.S. In Kingston in 2023, the FMR for a two-bedroom

apartment was \$1,498. In order to afford this level of rent and utilities without paying more than 30% of income on housing, a household must earn \$59,940 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$28.81—the hourly rate required to afford a two-bedroom rental unit at the HUD FMR of \$1,498

In Ulster County, a minimum-wage worker earns an hourly wage of \$15.00. In order to afford the FMR for a two-bedroom apartment, a minimum-wage earner must work 76.8 hours per week, 52 weeks per year. Or a household must include 1.9 minimum-wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

Monthly Supplemental Security Income (SSI) payments for an individual are \$1,030 in Ulster County and across New York. If SSI represents an individual's sole source of income, \$309 in monthly rent is affordable, while the FMR for a one-bedroom is \$1,155.

SALES HOUSING

One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level. It is also possible to determine the affordability of the housing market for each racial or ethnic group. To determine affordability in Kingston (i.e., how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at 7.4% (as of January 29th, 2024)
- The buyer made a 10% down payment on the sales price
- Property taxes were levied at the City's rate of 4.3%
- Private mortgage insurance was 0.8%
- Principal, interest, taxes and insurance (PITI) equaled no more than 30% of gross monthly income, and
- There was no additional consumer debt (credit cards, etc.).

According to 2020 ACS data, the median housing value for single-family and condo homes was \$186,500 in Kingston. Based on these assumptions, a household would need to have an annual income of (\$100,760) to purchase the median valued home and pay no more than 30% of their household income on monthly expenses. In Kingston, only Asian households have a median household income high enough (\$118,250) to be able to afford the median home without being cost burdened. This shows that the City does not have an affordable housing market.

PROTECTED CLASS STATUS AND COST BURDEN

Among households making less than 30% of the area median income in Kingston, 25% of renter households and 16% of owner households were paying more than 30% of their gross income on housing costs, while 70% of renters and 53% of owners were paying more than 50%. The 2020 CHAS data does not provide analysis by race or ethnicity. The following figure shows that the highest percentages of cost-burdened and severely cost-burdened households are the lowest income households at 0-30% AMI.

FIGURE 3-26 COST BURDEN BY TENURE, 2020

	0% to 30% AMI		30% to 50% AMI		50% to 80% AMI		80% to 100% AMI		Total
	#	%	#	%	#	%	#	%	
Renter									
Cost burdened	290	25%	375	32%	465	40%	45	3%	1,175
Severely cost burdened	810	70%	330	30%	0	0%	0	0%	1,140
Owner									
Cost burdened	85	16%	95	18%	230	43%	120	23%	530
Severely cost burdened	305	53%	170	30%	80	14%	15	3%	570
Total									
Cost burdened	375	22%	470	28%	695	41%	165	9%	1,705
Severely cost burdened	1,115	65%	500	29%	80	5%	15	1%	1,710

Note: Percentages reflect the share of all cost-burdened or severely cost-burdened households.

Source: 2020 CHAS

EVIDENCE OF HOUSING DISCRIMINATION

This section analyzes the existence of fair housing complaints, where made available, or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section includes the outcomes of any local market testing for discrimination.

THE FEDERAL FAIR HOUSING ACT

WHAT HOUSING IS COVERED?

The federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

WHAT DOES THE FAIR HOUSING ACT PROHIBIT?

In the sale and rental of housing:

- No one may take any of the following actions based on race, color, religion, sex, disability, familial status, national origin, perceived sexual orientation, gender identity or marital status.
- Refuse to rent or sell housing.
- Refuse to negotiate for housing.
- Make housing unavailable.
- Deny a dwelling.
- Set different terms, conditions or privileges for the sale or rental of a dwelling.
- Provide different housing services or facilities.
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting), or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

In mortgage lending:

- No one may take any of the following actions based on race, color, religion, sex, disability, familial status, national origin, perceived sexual orientation, gender identity or marital status.
- Refuse to make a mortgage loan.
- Refuse to provide information regarding loans.
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees.
- Discriminate in appraising property.
- Refuse to purchase a loan, or
- Set different terms or conditions for purchasing a loan.

OTHER PROHIBITIONS

It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right.
- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, sex, disability, familial status, national origin, perceived sexual orientation, gender identity or marital status. This prohibition against discriminatory advertising applies to single family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

ADDITIONAL PROTECTIONS FOR PEOPLE WITH DISABILITIES

If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person's expense, if necessary for the disabled person to use the housing. Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original condition when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.

For example, a building with a "no pets" policy must make reasonable accommodation and allow a visually impaired tenant to keep a guide dog.

HOUSING OPPORTUNITIES FOR FAMILIES WITH CHILDREN

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age of 18 live with:

- A parent or
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.
- Familial status protection also applies to pregnant women and anyone securing legal custody of a child under age 18.

Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a federal, state or local government program, or
- It is occupied solely by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80% of the occupied units and adheres to a policy that demonstrates the intent to house persons who are 55 or older, as previously described.
- A transition period permits residents on or before September 13, 1988, to continue living in the housing, regardless of their age, without interfering with the exemption.

NEW YORK HUMAN RIGHTS LAW

The New York Human Rights Law (Article 15 of the New York State Executive Law), as amended, prohibits housing discrimination based on race, color, religion, ethnicity, creed, age, national origin, alienage or citizenship status, familial status, gender, including gender identity, gender expression, gender dysphoria, transgender status, group identity, marital status, sexual orientation or disability

State or local laws may be certified as substantially equivalent to the federal Fair Housing Act when the U.S. Department of Housing and Urban Development (HUD) determines that the law provides rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Act. Currently, the New York State Division of Human Rights participates in HUD's Fair Housing Assistance Program (FHAP) by virtue of the New York Human Rights Law having been deemed substantially equivalent to the federal Fair Housing Act. Participation allows the agency the opportunity to receive funding to support a variety of fair housing administrative and enforcement activities, including complaint processing, training, implementation of data and information systems and other special projects.

Section 296 of the Human Rights Law describes the unlawful acts of discrimination related to fair housing. These include:

- Discriminatory real estate practices, including refusal to sell or lease housing accommodations to members of the protected classes
- Discrimination in the terms, conditions and privileges of real estate transactions
- Printing or circulating any statement, advertisement, publication or application with the intent or effect of making limitations, specifications or discrimination with regard to protected classes
- Representing that any housing accommodation, land or commercial space is not available for inspection, sale, rental or lease when it in fact is available, or to otherwise deny or withhold any housing accommodation on the basis of protected class status
- Excluding or expelling qualified individuals from real estate board membership on the basis of protected class status, or discriminating against such an individual in the terms, conditions and privileges of board membership

Additionally, Section 296-a explains unlawful discriminatory practices in relation to credit, outlining prohibitions related to discrimination in the lending of money to acquire, construct, rehabilitate, repair or maintain housing.

Section 293 of the Human Rights Law establishes the Division of Human Rights within the state's executive department. The Division has statutory authority to:

- Adopt, promulgate, amend and rescind suitable rules and regulations to carry out the provisions of the Human Rights Law (HRL)
- Make, sign and file complaints alleging violations of the HRL
- Initiate investigations and studies to carry out the purposes of the HRL
- Hold hearings and provide for cross interrogatories, subpoena witnesses, impel their attendance, administer oaths, take testimony and require the production for examination of any books or matters relating to Division investigations
- Create local, regional or statewide advisory councils
- Develop human rights plans and policies for the state and assist in their execution

- Render each year to the governor and legislature a full written report of its activities and recommendations
- Promote the creation of human rights agencies by counties, cities, villages or towns

The New York Human Rights Law describes unlawful acts of discrimination and sets forth the procedures for aggrieved parties to file complaints.

KINGSTON HUMAN RIGHTS

The City is committed to the elimination of segregation and other discriminatory housing practices. In support of this commitment, the City proactively monitors potential discriminatory activities both through its community development office and the City of Kingston Human Rights Commission. The commission is responsible for receiving complaints of alleged discrimination in the City.

The fundamental goal of the City of Kingston's fair housing policy is to make fair housing choice a reality through ongoing fair housing planning, community outreach, education and referral. In achieving this goal, the City will employ a full range of programmatic tools and resources available to promote fair housing choice in Kingston.

The Kingston Human Rights Commission acts as a resource office that directs people to resources and informs them of their rights under state and federal law. They do not have the personnel or authority to investigate their own cases but will direct residents to the Ulster County Human Affairs Bureau or the State Attorney General Office. Most of the calls that the office receives are about landlords raising rents, the eviction process, and maintenance issues. It is not common for the office to receive complaints on specific discriminatory actions or issues with protected classes.

EXISTENCE OF FAIR HOUSING COMPLAINTS

The number of complaints reported may under-represent the actual occurrence of housing discrimination in any given community, as people may not file complaints because they are not aware of how or where to file a complaint. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing their treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Also, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. According to the Urban Institute, 83% of those who experience housing discrimination do not report it because they feel nothing will be done. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives complaints from persons regarding alleged violations of the federal Fair Housing Act. The City requested from the HUD Fair Housing & Equal Opportunity Office a list of all housing discrimination complaints filed by Kingston residents; however, a response was not received in time to include an analysis of the cases in this document.

NEW YORK DIVISION OF HUMAN RIGHTS

Housing discrimination complaints constitute 9.2% of all cases handled by the New York State Division of Human Rights, compared to employment cases (77.1%), public accommodation cases (9.3%), education cases (2.6%), and

other cases (1.8%). The Division enforces the State’s Human Rights Law, the first of its kind in any state that prohibits discrimination based on age, sexual orientation, marital status and military status, in addition to classes protected by federal law. The Division is headquartered in the Bronx. Complaints may be filed in person or by mailing a form.

ULSTER COUNTY HUMAN RIGHTS COMMISSION

The Ulster County Human Rights Commission exists to foster respect for the rights of all people and to explore opportunities for improving relations among all people of Ulster County. The commission has 11 people on it including a chair, vice chair, and secretary.

The Commission created the “Ulster County Human Rights Protection Act of 2018.” It states that, “the County has the responsibility to act to assure that every individual within the County is afforded certain basic rights and freedoms to which all human beings are entitled, including but not limited to the right to life and liberty, freedom of thought and expression, and equality before the law.” The Ulster County Human Rights Commission carries out and follows the New York State Human Rights Law.

“The Ulster County Legislature recognizes, finds and determines that the laws and regulations of the United States of America and the State of New York prohibit acts of discrimination, including discrimination in employment, discrimination in public accommodations, resort and amusement, discrimination in housing accommodation, discrimination in commercial space and land transactions, and discrimination in the issuing of credit based upon impermissible considerations relating to a person's race, color, religion, ethnicity, creed, age, national origin, alienage or citizenship status, familial status, gender, including gender identity, gender expression, gender dysphoria, transgender status, group identity, marital status, sexual orientation or disability.”

There is a compliant form that residents can submit if they feel like they have experienced discrimination, and the department will investigate their complaint.

TESTING

Many victims of housing discrimination encounter barriers that can be hard to detect, such as false information, neighborhood steering, and the application of different standards. As a result, fair housing advocates across the county have turned to testing as the most effective tool to investigate violations of fair housing law and gather litigation quality evidence of discriminatory practices. Testing involves covert investigation by testers who pose as housing applicants and document the treatment they receive from housing providers. By comparing the ways different testers are treated, fair housing enforcement organizations can demonstrate that a violation of fair housing law has occurred. In Kingston, conducting paired testing would be beneficial especially for those protected classes who are already experiencing trouble finding decent, safe, and affordable housing. These groups include large families, single-mother households, those with Section 8 vouchers, racial/ethnic minorities, etc.

TRENDS IN HOUSING DISCRIMINATION

The Kingston Human Rights Commission has not handled, participated in, or is currently involved in any housing complaints/cases based on discrimination.

The inquiries which the Human Rights office have encountered have been questions regarding the Tenant and Landlord’s Rights and Responsibilities in nature. Their questions were either answered or redirected to the Ulster County Consumer Affairs office or the NYS Attorney General’s office.

EXISTENCE OF FAIR HOUSING DISCRIMINATION SUIT

There is no pending fair housing discrimination suit involving the City of Kingston.

REVIEW OF PUBLIC SECTOR POLICIES

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that 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. Policies, practices or procedures that appear neutral on their face, but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute such impediments.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the City to determine opportunities for furthering the expansion of fair housing choice.

POLICIES GOVERNING INVESTMENT OF FEDERAL ENTITLEMENT FUNDS

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower-income households has shifted much of the challenge of affordable housing production to state, County and local government decision makers.

Kingston receives federal entitlement funds from HUD in the form of:

- The Community Development Block Grant (CDBG) program, the primary objective of which is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. For fiscal year 2023, HUD allocated \$683,822 in formula grant CDBG funds to Kingston. CDBG funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

The City's annual CDBG entitlement grant is generally divided among public facilities/infrastructure and public service activities, with the addition of some economic development investments. Particularly, the City is focusing on funding supportive service programs, improving public facilities and infrastructure, expanding economic opportunity, and assisting first time homebuyers with its CDBG funds.

The City of Kingston, working in collaboration with RUPCO, administered and closed out a NYS Department of Homes and Community Renewal-funded promoting homeownership program with the assistance of its second round of HOME grant funds. The program called for outreach to public housing residents to participate in the program to create more homeownership opportunities for City residents. Targeted outreach occurred at the KHA properties among other locations in Midtown and Downtown

PROJECT PROPOSAL AND SELECTION

The Kingston Community Development Advisory Board (CDAB) is charged with the responsibility of assisting the Office of Economic and Community Development (OECD) in reviewing applications for CDBG funding and provide recommendations for programs and projects to receive CDBG funding.

In soliciting applications for CDBG funds, applicants are able to print the application packet from the City's website or they can be emailed upon request. For the fiscal year 2024, the City received thirteen applications. The projects will be received by the Director of the Office of Community Development first and vetted for eligibility. The applications are reviewed and discussed by the CDAB and then recommendations are made to the Mayor of Kingston.

ACCESSIBILITY OF RESIDENTIAL DWELLING UNITS

From a regulatory standpoint, local government measures to control land use (such as zoning regulations) define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures.

PRIVATE HOUSING STOCK

The New York State Building Code contains standards for the accessibility of private housing structures that are consistent with UFAS and ADA accessibility guidelines. In order to ensure that the applicable local, state and federal accessibility standards are met in new residential units, the Building Safety & Zoning Enforcement is responsible for all building inspection and permitting in the City of Kingston. Building Safety & Zoning Enforcement is responsible for the enforcement of the New York State Uniform Fire Prevention and building Code within the City of Kingston.

All new multi-family buildings must be accessible and, therefore, free of barriers. Many accessibility improvements are readily achievable with minimal cost. However, the vast majority of housing units in Kingston are not accessible because they were built prior to the enactment of the ADA in 1988. Older multi-family structures are often exempt from accessibility mandates.

ASSISTANCE FOR PERSONS WITH MOBILITY IMPAIRMENTS

Located in Kingston is a County-run center called, "Resource Center for Accessible Living, Inc." Their vision is to create a fully accessible, integrated community without barriers for people with disabilities, and to assist and empower individuals with disabilities to live independently and participate in all aspects of community life. RCAL runs several programs and services for the community including;

- Architecture Modification Consulting
- Benefits Advisement
- Community Habilitation and Waiver Respite
- Equipment Loan Closet
- Information and Referral
- Nursing Home Transition & Diversion Waiver Services
- Open Doors Program
- Representative Payee
- Vocational Employment Services
- Special Education Services & Advocacy
- Statewide Systems Advocacy Network
- Support Groups

RCAL employs an architectural modification consultant that works with both individuals and businesses to make their spaces safe, accessible, and ADA compliant. In particular, the home modification services includes a professional on-site survey of your home, detailed information on cost effective modifications, extensive product and vendor listings, and referrals to funding resources if available.

Aside from their own programs, RCAL also directs people to other resources including but not limited to RUPCO for affordable, accessible housing, contractors that do van modifications, and the National Disability for financial advice.

PUBLIC HOUSING STOCK

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, an Authority's administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

All new multi-family buildings must be accessible and, therefore, free of barriers. Multi-family projects are regulated through the commercial building code, which requires a minimum number of accessible units and parking spaces. Many accessibility improvements are readily achievable with minimal cost. However, the vast majority of housing units in Kingston are not accessible because they were built prior to the enactment of the ADA in 1988. Older multi-family structures are often exempt from accessibility mandates.

COMPREHENSIVE PLANNING

A community's comprehensive plan is a statement of policies relative to new development and preservation of existing assets. In particular, the land use element of the comprehensive plan defines the location, type and character of future development. The housing element of the comprehensive plan expresses the preferred density and intensity of residential neighborhoods within the City. Taken together, the land use and housing elements of the comprehensive plan define a vision of the type of place that a community wishes to become.

The City of Kingston adopted a new comprehensive plan in March of 2016 titled "Kingston 2025". The previous comprehensive plan was written in 1961. Since then, Kingston has developed and grown as well as has made a number of changes to its land use regulations. These changes have been made based on studies and planning and others have been a response to the evolving trends and development proposals for the City.

The new comprehensive plan was, "Originally conceived as a necessary update required to update and streamline the City's development regulations, but the City quickly came to understand the value of the Comprehensive Planning Process as a means to engage the public, look to old problems with fresh perspectives, compile the extensive catalog of preceding planning work, and to focus attention on areas of the City that had not been the subject of intensive previous planning." (Kingston 2025).

This plan focuses setting objectives for three specific areas of the City including Uptown, Midtown, and the Rondout/Waterfront Areas, as well as the City as a whole. It is the goal of the City that these core areas be "centers for local life providing nutritious fresh food, necessary personal services, transportation and mass transit options, employment opportunities at a range of incomes, a diversity of housing options, and nearby public and private recreational facilities." (Kingston 2025)

The City developed a Vision Statement that all new policies and proposals can be tested against. The statement is based on information received through extensive public outreach including:

- The Comprehensive Plan Advisory Committee and Steering Committee
- Online and paper surveys
- Small group workshop meetings
- Online submissions through the City website
- Citizen engagement from other planning initiatives

All the public outreach helped guide the public to a better understanding of how they would like to see the City develop over the next 20 years. The Vision Statement proclaims, "In 2025, Kingston will be a City of Neighborhoods, vibrant neighborhoods diverse in land use and diverse in population. Development will be focused around four cores incorporating and reflecting the historic and architectural heritage of the City at the Stockade District; at the Rondout; at a future Hudson Landing Core; and at a new core in Midtown centered at the existing Ulster Performing Arts Center. These cores will be comprised of mixed-use centers with multifamily residential incorporated with ground floor retail; pedestrian and bicycle friendly streets; active use of sidewalks; traditional architecture and historic identity. These nodes will be connected not only by a network of streets supporting slow-speed/high-capacity vehicular travel, but by a network of on-road and off-road bicycle paths, and by public transit ranging from shuttle bus to trolley. Extending outward from the cores, lower densities of mostly well-maintained and predominantly owner-occupied two-family and single-family residential neighborhoods will dominate, with occasional neighborhood corner stores and well-designed townhouses and multifamily residential interspersed. Remote or environmentally-sensitive areas will remain as open space, agriculture, forestry or used for clustered, very low-density residential. Employment opportunities will be diverse from County government, historic tourism and specialty retail in Uptown; to arts and new media in Midtown; to cultural, water-related, restaurant and entertainment uses in the Rondout; and to clean, green industry along existing active rail lines and within the Kingston Business Park."

ZONING

In New York, the power behind land development decisions resides with municipal governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and development permits.

After extensive research, studies, and public input, The City of Kingston replaced its existing zoning with a form-based code, which regulates land use based on the physical form and design of buildings and their relationship to the surrounding environment rather than their use. The City's new zoning code is called Kingston Forward, and it is a form-based code that regulates the location, design, alteration, occupancy, and use of structures and the use of land. Adopted in August of 2023, the priorities this new zoning code are to:

1. Diversify housing types, prices, and locations.
2. Introduce new mandates and incentives for affordable housing.
3. Design streets for everyone, not just cars.
4. End minimum parking requirements in all transects.
5. Allow adaptive reuse of existing buildings.
6. Legalize accessory dwelling units citywide.
7. Legalize neighborhood businesses and mixed-use development.
8. Ensure that new development contributes to the City's historic urban form.

Kingston Forward focuses on housing as its primary goal and specifically tries to remove barriers to the development of multi-family housing in the City. It encourages more housing types such as infill housing as well as density increases for single family homes with attached units. This effort works towards achieving the City-wide goal of approving 1,000 new housing units by 2029 through a mix of market rate, fair market, and workforce housing.

Additionally, Kingston Forward introduces an inclusionary zoning ordinance that requires all housing developments with 7 or more units to be 10% affordable at 80% AMI and any developments with over 20 units have to have workforce housing at 120% AMI. There is an opt-out provision in which developments are required to make payment to the housing trust fund. The opt-out provision is the only place in the zoning code that requires Common Council vote.

The City's new Zoning Task Force will promote zoning changes that are consistent with the City's Comprehensive Plan, including rezoning to encourage development of affordable and multifamily housing. The working group will also suggest potential amendments and assist the City staff to prepare an annual report for the Common Council on the new code's performance.

PUBLIC HOUSING

The City of Kingston's public housing program is operated by the Kingston Housing Authority (KHA), which was established in 1947. The primary goal of the KHA staff is to, "continue to provide housing services for moderate and low-income families and individuals while maintaining high standards of property management, service delivery and fiscal responsibility."

Recently, KHA has changed its public housing system by completing a Streamlined Voluntary Conversion (Section 22) which converts 161 of its public housing units into Tenant Protection Vouchers (TPV) to use for rental payments. In doing this the residents of those units could choose to stay at the complex or choose to take the vouchers elsewhere. KHA converted 131 units at Rondout Gardens, 25 units at Leonard & Vera Van Dyke Apartments, and 6 at units from Brigham Senior Housing. In addition to the TPV's from the former public housing facilities, the KHA also administers the City's Section 8 Housing Voucher (HVC) Program, which provides 180 vouchers to the residents. However due to the extremely limited housing stock available within the City, often times the vouchers end up needing to be returned after an already extended 6 month period to try to locate housing.

The Kingston Housing Authority has a Board of Commissioners that consists of 7 members. Five of the members are appointed by the Mayor and two members are required to be residents of the housing authority and are elected by other residents. The Board works to set policy for the Authority as well as inform tenants on administration changes and maintenance issues.

The Housing Authority has determined several preferences for their vouchers as well as the physical units. The HCV's should be prioritized to those living within the 12401 zip code, followed by the rest of Ulster County. The KHA-managed physical units are prioritized for those elderly, people with disabilities, and/or Veteran populations. Specifically, the VanDyke Apartments have a preference for ELI residents, as there are project-based vouchers attached to those units. KHA also established a displacement preference for households that are displaced by natural disaster or other national emergency declaration. Moving forward, KHA is working in phases to gradually rehabilitate and renovate their managed housing complexes as they are all aging and in strong need of restoration to provide decent and safe living arrangements.

PUBLIC TRANSIT

Households without a vehicle are at a disadvantage in accessing jobs and services, particularly if public transit is inadequate or absent. Access to public transit is critical to the lower income households in particular. Without convenient access, employment is potentially at risk and the ability to remain housed is threatened. The linkages between residential areas of concentrations of minority and LMI persons and employment opportunities are key to expanding fair housing choice. It is important to make sure that there is adequate public transportation options for the minority concentrations and LMI people who need to use them for daily employment. An additional piece of information to consider is the displacement and relocation of residents which could further their commute not only to work, but also to other places like the grocery store, shopping centers, parks and other recreational facilities, schools, etc. One way the City is working towards anti-displacement efforts is through the Anti-Displacement Learning Network (ADLN) Program. In 2020, the City met regularly with Enterprise Community Partners staff, housing experts, and other teams across the State for a series of workshops designed to guide anti-displacement strategies. Since then, the City has proceeded with creating a Tiny Homes Community that works to provide safe, emergency non-congregate housing and support residents who are at risk of becoming or are already homeless.

There were 1,322 households in 2020 without access to a vehicle in Kingston, comprising 11.8% of all households

Total	Drove alone	%	Carpooled	%	Public Transportation	%	Walked	%	Taxi, motorcycle, bicycle, etc.	%	Worked at home	%
Total												
11,120	7,627	68.5%	1,432	12.8%	461	4.1%	508	4.5%	374	3.3%	718	6.4%
White												
7,887	5,753	72.9%	939	11.9%	196	2.4%	282	3.5%	147	1.8%	570	7.2%
Black												
1,911	1,071	56.0%	321	16.7%	217	11.3%	74	3.8%	142	7.4%	86	4.5%
Hispanic												
1,322	803	60.7%	172	13.0%	48	3.6%	152	11.4%	85	6.4%	62	4.6%

Source: American Community Survey 2020 - 5 Year Data (B0801, B08105A, B08105B, B08105)

with workers aged 16 and over. Most residents drove to work alone. Black residents were least likely to drive to work alone and were the most likely to carpool or use public transportation. Hispanic residents were the most likely to walk. Whites were the most likely to drive to work alone and to work from home.

5-3 MEANS OF TRANSPORTATION TO WORK BY RACE/ETHNICITY, 2020

The City's most recent Comprehensive Plan identifies strategies to encourage the use of and improve public transportation stops and facilities. A few of these strategies and objectives include:

- Collaborate with the Kingston City School District, senior centers, advocacy groups, and public safety departments to provide community education about safe travel for pedestrians, bicyclists, public transportation riders, and others.
- Identify safety/accessibility improvements to pedestrian and bicycle routes used to access public transportation stops; collaborate with Kingston Citibus and UCAT to relocate stops where advisable.

- Ensure that public transportation facilities and vehicles are fully accessible to people with disabilities.
- Partner with UCTC & UCAT to enhance and expand public transportation services and infrastructure throughout Kingston and the surrounding region.
- Promote the enhancement of a local bus/paratransit system that increases personal mobility and travel choices, conserves energy resources, preserves air quality, and fosters economic growth.
- Work jointly with UCTC & UCAT to provide destinations and activities that can be reached by public transportation and are of interest to public transportation dependent populations, including youth, older adults, and people with disabilities.
- Incorporate infrastructure to assist users in employing multiple means of transportation in a single trip in order to increase transportation access and flexibility; examples include, but are not limited to, provisions for bicycle access on public transportation, secure bicycle racks at transit stops, access via public transportation to trails and recreational locations, and so on.

These strategies and objectives, if met, will allow for greater accessibility options for persons with disabilities, safer streets for pedestrians and bicyclists, expanded transportation services, increased travel choices, and more.

PRIVATE SECTOR POLICY

In addition to the public sector policies that influence fair housing choice, there are private sector policies that can influence the development, financing and advertising of real estate. In this section of the AI, mortgage lending practices, high-cost lending and real estate advertising are analyzed.

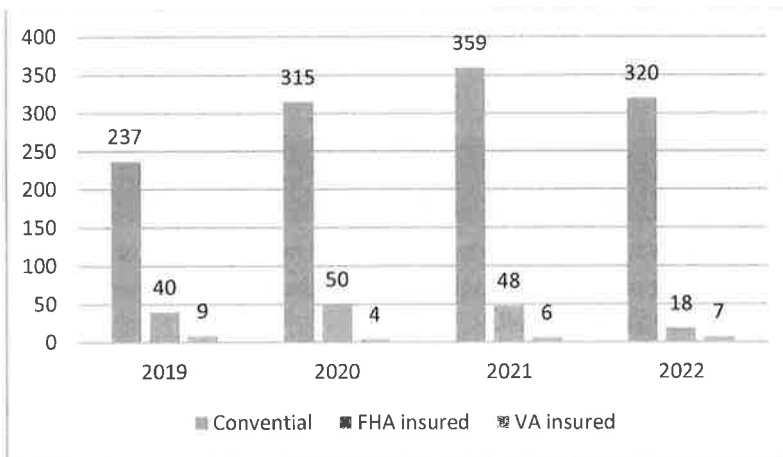
MORTGAGE LENDING PRACTICES

The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals and considering whether to purchase loans. Unfettered access to fair housing choice requires fair and equal access to the mortgage lending market regardless of race, color, national origin, religion, sex, familial status, disability or any other statutorily protected basis. Additionally, recent changes to HUD program regulation prohibit housing providers that receive HUD funding, those who have loans insured by the Federal Housing Administration (FHA) and lenders insured by the FHA from discriminating on the basis of marital status, perceived or actual sexual orientation or gender identity.

An analysis of mortgage applications and their outcomes can identify possible discriminatory lending practices and patterns in a community. Home Mortgage Disclosure Act (HMDA) data contains records for all residential loan activity, reported by banks pursuant to the requirements of the Financial Institutions Reform, Recovery and Enforcement Act of 1989. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

In 2022, there were 345 mortgage applications for home purchases in the City of Kingston according to data collected under the Home Mortgage Disclosure Act (HMDA). The total number of mortgage applications for home purchase increased between 2019 through 2021 but decreased in 2022. Conventional loans also saw an increase between 2019-2021, but a decrease then in 2022. The other loan types are far less common than the conventional loan.

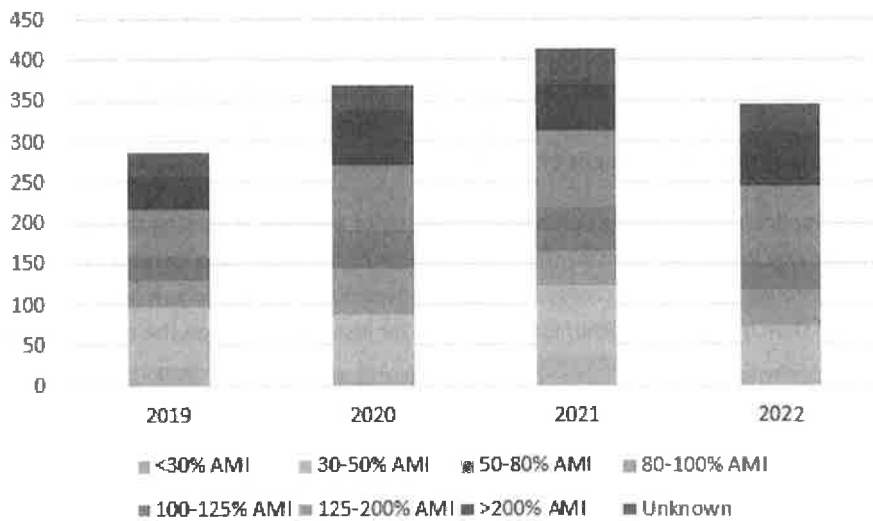
FIGURE 6-1 MORTGAGE LOAN TYPES



Source: HMDA 2019-2022 Data, Calculations by M&L Associates

Home purchases loans in the City of Kingston go to households earning between 50-80% area median income and 125-200% area median earnings very similarly over the course of the four years. Households at the lower ends of the income bands, <30% AMI and 30-50% AMI, receive much less mortgages compared to other income brackets. This breakdown has remained relatively consistent over the years.

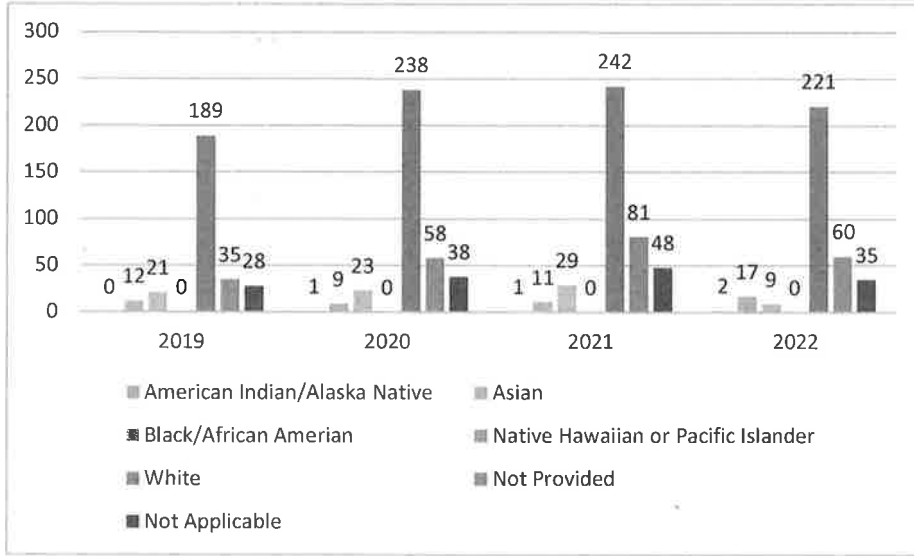
FIGURE 6-2 MORTGAGES BY INCOME



Source: HMDA 2019-2022 Data, Calculations by M&L Associates

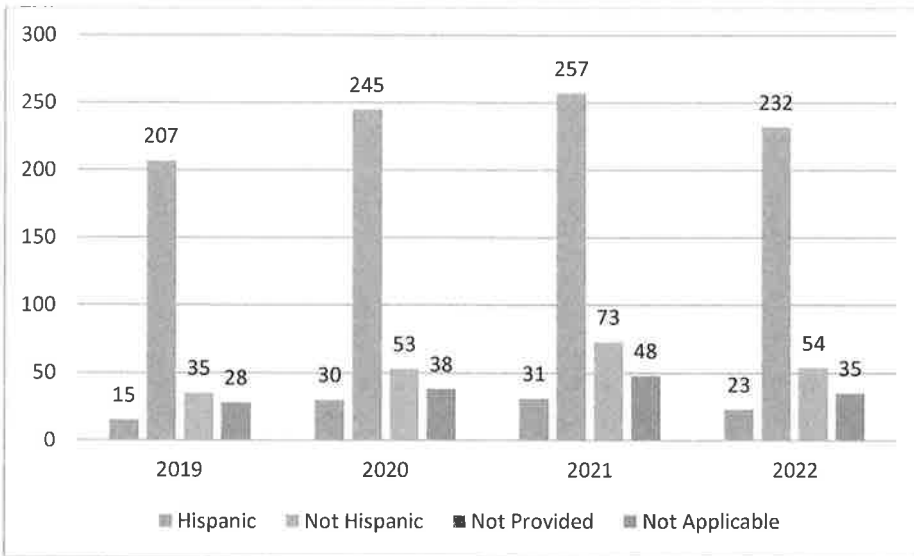
The most home purchase loans were approved for White applicants (64.2% in 2022). Of the loans awarded in 2022, Black applicants accounted for only 2.6%, Asian applicants 4.9%, American Indian/Alaska Native applicants 0.5%, and Native Hawaiian/Pacific Islanders for 0.0%. However, a significant portion of applications did not provide this information or responded, “not applicable” (27.6%).

FIGURE 6-3 MORTGAGES BY RACE



Source: HMDA 2019-2022 Data, Calculations by M&L Associates

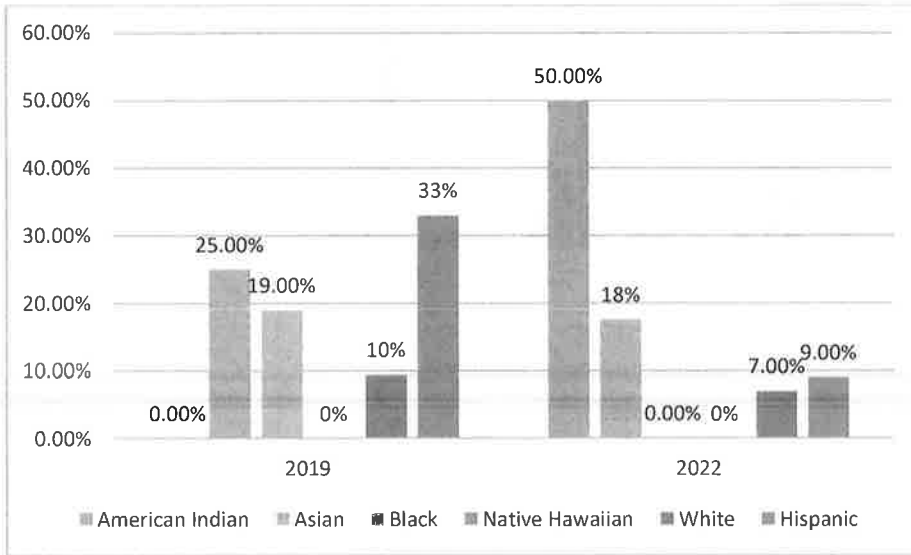
FIGURE 6-4 MORTGAGES BY ETHNICITY



Source: HMDA 2019-2022 Data, Calculations by M&L Associates

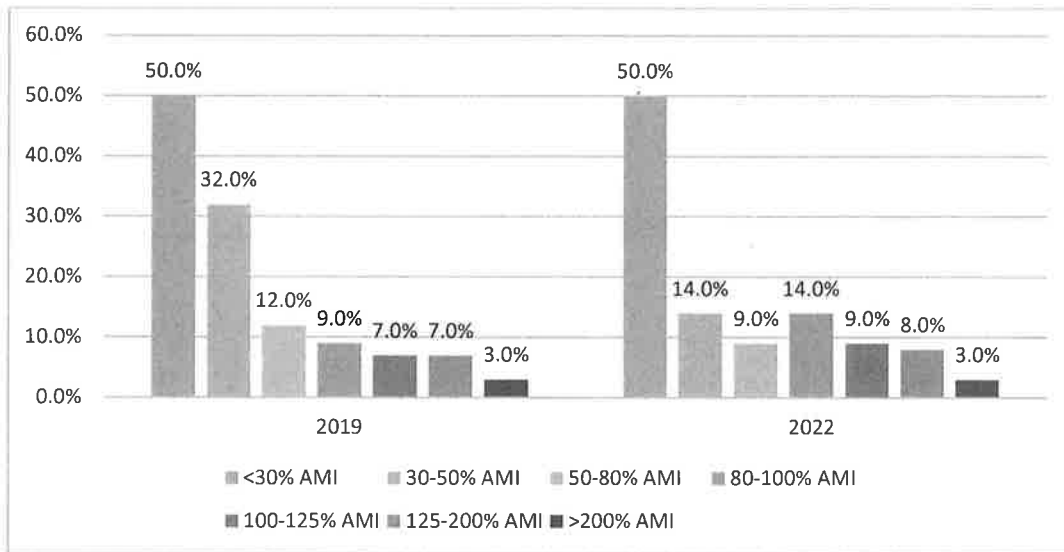
In terms of race and ethnicity, Hispanics had the highest denial rate in 2019 and American Indian/Alaska Native had the highest denial rate in 2022. In 2019, American Indian/Alaskan Native’s and Native Hawaiian’s had no data, meaning there were no mortgage applications at all. Therefore in 2019, the group with the lowest denial rate was White applicants with just 10%. In 2022, Black applicants had the lowest with 0%, although it should be noted there were only two total applications.

FIGURE 6-5 MORTGAGE DENIALS BY RACE/ETHNICITY



Source: HMDA 2019 & 2022 Data, Calculations by M&L Associates

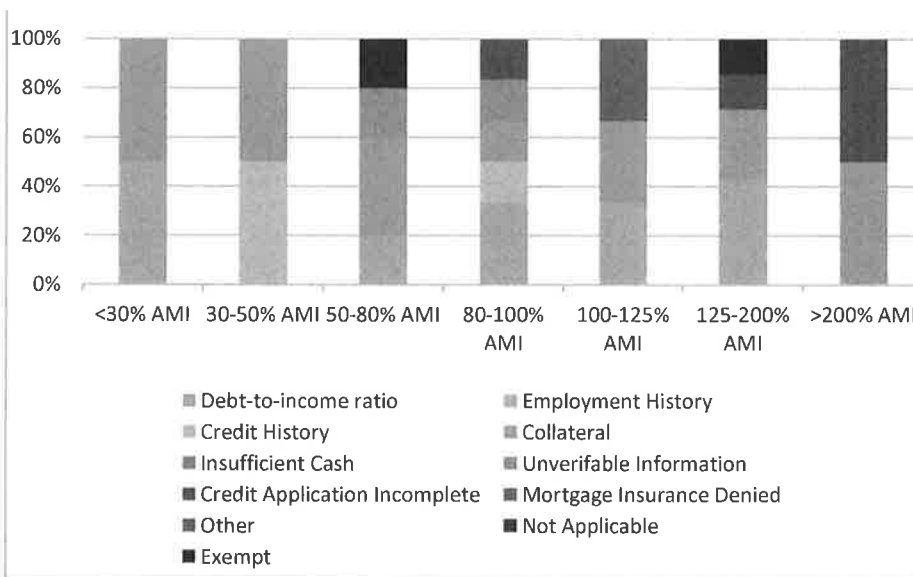
FIGURE 6-6 MORTGAGE DENIALS BY INCOME



Source: HMDA 2019 & 2022 Data, Calculations by M&L Associates

Issues with collateral were the most consistent reason for being denied a mortgage across all income brackets, appearing in each. Another common denial reason was the applicant’s debt-to-income ratio. Applicants at 80-100% AMI had the largest range of denial reasons.

FIGURE 6-7 MORTGAGE DENIAL REASONS BY INCOME

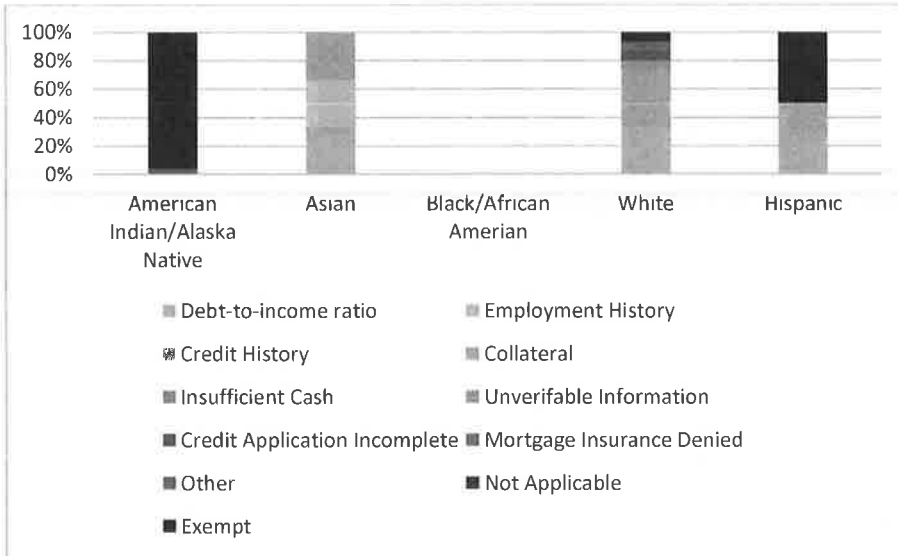


Source: HMDA 2022 Data, Calculations by M&L Associates

Debt-to-income ratio and collateral was the most common reason for denial across all groups. One thing to note is that the data sizes for each category is very small. One American Indian/Alaskan Native was exempt. Three Asian

applicants were denied, one for debt-to-income ratio, one for credit history, and one for collateral. No Black/African American applicants were denied. Fifteen White applicants were denied, five for debt-to-income ratio, six for collateral, one for unverifiable information, one for their credit application being incomplete, one listed as another reason, and one was exempt. Two Hispanic applications were denied, one for debt-to-income ratio and the other was exempt.

FIGURE 6-8 MORTGAGE DENIAL REASONS BY RACE



Source: HMDA 2022 Data, Calculations by M&L Associates

FAIR HOUSING ACTION PLAN

IMPEDIMENTS IDENTIFIED

Based on the qualitative and quantitative analyses conducted for the AI, three impediments to fair housing choice were identified. These include:

1. A general lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes
2. Overall low incomes and high poverty rates across various racial/ethnic groups and household types in the City, thus limiting their housing choice.
3. The age and size of housing units in the City. Over half of the units in the City were built prior to 1939 and are deteriorating and unsafe. Due to age many of the units cannot accommodate larger families, thus limiting their fair housing choice.

FAIR HOUSING ACTION PLAN

This section outlines actions to be taken, benchmarks, and a timeline associated with each action.

Actions	Entities Responsible	Benchmark	Time to Complete
Impediment A: A general lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes			
<p>Facilitate the development of new affordable and preservation of existing affordable housing for members of the protected classes (race, color, religion, sex, disability, familial status, national origin, creed, sexual orientation, military status, age, marital status)</p> <p>Conduct paired testing in order to reveal possible housing discrimination based on race, disability, familial status, lawful source of income, and other grounds.</p> <p>Preparation of an Anti-Displacement Plan to protect long-term residents from displacement due to rising rents and home prices</p>	<p>Kingston Office of Community Development Kingston Department of Housing Initiatives Affordable housing developers and builders including those building new units under the inclusionary zoning ordinance, local and regional supportive service agencies, Kingston Housing Authority</p>	<p>Number of affordable units built by income level; number of affordable units preserved through rehabilitation and weatherization; number of households assisted by race, ethnicity, disability status, familial status; number of households provided supportive services to maintain housing by race, ethnicity, disability status, familial status</p> <p>Work towards reaching the City-wide goal of approving 1,000 new housing units by 2029</p>	<p>2024-2028</p>
Impediment B: Overall low incomes and high poverty rates across various racial/ethnic groups and household types, thus limiting their housing choice			
<p>Provide targeted financial education to members of</p>	<p>Office of Community Development</p>	<p>Number of people participated in financial</p>	<p>2024-2028</p>

Actions	Entities Responsible	Benchmark	Time to Complete
<p>the protected classes including the Hispanic and female-headed households subpopulations who both experience high levels of poverty</p> <p>Provide resources to single parent with children households (Single mother homes make up 83.1% of all people living in poverty in the City)</p> <p>Provide job training opportunities to help lower income residents increase their skills and employment opportunities</p> <p>Draft a language access plan to assist racial/ethnic minorities</p>	<p>Nonprofit organizations that provide job training and related services to lower income residents, Local and regional HUD-certified housing counselors</p>	<p>education programs; number of homebuyers assisted by race, ethnicity, income, disability</p> <p>Number of persons who participated in job training programs</p> <p>Language Access Plan for LEP populations approved by Common Council</p>	
<p>Impediment C: The age and size of housing units in the City. Over half of the units in the City were built prior to 1939 and are deteriorating and unsafe. Due to age many of the units cannot accommodate larger families or individuals with disabilities, thus limiting their fair housing choice.</p>			
<p>Use new form-based code to support higher density housing, infill housing, multifamily housing.</p> <p>Fund housing rehabilitation programs to bring available units up to safe standards.</p> <p>Invest in the development of 3+ bedroom housing types in the City.</p>	<p>Office of Community Development Department of Housing Initiatives Zoning Advisory Board Affordable housing developers and builders including those building new units under the inclusionary zoning ordinance, local and regional supportive service agencies, Kingston Housing Authority</p>	<p>Number of large (3+ bedroom) housing types approved and developed</p> <p>Number of high density, multi-family, and infill housing units developed</p> <p>Number of housing units rehabilitated and preserved.</p>	<p>2024-2028</p>

APPENDIX A: LIST OF STAKEHOLDERS

Organization	Contact Name
Office of Community Development	Amanda Bruck
Department of Health and Wellness	Kristen Kessler
CARES-Continuum of Care	Kathy Germain
Community Action	Douglas Blancero
Kingston Housing Initiatives	Bartek Starodaj
Ulster County IDA	Hillary Nichols
Pattern for Progress	Kate Stryker
Community Action	Suzy Hirchey
UCCAC	Carol Furman
Ulster County Planning	Kai-Lord Farmer
Not Specified	Katrina Williams
Kingston Advisory Board	Sara Pasti
Family of Woodstock	Michael B
Family of Woodstock	Paul Rakon
Gateway Hudson Valley	Brandom Gibson
Ulster County Planning	Burt Samuelson
Midtown Arts District/Midtown Business Alliance	Maggie Inge
Mayor	Steve Noble
Kingston Human Rights Commissioner	Tawana Washington
Kingston Planning Department	Suzanne Cahill

