



Long Island Housing Services, Inc.

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www.LIFairHousing.org

Protecting Civil Rights for Long Islanders since 1969



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PROUD COMMUNITY PARTNER OF



A 501(c)(3) nonprofit
Fair Housing agency

February 26, 2025

Department of Community Development
Town of Babylon
47 West Main Street – Suite 1
Babylon, NY 11702

Re: Recommendations for the FY 2025 Analysis of Impediments

Dear Sir/Madam:

Long Island Housing Services, Inc. (LIHS) would like to express our gratitude to the Town of Babylon for its support of our programs through the allocation of Community Development Block Grant funds, as the urgency and level of need is great.

We would like to congratulate the Town of Babylon on joining the New York State ADU Plus program

In preparation for the 2025 Analysis of Impediments (AI) and Consolidated Plan (CP), we have provided our Fair Housing concerns for the town and their subgrantee villages:

1. Join Nation Fair Housing Alliance as a Supporting member
2. Join National Community Reinvestment Coalition as a member in order to deposit town funds in banks that support community reinvestment
3. Require Rental Permit Inspections to check whether Landlords are displaying NYS DHR required Notice of Reasonable Accommodation/Reasonable Modification rights in their rental offices.
4. Become designated as a ProHousing Community by New York State
5. Enact Rental Permit requirements that Landlords adopt a Fair Housing Policy
6. Remove from their Rental Permit requirements that tenants are a family or functional equivalent.
7. Require subgrantee Villages to disprove an assumption that a Local Preference or Local Residential Requirement for Affordable Housing has a Disparate Impact
8. Require investment subgrantee Villages show that if they are in High Opportunity Areas that they have their fair share of affordable housing
9. Require segregation level, such as using a dissimilarity index for their neighborhoods versus surrounding neighborhoods.
10. Adopt a visitability standard for building code.

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

11. Require that all accessibility requirements include needs of Persons with Intellectual Developmental Disabilities such as providing Wayfinding, Visual cues, and Quiet spaces.
12. **Desegregation** - Babylon is a historically segregated town. The placement of all the affordable housing outside of high opportunity areas reinforces that segregation. Priority must be given to seeking out and channeling resources to build affordable housing projects in high opportunity areas.
13. **Subrecipients.** Babylon has a duty to require that its subrecipient villages are also Affirmatively Furthering Fair Housing. Since those villages include Babylon's high opportunity areas, the funds they receive should be targeted to opening up the opportunity to move to those communities from low opportunity portions of the town, including auditing village zoning laws to ensure that they are inclusive and actively seeking the placement of affordable housing in those communities.
14. **Affiliated Housing Providers.** Babylon should remind their affiliated housing providers to follow county, state, and federal fair housing law, and provide evidence of auditing their procedures to ensure that those laws are followed.

LIHS' mission is the elimination of housing discrimination and promotion of decent and affordable housing through advocacy and education. Our services and programs driven by that mission. CDBR funds defray the costs of salaries, fringe benefits and other operational costs (including rent, utilities, equipment, and the cost of program audits). Our private enforcement efforts include investigating and prosecuting fair housing cases, advocating for victims and providing representation when evidence gathered is compelling. We collaborate and offer services for government sponsored agencies, non-profit service providers, and housing industry groups by providing fair housing education, outreach, counseling, and advocacy services.

LIHS works with the Town of Babylon to ensure that alleged Fair Housing law violations investigated and appropriate complaints are filed. Our staff will assist the Babylon's tenants, landlords and homeowners with maintaining a safe, affordable place to live.

We appreciate the support through CDA funds to augment our ability to provide these services and resources.

Sincerely,



Ian Wilder, Esq.

Executive Director

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