

WARREN COUNTY

Analysis of Impediments to Fair Housing Choice





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EXECUTIVE SUMMARY

This report is an Analysis of Impediments to Fair Housing Choice for Warren County Ohio. The analysis was directed by the Warren County Regional Planning Commission with guidance from the Warren County Grants Administration and supported with input from multiple County Departments and Agencies.

Community outreach and participation was an important driver for this analysis. Information was gathered from focus groups, community workshops, and an online survey. Focus groups were broken down into the following categories:

- Residents
- Housing Representatives
- Local Jurisdictions and Government Officials
- Financial Institutions
- Transportation
- Home Builders and Developers

The residents' survey along with supporting documentation for the plan could be found on the project's website in both English and Spanish. Survey results indicate that race and disabilities were not perceived as significant impediments to fair housing choice; however, neighborhood safety was a high priority for survey takers. It is important to note that the majority of survey takers are homeowners compared to renters. Respondents felt that lowering the cost of housing to make living expenses more affordable would improve housing for them and their families. The majority of respondents believed that supporting the availability of more affordable housing units would be the best route for the County to improve housing choices. Survey results are included in the Appendix.

A community profile and an existing conditions analysis were also conducted to get an understanding of where potential impediments and inequalities are located throughout the County. Notable findings regarding this study include the following:

- 222,184 people live within the study area in Warren County (*American Community Survey 5-Year Estimates*).
- The age cohort with the largest population in Warren County is 10 to 14 year olds with roughly 8,200 individuals, followed by around 7,950 people aged 50 to 54 years old.
- 9.4 % of County residents have a disability.
- 20.8% of residents within the age range of 65 to 74 years of age have a disability, and 46% of residents who are 75 and older also have some form of disability.



- Racial and ethnic minorities represent 10.4% of the County's population.
- Asians are the largest minority and they embody 5.5% of the County's population. Asians are primarily located in Deerfield Township and the City of Mason.
- African Americans account for 4.1% of the County's population and a majority of them live in the City of Lebanon, City of Franklin, and the Village of South Lebanon.
- The County's average household income is \$100,123 which is a 20% percent increase from 2010.
- 20% of family households with children under the age of 18 were Single-Parent households (5747 households). Single parent households, especially female head of households are also at risk of experiencing fair housing discrimination based on familial status.

Identification of Impediments

During the review, it was discovered that some situations have the potential to foster unfair housing practices and to make fair housing choice more difficult. For example, a high percentage of minorities have experienced challenges regarding communication barriers, transportation difficulties, and finding quality affordable housing. Specific impediments to fair housing choice in Warren County were identified as the following:

1. **Large Lot Size:** The eastern portion of the County, including Harlan, Salem, Washington, and Wayne Townships, is primarily rural. The zoning regulations for these areas require large lot sizes due to the lack of a central sanitary sewer connection and in an effort to retain the rural character of the area. Jurisdictions with adequate services have addressed barriers to affordable housing such as lot size, density, and building size. However, the market has been reluctant to build these types of developments.
2. **Required Minimum House Size:** Jurisdictions have implemented minimum house sizes ranging from 950 sq. ft. to 1,200 sq. ft. for single family. These minimum house sizes have not resulted in barriers to fair housing choice, although developers have been reluctant to build houses to the allowed minimum size standards.
3. **Prohibited Manufactured Home Parks:** Manufactured homes are allowed on most single family lots in Warren County, including all the jurisdictions in the eastern portion of the County. Only Wayne Township allows Manufactured Home Parks.
4. **Limited Multi-Family Zoning:** Multi-family housing is only allowed on a limited basis. This type of housing is frequently the route by which lower income minority households enter a community.



5. **The Definition of Family:** Areas of initial concern were jurisdictions that define “family” and had requirements of a maximum household size. However, upon further analysis these jurisdictions define family so broadly that it is unlikely to have an impact.
6. **Neighborhood Revitalization:** Areas identified as containing high concentrations of minorities include the cities of Franklin and Lebanon, and the villages of Morrow and South Lebanon. The physical and social infrastructure in the minority areas within these communities has remained dormant even as other areas experienced increased commercial and residential development.
7. **Employment and Housing Transportation Link:** Access to employment opportunities for minorities and families with a single head of household is limited. The County’s suburban growth pattern over the last 60 years has spread employment centers away from central city cores. These development models have separated jobs and residences and add to transportation cost.
8. **Public Transportation:** Inconvenient transportation services limit access to goods and services, as well as employment opportunities. Public transportation must be improved to efficiently connect the county’s employment and service centers to neighborhoods.
9. **Municipal and Other Services:** A major concern is the overall cost of utilities. Builders and developers stated during our community meetings that the average cost ranged between \$750-\$800 per linear foot for grading, paving, sewer, and water. Utility tap-in fees are also a concern for affordable multi-family projects.
10. **Public Housing and Housing Choices Vouchers:** This housing assistance is available in the form of Section 8 Housing Choice Vouchers, project-based Section 8 contracts, public housing, and USDA Rental Assistance. There is not enough public housing to serve demand creating a constant waiting list.
12. **Property Tax Policies:** Local tax policies impact housing affordability, and include laws related to property taxes, tax assessments, transfer taxes, and sales taxes on building materials. The added cost burden from property taxes may be an impediment for LMI ownership.
13. **Building Codes:** Warren County Building Department rates and service were not deemed impediments to fair housing choice. However, updated building codes inadvertently create impediments to affordable fair housing choice by impacting the rehabilitation cost of the older housing stock, often located in minority neighborhoods. Many times the cost of these upgrades exceeds the cost of the originally planned rehab project.



- 14. Visitability in Housing:** Visitability is the design approach recognizing that a non-resident with mobility impairment who uses a wheelchair or other mobility device should be able to visit the home. There is a need for implementing visitability standards in Warren County outside of senior living facilities.
- 15. Lending Policies and Practices:** The ability to own a home is highly dependent upon access to mortgage credit. This report investigates the extent to which people with different racial and ethnic characteristics have access to different types of mortgage credit.
- 16. Internet Advertising:** Local real estate brokers indicated knowledge of the Fair Housing Act and other laws governing fair housing. A review of real estate sites on the Internet revealed no discriminatory advertising, and in all cases, the HUD fair housing logo was included on the web page.

Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

Key impediments that were identified in the 2012 report and the progress that has been achieved solving those impediments are as follows:

- 1. Wider Variety of Housing Types in Zoning Codes:** Several of Warren County's jurisdictions limited the types of housing units permitted. Patio homes, zero-lot-line housing and accessory dwelling units and other types of small lot housing were restricted or not permitted. Warren County adopted a new zoning code that permits these types of housing, but several urban jurisdictions still restrict these uses.
- 2. Greater Degree of Neighborhood Planning; Revitalization & Investment:** The Regional Planning Commission (RPC) finished Comprehensive Plans in areas with concentrations of low to moderate income persons and minorities. The RPC held many evening meetings in the neighborhoods and invited the public to attend.
- 3. Better Housing-Transportation Linkage:** In 2014, the Regional Planning Commission, along with Warren County Transit Service established the Transportation Needs Committee to evaluate transportation issues; specifically, unmet transportation needs among low-income residents, the disabled, the elderly, and the mentally handicapped. The County Commissioners increased their contribution to the Warren County Transit Service to \$400,000 in order to help alleviate the job, housing and transportation disconnect. The Lebanon Loop, a flex-route transit service, was created.
- 4. Creative Delivery of Affordable Housing:** In 2014, students from the Warren County Career Center (WCCC) in a joint effort with Warren County Balanced Housing (WCBH) successfully completed a home rehab project. Upon completion of the project, the house was sold to a low-moderate household.



- 5. Coordinating the Delivery of Accessible Housing for the Aging and People with Disabilities:** One impediment that Warren County identified is a lack of accessible housing for the aging and persons with disabilities. The Community Housing Assistance Program (CHAP) is a non-profit board that finances and supervises housing for adult persons with disabilities. This organization purchases houses, conducts any necessary renovations and repairs, and rents them to disabled persons who are at the level of reasonable self sufficiency. The organization currently owns 37 units and has a waiting list of approximately 30 persons and growing.
- 6. Greater Awareness of Fair Housing Rights for Realtors and Residents:** Warren County continues to strive for housing equality through education, communication, and information. Approximately 1000 pieces of literature and 500 to 1000 pieces of "give-away" novelty items are distributed to the general public every year. Caseworkers from both Warren County Board of Developmental Disabilities and Warren County Community Services Senior Services ensure that clients are informed of their rights in regards to fair housing. Warren County Community Services (WCCS) and Warren County Board of Developmental Disabilities (WCBDD) coordinate with the Warren County Grants Office to provide Fair Housing information.
- 7. Visitability:** The Ohio Visitability Strategy Group, made up of state agencies, departments and commissions, was created to examine ways to promote visitability in Ohio's building and zoning codes. The Warren County Building and Zoning Department created a "Guideline for Warren County Universal Design and Visitability." The literature was made available to residents in 2014.



SHORT TERM RECOMMENDATIONS

This section outlines further recommendations to overcome the impediments to fair housing choice and details action items and strategies to achieve those goals.

- 1. Improve Financial Education:** The County can take an active role in bridging the language/cultural gap by translating brochures and applications. Also, the County can work in tandem with financial institutions to better assist them with their federally mandated programs intended to promote lending and provide loans in minority neighborhoods.
- 2. Promote Ohio Housing Locator:** The Fair Housing Office with the assistance of Housing Opportunities Made Equal (HOME) should promote the Ohio Housing Locator (OhioHousingLocator.org) to landlords and property management companies (for free property registry sign-up) and to the citizens of Warren County to find a place to rent. It is a searchable directory of affordable, accessible rental housing.
- 3. Provide Fair Housing Training for Policy Makers:** In order to minimize the potential negative impact of public policies and codes, policy makers should receive fair housing training to recognize potential fair housing problems experienced by protected classes. This could be achieved with assistance from HOME.
- 4. Update Zoning Codes to Address Mixed Use; Cluster Development; The Range of Permitted Housing Types; and Impediments for Group and Recovery Homes:**
 - Mixed Uses Developments: Updated zoning codes should include higher density districts, encourage infill, revitalization, and promote mixed-use districts.
 - Cluster Development: The Warren County Zoning Department's cluster subdivisions' required open space percentage will need to be reevaluated to gauge the balance between providing opportunities for fair housing choice through lower cost development and the quality of life the open space provision provides.
 - Range of Permitted Housing Types: Revise zoning policies to allow development of a range of housing types "as of right." Greater housing diversity and affordability may be achieved by revising zoning policies to explicitly allow a range of housing types, rather than requiring a special review process or disallowing certain types of structures entirely.
 - Group and Recovery Homes: Several county jurisdictions include location criteria for group home and institutional care facilities as well as other impediments including provisions beyond that required for single family development. Zoning codes should be updated to include language indicating that the Board of Appeals (BZA) may grant variances when considered a reasonable accommodation under the Fair Housing Act.



- 5. Expand the Lebanon Loop and Continue to Improve the Employment & Housing Transportation Linkage:** Warren County Transit has discussed the possibility of expanding the Lebanon Loop to include the industrial center south of Lebanon as well as South Lebanon. This route will allow the public, including those who live in low-income areas, to have better access to transportation for jobs, doctor appointments and recreational activities.
- 6. Provide Accessible Housing for the Aging and People with Disabilities:** The lack of accessible housing for the aging and persons with disabilities can be addressed by working with the Warren County Board of Developmental Disabilities (WCDD). WCDD has an established relationship with private care facilities to provide housing for disabled persons and through the Community Housing Assistance Program (CHAP), a non-profit organization that finances and supervises housing for adult persons with disabilities.
- 7. Lending Policies and Practices: Financial Institution Self-Testing:** It is important that the County's Fair Housing Office work with HOME to target marketing of responsible loan products and counseling targeted to communities and borrowers experiencing unequal access to loans. In addition, the County should ask the banks in Warren County to assess their HMDA data and establish Mortgage Review Committees to ensure that loan originators and underwriters are not letting stereotypes and prejudice affect their decisions.

LONG TERM RECOMMENDATIONS

- 1. Support the Use of the Low Income Housing Tax Credit (LIHTC) program:** The Low Income Housing Tax Credit (LIHTC) program was created in 1986 and is the largest source of new affordable housing in the United States. Warren County should research incentive programs to encourage LIHTC projects.
- 2. Establish a Housing Advisory Board and Housing Trust Fund:** The Warren County, Ohio Board of Commissioners could establish a Housing Trust Fund and a Housing Advisory Board. The Housing Trust Fund Implementation Task Force would develop recommendations on establishing a trust fund to address low-income housing needs in the community.
- 3. Establish a Land Bank:** Land banks are not financial institutions. They are public or community-owned entities created for a single purpose: to acquire, manage, maintain, and repurpose vacant, abandoned, and foreclosed properties, the worst abandoned houses, forgotten buildings, and empty lots. Land Bank programs give communities the opportunity to repurpose abandoned properties in a manner consistent with the community's values and needs.



WARREN COUNTY

Analysis of Impediments to Fair Housing Choice

SECTION 1

Introduction





SECTION I: INTRODUCTION

The Fair Housing Act of 1968 prohibits discrimination in housing-related activities on the basis of race/national origin, religion, color, sex, handicap (disability) and/or familial status.

The United States Department of Housing & Urban Development (HUD) has played a lead role in administering the Fair Housing Act. HUD's mission is to increase homeownership, increase access to affordable housing, fight housing discrimination, eliminate chronic homelessness, improve communities and affirm our nation's support of homes for society's most vulnerable populations.



Fair housing is a term that describes the right of individuals to obtain housing of their choice. This right is assured by the federal Fair Housing Act, as amended and other legislation which makes it unlawful to discriminate in the sale, rental, financing, and insuring of housing. The U.S. Department of Housing and Urban Development (HUD) requires that all governing authorities prepare a Consolidated Plan in order to receive HUD funds, and certify that they will "affirmatively further fair housing" within their jurisdictions. It is not enough for a community to support the idea of fair housing for all people; special measures must be implemented to afford all citizens the opportunity to live in housing of their choosing.

This analysis reviews Warren County's public and private policies, procedures, and laws that might impact a person's ability to choose housing of his or her choice without regard to their membership in any of the protected classes. Affirmatively furthering fair housing may be grouped into three categories:

- **Intent:** The obligation to avoid policies, customs, practices, or processes whose intent or purpose is to impede, infringe, or deny the exercise of fair housing rights by persons protected under the Act.
- **Effect:** The obligation to avoid policies, customs, practices, or processes whose effect or impact impedes, infringes upon, or denies the exercise of fair housing rights by persons protected under the Act.
- **Affirmative Duties:** The Act imposes a fiduciary responsibility upon public agencies to anticipate policies, customs, practices, or processes that previously, currently, or may potentially impede, infringe, or deny the exercise of fair housing rights by persons protected under the Act.

The first two obligations pertain to public agency operations and administration, including those of employees and agents, while the third obligation extends to private as well as public sector activity.



Entitlement communities, such as Warren County, have responsibilities related to the planning and development of fair housing within their respective community. Documentation of fair housing planning (FHP) is typically a component of the Consolidated Plan, which certifies that the community has undertaken steps to further fair housing by addressing the needs and concerns of the community. Fair housing planning is an on-going process that integrates various datasets reflecting

housing and market conditions in open and continuous dialog with community stakeholders. HUD expects fair housing planning to reflect community housing issues of the larger community with special consideration of the protected classes. The planning process should reflect local legislation, housing conditions, demographic assessments, phased action plans addressing local concerns and an evaluation of progress with supporting documentation.

This AI submission is the second AI assessment submitted by Warren County since becoming an entitlement community in 2009. The analysis was conducted by the Warren County Regional Planning Commission in cooperation with the Warren County Grants Administration. In addition, several other County agencies such as Economic Development, the Geographical Information Systems Department, the Warren Metropolitan Housing Authority, and the County Zoning Department provided supporting documents and feedback. The Warren County Regional Planning Commission was the lead facilitator for the focus group meetings, public participation, and for compiling this report. The AI is comprised of various sections and is highlighted below:

- **Executive Summary**

- **Section I: Introduction**

- **Section II: Jurisdictional Background Data**

An assessment of the County's population complete with demographics and a community profile follows the executive summary and introduction. The methodology on how the analysis was conducted and leading organizations involved with the planning is incorporated in this Section.

- **Section III: Evaluation of Jurisdiction's Current Fair Housing Legal Status**

Section III evaluates the jurisdiction's current fair housing legal status, which includes: fair housing complaints and compliance reviews, fair housing discrimination suits filed by the Department of Justice or private plaintiffs, reasons for any trends or patterns, and other fair housing concerns and/or problems.

- **Section IV: Identification of Impediments to Fair Housing Choice**

Section IV addresses the impediments that were found in private and public sectors, as well as current programs and activities in the jurisdiction to combat the impediments.



■ Section V: Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

Section V lays out what programs and opportunities are available to help combat impediments in the County.

■ Section VI: Conclusion and Recommendations

The concluding section provides a summary of the analysis as well as conclusions drawn from the study. A detailed breakdown of solutions and recommendations for alleviating impediments are provided in this section.

The report investigates potential public and private regulatory barriers including zoning and building codes to identify potential strategies to help improve affordability and fair housing choice. To examine aspects of the private for-profit sector's involvement with fair housing, loan and foreclosure data is examined to assess the extent of lending policies and procedures as well as any possible corrective action. Correlations between local tax policies and affordability are also explored. The report concludes with a list of recommendations and strategies to help alleviate the impediments found within the County. Warren County hopes that this AI will serve as the basis for fair housing planning, providing essential information to County staff, policy makers, housing providers, lenders, and fair housing advocates, and assisting with garnering community support for fair housing efforts.



An Analysis of Impediments to Fair Housing Choice (AI) is an examination of the impediments or barriers to fair housing that affect protected classes within a geographic region. HUD defines impediments to fair housing choice in terms of their applicability to state and federal law; this includes any actions, omissions, or decisions taken or that have the effect of restricting housing choice because of race, color, religion, sex, disability, familial status, or national origin.

Definition: HUD defines affirmatively furthering fair housing as requiring the County to:

1. Conduct an analysis to identify impediments to fair housing choice within its jurisdiction.
2. Take appropriate actions to overcome the effects of any impediments identified through the analysis.
3. Maintain records reflecting the analysis and actions taken in this regard.

Methodology

The study area for the Analysis of Impediments spans all of Warren County inclusive of its cities and villages, except for the cities of Loveland, Middletown, and Monroe and the Village of Carlisle. The following methods were used in preparing this AI:



1. Data coherency and reliability were critical concerns during preparation of this document. Analyses were prepared based on data from the U.S. Census; The American Fact Finder 2016 (estimates), the American Housing Survey, the Warren County Housing Coalition, the Warren County Comprehensive Plan, OKI Reports and other sources.
2. Interviews were conducted with service providers and experts in housing and human services, financial institutions, local government officials (including zoning inspectors, community development organizers, and administrators), educational organizations and schools, and public/private entities associated with fair housing concerns.
3. Information collected from research and/or discussions with other local and regional stakeholders.
4. Focus groups with housing professionals including bankers, developers, real estate agents, fair housing program staff, educational services, governmental agencies and advocates for special populations.
5. Consultations were held with key County, City and Village staff members.

Components of Analysis of Impediments (AI)

An Analysis of Impediments (AI) to Fair Housing Choice (FHC) is a federally mandated assessment that provides the foundation for Fair Housing Planning (FHP) and development of safe, accessible housing within the community. The AI presents the current state and situation of housing and provides policymakers, stakeholders, and members of the larger community an evaluation of specific needs and potential programs, policies and corrective actions to address local housing issues. The purpose of the AI is to increase housing choice across the County to guarantee equal access and identify problems that impede choice and therefore restrict personal, educational, employment, or other goals. The intent of the AI is to support FHP by identifying impediments to FHC in the public and private sector. At its core the AI is an assessment of conditions affecting FHC for all protected classes. The AI is required to address the following issues:

- Population Demographics
- Income & Employment Data
- Housing Profiles

The AI report documents the dynamics of the local population detailing the size and extent of certain protected classes and depicts the changing demographic composition of the community's elderly population and its labor force. Included in the housing assessment is an analysis on the availability and affordability of accessible housing in a range of unit sizes in order to better assess the demand for accessible units. The AI also reviews local laws, regulations and administrative policies, procedures and practices that inhibit or restrict fair housing choice. This includes an assessment of how those laws, policies, and procedures affect the location, availability, and accessibility of housing.



Founding Sources

HUD's Community Development Block Grant Program (CDBG) has been a versatile funding source to assist local communities with their economic, housing and community development needs. Each activity funded by CDBG program funds must meet at least one of three national objectives identified in Title I of the Housing and Community Development Act of 1974 as amended, and regulations contained in 24 CFR 570.4832. The three objectives are:

1. Benefit to low and moderate income persons;
2. Prevention or elimination of slums or blight; and/or,
3. Meeting community development needs having a particular urgency.

This analysis of Impediments to Fair Housing Choice was funded by the County Commissioners, who entered into an agreement with the Warren County Regional Planning Commission relative to the Warren County Community Development Block Grant Entitlement Program. The Resolution for the written legal transaction is represented on Figure 1.1 below.

Figure 1.1: Funding Source Resolution

**BOARD OF COUNTY COMMISSIONERS
WARREN COUNTY, OHIO**

Resolution

Number 12-0136

Adopted Date January 31, 2012

APPROVE AND AUTHORIZE THE PRESIDENT AND/OR VICE PRESIDENT OF THIS BOARD TO ENTER INTO AN AGREEMENT WITH THE WARREN COUNTY REGIONAL PLANNING COMMISSION RELATIVE TO THE WARREN COUNTY COMMUNITY DEVELOPMENT BLOCK GRANT ENTITLEMENT PROGRAM

WHEREAS, Warren County desires assistance with the development of the Fair Housing Analysis of Impediments as outlined by the U.S. Department of Housing & Urban Development as a requirement of the Community Development Block Grant (CDBG) Entitlement Program; and

WHEREAS, the Warren County Regional Planning Commission has agreed to undertake the development of the aforementioned document; and

NOW THEREFORE BE IT RESOLVED, to approve and authorize the President and/or Vice President of this Board to enter into an Agreement with the Warren County Regional Planning Commission for consideration set forth for services of the development of the Fair Housing Analysis of Impediments relative to Warren County's CDBG Entitlement Program, as attached hereto and made a part hereof.

Mr. Ariss moved for adoption of the foregoing resolution, being seconded by Mr. Young. Upon call of the roll, the following vote resulted:

Mrs. South - absent
Mr. Young - yea
Mr. Ariss - yea

Resolution adopted this 31st day of January 2012.

BOARD OF COUNTY COMMISSIONERS

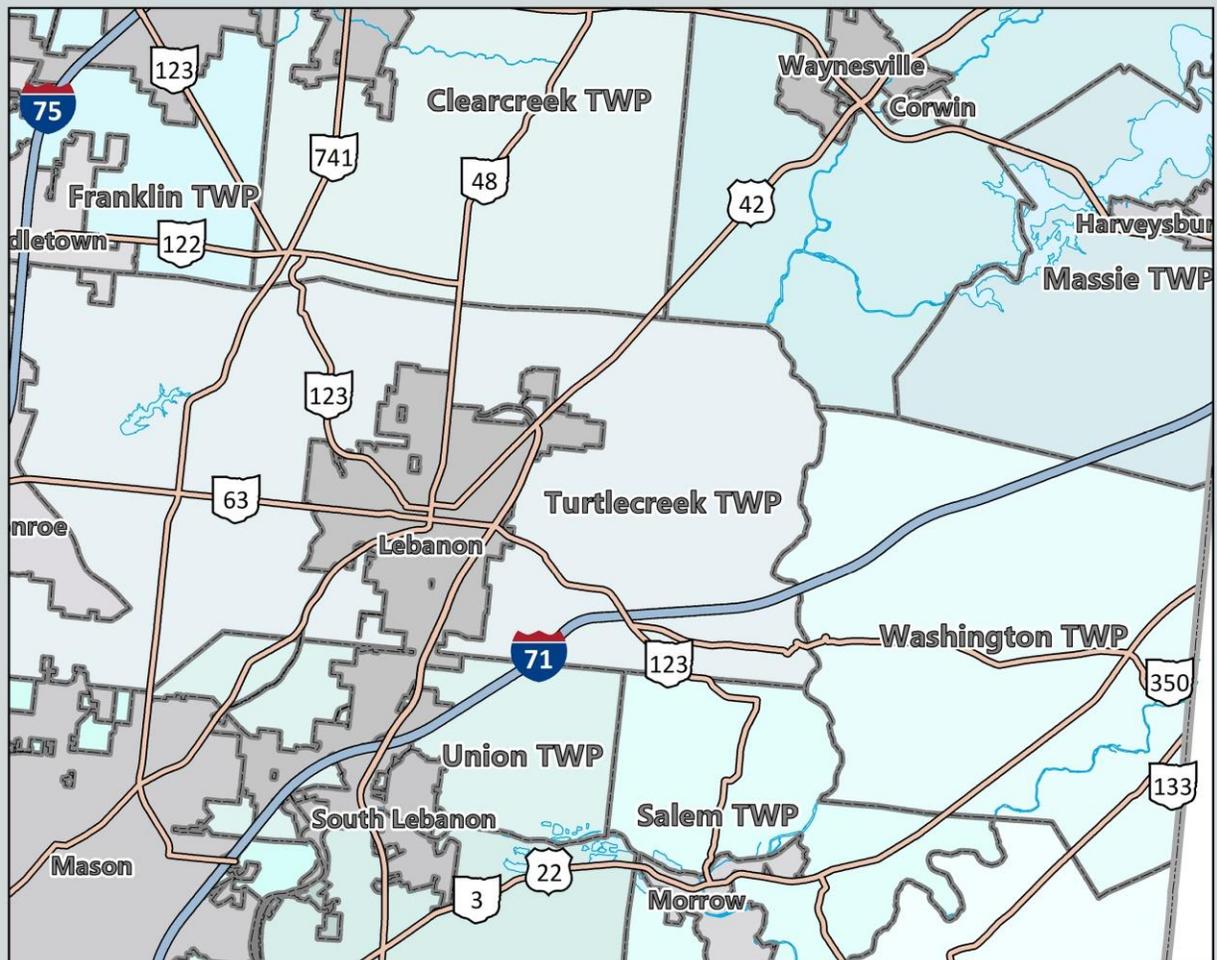
Tina Davis, Clerk



WARREN COUNTY

Analysis of Impediments to Fair Housing Choice

SECTION 2 Community Profile and Existing Conditions





SECTION II: COMMUNITY PROFILE AND EXISTING CONDITIONS

DEMOGRAPHIC/ ECONOMIC OVERVIEW

This section profiles Warren County's demographic and housing trends by examining and mapping data collected from American Fact Finder, the United States Census, HUD, and other relevant sources. After analyzing demographic characteristics and trends, this section provides an analysis of the County's demographic, income, employment, and housing trends that have developed since the last analysis.

COMMUNITY PROFILE

Warren County, Ohio was established in 1803 and is located in the southwest corner of the state, approximately 25 miles north of Cincinnati and 15 miles south of Dayton. It is also located within a day's drive for approximately 65% of the U.S. population. Its 400 square mile area serves a residential population estimated at 228,882 (*American Community Survey, 2017 Population Estimates*). The County includes 11 townships, 10 villages, and 7 cities. However, this report excludes the cities of Loveland, Middletown, Monroe, and the Village of Carlisle as those communities do not fall under Warren County's entitlement umbrella. Ranked as the 3rd fastest growing County in Ohio, behind Delaware County, north of Columbus, and Geauga County; Warren County has experienced a 4.5% increase in population since the 2010 census and a 34.3% increase in population since the year 2000. Our estimated population makes us the 12th largest county in Ohio. Warren County is also ranked as the 98th fastest growing County in the nation out of 3,141 counties. Last year, the City of Mason was ranked #24 and the City of Springboro ranked #41 by CNN Money Magazine in their list of the top 100 best places to live in the United States. The City of Lebanon was chosen as the Best Hometown by Ohio Magazine.

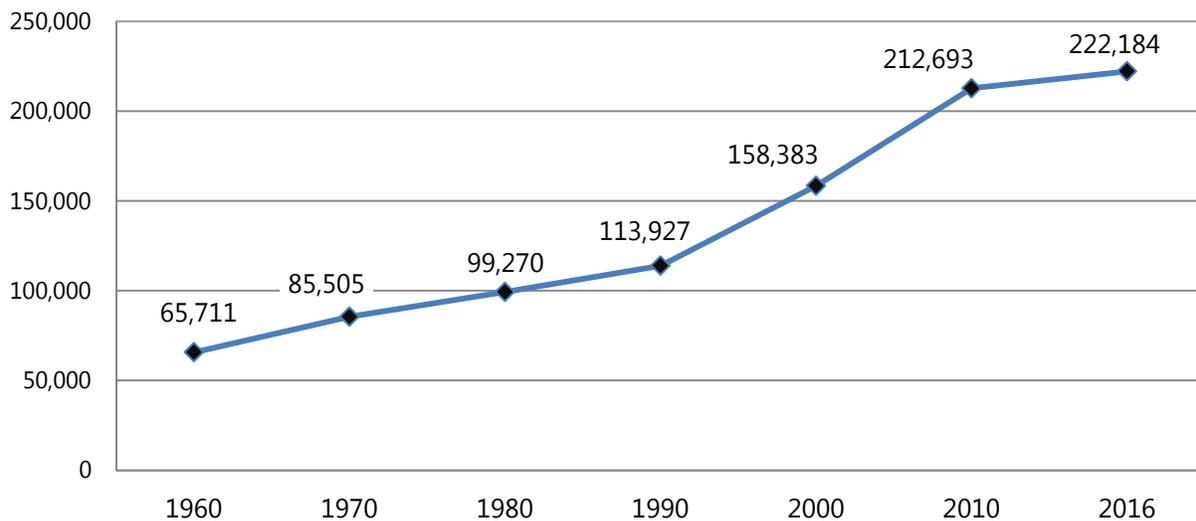
Warren County has a 77% home ownership rate. That is the highest rate in the Dayton-Cincinnati Region while the state average is 66%. Despite our population increase, 53% of land in Warren County is still farmland, open/green space, and designated parks.

Perhaps the greatest attribute to Warren County has been the explosive growth it has received over the last 20 years, particularly in the western portion of the County where there has been intense residential, commercial, and industrial growth.

The fastest growing areas in Warren County are the western portions of the County, including the Cities of Mason and Springboro, and the Townships of Clearcreek, Deerfield, and Hamilton. The County's Net Migration Flow between 2011 to 2015 showed an increase of 1,857 individuals. Approximately 1,000 of these residents originated outside of the United States of America.



Figure 2.1: Warren County Population History



Source: American Community Survey: 5 year estimate, 2016

RACE/ETHNICITY

Since the last analysis in 2012, Warren County has grown more diverse in terms of racial and ethnic composition. In 2010, 90.5% of County residents were White (non-Hispanic) and in 2016 this category decreased, and now accounts for 87.5%. The percentage of White Hispanics also grew by 1,226 persons since the last study and White Hispanics now represent 2.5% of the population. The numbers indicate that the County's minority populations have grown at a faster rate and in 2016 the racial and ethnic minorities represent a greater percentage (10.4%) of the County population.

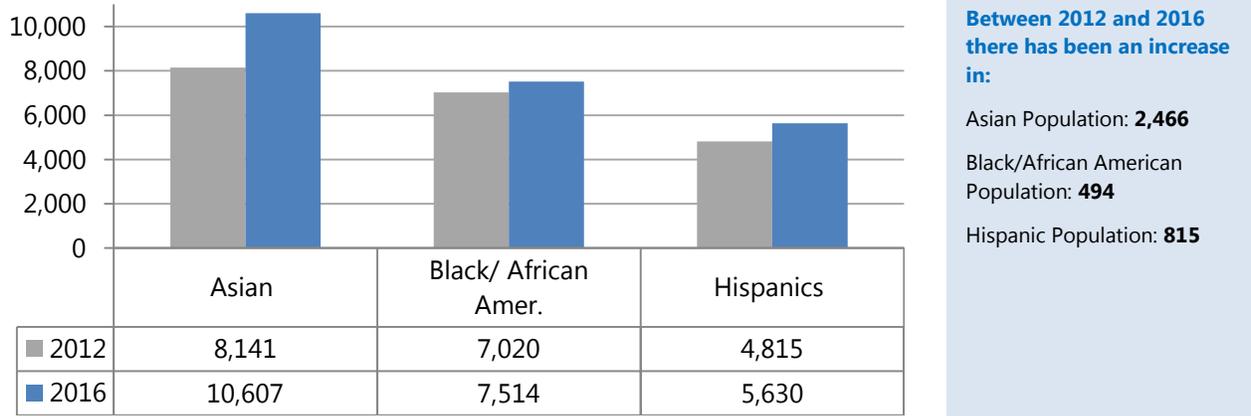
Although dispersed across the County, the Asian population, the County's largest minority at 5.5% is largely concentrated in southwest portions of the County; where they constitute 9% of the City of Mason and 15.2% of Deerfield Township's population. A significant Asian population was also found in the Cities of Springboro and Lebanon. African American, the second largest minority (4.1%) is mainly concentrated in the central and northwest portions of the County, within the City of Lebanon and City of Franklin. The 2016 estimated census data reveals that minority populations have grown since the last analysis. The areas of concentration for minorities are also the areas that have seen the largest number of new housing units. Growth with these areas, the western portion of the County, is predicated on the availability of housing, the cost of housing, the quality of housing and access to community services and employment.

Figures 2.2, 2.3, and 2.4 collectively illustrate the distribution and shifts within the racial/ethnic minority population in Warren County. Comprising nearly 12% percent of the County's population, racial minorities are highly concentrated in census block groups near the City of Lebanon, where they make up 9.7% of the city's population. Lebanon's racial and ethnic



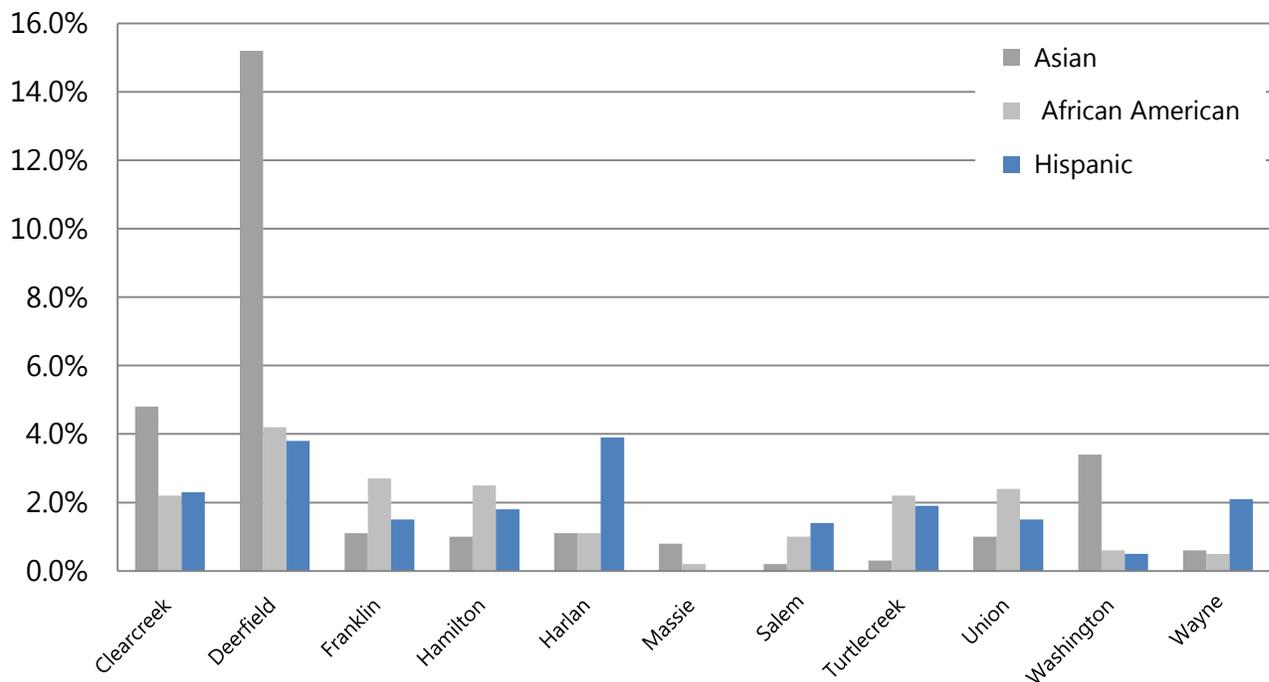
minorities are primarily Hispanics and African-Americans (non-Hispanic) that respectively constitute 3.6% and 2.5% of the city’s population.

Figure 2.2: Minority Population change within Warren County



Source: American Community Survey: Five year estimate, 2012 & 2016

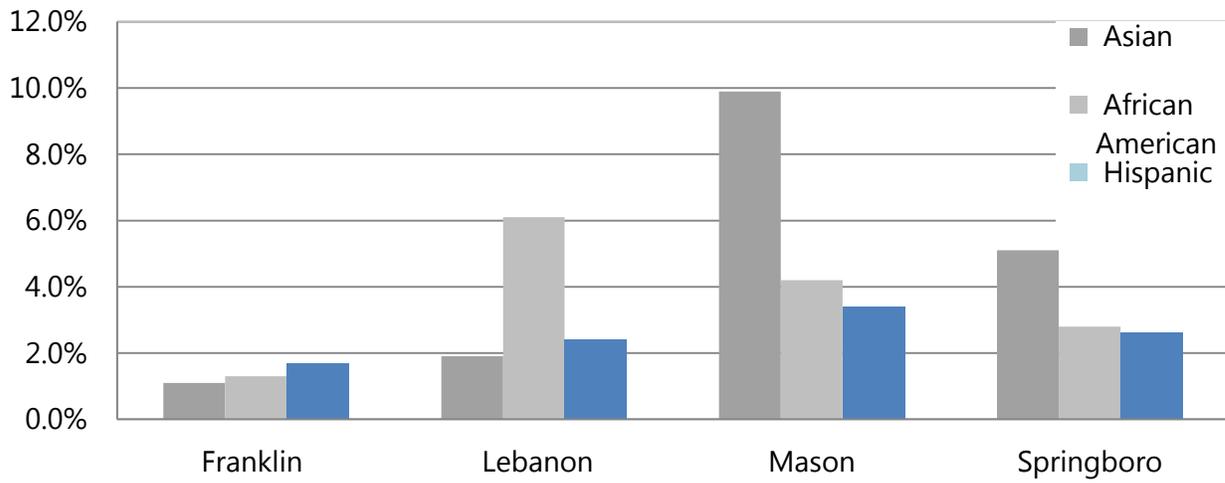
Figure 2.3: Racial & Ethnic Distribution by Township in Warren County, 2016



Source: American Community Survey: Five year estimate, 2012 & 2016



Figure 2.4: Racial & Ethnic Distribution by City within Warren County, 2016



Source: American Community Survey: Five year estimate, 2012 & 2016

AGE

The following population pyramid displays individual cohorts for 2016. As illustrated in Figure 2.5, the most populated cohorts were those aged 10-14, followed by those aged 50-54. The analysis conducted in 2012 showed that the most populated cohort were those in the age ranges of 45-49 and 10-14. This indicates that Warren County's population has grown older. The median age in 2010 was 37.8, and the estimated median age in 2016 is 39.1. This indicates that there should be a focus on maintaining services for the elderly, so that the aging population may continue to be a part of the community.



Figure 2.5: Population Pyramid, 2016

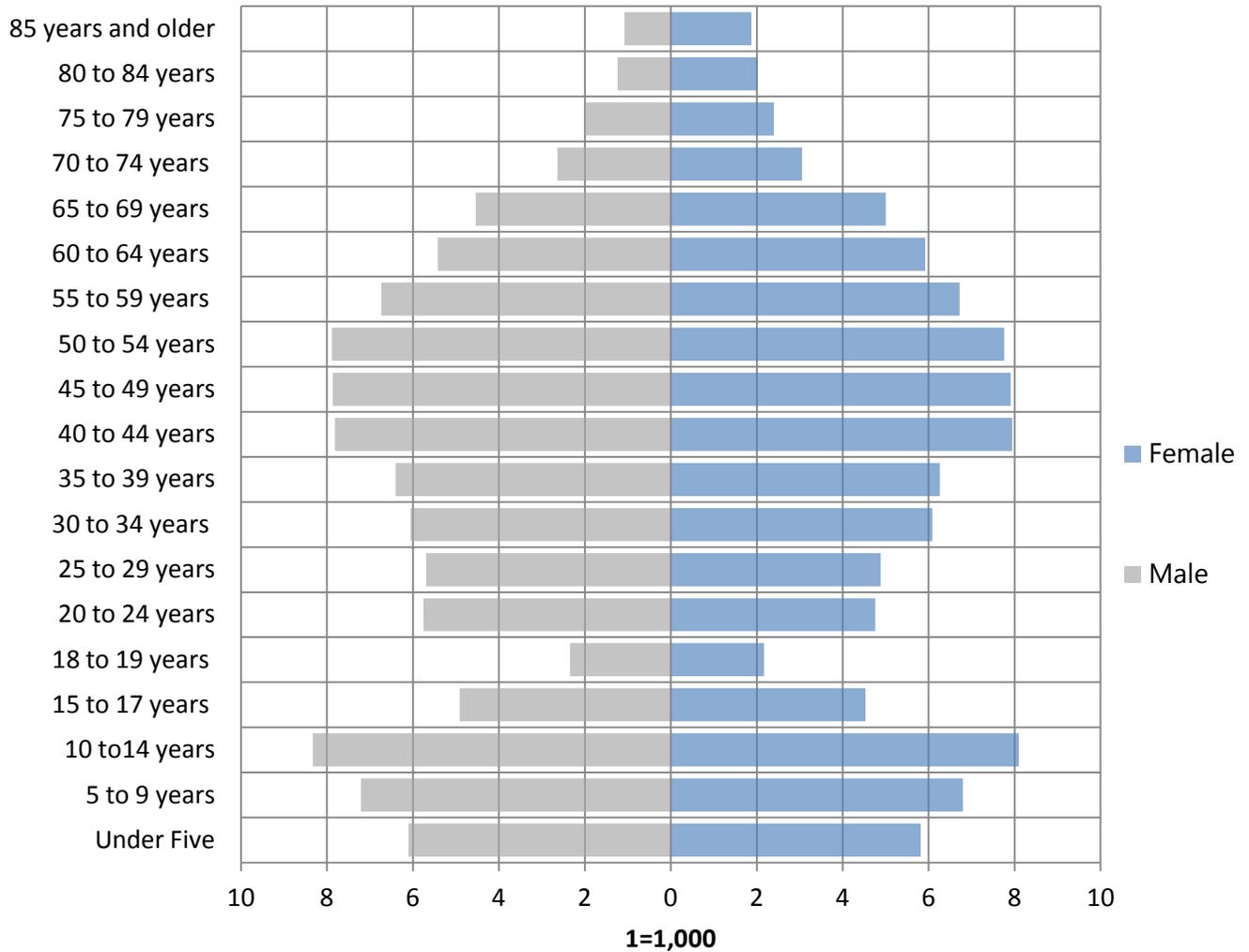


Table 2.1: Disabilities, 2016 Estimate for Warren County

2016 Census Age	Warren County			Ohio		
	Population	Disabled	% Disabled	Population	Disabled	% Disabled
Under Five years	13,241	80	0.6%	695,764	5,039	0.7%
5 to 7 Years	44,288	1,725	3.9%	1,940,593	124,463	6.4%
18 to 34 years	38,745	1,825	4.7%	2,522,084	174,618	6.9%
35 to 64 years	91,551	8,092	8.8%	4,528,611	661,433	14.6%
65 to 74 years	16,692	3,473	20.8%	989,750	249,056	25.2%
75 years and older	11,215	5,164	46.0%	737,177	357,045	48.4%
Total	215,732	20,359	9.44%	11,413,979	1,571,654	13.77%

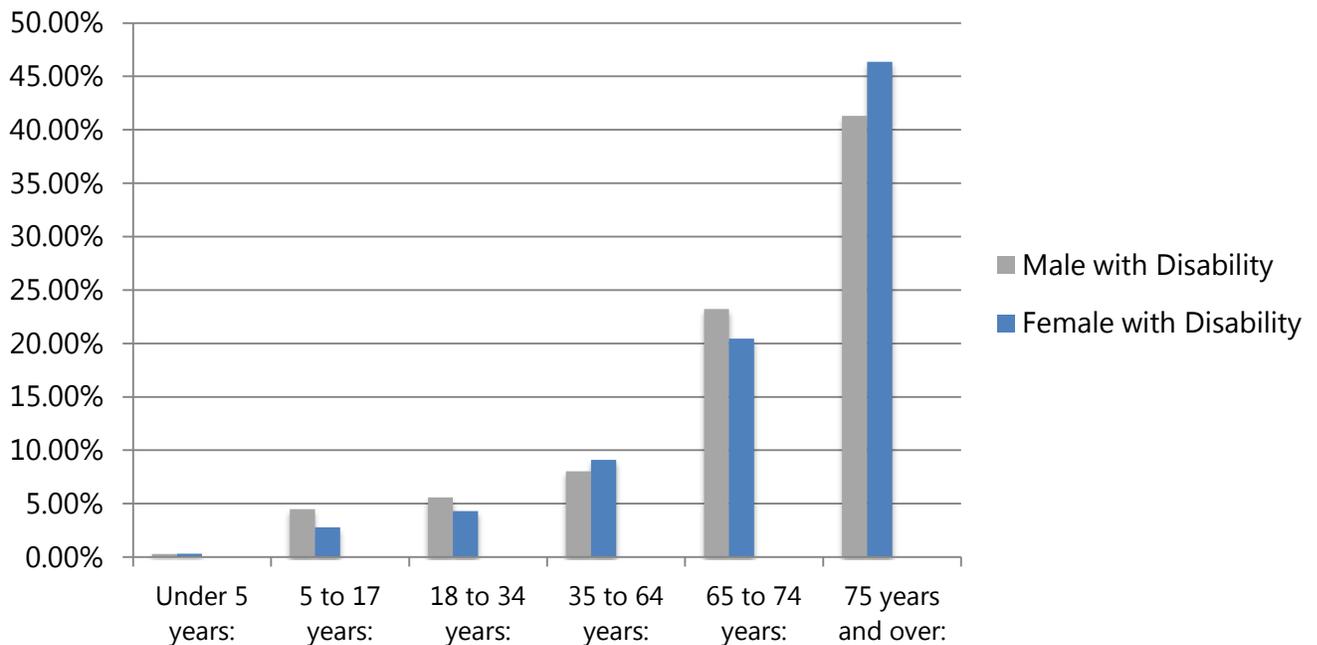
Source: American Community Survey



DISABILITIES

Persons with disabilities face some of the greatest barriers to fair housing choice due to needed accessibility features, as well as access to public transit, support services and/or affordability. According to Table 2.1, 20.8% of residents within the age range of 65 to 74 years of age have a disability, and 46% of residents who are 75 and older also have some form of disability. These two age groups may also experience ambulatory difficulties as they continue to live within the County.

Figure 2.6: Male & Female Disability Percentages in Warren County



Source: 2011-2015 American Community Survey Selected Population Tables

The mobility impaired segment of the population are most likely in need of specialized transit consideration, as they would most likely not be able to drive, walk independently or utilize public fixed-route transportation services. The County's aging population should continue to be observed so that they may still have the ability to access essential services. The needs of the County's elderly population will be considered in terms of how it affects their housing choice.

FAMILIAL STATUS

Census data reveals that the total number of households in 2016 was approximately 86,789; a 13% increase from 2010. The average household size in Warren County has increased slightly from 2.70 persons per household in 2010 to 2.71 persons per household in 2016. Table 2.2 examines the change of housing units from 2000 to 2016 in the townships and cities within Warren County, indicating that households have steadily increased over time. The greatest growth trends from 2000 to 2016 have been Hamilton, Deerfield, and Clearcreek Township.



Single parent households, especially female head of households are at risk of experiencing fair housing discrimination based on familial status. 2010 census data indicated that on average roughly 4.7 percent of the County's households are single family female parents raising children 18 years old or younger. Union Township accounts for the highest amount of female parent at 7.5%, with Franklin Township being the 2nd highest at 6.77%. A summary of the 2010 census household data is listed below on Table 2.3.

Townships that have the highest percent of Female-Single Parent Households:

1. Union
2. Franklin

Table 2.2: Housing Units, 2000 - 2016

Jurisdiction	Total Housing Units: 2000	Total Housing Units: 2010	Total Housing Units: 2016
Clear Creek Township	7,474	10,404	11,245
Deerfield Township	9,723	13,419	14,781
Franklin Township	11,198	11,752	13,111
Hamilton Township	3,852	8,508	8,933
Harlan Township	1,306	1,705	1,797
City of Lebanon	6,218	7,436	7,793
City of Mason	8,111	11,016	12,337
Massie Township	393	432	532
Salem Township	1,614	1,658	1,797
Turtlecreek Township	3,394	3,952	7,793
Union Township	1,857	1,787	1,886
Washington Township	703	976	1,160
Wayne Township	2,769	3,123	3,604

Table 2.3: Households, 2010

Jurisdiction	Total Housing Units	Female Single- Parent Households	Percent of Total Households
Clear Creek Township	10,404	441	4.24
Deerfield Township	13,419	637	4.75
Franklin Township	11,752	796	6.77
Hamilton Township	8,508	322	3.78
Harlan Township	1,705	43	2.52
City of Lebanon	7,436	654	8.8
City of Mason	11,016	560	5.08
Massie Township	432	11	2.55
Salem Township	1,658	77	4.64
Turtlecreek Township	3,952	163	4.12
Union Township	1,787	126	7.05
Washington Township	976	23	2.36
Wayne Township	3,123	133	4.26



Home Values and Affordability

The most expensive homes in the County are located in Clearcreek Township, the City of Mason, and Deerfield Township having an estimated median home value at around \$230,000. The most affordable homes are located in Franklin Township and the City of Franklin with median home values of \$100,000 to \$130,000 (see Figure 2.7 and Table 2.4).

Table 2.5 documents the median income for protected groups and illustrates how much of that income per month could be budgeted toward making housing payments without experiencing a cost burden. This amount is calculated at 30% of the median income, which is a threshold that the Department of Housing determines reasonable to pay for housing expenses. Anything higher than 30% is considered a cost burden. Table 2.5 also lists the monthly budgeting toward housing for minorities who are considered low income, very low income, and extremely low income. Low income is considered to be 80 percent of the median income amount; very low income is 50%, followed by extremely low income at 30%. Calculations for minorities in these categories are listed on line items 3 – 5 in Table 2.5.

The data indicates that the wealthiest minorities in Warren County are Asians, which have a yearly median income of \$116,506. This is significantly higher than other minority groups, with the second wealthiest population being Hispanics with a median income of \$70,085. In fact, Asians who are considered extremely low income would still be able to afford homes in the City of Franklin and Franklin Township. According to this analysis, female head of households with no husband present are the minorities who experience the greatest cost burden (a median income of \$42,876). Female head of households with an extremely low income could afford approximately only \$320 towards housing per month. This group would experience a cost burden in any jurisdiction in the County.

In summary, the conclusion can be made that that the main impediment to the County is not that the majority of minorities can't afford housing, but that there is a lack of affordable houses on the market to meet the demand. As a result, many minorities have to find affordable homes outside of Warren County in order to meet their housing needs. Figure 2.15 supports this statement by showing that a majority of individuals that work in Warren County actually commute to the County from outside its jurisdiction. It is apparent that the availability of affordable homes is lacking in the County, and solutions to address this need to be considered.



Figure 2.7: Median Home Values in Warren County

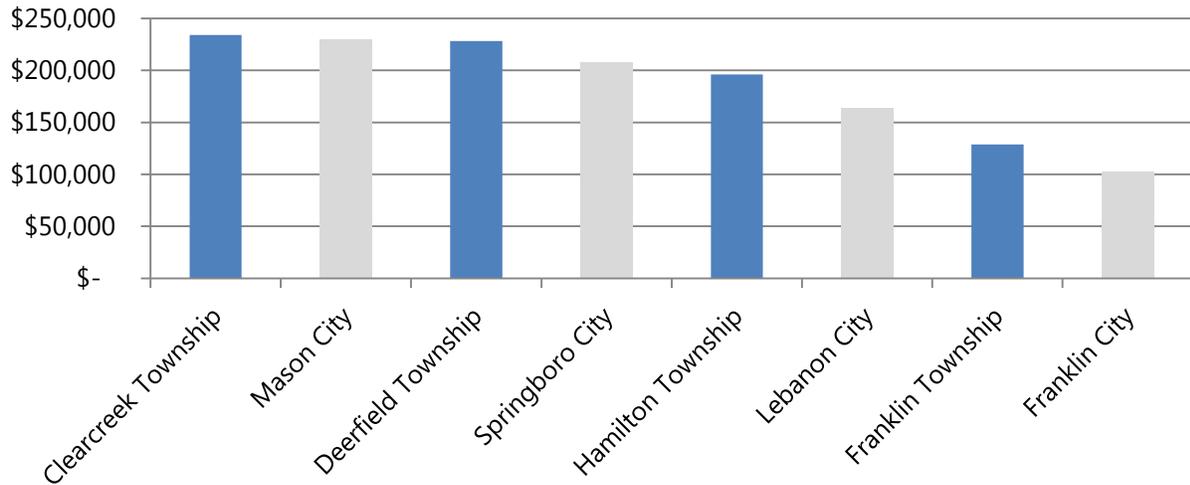


Table 2.4: Home Values and Estimated monthly mortgages by Jurisdiction

	Median Home Value Source: U.S. Census Bureau	Estimated Monthly Mortgage Cost (After 20% downpayment) Source: Zillow
Clearcreek Township	\$ 233,900	\$ 1,353
Mason City	\$ 230,100	\$ 1,332
Deerfield Township	\$ 228,100	\$ 1,321
Springboro City	\$ 207,500	\$ 1,207
Hamilton Township	\$ 196,100	\$ 1,145
Lebanon City	\$ 163,800	\$ 967
Franklin Township	\$ 128,700	\$ 774
Franklin City	\$ 102,500	\$ 648

Table 2.5: Affordable Housing Expenditures for Minorities

	Black or African American	Asian	Hispanic or Latino	Female Head of Household (No Husband Present)
Median Income	\$66,989.00	\$116,506.00	\$70,085.00	\$42,876.00
Affordable Housing Expenditure at Median Income	\$1,674.73	\$2,912.65	\$1,752.13	\$1,071.90
Affordable Housing Expenditure at 80% of the median income	\$1,339.78	\$2,330.12	\$1,401.70	\$857.52
Affordable Housing Expenditure at 50% of the median income	\$837.36	\$1,456.33	\$876.06	\$535.95
Affordable Housing Expenditure at 30% of the median income	\$502.42	\$873.80	\$525.64	\$321.57



INCOME

Since the last analysis in 2012, Warren County has continued to see growth within its jurisdictions and a change within the median household income (MHI). Figure 2.9 compares the County's MHI to the state of Ohio and the United States. Within the four year time gap the County has seen a 5.75% increase, going from 72,055 in 2012 to 76,200 in 2016.

Figure 2.8: Percentage of Households by Income

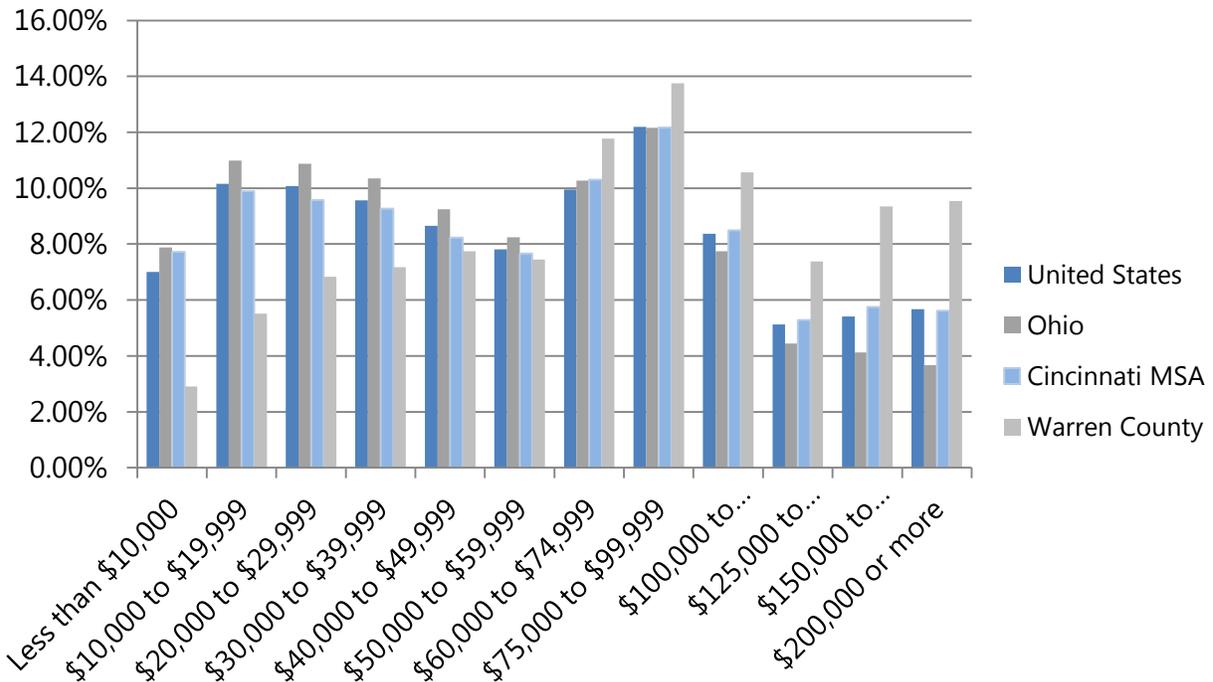
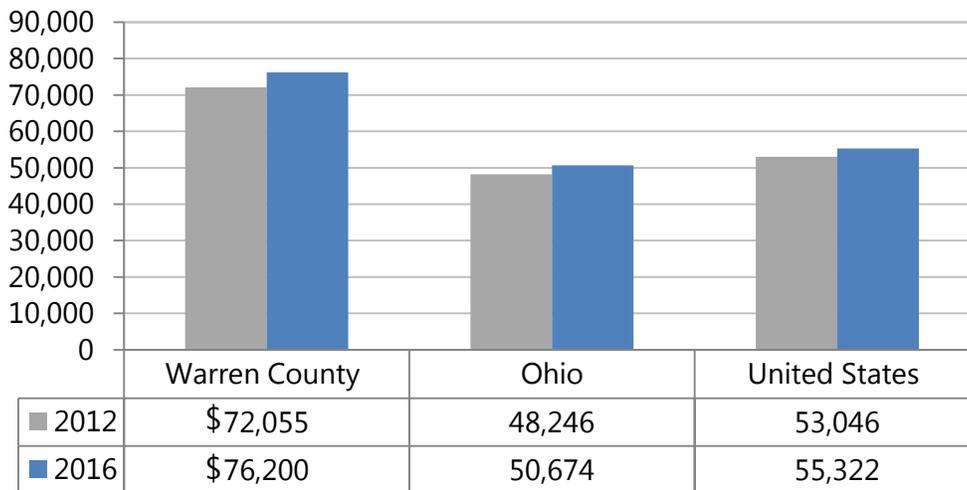


Figure 2.9: Median Household Income





According to the ACS, the ethnic groups within Warren County experienced some form of change in their household income with Whites (Non-Hispanics) MHI increasing by 6.7%; Asian MHI experiencing a 2.6% increase; African Americans saw an 8.7% decrease; and Hispanic households saw a 23% decrease.

Table 2.6 illustrates the differences in the County’s household income range. When compared to the State, Warren County has a greater percentage of households that have an income range of above \$50,000. In the State of Ohio the estimated median income is \$50,674, however the estimated median income in Warren County is \$76,200. Over 70% of Warren County households make more than the State’s median income.

Table 2.6: Household Income Range for Warren County and the State of Ohio

Income Range	Warren County Households	Ohio Households
Less than \$10,000	2.9%	7.9%
\$10,000 to \$14,999	2.4%	5.4%
\$15,000 to \$24,999	6.7%	11.2%
\$25,000 to \$34,999	6.8%	10.7%
\$35,000 to \$49,999	11.4%	14.2%
\$50,000 to \$74,999	19.2%	18.5%
\$75,000 to \$99,999	13.8%	12.2%
\$100,000 to \$149,999	18.0%	12.2%
\$150,000 to \$199,999	9.3%	4.1%
\$200,000 or more	9.5%	3.7%

POVERTY

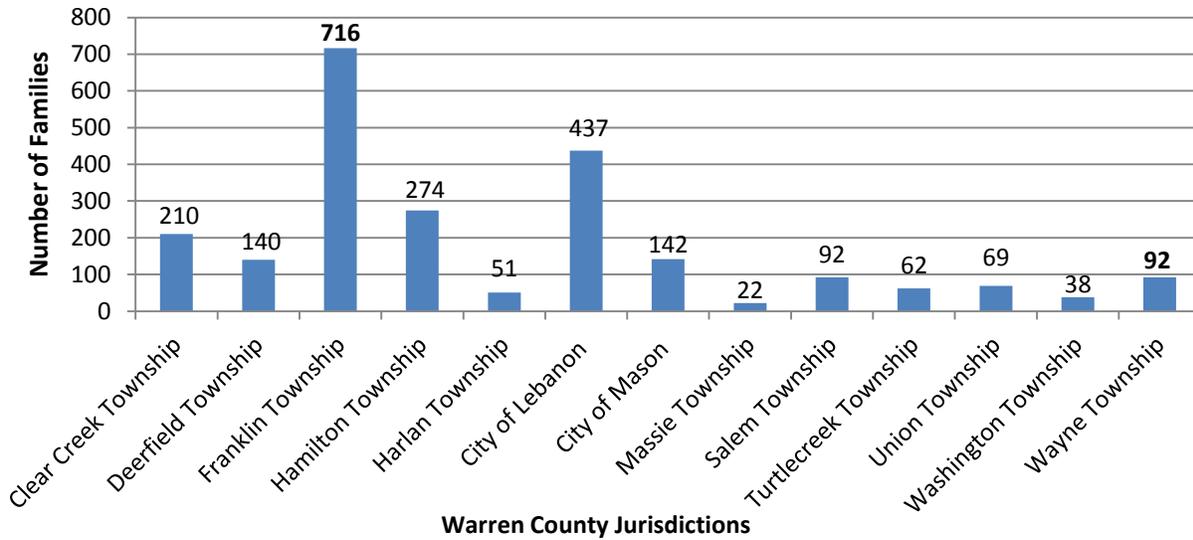
While median income can be viewed as an indicator of financial well-being, it must be coupled with information regarding cost of living in a geographic area to be more meaningful. The "Self-Sufficiency Standard for Ohio 2015" defines how much income a family needs to meet their basic living expenses without public or private assistance. According to the U.S. Department of Health & Human Resources, a family consisting of one adult and two children would be considered "poor" with an income of \$18,850 or less annually, regardless of where they live, or the age of their children. Although the cost of living in Ohio is relatively low compared with other regions of the country, cost of living issues still exist. 6.5% of children in Warren County are considered in poverty.

The Self-Sufficiency Standard stated in Table 2.7 shows that earnings well above the official Federal Poverty Level are nevertheless far below what is needed to meet families’ basic needs



within Warren County. The Ohio Self-Sufficiency Standard for a single adult with one preschooler ranges from \$36,185 to \$44,814 annually depending on the County.

Figure 2.10: Warren County Families in Poverty



Source: American Community Survey: 5 year Estimate, 2016

Figure 2.11: Warren County Poverty Status Percentage

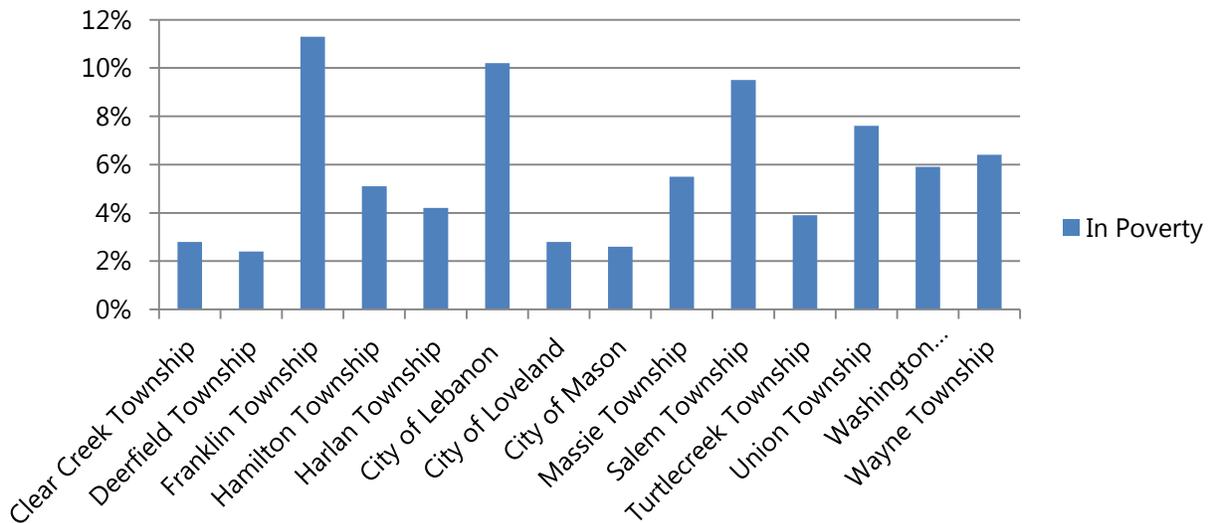




Table 2.7: 2015 Warren County Self Sufficiency Standards

Category	1 Adult	1 Adult 1 Preschooler	1 Adult 1 Preschooler 1 School Age	2 Adult 1 Preschooler 1 School Age
Monthly Cost				
Housing	\$580	\$716	\$716	\$716
Child Care	\$0	\$781	\$1,219	\$1,219
Food	\$216	\$328	\$495	\$680
Transportation	\$247	\$254	\$254	\$482
Health Care	\$166	\$370	\$395	\$455
Miscellaneous	\$121	\$245	\$308	\$355
Taxes	\$234	\$504	\$689	\$705
Earned Income Tax Credit	\$0	\$39	\$0	\$0
Child Care Tax Credit	\$0	\$60	\$100	\$100
Child Tax Credit	\$0	\$83	\$167	\$167
Self Sufficiency Wage				
Hourly	\$8.89	\$17.13	\$21.65	\$12.34 adult
Monthly	\$1,564	\$3,015	\$3,810	\$4,345
Annual	\$18,772	\$36,185	\$45,715	\$52,143
Emergency Savings	\$35	\$112	\$101	\$59

Since the last AI Warren County has continued to grow in population and in diversity. The County's poverty rate has decreased from 6% in 2010 to an estimated poverty rate of 5.4% in 2016. While the County's poverty rate has decreased the rate within certain communities and ethnic groups have increased. The poverty rate with White households decreased from an estimated 11,870 households in 2012 to an estimated 9,900 households in 2016. Hispanics also decreased in the number of households below the poverty rate, while Blacks/African Americans and Asians saw an increase in their level of poverty. This analysis explores issues related to poverty and tries to find solutions to better address these issues.

A single adult needs to earn \$8.89 per hour working full time to be able to meet basic needs, which is more than the Ohio minimum wage (\$8.10 per hour).

Adding a child nearly doubles this amount; one parent caring for one preschool-aged child needs to earn \$17.13 per hour to be self-sufficient. Two children increase the rate to \$21.65 per hour.

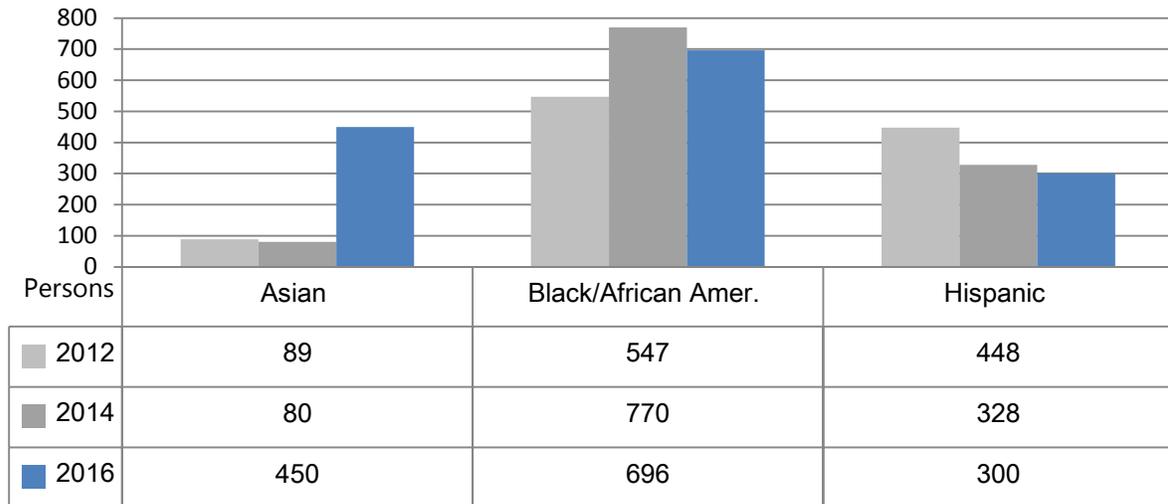


1 OUT OF 4
RENTER HOUSEHOLDS

IS EXTREMELY LOW INCOME



Figure 2.12: Racial Poverty Trends in Warren County, 2012-2016



Source: American Community Survey: 2016 Estimate



EMPLOYMENT

ECONOMIC DEVELOPMENT

The Board of County Commissioners remain focused on economic development efforts and coordinating with the existing economic development initiatives from our various cities and townships to create more visibility and productivity. During 2017, our Economic Development Office helped bring in more than 3,074 new jobs and retained 5,213 existing businesses, representing 3,703,812 square feet of new/taken down space with \$273,763,784 in capital investment. Eighty percent of these projects involved manufacturing, research and development or service sector companies who pay high wages and sustain the quality of living we are so proud of in Warren County. Warren County continues to attract high paying businesses and this trend is expected to continue.



The County has the lowest unemployment rate in southwest Ohio at 3.25% and provides more jobs than its workforce is capable of filling, thus providing employment beyond Warren County (See Figure 2.14). As a result of Warren County's partnerships with local governments and the State of Ohio, several new and existing companies have announced projects inside Warren County. These companies, such as Amazon, Hayneedle, Kadant, and Green Bay Packaging will bring increased investment and employment opportunities.

The partnership between the Economic Development Department and the Workforce Investment Board of Butler, Clermont & Warren Counties (WIB) has been very active. Economic Development staff assisted with initiatives of the WIB to help foster workforce growth in the County. The Office continued to assist in the WIB engaging in "workforce transformation services" by reviewing proposals and providing scoring/ comments on applicants. The end goal is to hire a consultant to implement Phase 2 of the workforce transformation services which will improve the County's business base. The Business Outreach Program also assisted OhioMeansJobs, Warren County and other workforce development partners in obtaining an audience with businesses to determine employer needs and workforce development best practices.



The Economic Development Department has worked closely with the Warren County Convention and Visitor's Bureau pertaining to efforts made to attract additional visitors to Warren County. Warren County is branded to be Ohio's largest playground. Tourism generates over \$1.2 billion for Warren County; it is important that the Economic Development office partner with other organizations to increase spending by tourists inside of the County. Increased tourism contributes significantly to the County's sales tax revenue, aiding in paying for governmental services and lessening the need to request additional resources from our residential and business partners.

LABOR FORCE

The total labor force in Warren County, reflecting those 16 years of age and over, numbered 156,241 persons according to the 2010 ACS 5 year tabulation. Currently, there is approximately 177,000 people in the labor force (ACS 2016 estimates), which is an increase from 2010. The unemployment rates among these individuals are approximately 3.2% in the County; the unemployment rate was 6.3% in 2010, therefore the rates have lowered in the past 8 years (see Figure 2.13). A perspective on the labor force can be gained by examining the number of employed persons by industry. Figure 2.13 is a breakdown of industries in the County and the amount of individuals that work in those industries. Educational services, health care and social assistance industries has the highest amount of workers at 23,737 people, followed by manufacturing jobs, which has approximately 18,000 employees.

In Warren County, the employment-population ratio—the proportion of the population 16 years of age and over in the workforce—has dipped slightly over the past 10 years to 62.9%; it was 67.5% in 2000. This proportion has stayed slightly above the rate for Ohio at 63.2%. The unemployment rates over the past 10 years reflect the impact of major employers relocating or instituting major cutbacks in response to market events or economic trends.



Figure 2.13: Unemployment Rates 2010 - 2016

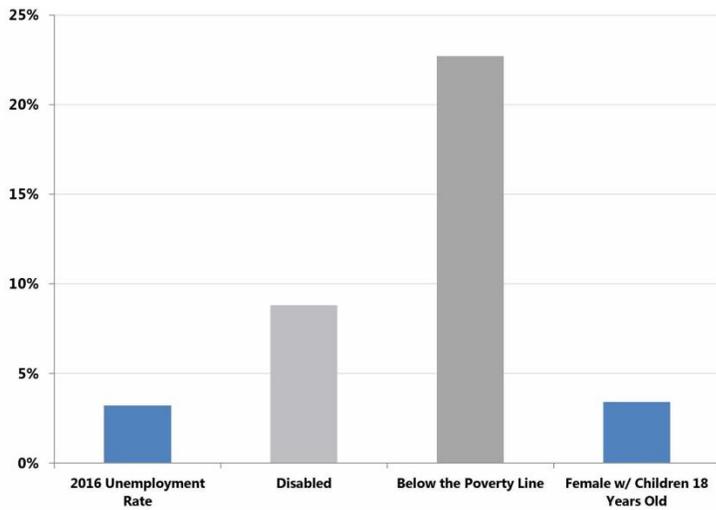


Figure 2.14: Employment by Industry

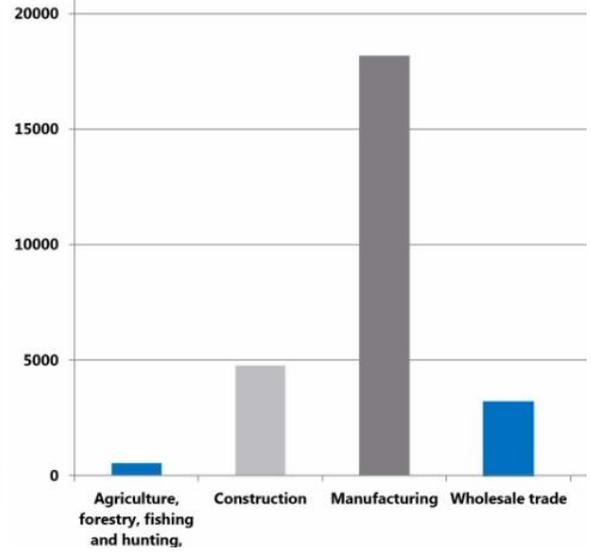
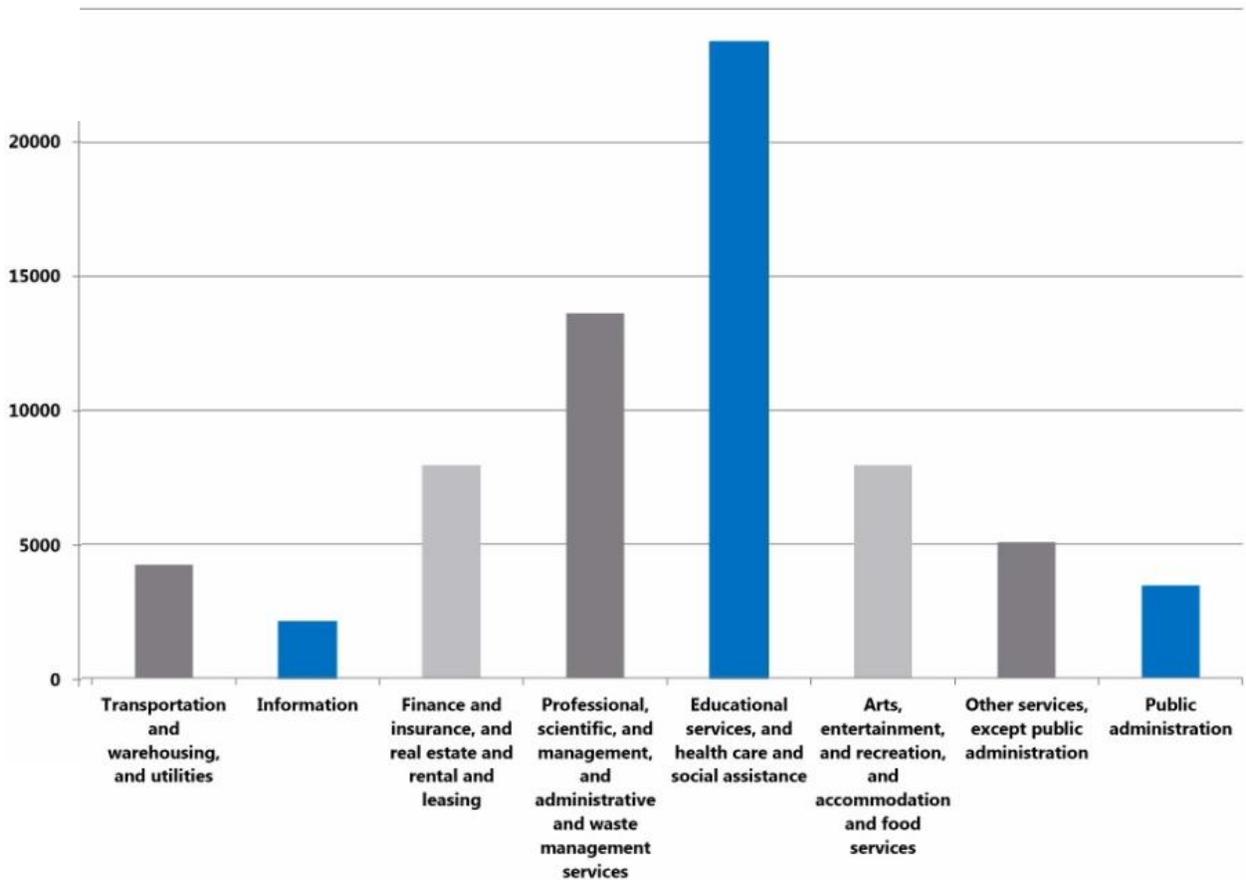


Figure 2.14: Employment by Industry - continued





Many residents in Warren County live in the County but seek jobs outside the County. This may be a trend of workers who commute to and from Cincinnati for employment. The growing trend of new generations is to seek efficient forms of transportation and enjoy walking or biking to work instead of relying on a personal vehicle. With Warren County’s rural character, it results in a low number of workers that are employed and live within the County.

Figure 2.15: Worker Totals and Flows 2015

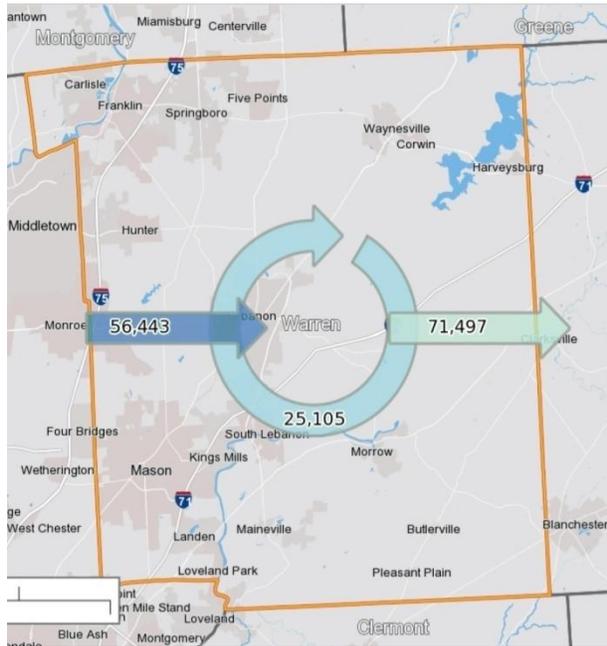
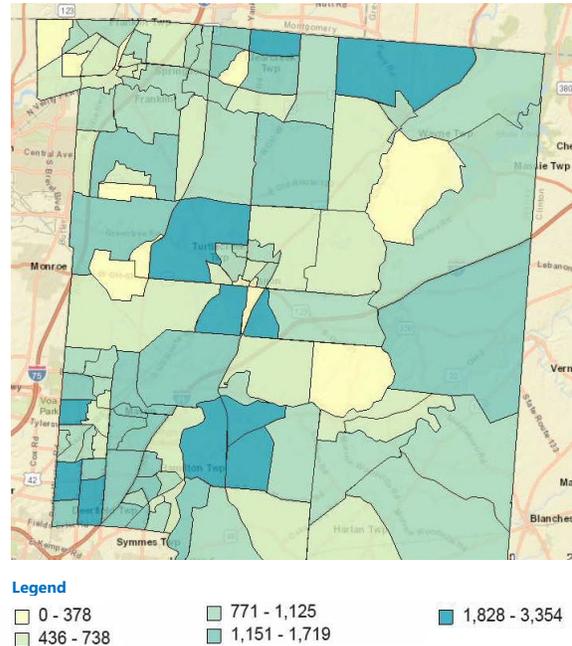


Figure 2.16: Major Centers of Employment

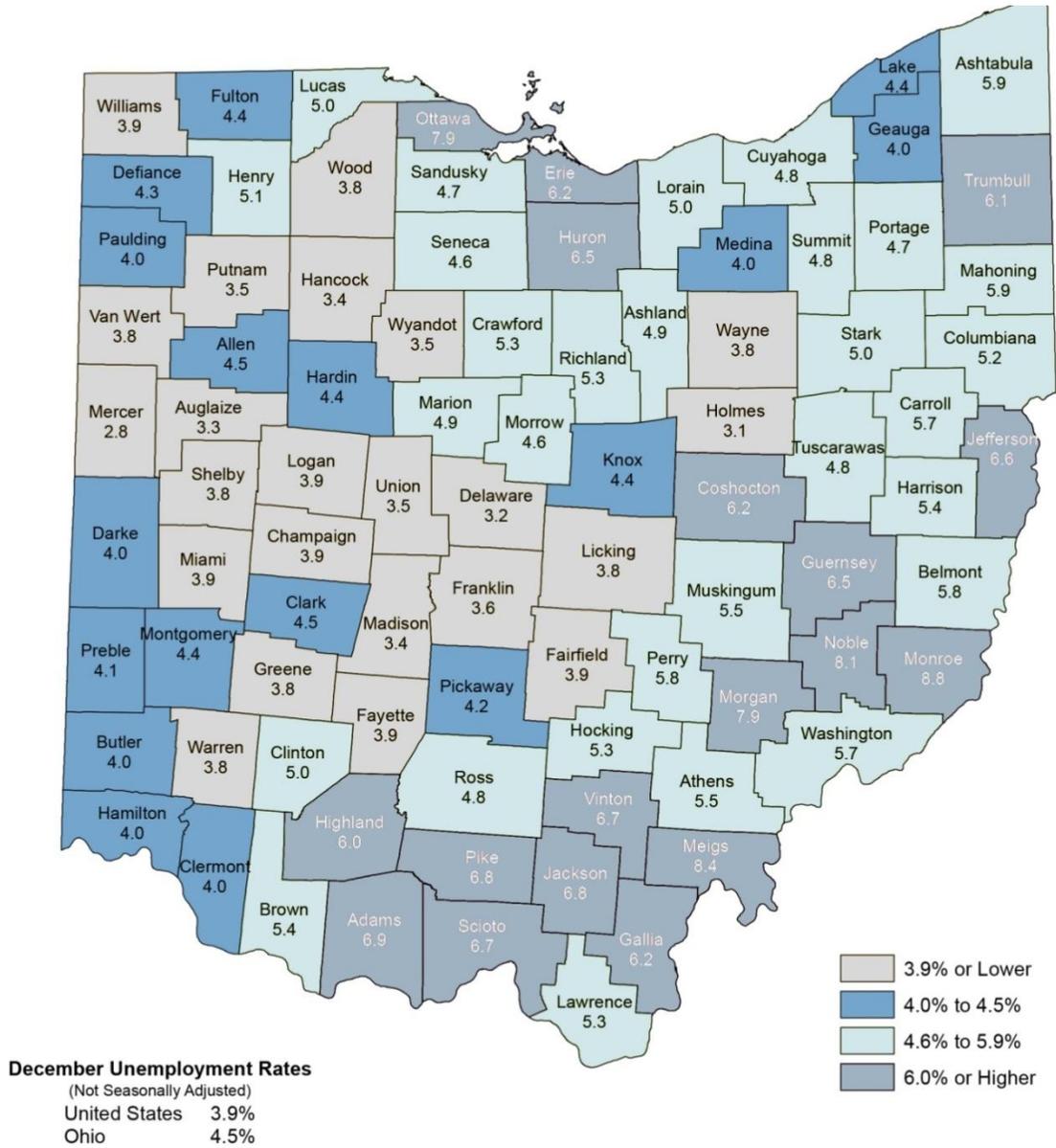


The high-tech and knowledge-based New Economy companies associated with the Mason/Deerfield Township and Springboro/Clearcreek Township areas, has been extremely important to the economic growth of the County. These companies are relatively insensitive to traditional land and labor cost factors and locate in areas with a wide variety of cultural amenities and high quality of life so that they can compete for the young, highly educated information workers that are keys to their success. These employment centers also provide many service and blue-collar jobs, along with moderate-income white-collar workers employed in and around high-tech nodes. These workers are consequently forced to commute long distances from areas where they can find affordable homes, quite often from outside of Warren County.

The Cities of Lebanon and Franklin have the highest percentages of households with a high housing cost burden. These areas also have higher unemployment rates and low median earnings compared to other portions of western Warren County. This data indicates that these communities have adequate housing and serve as major employment centers. Fair housing strategies in these areas should continue economic and workforce development components to help reduce high housing cost burdens.



Figure 2.17: Ohio Unemployment Rates December 2017



HOUSING PROFILE

HOUSING QUALITY

The quality of housing varies across the County. The quality of construction largely reflects the architectural detail, the quality of the materials used and age of the housing stock. Salem and Union Townships have the distinction of having the oldest housing stock in the County, with a median year build of 1963. The oldest housing in the western and high growth areas of the county are found in Franklin Township and the neighborhoods immediately adjacent to the



Table 2.8: Housing Quality Assessment

Jurisdiction	Excellent	Very Good	Good	Average	Fair	Poor	Very Poor	Total	Fair & Below	Percent Fair & Below
BLANCHESTER	0	0	0	0	1	0	0	1	1	100
BUTLERVILLE	0	0	18	31	12	3	0	64	15	23.4
CARLISLE	0	8	500	1286	102	68	0	1964	170	8.7
CLEARCREEK TOWNSHIP	231	757	2601	2269	91	26	7	5982	124	2.1
CORWIN	0	0	23	165	13	9	2	212	24	11.3
DEERFIELD TOWNSHIP	638	2154	5253	3034	153	25	3	11260	181	1.6
FRANKLIN	0	12	332	3181	283	52	6	3866	341	8.8
FRANKLIN TOWNSHIP	4	45	1117	3022	269	41	16	4514	326	7.2
HAMILTON TOWNSHIP	300	771	3426	4252	105	19	5	8878	129	1.5
HARLAN TOWNSHIP	5	34	419	1148	89	15	10	1720	114	6.6
HARVEYSBURG	0	7	50	125	32	15	2	231	49	21.2
LEBANON	9	175	2676	2990	209	28	2	6089	239	3.9
LOVELAND	16	3	306	23	2	0	0	350	2	0.6
MAINEVILLE	0	13	88	334	15	5	2	457	22	4.8
MASON	509	1255	4687	4397	22	3	0	10873	25	0.2
MASSIE TOWNSHIP	1	20	84	129	10	4	1	249	15	6
MIDDLETOWN	0	18	426	280	9	1	0	734	10	1.4
MONROE	1	3	22	16	2	0	1	45	3	6.7
MORROW	0	2	167	257	65	11	2	504	78	15.5
PLEASANT PLAIN	0	1	8	34	10	0	1	54	11	20.4
SALEM TOWNSHIP	6	64	484	576	59	10	5	1204	74	6.1
SOUTH LEBANON	80	40	572	687	110	14	5	1508	129	8.6
SPRINGBORO	13	241	2114	3451	38	3	0	5860	41	0.7
TURTLECREEK TOWNSHIP	48	420	1634	1959	111	19	12	4203	142	3.4
UNION TOWNSHIP	15	60	328	482	55	10	5	955	70	7.3
WASHINGTON TOWNSHIP	7	39	346	634	42	10	6	1084	58	5.4
WAYNE TOWNSHIP	17	114	652	1015	80	21	5	1904	106	5.6
WAYNESVILLE	2	6	332	606	17	0	1	964	18	1.9



central business district, of the City of Lebanon, while the newest is located in the City of Mason. Furthermore, there are 4514 homes in Franklin Township and of those homes 326 are considered fair or below fair, according to the county auditor’s assessment. That amounts to 7.2 percent of the total homes for Franklin Township, which signifies that there is need to improve housing in the Township. In addition, Butlerville has the highest percentage of homes that are either fair or below fair at 23.4%, followed by Harveysburg at 21.2% which shows an even greater need in those jurisdictions. Blanchester is disregarded due to the fact that the municipality only has 1 rated home listed and is considered an outlier to this assessment. The full assessment is listed on Table 2.10 which identifies the number of housing units by median age and political subdivision.

HOME OWNERSHIP

Figure 2.18: Rent vs. Own in Warren County Ohio

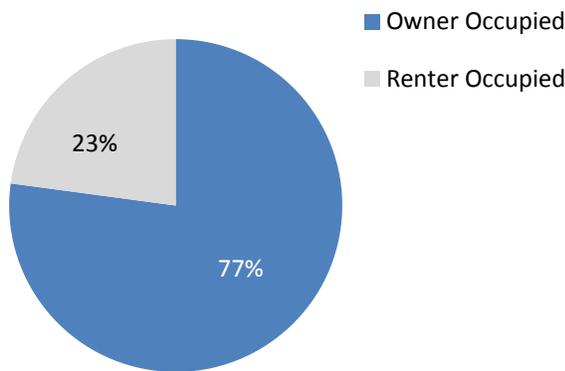


Table 2.9: Housing Age in Warren County Ohio

YEAR STRUCTURE BUILT	Total housing units
2014 or later	440
2010 to 2013	2,875
2000 to 2009	22,381
1990 to 1999	21,064
1980 to 1989	8,766
1970 to 1979	8,602
1960 to 1969	6,030
1950 to 1959	7,501
1940 to 1949	1,713
1939 or earlier	4,375
Total:	83,747

Source: 2012-2016 American Community Survey 5-year Estimates

Table 2.10: Rental Unit Cost per month in Warren County Ohio

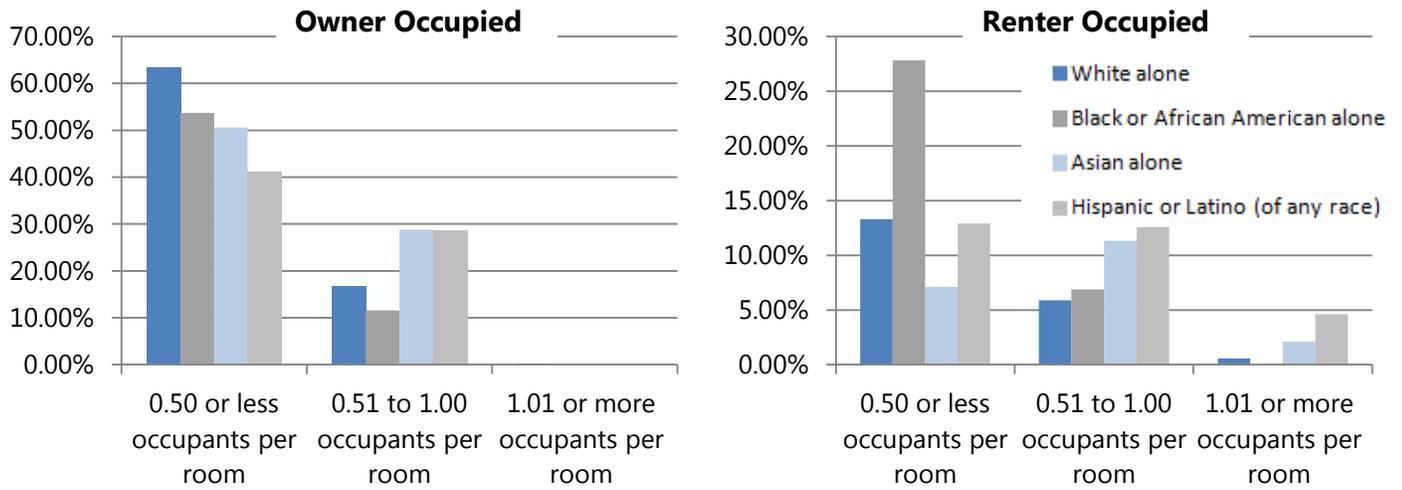
GROSS RENT COST	NUMBER OF UNITS
Occupied units paying rent	17,384
Less than \$500	1,378
\$500 to \$999	7,982
\$1,000 to \$1,499	6,057
\$1,500 to \$1,999	1,512
\$2,000 to \$2,499	326
\$2,500 to \$2,999	63
\$3,000 or more	66
Median (dollars)	957
No rent paid	950

95% of the houses in Warren County were built after the year 1940.

There are a total of 17,384 occupied rental units in the County, with a median cost of \$957 per month.

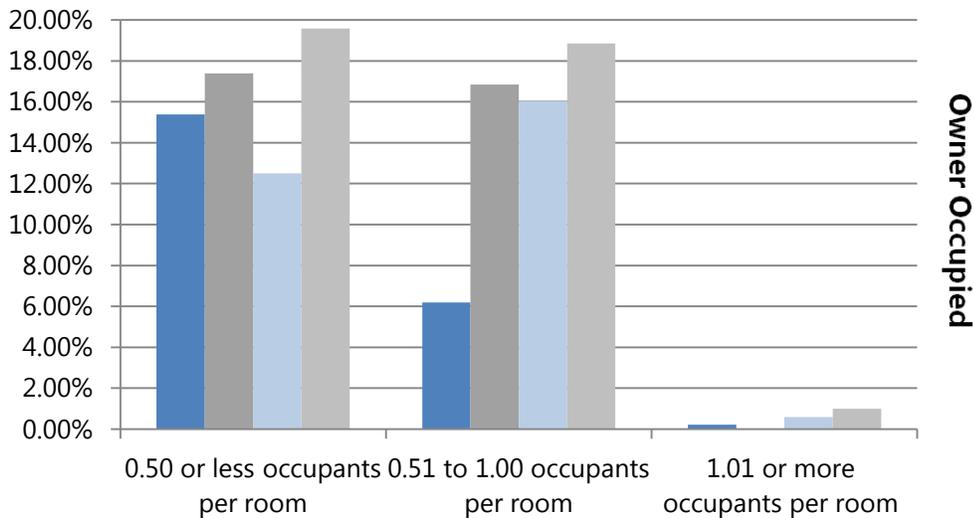


Figure 2.19: Overcrowded by Race in Warren County: 2010 Owner vs. Renter Occupied



Source: 2010 American Community Survey

Figure 2.20: Overcrowded by Race in Warren County: 2015 Owner vs. Renter Occupied



Source: 2015 American Community Survey (5 Year Estimates)

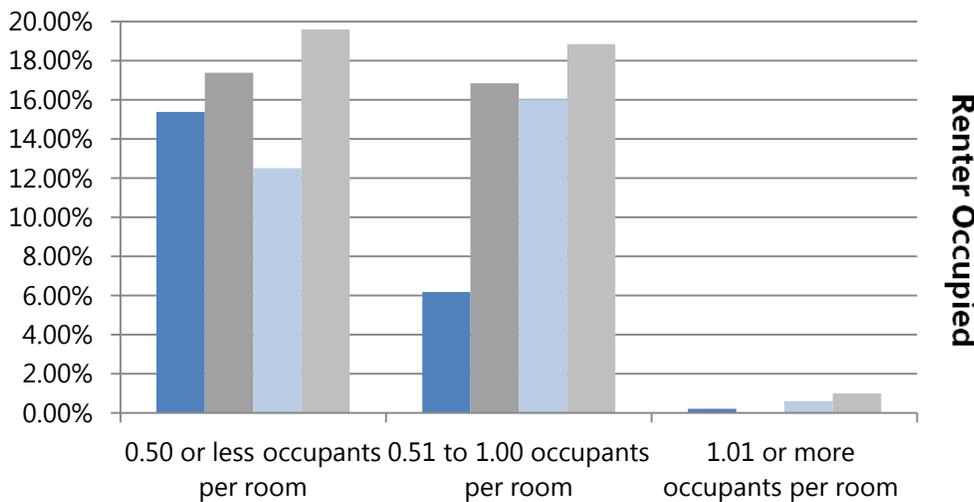
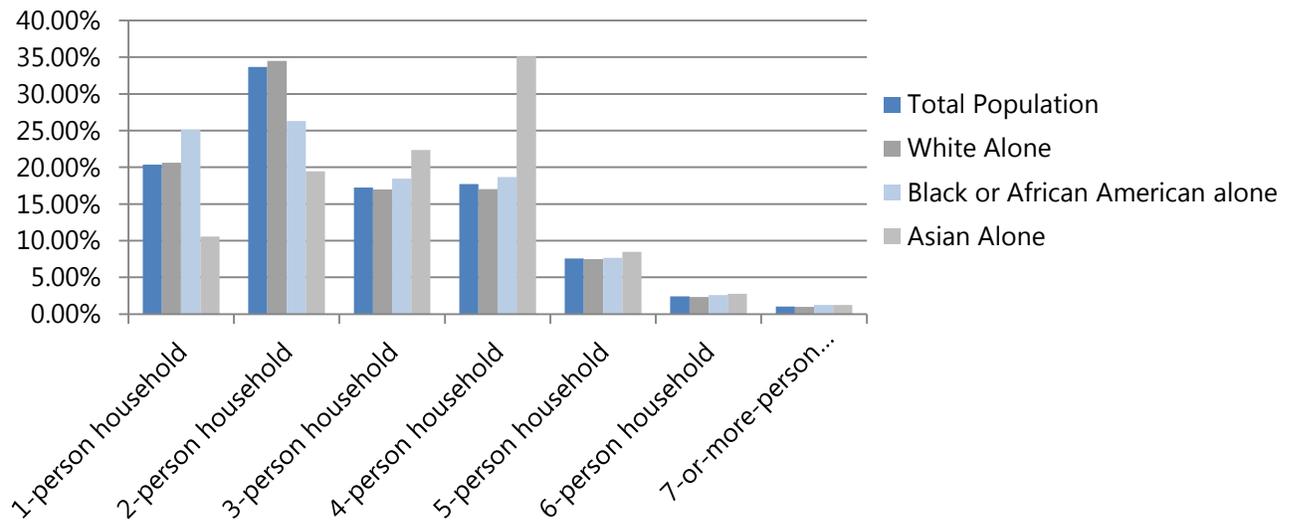




Figure 2.21: Household Size in Warren County





WARREN COUNTY

Analysis of Impediments to Fair Housing Choice

SECTION 3

Evaluation of Current Fair Housing Legal Status





SECTION III: EVALUATION OF CURRENT FAIR HOUSING LEGAL STATUS

Introduction

Unlawful discrimination is one of the most blatant impediments to fair housing, and it is therefore important to make efforts to measure the extent to which unlawful discrimination occurs in the housing market. Complaints filed with Housing Opportunities Made Equal (HOME) and the Ohio Civil Rights Commission is the basis for this analysis. However, the lack of filed complaints does not necessarily indicate a lack of a problem. Some persons may not file complaints because they are not aware of how to file a complaint or where to go to file a complaint. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his 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. According to the Urban Institute, 83% of those who experience housing discrimination do not report it because they feel nothing will be done.

Education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments. Complaints brought by those who believe they have been illegally discriminated against can shed light on the barriers to housing choice and accessibility. Though the number of complaints cannot provide a complete picture of the level of discrimination, it can provide a snapshot of some of the barriers that may exist.

In Ohio, fair housing cases may be filed with the U.S. Department of Housing and Urban Development (HUD), the Ohio Civil Rights Commission (OCRC), or sometimes with local fair housing agencies such as HOME. Because of an agreement with HUD, fair housing cases filed directly with the OCRC were also logged into HUD's database if the complaint alleges a basis of discrimination that is found under both federal and state law. Cases from Ohio that are filed with HUD are generally referred to the OCRC for investigation unless there is a potential conflict of interest in such an arrangement. This results in most OCRC cases also being found in HUD's database and vice versa.

The Fair Housing Act authorizes federal funding for state and local agencies to implement and enforce fair housing laws through grant programs administered by HUD. HUD funds both public and private agencies. Public entities such as the Ohio Civil Rights Commission (OCRC) and Private agencies such as HOME are funded through the Fair Housing Initiatives Program (FHIP), a competitive, discretionary grant program.





The State of Fair Housing at the Federal Level

The primary relevant law is the Federal Fair Housing Act. Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings and in other housing-related transactions based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability). Other Federal laws and Executive Orders deal with related issues, particularly with discrimination and accessibility in federally-funded programs.

The Fair Housing Act also requires housing providers to make reasonable accommodations in rules, policies, practices, and paperwork for persons with disabilities. They must allow reasonable modifications in the property so people with disabilities can live successfully. Due to the volume of questions and complaints surrounding this aspect of the federal act, in March 2008, the Department of Justice (DOJ) and the Department of Housing and Urban Development (HUD) released a joint statement to technically define the rights and obligation of persons with disabilities and housing providers.

In addition to prohibiting certain discriminatory acts, the Act places no limit on the amount of recovery and imposes substantial fines. The fine for the first offense can be up to \$11,000; the second offense within a five year period, up to \$27,500; and for a third violation within seven years up to \$55,000.

The prohibition in the Fair Housing Act against advertising that indicates any "preference, limitation or discrimination" has been interpreted to apply not just to the wording in an advertisement but to the images and human models shown. Ad campaigns may not limit images to include only or mostly models of a particular race, gender, or family type.

As a test to determine if advertising relative to housing and real estate in the local housing market have impediments to fair housing, a review of local advertisements in recent real estate publications was conducted. These types of advertisements cover housing and real estate throughout the County. The data does however provide a snapshot of the advertising used.





Table 3.1: Analysis of Local Advertisement for Rental Housing

Address	Township/ City	Discriminatory/ Positive Factor
930 Snider Rd	Mason	Adults only (Over 25), back ground checks, must have good credit
209 N High St	Lebanon	Must be clean of drugs and felonies
15 N West St	Lebanon	Background check
155 Arlington Ave	Franklin City	Not qualified for section 8, Does not permit certain dog breeds
253 Grant St, Morrow	Salem	No pets
126 Sycamore	Franklin City	Will take section 8. Will not take transitions. No pets.
475 Gilpin Dr.	Springboro	Dog policy: must be under thirty five pounds; monthly dog fee
1030 Hunter's Run Drive	Lebanon	Permits affordable housing vouchers, applicant must have a sustainable income.
390 Forge Drive	Lebanon	Equal Housing Opportunity
4885 Cross Key Drive	Lebanon	Handicap accessible, housing vouchers welcome
350 Sycamore Drive	Lebanon	Disability access

The Office of Fair Housing and Equal Opportunity (FHEO) dataset is a list of all the Title VIII fair housing cases filed including the filing date, state and county of the alleged violation, and the bases for the alleged discriminatory acts. From March 2006 to April 2015, the FHEO, received a total of 44 housing discrimination complaints from Warren County residents. Discrimination based on disability, race or familial status were the three most common reasons for filing a complaint (see Table 3.2 below). Of the 44 complaints, about 41 % involved disability-based discrimination, and 23 % were race-based complaints- with African-Americans filing the greatest number of discrimination cases. Familial status was also the basis for 23% of the cases. The rest of the complaints were based on sex 13%, religion 2% and national origin 13%. These numbers show a concentration in complaints based on discrimination due to disabilities. In the 2012 Analysis of Impediments to Fair Housing Choice, discrimination due to disabilities was identified as the main impediment the fair housing. Five years later, clearly much more still needs to be done to ensure fair housing for persons with disabilities. These numbers also indicate an increase in discrimination due to familial status. The largest number of complaints were filed in year 2007 (8 complaints), closely followed by year 2010 (6 complaints). Since year 2010 the number of complaints has decreased to an average of approximately four complaints per year.



Table 3.2: Complaints Filed with FHEO (2006-2015)

Form of Discrimination	# of Cases
Race Basis	10
Asian Race	0
African-American Race	8
Black & White Race	2
White Race	0
Color Basis	2
National Origin Basis	6
Hispanic National Origin Basis	1
Disability Basis	18
Familial Status Basis	10
Religion Basis	1
Sex Basis	6
Retaliation Basis	2
Number of Filed Cases	44

The State of Fair Housing at the State Level.

In Ohio, residential property is covered by state law governing fair housing (Ohio Revised Code 4112.02(H)). The Ohio statute is broader than the federal Fair Housing Act in several important respects. First, Ohio law prohibits discrimination based on all of the classes protected by federal law (race, color, religion, national origin, sex, familial status, and disability). It also prohibits discrimination based on two additional grounds: "ancestry," a somewhat different and potentially broader category than "national origin," and military status. Second, while federal law contains several provisions that exempt certain residential property from coverage, Ohio's statute does not include these exemptions, making Ohio's fair housing law applicable to almost all housing in the state.

HUD considers Ohio's law substantially equivalent to the Federal Fair Housing Act and because of the substantial equivalency; HUD refers fair housing complaints to the Ohio Civil Rights Commission for investigation and enforcement under Ohio law. A person who believes he or she is a victim of housing discrimination can file a fair housing complaint with HUD or the Ohio Civil Rights Commission.

Although Ohio's fair housing law is written in language nearly identical to the federal Fair Housing Act, a series of decisions by Ohio courts in 2007 and 2008 interpreted Ohio's law to be inconsistent with the federal law in several key respects. These decisions held that the statute of limitations in design and construction cases is only one year from the issuance of the certificate of occupancy for private citizens, regardless of when they encounter the discrimination, that the Ohio Attorney General may not seek remedies to require retrofitting of inaccessible housing constructed in violation of Ohio's fair housing law, and that landlords are not required to take action when they know that one tenant is racially harassing another tenant. This may impact the work-sharing agreement between HUD and the Ohio Civil Rights Commission (OCRC) that results in substantial revenue for the OCRC to investigate and process fair housing cases in the state.

The Ohio Civil Rights Commission received nineteen (24) complaints of housing discrimination in Warren County from 2012 to 2017, as shown in Table 3.3 "Complaints Filed with OCRC – 2012-2017." The OCRC complaints include both complaints received directly from people who

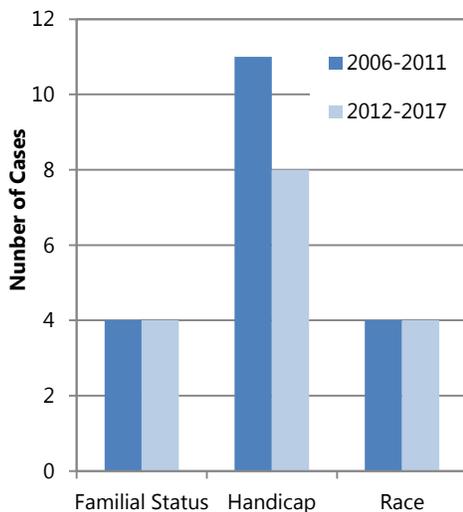


thought they were treated unfairly and from those filed by people who first called Housing Opportunities Made Equal (HOME). The number of cases reported to OCRC for the 2012 to 2017 period have slightly decreased from the prior reporting period (2006-2011) that had 22 cases. Nevertheless, national studies show that only a few of the people who believe they have experienced illegal discrimination ever report it or file a complaint. Therefore, a decrease in complaints does not necessarily mean there is a decrease in discrimination.

Table 3.3: Complaints Filed with OCRC (2012-2017)

Form of Discrimination	Number of Cases
National Origin	2
Sex	3
Retaliation	3
Familial Status	4
Race	4
Handicap	8

Chart 3.4: Complaints Filed with ORC



Like the complaints received by FHEO, more complaints were filed with the OCRC based on disability (eight of the nineteen cases) than for any other protected class. Most of the complaints were by residents experiencing discrimination in the City of Mason (six cases) followed by the City of Springboro (3 cases). The areas of the county with a high concentration of minority residents received the fewest number of complaints. There were no cases involving military status or ancestry—the additional classes protected under Ohio law and no cases involving religion. Eight cases were settled or withdrawn with benefits and four cases are pending.

The State of Fair Housing at the Local Level

In 1993, the Warren County Commissioners adopted Resolution 93-417. In the analysis, the county statutes were compared to the Federal Fair Housing Act to determine whether they offered similar rights, remedies, and enforcement to the federal law and might be construed as substantially equivalent. It was concluded that although dated and that some definitions should be updated, the language in the County's fair housing legislation is similar language to the federal and state legislation to advance fair housing and ensure enforcement. Many other jurisdictions in Warren County have passed similar resolutions covering fair housing.

Title I of the Housing and Community Development Act of 1974, as amended, requires each unit of general local government that receives Community Development Block Grant (CDBG) funding from a state to certify that it will affirmatively further fair housing. In addition to the adoption of Resolution 93-417 the county has named a local fair housing contact. This is a local government employee who provides general information, and refers cases to the Ohio Civil Rights Commission. The local contact also maintains a Fair Housing website and distributes fair



housing brochures, pamphlets, posters and other informational materials to area agencies, organizations, and public events.

Complaints Received by HOME

Housing Opportunities Made Equal (HOME) is the private fair housing agency in the Cincinnati metropolitan area that counsels people who believe they have experienced illegal housing discrimination and helps them gather evidence and take enforcement action. In addition, HOME operates both educational and enforcement activities related to fair housing and fair lending. They publish public service announcements, flyers, and posters, and develop and conduct fair housing trainings, in-services and symposia. The numbers and types of fair housing complaints received by HOME in the five years since the last Analysis of Impediments are listed in the table "Complaints Filed with HOME – 2012-2017". This table includes only those calls in which issues of possible illegal housing discrimination were raised. HOME also receives complaints about landlord-tenant problems, which do not involve potential housing discrimination.

The Fair Housing Act not only prohibits denial of housing because of a physical or mental disability, but also requires housing providers to grant requests for reasonable accommodations and modifications needed to allow someone with a disability an equal opportunity to use and enjoy the home.

HOME is partially funded through HUD's Private Enforcement Initiative. Funding is provided on a single-year or multi-year basis, to investigate violations and obtain enforcement of the rights granted under the Fair Housing Act or State or local laws that provide rights and remedies for discriminatory housing practices that are substantially equivalent to the rights and remedies provided in the Fair Housing Act. Multi-year funding may be contingent upon annual performance reviews and annual appropriations.

In addition to complaints brought to HOME from 2012 through 2017, Legal Aid attorneys represented tenants in cases involving claims of Fair Housing Act or Section 504 violations. Mostly these were eviction cases where the fair housing issue was a defense and/or a counterclaim; some were conditions cases where the client had a disability and they had

Chart 3.5: Complaints Filed with HOME 1/1/12-12-31-17

Form of Discrimination	Number of Cases
National Origin	2
Gender	3
Religion	1
Familial Status	6
Race	9
Disability	35





requested a reasonable accommodation. Also, the number of national origin complaints has remained stable since the 2012 Analysis.

Lawsuits

The Federal Fair Housing Act can be effective in mitigating barriers to fair housing choice, depending upon enforcement efforts. Relevant judicial court case decisions pertaining to fair housing were reviewed and are incorporated in the analysis. Other related regulations and case law that provide further interpretation, understanding, and support to the Federal Fair Housing Act were considered and will also be discussed. This section addresses the existing statutory and case law that works to remove impediments and promote fair housing choice. Cases in Ohio were reviewed with a focus on cases within the Cincinnati metropolitan area. This Analysis includes significant cases which have been filed or which have concluded since the 2012 Analysis of Impediments was approved.

1. A Cincinnati landlord agreed to the entry of an \$855,000 civil judgment against him, after admitting that he violated the Fair Housing Act by sexually harassing his female tenants, according to a recent announcement by the Justice Department. The complaint alleged that the landlord subjected female applicants and residents to unwanted sexual comments and touching, entered the apartments of female residents without notice or permission, granted tangible housing benefits in exchange for sexual favors, and took adverse actions against female residents when they refused his sexual advances. The settlement requires the landlord to pay \$800,000 in damages to 14 women he sexually harassed and \$55,000 in a civil penalty to the United States. In addition, it prohibits him from further acts of discrimination and requires him to retain an independent management company to manage any currently rented units and any future rental properties he acquires.
2. In 2011, Michael Gunn filed a fair housing complaint against his Westwood landlord. With the assistance of HOME, Gunn, who is white, stated his landlord placed a "Public Swimming Pool – Whites Only" sign on the pool gate after his bi-racial daughter swam in the pool while visiting him. The Ohio Civil Rights Commission found probable cause of racial discrimination and the Ohio Attorney General tried the case before an Administrative Law Judge. Damages of \$55,000 were awarded to Mr. Gunn and his family. The case and a picture of the sign were reported widely in the national press.
3. In 2013, the City of Montgomery in suburban Hamilton County filed in Federal Court requesting a declaratory judgment allowing them to prevent a group home for five adults with dementia from locating in the city. The group home provider filed a counterclaim under the Fair Housing Act alleging discrimination against people with disabilities. The case was settled with the City permitting the group home, agreeing to revise its zoning code in accordance with fair housing, and to pay \$25,000. *City of Montgomery, Ohio, v. Our Family Home, Inc.*



4. In 2013, the City of Blue Ash gave Ingrid Anderson a citation for a miniature horse she kept as an assistance animal for her severely disabled daughter. The city claimed the animal was “livestock” and could not be kept in the city limits. After her request for a reasonable accommodation was denied, Anderson, working with HOME, filed a complaint with HUD and a complaint in Federal Court for a violation of the Fair Housing Act. The case is now pending with the Federal Court and the complaint is being investigated by the Ohio Civil Rights Commission.
5. The Ohio Civil Rights Commission and Ohio Attorney General Mike DeWine announced the settlement of a discrimination claim against the developers, designers, owners, and builders of several Cleveland residential rental communities. A fair housing organization filed the discrimination charge, alleging that rental and condominium units in the communities didn’t comply with federal and state accessibility guidelines. After a preliminary investigation, the commission concluded that properties violated federal and state fair housing laws by creating inaccessible living conditions for individuals with disabilities. Among other things, the commission said that there were not enough disabled parking spaces on accessible routes throughout the complex to allow safe travel for persons who rely on wheelchairs for mobility. In addition, the properties allegedly failed to provide units with space wide enough to allow those in wheelchairs to pass through hallways and use the bathrooms or kitchens. Under the settlement, more than 100 units within the properties will be redesigned to fully comply with all accessibility standards within a five-year period. The developers and the others also agreed to create a fund to assist persons with disabilities to secure modifications to their housing accommodations to make them accessible.

Source: Ohio Civil Rights Commission.

6. The Justice Department filed a consent order to resolve allegations that Union Savings Bank and Guardian Savings Bank engaged in a pattern or practice of “redlining”¹ predominantly African-American neighborhoods in and around **Cincinnati**; Columbus, Ohio; **Dayton**, Ohio; and Indianapolis. The complaint alleges that Union and Guardian violated the Fair Housing Act and the Equal Credit Opportunity Act, which prohibit financial institutions from discriminating on the basis of race and color in their mortgage lending practices. The lawsuit alleges that, from at least 2010 through 2014, Union and Guardian served the credit needs of the residents of predominantly white neighborhoods to a significantly greater extent than they served the credit needs of majority African-American neighborhoods. Both banks are headquartered in Cincinnati and share common ownership and management. As a result of the settlement, Union will open two full-service branches and Guardian will open one loan production office to serve the



residents of African-American neighborhoods. Together, Union and Guardian will invest at least \$9 million in the majority of African-American neighborhoods in the Cincinnati, Columbus, Dayton and Indianapolis metropolitan areas. That investment includes \$7 million in a loan subsidy fund to increase the amount of credit that Union and Guardian extend to residents of majority African-American census tracts. In order to make residential mortgage loans available to residents of predominately African-American neighborhoods that were not adequately served by Union and Guardian, the banks will further invest \$2 million in advertising, outreach, financial education and community partnership efforts. The settlement also requires both banks to develop robust internal controls to ensure compliance with fair lending obligations and conduct fair lending training for their employees.



WARREN COUNTY

Analysis of Impediments to Fair Housing Choice

SECTION 4

Impediments to Fair Housing Choice





SECTION IV: IMPEDIMENTS TO FAIR HOUSING CHOICE

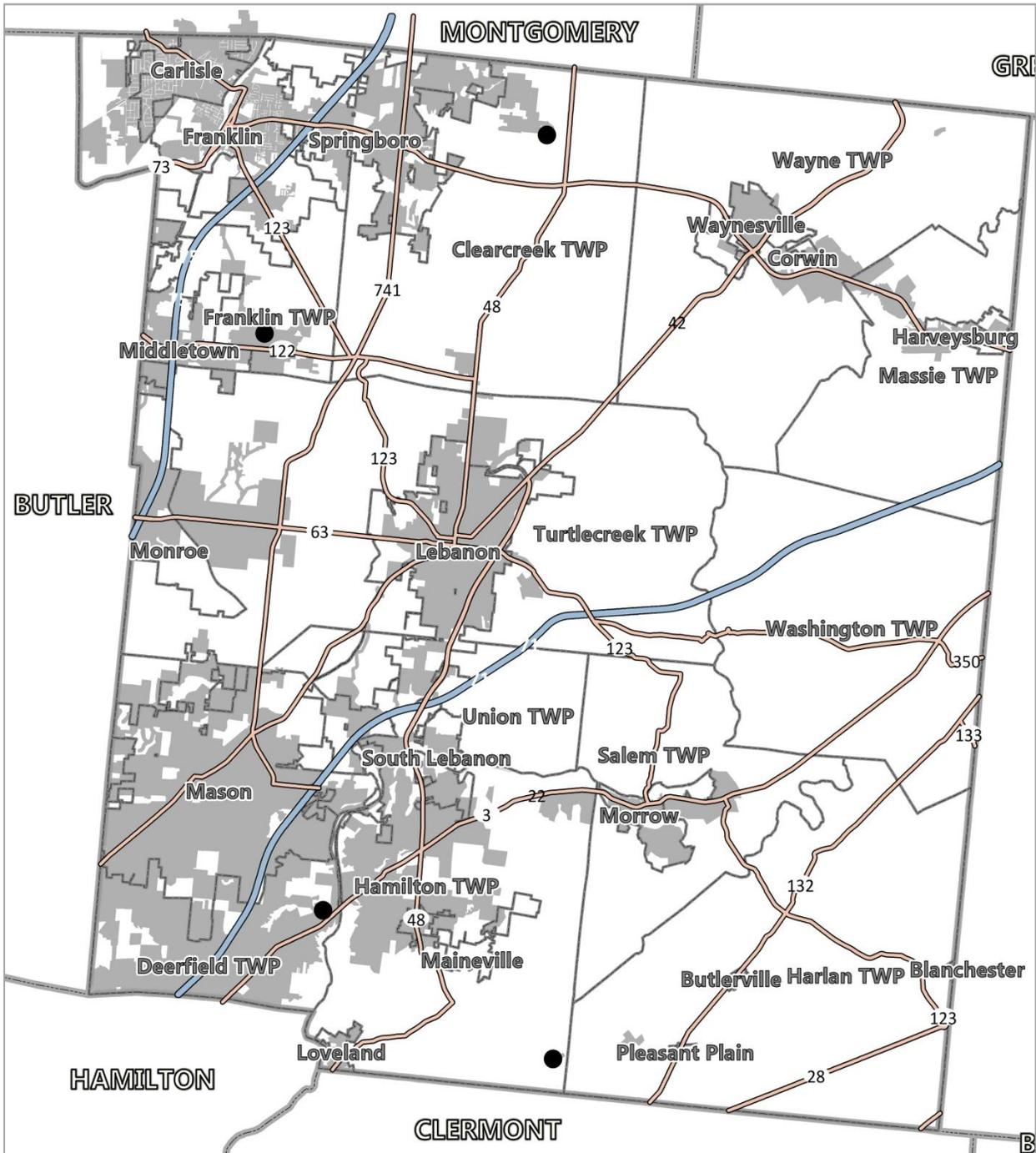
The policies, procedures, and practices of county, city, village and township departments, can impact fair housing goals and influence housing patterns. To affirmatively further fair housing, Warren County must address the reality that citizens of protected classes are particularly impacted by housing effects brought about by these practices. This section focuses on local public policies concerning community development and housing activities that have a disproportionately adverse effect on groups protected by the Act. This section also focuses on the availability and location of affordable housing because opportunities for minority households to select housing outside areas of minority concentration are often compromised by the provision of affordable housing. The lack of affordable housing in Warren County impacts Hispanics and African Americans disproportionately because a higher percentage of these minorities are only able to afford housing units within the lower price range. Minorities are often unable to select housing in the County's employment centers (The City of Mason, The City of Springboro, and Deerfield and Hamilton Townships). Individuals with disabilities are impacted by governmental decisions as well.

ZONING AND SITE SELECTION

Most of Warren County is subject to zoning and there are twenty-two individual zoning jurisdictions. The jurisdictions have zoning provisions to meet their individual expectations and vision. Although these zoning codes are not designed to create barriers to fair housing choices, such regulations do impact the availability of housing for persons protected by fair housing legislation. The zoning designation of property directly affects the cost of housing by dictating the density, size, and type of housing that may be built on specific sites. Often zoning code requirements, especially those that increase the size of the lot or that specify the size of the houses, have a direct effect on the cost of housing. When affordable housing is limited, it is often the individuals protected by fair housing laws that are affected. There is a clear connection between the affordability of housing and the issue of providing fair housing choice. The cost of land represents a sizable portion of housing costs. Zoning practices affect the price of land and thus the cost of housing. The construction of affordable housing may become more limited, effectively excluding many low-income minorities. Minorities, in turn, are excluded from the educational and employment opportunities of these areas. During public meetings, planning and zoning administrators from several municipalities discussed potential impediments to fair housing choice in detail and identified the following impediments or potential impediments.



Map 4.1: Jurisdiction & Sewer Service Map



1. Large Lot Size

The eastern portion of the County including Harlan, Salem, Washington, and Wayne Townships are primarily rural. The zoning codes require large lot sizes due to the lack of central sanitary sewer connection and in an effort to retain the rural character of the area. These two conditions create a significant impediment to fair housing choice in this region. There have been inquires



regarding smaller lot sizes in this area, but the cost of an individualized wastewater disposal system, coupled with the cost of running other utilities to areas that are geographically distant, contribute to the overall expense of building an affordable house. The smallest required lot sizes are found in the City of Franklin's zoning code (4,000 square feet) and the lowest density allowed is within the Warren County Rural Zoning Code (WCRZC) at one unit per five acres.

2. Required Minimum House Size

Jurisdictions that have implemented a "minimum house size" have set the minimum standard so low (1,200 square feet for single family) that it is unlikely to impede fair housing. No jurisdiction, except Hamilton Township, has received a request to build below the minimum. Home builders indicated that it is not cost-effective to build smaller homes at lower cost. Larger housing size leads to a higher percentage of high cost homes and this translates into an impediment in Warren County. However, a trend is emerging where younger generations are starting to see that bigger isn't always better and where value is placed on efficiency and the quality of housing versus the quantity of housing. This is evidenced by the tiny-home phenomenon that has been sweeping the nation the last couple of years. Nevertheless, all jurisdictions include a variance process and flexible Planned Unit Development standards that may permit smaller home sizes. Although some jurisdictions have addressed barriers to affordable housing such as lot size, density, and building size, developers and the market have been reluctant to build these types of developments.

3. Prohibited Manufactured Home Parks

Manufactured homes are allowed on most single family lots in Warren County, including all the jurisdictions in the eastern portion of the County. The only exception is the City of Franklin where manufactured homes are prohibited. Warren County has discussed the legal ramifications of this policy with Franklin and will work with the City to update their zoning code to comply with Federal and State requirements. Only Wayne Township allows Manufactured Home Parks. In other municipalities Manufactured Homes must be built on an individual single family lot with the same building requirements as standard home construction. Manufactured homes must be built on a concrete foundation and the same utility installation cost and fees, that increase the cost of traditional homes, applies to a manufactured home.

4. Limited Multi-Family Zoning

All zoning jurisdictions allow multi-family housing. This type of housing is frequently the route by which lower income minority households enter a community. In addition to limited traditional multi-family zoning, the western section of the County allows mixed-use developments. This portion of the county contains major interchanges along Interstates 75 and 71; central sanitary sewer; retail and commercial services; and has a significantly higher population than the eastern half of the county. One of the objectives in the western portion of the County is to allow a mix of



residential choices that provide an opportunity for home ownership across a broad range of economic levels.

Policy makers in Warren County recognize the need to accommodate different types of housing, including workforce housing. A major policy impediment to the provision of multi-family housing is the lack of areas zoned for this use.

There is a possibility for multi-family and affordable housing through different options such as Planned Unit Developments (PUD), mixed-use, and cluster developments. However, the open space requirement and utility tap fees often increases the price of the land and thus the cost of housing. Most jurisdictions have adopted mixed use zones to encourage neighborhood revitalization and denser development. Unfortunately, mixed use zoning has been sparingly utilized in the County and when it is implemented the developments are often advertised as upper scale, amenity driven communities.

Multi-family zoning is typically limited because multi-family housing is seen as low-income housing that cost more in public services provided (call of police and emergency servicer etc.) than the taxes generated from this use. The norm is to segregate multi-family housing from single-family housing. Inclusionary zoning principles would be an excellent way to increase the supply of integrated affordable multi-family housing; however, no jurisdiction has incorporated inclusionary zoning into their zoning codes due to the political repercussion associated with this strategy. Warren County officials are looking into politically acceptable strategies to incorporate incentives for the delivery of affordable housing into their zoning policies.

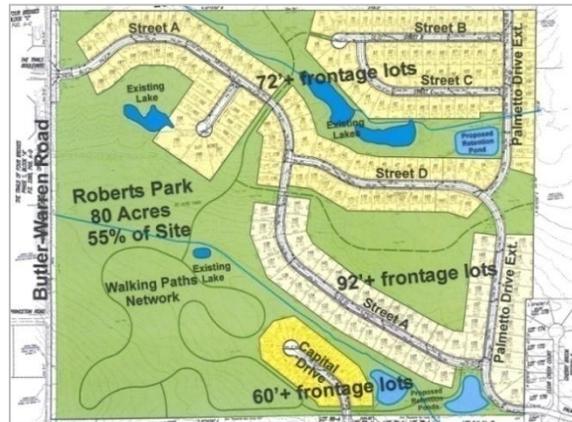
5. The Definition of Family

Areas of initial concern were jurisdictions that define "Family" and had requirements of a maximum household size. However, upon further analysis these jurisdictions define family so broadly that it is unlikely to have an impact. For example, Deerfield Township defines family as "A person living alone, or two or more persons customarily living together as a single housekeeping unit and using common cooking facilities as distinguished from a group occupying a hotel, club, boarding or lodging house, motel, sorority house, fraternity house or group home." This definition

Figures 4.2: Kerrisdale Subdivision Plan



Figures 4.3: Roberts Park Subdivision Plan





does not require families to be associated by blood, marriage or adoption and thus does not impede fair housing. Further, group homes are allowed in Deerfield Township with permitted standards and are allowed as a conditional use under the WCRZC with the conditional use standards coinciding with regulations set by the State of Ohio.

6. Neighborhood Revitalization

Areas identified as containing high concentrations of minorities include the cities of Franklin and Lebanon, and the villages of Morrow and South Lebanon. These areas were also identified as having the greatest need in terms of revitalization; infrastructure improvements; quality of life amenities to make sure their neighborhoods are desirable neighborhoods. The physical and social infrastructure of these communities has remained dormant even as other areas were experiencing increased commercial and residential development. These areas have experienced very little change over time. In the past, attempts have been made to address some of the concerns in these neighborhoods, but these measures have not resulted in significant improvement in these areas and strategies have not been holistic in approach. However, planners, County officials, and residents have begun comprehensive revitalization efforts as noted below and have implemented policy reform to implement these plans. The zoning regulations for most urban jurisdictions have been amended to preserve historic areas with the goal of revitalizing depressed neighborhoods. These policies encourage reinvestment in existing neighborhoods. Strong and stable neighborhoods further the vision of Fair Housing by offering improved social and economic opportunities. Through the County's Neighborhood Stabilization Program, commercial redevelopment, affordable infill development, and infrastructure improvements are encouraged.

The University of Cincinnati drafted a Multi-Unit Housing Analysis for Deerfield Township that identifies the fiscal impact of various housing types on the community. This data will enable the Township to better plan for a growing and transformative housing stock with the goal of maximizing the efficiency of public services to better service the needs of the residents. The following are planning efforts that address neighborhood revitalization and affordable housing issues:

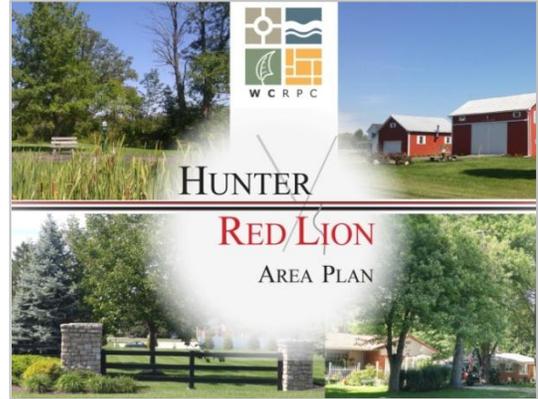
- Hunter-Red Lion Area Plan
- The Gateway Plan –West
- The Downtown Lebanon Plan
- Eastern Turtlecreek Plan
- Multi-Unit Housing Analysis for Deerfield Township

Affordable housing is a common issue addressed in these plans. Through our discussions, it was determined that there are desirable affordable housing choices available, but not in sufficient numbers to meet the demand; not the desired locations; and poor quality housing. African Americans, Hispanics, and Russians who live in these areas are typically relegated to substandard rental units that lack convenient access to goods and services.



Warren County jurisdictions realize the value of diverse and affordable neighborhoods. Many of the County's jurisdictions have a focus on downtown revitalization as well as improving adjacent neighborhoods which are often the areas of minority and low-income households. Several Warren County comprehensive and area plans have neighborhood revitalization strategies. The Hunter-Red Lion Plan details redevelopment strategies for the well established middle income neighborhood of Hunter as well as mixed-use and mixed-income strategies for rural Red Lion.

Figure 4.4: Hunter-Red Lion Plan



The City of Lebanon is currently seeking requests for proposals to develop infill housing in a low-income residential neighborhood located close to the downtown just off of the City's main thoroughfare. The City of Lebanon also developed a new Downtown Lebanon Master Plan that calls for additional apartments and single family homes within walking distance of downtown as a strategy to preserve neighborhood character and attract new residents.

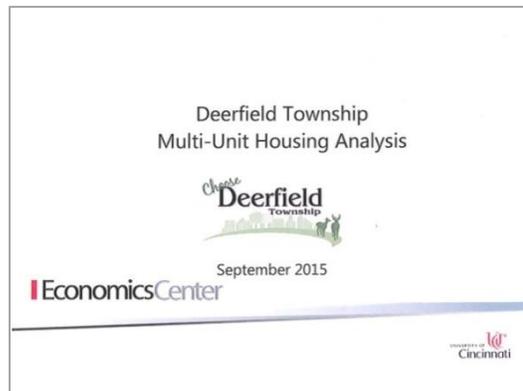
Figure 4.5: Lebanon Downtown Plan



7. Employment and Housing Transportation Link

A common theme that materialized during our public outreach discussions is access to employment opportunities for minorities and families with a single head of household. Warren County is predominately rural and suburban with small historic city centers. The County's suburban growth pattern over the last 60 years has spread employment centers away from central city cores. These development models have created artificial separations between jobs and residences that have unnecessarily lengthened

Figure 4.6: Deerfield Township Multi-Unit Housing Analysis



commute distances, travel times, and added to transportation cost. It is very difficult, if not impossible in some situations, to find gainful employment without a personal automobile. One of the factors contributing to the concentrations of minorities and low income individuals near the Cities of Franklin and Lebanon is the fact that those municipalities are historic and were built using traditional neighborhood development patterns where employment, goods and services are accessible. These communities are some of the few locations in the County where an individual



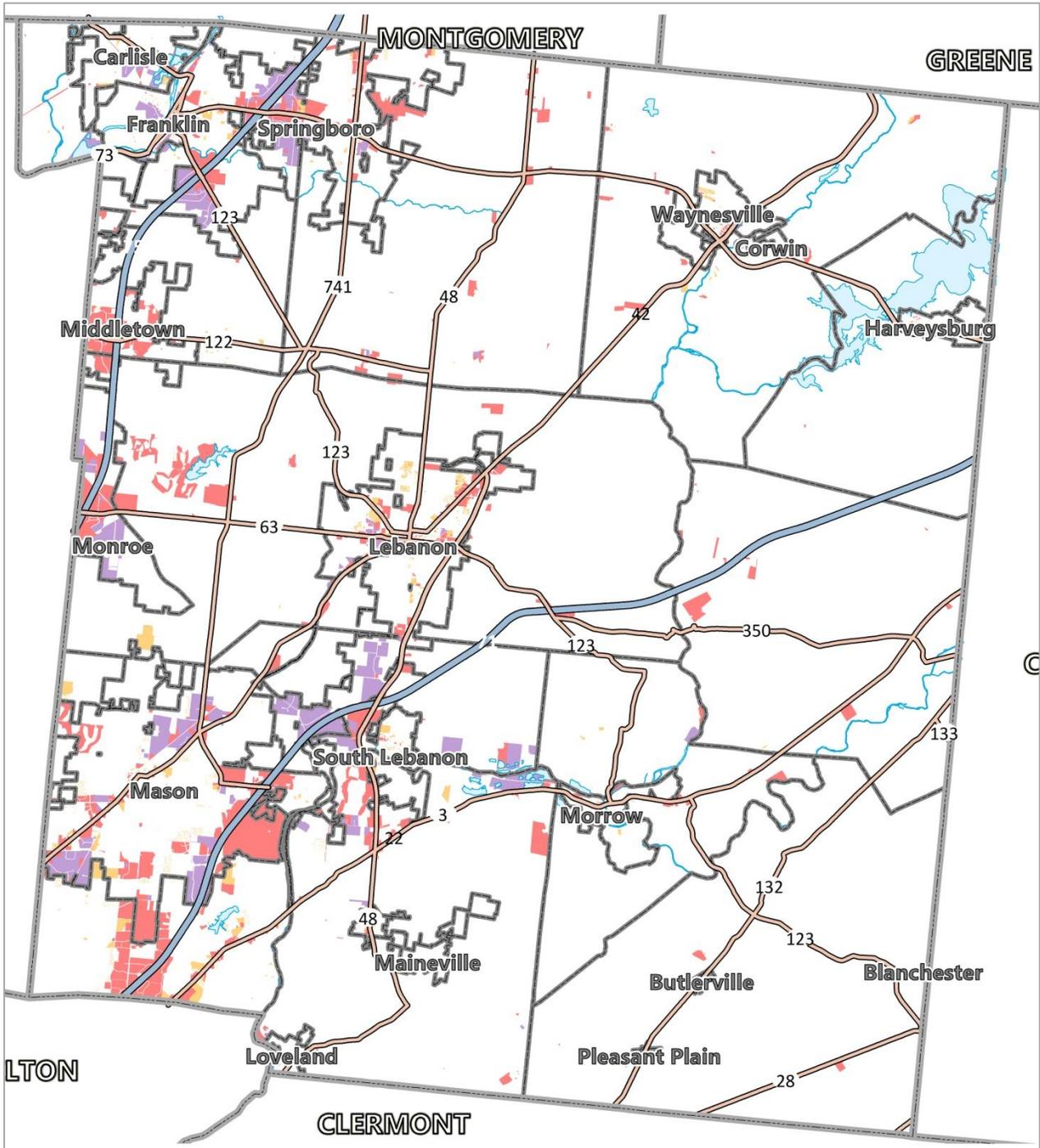
can walk from their residence to their place of employment. The downside is the employment opportunities are often low wage service jobs. The vast majority of new development is designed as suburban style residential with commercial and industrial development occurring along busy arterial or connector roads. This results in a lack of new affordable housing construction, especially near major job centers and the inability of many workers to purchase the housing being produced.

Businesses located in Mason/Deerfield Township and Springboro/Clearcreek Township have been extremely important to the economic growth of the County. Companies locate in areas that have access to a wide variety of amenities and a high quality of life, thus making it easier for them to compete for the highly educated worker. These employment centers also provide many service and blue-collar jobs. An analysis of the current jobs and housing location indicates that many jobs are located in Deerfield Township, Mason, and Springboro where the housing stock is more expensive and is above the median household income of many African Americans, Hispanics and single head of households. These unaffordable job-rich areas contribute to the jobs and affordable housing disconnect. In addition, the analysis also reveals that these areas are almost fully built-out making it difficult to develop affordable housing. Furthermore, high land values and complex land development issues such as floodplains, steep slopes, and accessibility make it more difficult to build affordable homes; therefore it will be difficult to resolve the employment and housing disconnect. Workers within several of the protected classes are consequently forced to commute long distances from areas where they can find affordable homes, such as the eastern areas of the county, and the Cities of Lebanon and Franklin. Commuting and the lack of public transit add to their cost burden.

The Cities of Lebanon and Franklin have the highest percentages of households with a high housing cost burden. These areas also have higher unemployment rates and low median earnings compared to other portions of western Warren County. Clearcreek Township has the highest median home price; these homes are still affordable to the majority of African Americans, Hispanics, and single head of households. African Americans, Hispanics, and female single head of households below fifty percent of the median income would likely experience a cost burden to live in the Cities of Mason and Springboro and Clearcreek and Deerfield townships. The primary issue is the availability of affordable housing. This data indicates that these communities need additional adequate housing and access to major employment centers.



Map 5.3: Employment Centers





8. Public Transportation

Public transportation is an essential component to achieve fair housing. For some residents, inconvenient transportation services limit access to commercial areas where they can shop for goods and services, as well as seek employment. An inadequate transportation system also limits the selection of housing to neighborhoods within transportation service areas. Public transportation must be improved to efficiently connect the county's employment and service centers to neighborhoods, thereby improving housing choice for the protected classes and for households without access to a car.

Presently, transit in Warren County is provided by Warren County Transit Services (WCTS) and by diverse county and nonprofit organizations. These service providers are allocating their resources as efficiently as possible to transport their clients, users, and consumers. However, most of the County's major employment and service centers are not currently served by fixed route public transit and the current on-demand transit system does not accommodate the work trip. Planning for a transit service that accommodates the work trip would substantially increase access to employment opportunities for people without access to a car, including those working second and third shifts and weekend hours. In Warren County, a sustainable and equitable approach may mean clustering development affordable to families of all incomes around town centers to ensure that trips to the workplace, retail services, and other amenities do not require lengthy travel in a personal vehicle and where they may reduce their transportation costs. African Americans, Hispanics, female single head-of-household, and in general low-income households have the most to gain from housing within walkable neighborhoods and access to lower costs and accessible transportation services. Lower transportation cost means higher housing opportunity access for these groups; the opportunity to live near employment, quality child care, parks and green space, and in a favorable socioeconomic climate.

The increase in the median age of Warren County could be the product of an aging local population, influx of retirees, and out migration of the younger people for employment and post-secondary education. The county's elderly population is growing. This may result in an increase in the disabled population over the next ten years because of the strong age and disability correlation. This will ultimately create an increase in demand for transit services. Transit provides a vital lifeline for people with disabilities to access employment, education, healthcare, and community life and allows them to live independently. In 2016, Warren County has approximately 20,359 disabled individuals or 9.44 % of the population. There are three disabilities that may have an effect on a citizen's ability to operate an automobile. These are ambulatory difficulties, self-care difficulties and individual living difficulties. The age category 75 years and older has the majority of individuals that are disabled. Taking all of this information into consideration, the need for transit services for the aging population and the disabled is expected to grow. The elderly and disabled both utilize the county's public transportation system and their transportation needs are



supplemented by several human service providers. The primary issues identified with transportation service for the elderly and disabled is availability and access to service.

The county's past growth pattern and low density zoning make it difficult to implement a sustainable public transportation system. New strategies, beyond the traditional approaches to public transportation, were proposed in the 2015 Transit Action Plan. This study prepared existing demographic, land use and travel pattern analyses to describe the market for transit. The analysis also generated data regarding ridership propensity, transit-supportive density, ridership survey, and travel patterns to help recommend areas for new or improved bus service. The first step towards implementation was to establish the "Lebanon Loop"— a fixed route bus service.

9. Municipal and Other Services

Although there has been rapid growth in Clearcreek, Deerfield, Hamilton, and Turtlecreek Townships, the equity of housing choice is still an issue for these areas. A major concern is the overall cost of utilities. Builders and developers stated during our community meetings that the average cost ranged between \$750-\$800 per linear foot for grading, paving, sewer, and water. Utility tap-in fees are also a concern for affordable multi-family projects. Municipalities have hookup fees for each unit that exacerbate the problem of accessible affordable housing, and the cost of larger projects can exceed \$100,000. The cost of an individualized wastewater disposal system, coupled with the cost of running other utilities to areas that are geographically distant, contribute to the overall expense of building an affordable house.



Utility cost, coupled with an increase in labor and material cost, provides very little margin of profit for developers on projects. Developers established that developments where the average unit costs are below \$250,000 are not economically viable in Warren County.

10. Public Housing and Housing Choices Vouchers

Rental assistance is a type of housing subsidy that pays for a portion of a renter's monthly housing costs, including rent and tenant paid utilities. This housing assistance can come in the form of Section 8 Housing Choice Vouchers, project-based Section 8 contracts, public housing, USDA Rental Assistance (in Section 515 properties) as well as HUD Section 202 and 811 properties



for elderly and disabled households. The Warren County Metropolitan Housing Authority (WCMHA) currently has 208 units of public housing and has access to 798 Section 8 Housing Choice vouchers. Due to funding shortages they are currently only able to fund 750 vouchers. The average monthly tenant contribution to rent by Warren Metropolitan Housing Authority voucher holders in 2016 was \$328 and the average monthly HUD expenditure per voucher holder was \$609. The average utility allowance across all voucher recipients is \$133. An analysis of Warren Metropolitan Housing Authority voucher program reveals the following:

- 529 persons/families on the waiting list for a voucher.
- Approximately 11 months wait for a voucher.
- Annual turnover of 21%.
- The average voucher holder receives housing benefits for 5 years and 1 month.
- Approximately 38 vouchers issued in 2017.
- 24% of voucher holders reside in a home with 1 bedroom, 39% with 2 bedrooms and 37% with 3 or more bedrooms.
- The average voucher household contains 2.2 persons.
- The average voucher user has a household income of \$12,276 per year.
- 98% of households were very low income (VLI) and 80% were extremely low income (ELI).
- 31% of households had wages as a major source of income.
- 1% of households had welfare (TANF, General Assistance or Public Assistance) as their primary source of income.
- 64% of households had other income (Social Security, Disability or Pension) as their major source of income.

There are 20 low income housing apartment complexes which contain 1,435 affordable apartments for rent in Warren County. Many of these rental apartments are income based housing with about 925 apartments that set rent based on income. Often referred to as "HUD apartments", there are 392 Project-Based Section 8 subsidized apartment units in Warren County. There are also 740 other low income apartment units that don't have rental assistance but are still considered to be affordable housing for low income families. Vouchers may be used throughout the County, region and country. Nevertheless, there are high concentrations of vouchers located in the areas with the highest concentration of low to moderate income households.

The location of Public housing and Section 8 public housing projects was also examined through the course of this AI. Map 4.8: Public Housing and Low Income Housing Options, shows the public housing developments within the County. The majority of these units are clustered in the central and northwestern portions of the County. Through stakeholder interviews with officials from



Warren Metropolitan Housing Authority and individuals living in the supportive housing system, it was determined that there is not a discernible pattern of racial or ethnic concentration within public or assisted housing developments. Most of the resources are used by predominately white families, which correspond with the racial and ethnic patterns of the County. There is flexibility to choose a housing location for tenants on the waiting list. An applicant on the waiting list sometimes receives a public housing option for a neighborhood that does not fit their needs. In this situation, the applicants may pass on this voucher and maintain their place on the waiting list. The applicant has the ability to pass on available voucher up to three times without the risk of being placed at the end of the waiting list. WCMHA makes every attempt to work with the individual or family to determine their neighborhood of choice and offer them available vouchers for those areas.

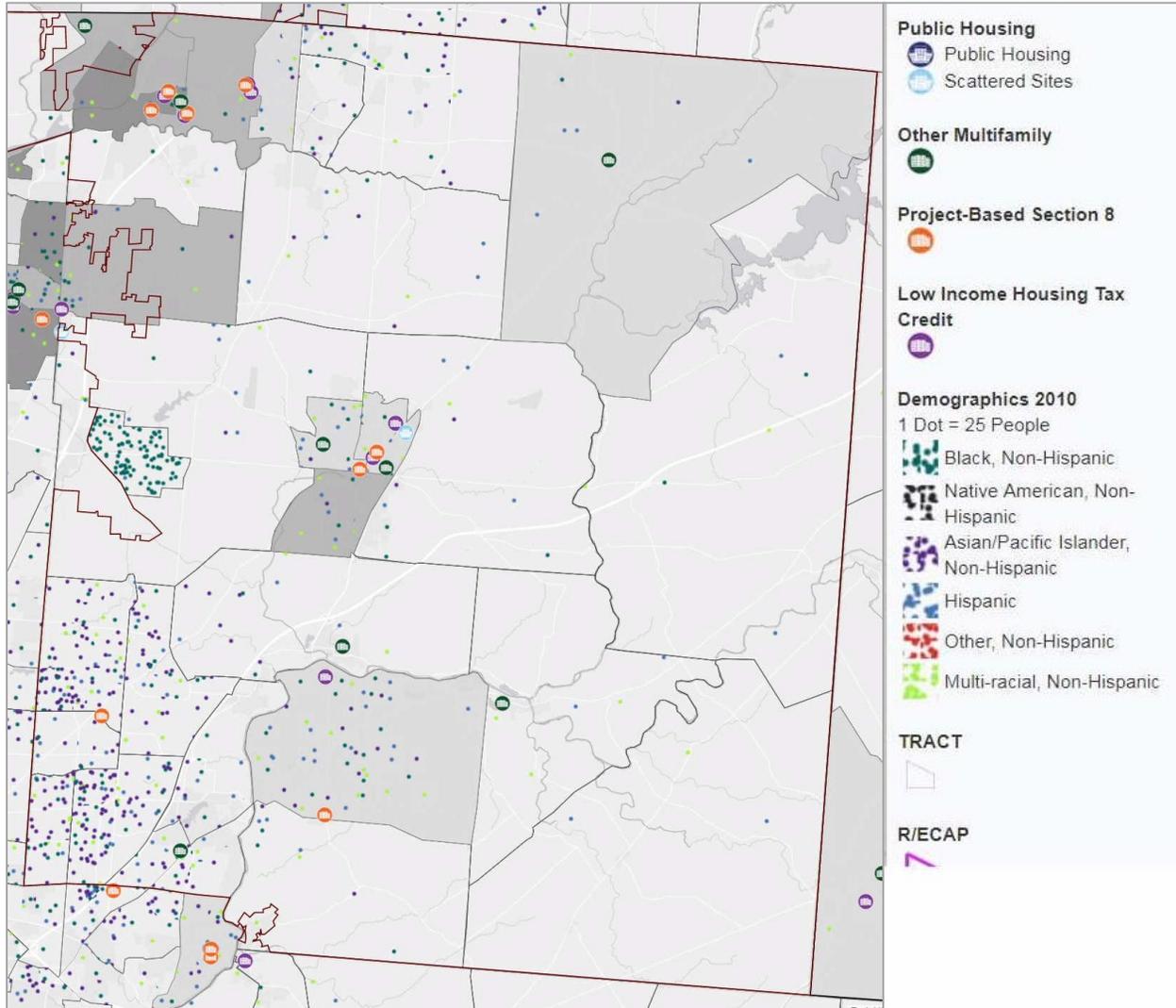
Holder can use vouchers they receive from the local PHA outside the PHA's geographic area and voucher holders from other Counties can use their vouchers in Warren County. Conversely, Warren County voucher holders can transfer to other jurisdiction if they accepted a voucher within the County. The voucher is given to a family who decides where they want to live. However, the local preference does create bias toward the existing social construct by reinforcing the existing demographic patterns.

The WCMHA has specific policies and procedures for the manner in which applications for housing are treated, rejected or selected as tenants. Everyone is on a waiting list and disabled or minority individuals are not specifically treated any differently than other applicants. However, there are preferences for the following categories: Live and/or work in the county, honorably discharged, currently employed or receiving disability payments, or involved in a transitional program.

The WCMHA does not exclude or limit the participation of persons with disabilities in the housing developments they manage and meets HUD's requirements for the disabled. Everyone is on the same list, but if someone is not handicapped and doesn't need the unit and there is a handicapped next on the list the agency pragmatically moves families around. Approximately 25% of the housing authorities' units are accessible and these are not limited to the first floor. According to 2016 Q4 PSH data, of all households participating in the Warren Metropolitan Housing Authority Housing Choice Voucher program, 25% include at least one person with a disability. 42% of households with a head of household 61 years or less were headed by a person with a disability. 67% of households headed by someone 62 or older were headed by a person with a disability.



Map 4.8: Public Housing and Low Income Housing Options



11. Property Tax Policies

Local tax policies impact housing affordability and include laws related to property taxes, tax assessments, transfer taxes, and sales taxes on building materials. It also refers to tax abatements and homestead exemptions. The added cost burden from property taxes may be an impediment for LMI ownership. The combination of County and City property taxes is usually considered as a catalyst for new homes to be built outside of cities and in many communities, the disparity between City and County property taxes usually driving people out of the City. However, as discussed earlier, the major distinctions in Warren County's growth areas are identified by the development potential in the western versus eastern portions of the County and not city versus unincorporated County.

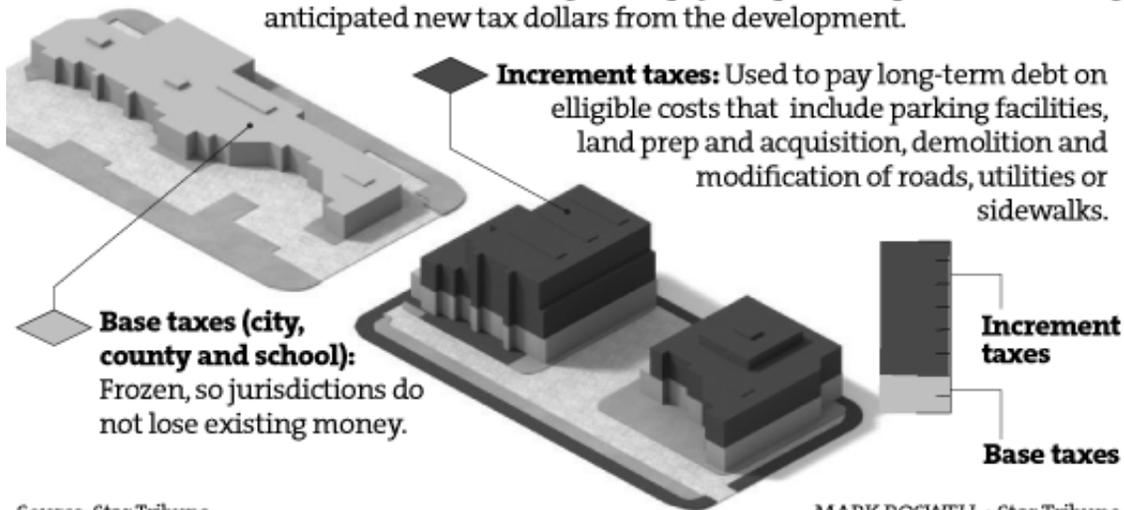


The County has instituted policies to offer tax abatements to many new construction projects to existing housing to minimize this burden. Tax forgiveness, delay, or other tax relief policies can help lower-income homeowners keep their homes. Programs of this kind can be part of an overall, much larger strategy to promote fair housing because they help to preserve homeownership opportunities for groups like minority families and elderly homeowners who otherwise would have only rental options. Tax relief can take the form of delayed payments. Alternatively, interest-free payments can be spread over months, permitting smaller monthly payments for those who qualify. Another possible form of tax relief is forgiveness by the cities of unpaid property taxes for non-profit housing.

TIF and Abatement: Tax Increment Financing or TIF's are a mechanism where taxes are paid and allocated to a certain area rather than to the General Fund budget. These agreements often specifically specify what the funds will go to within the taxing district and funds that go to the schools are generally still sent to the schools as part of the agreement. Tax abatements differ in that they often completely exclude a portion, or all, of the taxes that are being paid on a piece of property. The taxes are not diverted, they are simply not charged. Tax abatements, one could argue, impose a burden on other properties within that taxing district during the length of the abatement. The individuals with the abatement still require the services that the remainder of taxpayers must cover. The counter argument is that the abatements bring people that otherwise would not come. That could mean income taxes, jobs, patrons of local business and other fund producers.

TAX INCREMENT FINANCING

Tax increment financing, or TIF, pays for public improvements using anticipated new tax dollars from the development.





12. Building Codes

Building codes are necessary to insure public safety and have evolved over time to address issues that were not considered in older construction. During our community meetings developers agreed that the Warren County Building Department rates and service were not impediments to fair housing choice. However, updated building codes inadvertently create impediments to affordable fair housing choice by impacting the rehabilitation cost of the older housing stock often located in minority neighborhoods. Bringing older buildings up to the requirements of modern codes does have the benefit of establishing safer units. However, many times the cost of these upgrades exceeds the cost of the originally planned rehab project. In this situation, the applicant may choose to leave the structure as-is to avoid complying with costly code requirements to bring an older structure up to date.



The Building Department is certified by the Ohio Department of Commerce Board of Building Standards to enforce the 2017 Residential Code of Ohio (applies to construction for 1, 2 and 3 family detached dwellings) and The Ohio Basic Building Code (OBBC) which is usually referred to as the commercial code. All commercial/industrial, as well as residential projects, within the unincorporated County, the City of Lebanon and the Villages of Morrow and Maineville fall under the authority of the Warren County Building and Zoning Department.

The Building and Zoning Department issues the following: building permits, certificates of occupancy, renewals of temporary use permits, and zoning permits. Ultimately, a permit must be obtained from the Building and Zoning Department to erect a building or alter an existing building. Any development must comply with the Building Code. In addition, the Department must approve the alteration of any building and guarantee that changes comply with the necessary zoning and building codes.

A community's building codes can impact fair housing with regard to housing accessibility. The U.S. Department of Housing and Urban Development established Fair Housing Accessibility Guidelines to help communities comply with the Fair Housing Act. These guidelines refer to eight "safe harbors" documents that, if used as the Building Code, will ensure that buildings comply



with the Fair Housing Act. Some of these safe harbors include HUD's Fair Housing Accessibility Guidelines and, HUD's Fair Housing Act Design Manual.

In guaranteeing compliance with the specific building codes and accessibility standards, Department staff must ascertain compliance with yard, space, and structural requirements. In fact, the Building Codes Department should be recognized for assuring compliance for residents with physical and mobility challenges, a class protected by fair housing legislation. The County utilizes the Ohio Basic Building Code to guarantee accessibility for citizens with physical and mobility challenges. Furthermore, the Commercial and Multi-Family Permit Application provides specific notice of the need to comply with federal requirements, such as the Americans with Disabilities Act. All multifamily housing construction is required to be ADA accessible, or have ADA compliant units. Single family housing is not required to meet these same provisions.

Care facilities are often impacted the most by building code regulations. In November 2017, the Ohio Building Code was modified resulting in a change in the classification and requirements of care facilities based upon the capability of the occupants and the associated risks. The occupancy of an existing building is permitted to continue without change as long as there are no orders of the building official pending, no evidence of fraud, or no serious safety or sanitation hazards. The residents would not be required to be relocated simply because there is a change in the code. The rules are not permitted to be retroactively applied to existing buildings that are not being changed in any way. However, if a change of occupancy, an addition or an alteration occurs to an existing building after the effective date of the new code, then, after approval and inspection, a new certificate of occupancy must be issued which needs to reflect the current status as a care facility.

A care facility housing at least six and not more than 16 persons, shall be classified as Group R-4. R-4 Residential occupancies shall include buildings arranged for occupancy as residential care/assisted living facilities including more than five but not more than 16 occupants, excluding staff. Group R-4 occupancies shall meet the requirements for construction as defined for Group R-3, except as otherwise provided for in the code or shall comply with the Residential Code of Ohio requiring the building to be protected by an automatic sprinkler system.

An automatic sprinkler system installation is an expensive and difficult project, especially in an existing house. This new requirement could cause many care facilities to shut down due to the lack of funds to complete such a large project.



13. Visitability in Housing

Visitability is the design approach recognizing that a non-resident with mobility impairment who uses a wheelchair or other mobility device should be able to visit the home. A social visit requires the ability to get into the house, the ability to pass through interior doorways of the house, and the ability to get into a bathroom to use the facilities. Steps at every entrance and narrow interior doors, with the bathroom door usually the narrowest door in the house limit accessibility. Three specific accessibility features make it possible for most people to visit:

1. at least one zero-step entrance on leading from a driveway or public sidewalk,
2. all interior doors being wide enough to allow a wheelchair to pass through (32”), and
3. at least a half bathroom on the main floor.

Figures 4.9: Essential Visitability Features



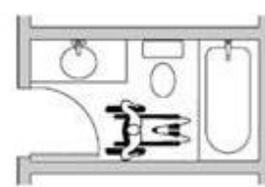
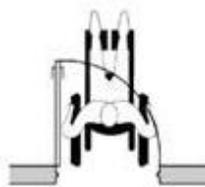
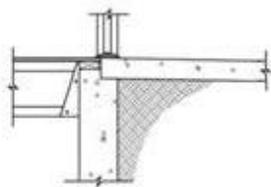
No-Step Entry



Adequate Doorways



Usable Bathroom



These features assist a person using a wheelchair as well as people with other kinds of mobility impairments, including temporary disabilities. Visitability features make homes easier for people who develop a mobility impairment to visit friends and extended family so that they don't have to turn down invitations, or not be invited at all. These features also provide a basic shell of access to permit formerly non-disabled people to remain in their homes if they develop a disability.

Although, the Building Department utilizes the Ohio Basic Building Code, which includes accessibility standards, visitability features are not included. Currently in Warren County, visitability is only considered in new homes when a buyer demands these features prior to the construction of the home. A majority of homes that are constructed today do not include visitability as a basic feature and would require costly retrofits in order to do so.



14. Lending Policies and Practices

The ability to own a home is highly dependent upon access to mortgage credit. For those who already own their homes, access to this type of credit is the major source of funding for such things as major home improvements, business start-ups, and the education of children. This part of the report investigates the extent to which people with different racial and ethnic characteristics have access to different types of mortgage credit. It begins with an analysis of Home Mortgage Disclosure Act data, proceeds with a review of the performance of Warren County banks under the provisions of the Community Reinvestment Act, and concludes with a discussion of homeowner's insurance.

Federal recognition of the importance of residential credit culminated in the mid to late 1970s with the passage of two pieces of legislation. The Home Mortgage Disclosure Act (HMDA) of 1975 required private lenders to report the number and dollar volume of residential loans at the Census tract level. This data allowed people to monitor local investment and disinvestment activity and to identify lenders or banks that were serving their local deposit bases and communities as opposed to those who were not.

The Community Reinvestment Act (CRA) of 1977 made "redlining" illegal by stipulating that lenders had an affirmative obligation to make loans in low and moderate income communities. In brief, CRA required lenders to do business in communities that were traditionally objects of redlining and disinvestment, while HMDA provided people with the information to make sure they were doing it. This information is made available to public officials and the general public to identify possible discriminatory lending patterns and practices, and to aid in determining if financial institutions are meeting the housing finance needs of all communities.

Several federal initiatives, such as the Community Reinvestment Act, have curtailed redlining and made credit more readily available to these communities. In addition, advancements in computerized underwriting practices have removed some of the subjectivity of local loan officers, and the potential for illegal discrimination, in the determination of creditworthiness. As a result, discrimination in today's financial services market is not as blatant and is more difficult to detect. Financing is more available to borrowers, but details are in the terms of the loan.

The results of the stakeholder interviews and community meeting did not identify local lending policies and practices of financial institutions as an impediment to fair housing choice. The majority of the comments stated that the lending policies and practices of mortgage lenders have policies to actively pursue minority persons and families for a home loan so they are in

Figures 4.10: Mortgage Compliance Magazine



Home Mortgage Disclosure Act

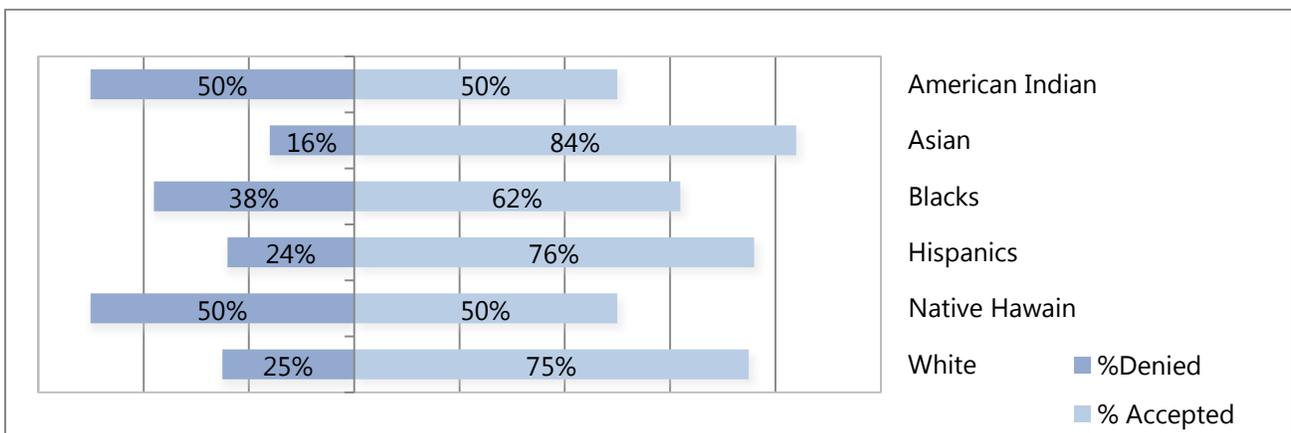
HMDA



compliance with state and federal regulations. Representatives of financial institutions, involved, indicated that they focus on the credit history and credit scores of an applicant, when either approving or denying applications for mortgages. Mortgage Lenders currently recommend credit scores of at least 680 to be eligible for a mortgage. Only a few years ago, a score in the mid-to upper 500's would be high enough to secure a mortgage. Also, if the applicant has a credit score that was not at the recommended level, the applicant would still be able to be approved for a mortgage, but likely at a higher interest rate. All of the participating lenders stated that it is extremely rare that an applicant has 20 percent for a down payment. Statistics of loan approvals based on race do show a bias toward higher approval for Asian, Hispanics, and White families in Warren County versus lower approval percentages for African-Americans and the few Native Americans in the County.

Tables 4.13: 2014 Low Income Approval Rating

Race / Ethnicity	2014- Low Income				
	Total # of apps	Approved but not Accepted	Denied	Loan Originated	Accepted
Native Americans	4	0	2	2	2
Asian	51	2	8	41	43
African-Americans	39	1	15	23	24
Hispanics	42	3	10	29	32
Native Hawaiian	2	0	1	1	1
Whites	2551	117	645	1789	1906

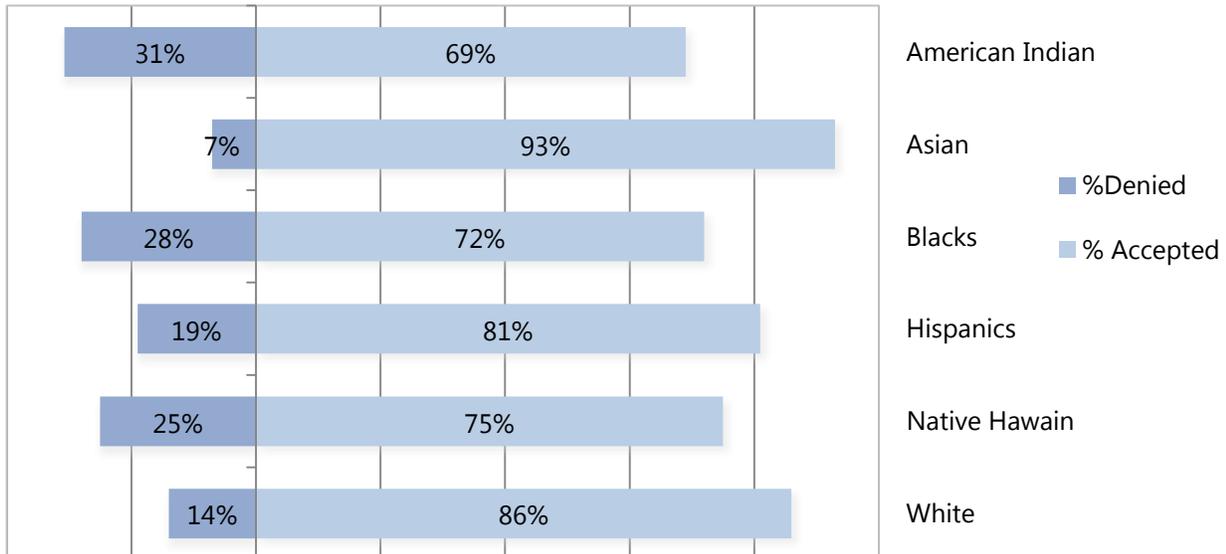




Tables 4.14: 2014 Upper Income Approval Rating

Race / Ethnicity	2014- Upper Income				
	Total # of apps	Approved but not Accepted	Denied	Loan Originated	Accepted
American Indian	13	1	4	8	9
Asian	303	14	21	268	282
Blacks	83	4	23	56	60
Hispanics	75	4	14	57	61
Native Hawaiian	4	0	1	3	3
Whites	3645	134	523	2988	3122

Tables 4.15: 2014 High Income Approval Rating



It is a violation of the Fair Housing Act to impose different terms or conditions on a loan, such as different interest rates, points or fees based a person’s race, color, national origin, religion, sex, familial status or disability. A study by the Urban Institute found that African-American and Hispanic homebuyers received disparate treatment in terms of financing options. In addition, Freddie Mac indicates that a third to a half of borrowers who qualify for low cost loans receive subprime loans instead.

Minority consumers often have unequal access to loans at the best price and on the best terms based on credit history, income, and other risk factors. High cost loans can be defined as first mortgages with interest rates that are 3 percentage points higher than a benchmark rate and second mortgages that are 5 percentage points or higher than a benchmark rate. According to a Woodstock Institute study, sixty percent of mortgages obtained by African American households



and 46 percent obtained by Hispanic families were high-cost loans.

This disparate treatment was not limited to lower income households. In fact, there was a higher level of discrepancy when analyzing upper income households. A low-income African American borrower was three times more likely to receive a high-cost loan than a low-income White borrower. An African American earning more than \$135,000 annually was five times more likely to receive a high-cost loan than a White borrower at the same income level.

15. Internet Advertising

Local real estate brokers indicated knowledge of the Fair Housing Act and other laws governing fair housing. The real estate industry depends largely on marketing through the Internet, and therefore much of the initial direct contact has been eliminated from the sales process. A review of real estate sites on the Internet revealed no discriminatory advertising, and in all cases, the HUD fair housing logo was included on the web page.



ASSESSMENT OF PAST GOALS AND ACTIONS

Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

Affordability problems affect both renters and homeowners. This problem is especially true for the individuals of protected classes who most often suffer based on their race, color, religion, sex, national origin, familial status, and/or disability.

Even among minorities with relatively better paying jobs, higher housing costs precipitate a significant decline in real, spendable income. For both renters and homeowners, housing and transportation costs consume a large share of the household budget. The widespread problem of housing affordability has a profound impact on the quality of life for families, especially children, and on the overall well-being of neighborhoods and communities.

These issues transcend jurisdictional boundaries. There is a need for a countywide partnership that supports a shared vision for housing and community development for the entire county. Warren County can strengthen the policy linkages between housing and transportation, job centers and social services, and the whole spectrum of community needs. Coalition building, working toward consensus, and coordinating housing programs and resources are key tools and building blocks to addressing fair housing. Key impediments that were identified in the 2012 report and the progress that has been achieved solving those impediments are as follows:

1. Wider Variety of Housing Types in Zoning Codes

Several of Warren County's jurisdictions limit the types of housing units permitted. Patio homes, zero-lot-line housing and accessory dwelling units and other types of small lot housing are restricted or not permitted. Warren County adopted a new zoning code that permits these types of housing, but several urban jurisdictions still restrict these uses. In addition, to address overly restrictive or costly development regulatory standards the county might consider permitting narrower streets, a relaxation of parking requirements, and/or density bonuses in Planned Unit Developments for affordable units.

As discussed earlier, the Warren County Zoning Department established and legalized cluster subdivisions in certain parts of the County. This allows for small lots and secondary dwellings on lots. The result of this is that lower income families are able to afford purchasing a house and lot. An unknown number of residents took advantage of this zoning option. This zoning will continue to have a positive impact on the community by providing more housing opportunities for low income families.

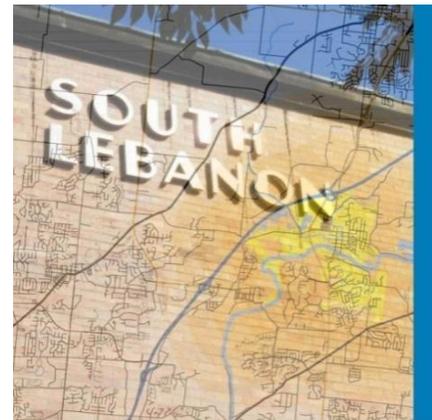


2. Greater Degree of Neighborhood Planning; Revitalization & Investment

There are concentrations of low-income persons, minorities and female headed households which lack decent, safe and sound housing that is affordable, which impacts neighborhoods throughout the County. During the 2012 Housing Assessment, no jurisdiction indicated that they were actively engaged in neighborhood planning; however, several identified incremental projects within low to moderate income neighborhoods. No jurisdiction comprehensively addressed neighborhood revitalization.

A goal of the 2012 AI was to improve the housing conditions in the County's older and established neighborhoods while also improving schools, recreational facilities and programs, parks, roads, transportation, street lighting, trash collection, street cleaning, crime prevention, and police protection activities. Jurisdictions should strive to equalize services as part of FHP. Towards this goal the following was achieved:

- a. In 2014, seven school levies went into effect due, in part, by the rallying of neighborhood groups. The levies will have a positive effect on the school system. Three of the school levies were in low-moderate income areas, the Village of Carlisle, Wayne Township and the City of Franklin.
- b. The Regional Planning Commission finished Comprehensive Plans for the Villages of Morrow, Maineville, and South Lebanon, and the Townships of Salem, Wayne and Massie, all with concentrations of low-moderate income persons. They held many evening meetings in the towns and invited the public to attend. The Regional Planning Commission also completed the comprehensive plan for Union Township and an Area Plan for the Hunter-Red Lion communities.



- c. The City of Franklin completed 5,000 feet of sewer realignment project enhancing the sewer facilities in the area, funded with CDBG funds. The County has funded and completed five road projects totaling 9,260 linear feet of roadway with CDBG funds in 2013. A low-income section of Lebanon also had a street rehab project that was finished in 2015. Improvements were made to the water treatment plant which services the entire Village of Morrow.



- d. Other neighborhood projects that involve community planning are the Loveland Park Street Repaving Project; South Lebanon Street Project; Butlerville Fire Hydrant Project; and several other CDBG-funded projects. The Villages of Morrow and South Lebanon and City of Franklin are low-moderate income communities having the majority of the over 16,000 rental property housing stock of Warren County. These communities are organizing Neighborhood Watch Programs to provide a safe environment for their residents.
- e. All cities and villages have contracted with a trash hauler so that every household in their jurisdiction has trash services and can participate in a recycling program. The Community of Wayne Township desires to contract trash service to reduce the number of trash trucks going through residential areas, including low-moderate income areas.

3. Better Housing-Transportation Linkage

Many of the County's major employment centers lack affordable housing and do not offer fixed route public transportation services. Thus, this limits the choice of housing for moderate income households, in particular African-Americans, Hispanics and households with disabled individuals. The job, housing and transportation disconnect is a contributing factor to the concentration of low-to-moderate income households within the Cities of Lebanon, Franklin and South Lebanon and results in economic segregation.

In 2014, the Regional Planning Commission, along with Warren County Transit Service established the Transportation Needs Committee to evaluate transportation issue; specifically, unmet transportation needs among low-income residents, the disabled, the elderly, and the mentally handicapped. The committee analyzed transportation issues by speaking to stakeholders and gathering data. Solutions were developed after discussion with other counties and researching case studies from other communities. The approved action plan included items such as adding flex routes. Following recommendations from the Transportation Needs Committee the County Commissioners increased their contribution to the Warren County Transit Service to \$400,000 in order to help alleviate the job, housing and transportation disconnect.





The Lebanon Loop, a flex-route transit service, was created after detailed analysis and additional meetings with the Transportation-Needs committee. The City of Lebanon was chosen because of its central location; relatively high population density and employment opportunities located within reasonable proximity to one other, which offered a greater probability of success. The service has been successful and the County intends to expand the route.

Figure 4.11: Lebanon Pilot Loop



4. Creative Delivery of Affordable Housing

Most of the housing being built throughout the County has been priced completely out of the price range for low-to-moderate income families. An issue of particular concern is the lack of affordable housing near major employment centers as well as the lack of fixed route transit services to those areas.

A joint effort between Warren County Balanced Housing (WCBH) and the Warren County Career Center (WCCC) in 2014, Warren County successfully completed a home rehab project by the students at the Career Center. WCNH purchased a home and WCCC provided the labor by students while using this as an educational experience. They contracted with WCCC for the construction classes to donate their labor for the renovation. This labor included: engineering and blue prints by the engineering and architectural classes, rewiring by the electrical class, new furnace and air conditioning unit by the HV AC class, adding a room and total new roof by the carpentry class, and plumbing by the plumbing class. All phases of the renovation were contracted through the school to give the students the hands on experience that books have only explained. Upon completion of the project, the house was sold to a low-moderate household.



5. Coordinating the Delivery of Accessible Housing for the Aging and People with Disabilities

One impediment that Warren County identified is a lack of accessible housing for the aging and persons with disabilities. There are nine senior housing communities for the elderly in Warren County. These are distributed throughout the County in the Cities of Franklin, Lebanon (2), Mason and Loveland, and the Villages of Carlisle, Waynesville, Morrow, and South Lebanon. There is a short waiting list and vouchers/subsidies are accepted. While there is rental housing available to older adults with disabilities over the age of 55, there is limited housing available for younger people with mental and/or physical disabilities. This issue has been addressed by working with Warren County Board of Developmental Disabilities (WCDD). WCDD has established relationships with private care facilities to provide housing for disabled persons of all ages. The homes are designed to house one or two persons on long-term basis in an effort to receive more individual care than an institution could provide.

Metropolitan Housing Authority continues to provide vouchers to private landlords of Section 8 housing units. Last year, the County nearly doubled the number of vouchers when it absorbed the vouchers of the neighboring city of Middletown, which is no longer involved in the program. One action plan is to identify more landlords to be involved in the program to meet the needs. Agency leaders have met to discuss ways to do this. The Community Housing Assistance Program (CHAP) is a non-profit board that finances and supervises housing for adult persons with disabilities. This organization purchases houses, conducts any necessary renovations and repairs, and rents them to the disabled that are at the level of reasonable self sufficiency. The organization currently owns 37 units and has a waiting list of approximately 30 persons and growing. Funding is a major factor regarding the lack of housing in this program. The major source of income is the rent from individuals. Since their rent cannot be more than 30% of their income, some housing vouchers are available through Section 8. The WCBDD also offers rent subsidies. The County will continue to identify more landlords to be involved in the program to meet the needs.



6. Greater Awareness of Fair Housing Rights for Realtors and Residents

In the 2012 Assessment Report it was determined that impediments to fair housing could be addressed if people were better informed. Individuals often times lack information on fair housing, specifically regarding their rights and responsibilities on housing issues and/or where to find accessible rental properties. Warren County continues to strive for housing equality through education, communication, and information. By informing persons on “both sides of the fence” of their responsibilities, so that each party realizes it is a reciprocal agreement, the spirit of cooperation is more likely to exist. Approximately 1000 pieces of literature and 500 – 1000 pieces



of “give-away” novelty items (i.e. pens, note pads, magnets, chip clips, bottle openers, etc.) are distributed to the general public every year at fairs, festivals, meetings, outings, etc.

One of the main problems is non-professionals that are selling or renting a small number of units do not know the extent of the Fair Housing laws, or they do know, but fail to abide by those laws. The County, as part of the five-year Fair Housing Program, provides Fair Housing Training to officials of public bodies, or non-profit groups. This includes a presentation of Fair Housing requirements as well as distribution of related materials.

Caseworkers from both Warren County Board of Developmental Disabilities and Warren County Community Services Senior Services ensure that clients are informed of their rights in regards to fair housing. Furthermore, caseworkers serve as advocates for the clients to communicate with housing authorities. Warren County Community Services (WCCS) and Warren County Board of Developmental Disabilities (WCBDD) coordinate with the Warren County Grants Office to provide Fair Housing information. Workshops have been provided with caseworkers from these agencies in order to help inform and educate clients of their rights. Representatives from the Warren County Fair Housing Office will meet with caseworkers to give a brief training session/refresher course about fair housing practices. Literature will also be distributed.

7. Visitability

The Ohio Visitability Strategy Group, made up of state agencies, departments and commissions, was created to examine ways to promote visitability in Ohio’s building and zoning codes. The intent is to design dwelling units that can be easily modified, with little cost, to ensure usability by everyone, regardless of a person’s age, size, abilities or disabilities. Currently, the County’s Building Department does not track homes that meet visitability standards.

The Warren County Building and Zoning Department created a “Guideline for Warren County Universal Design and Visitability.” The literature was made available to residents in 2014 and distributed through the office. The Regional Planning Commission served as an informing agency to the public. Copies of said document are also on file in the Grants/Fair Housing office.



WARREN COUNTY

Analysis of Impediments to Fair Housing Choice

SECTION 5 Recommendations



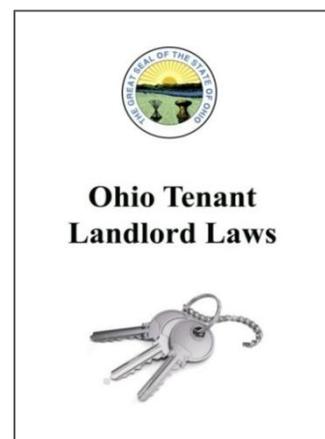


SECTION V. RECOMMENDATIONS

Warren County continues to do well in avoiding systematic impediments to fair housing choice and the County actively pursues actions to deal with possible impediments to fair housing. However, the County recognizes that barriers to fair housing exist and the need to have an Action Plan to continue to affirmatively further fair housing choice. The county has made considerable strides in the areas for zoning— addressing minimum lot size requirements and permitting accessory dwelling units. Additional code improvements are needed identified below.

Another significant area of achievement is the work of the Warren County Fair Housing Office; the Fair Housing coordinator; and Housing Opportunities Made Equal (HOME). These organizations efforts towards enforcement; training; and dissemination of information lie at the heart of the county's ability to affirmatively further fair housing. The Warren County Fair Housing Office and a Fair Housing coordinator along with Housing Opportunities Made Equal (HOME) should continue to carry out the following scope of services for the County:

- **Enforcement:** HOME will receive and investigate complaints of illegal housing discrimination. When a complaint has been investigated and verified, the complainant will be counseled and advised of the various options available for the enforcement of the law and referred to appropriate legal services. Legal help and guidance through the administrative process will be provided to the complainant at no cost to the complainant.
- **Testing:** HOME will conduct random rental tests to ensure families with children and minorities are receiving equal treatment in the rental market. HOME will also conduct tests in the for-sale housing market.
- **Awareness:** The Fair Housing Officer will continue to disseminate Fair Housing and Tenant/Landlord brochures to social service organizations and makes them available at the Fair Housing Office. A special effort should be made to inform government officials, in particular recipients of CDBG funds, of fair housing legislation. County offices will continue to work with communities to update and disperse information related to discrimination, hold informational sessions when cluster issues are identified, and assist affected individuals through the Warren County Grant Administration's fair housing choice program.





Language for LEP persons can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally-funded programs and activities. Warren County will continue to provide Fair Housing and Warren County Transit Service brochures in Spanish.

The following sections outlines further recommendations, categorized as “Short Term” and “Long Term” recommendations needs to overcome the impediments to fair housing choice and details action items and strategies to achieve those goals. An effort should be made to implement or partially implement short term recommendations during the four years time horizon of the AI Plan. Long range recommendations should be studied and data gathers during the four years time horizon of the AI Plan. Nevertheless, if there is an opportunity for funding and implementation of long range recommendations in short term the County should capitalize on the opportunities.

- 1. Improve Financial Education:** There is a need for greater financial literacy. The County can take an active role in bridging the language/cultural gap by translating brochures and applications. Also, the County can work in tandem with financial institutions to better assist them with their federally mandated programs intended to promote lending and provide loans in minority neighborhoods.
- 2. Promote Ohio Housing Locator:** The Fair Housing Office with the assistance of Housing Opportunities Made Equal (HOME) should promote the Ohio Housing Locator (OhioHousingLocator.org) to landlords and property management companies (for free property registry sign-up) and to the citizens of Warren County to find a place to rent. It is a searchable directory of affordable, accessible rental housing. Listings also offer information on amenities, supportive services and accessibility features.
- 3. Provide Fair Housing Training for Policy Makers:** In order to minimize the potential negative impact of public policies and codes, elected officials, municipal staff, and citizens appointed to relevant public decision-making boards should receive fair housing training to recognize potential fair housing problems experienced by protected classes and those traditionally excluded from the decision-making processes. This could be achieved with assistance from HOME.

HELP

If you need legal assistance, you may call:

Warren County Legal Aid
1-800-582-2682
513-241-9400

**FAIR HOUSING IS MORE THAN JUST A
GOOD IDEA, IT'S THE LAW!**

It is illegal to discriminate against any person because of race, color, religion, sex, national origin, handicap or familial status:

- in the sale or rental of housing or residential lots
- in the advertising the sale or rental of housing
- in the financing of housing
- in the provision of real estate brokerage services

If you have any questions about the information in this brochure or feel that you have been discriminated against, you may contact:

Warren County Fair Housing Office
513-695-1259



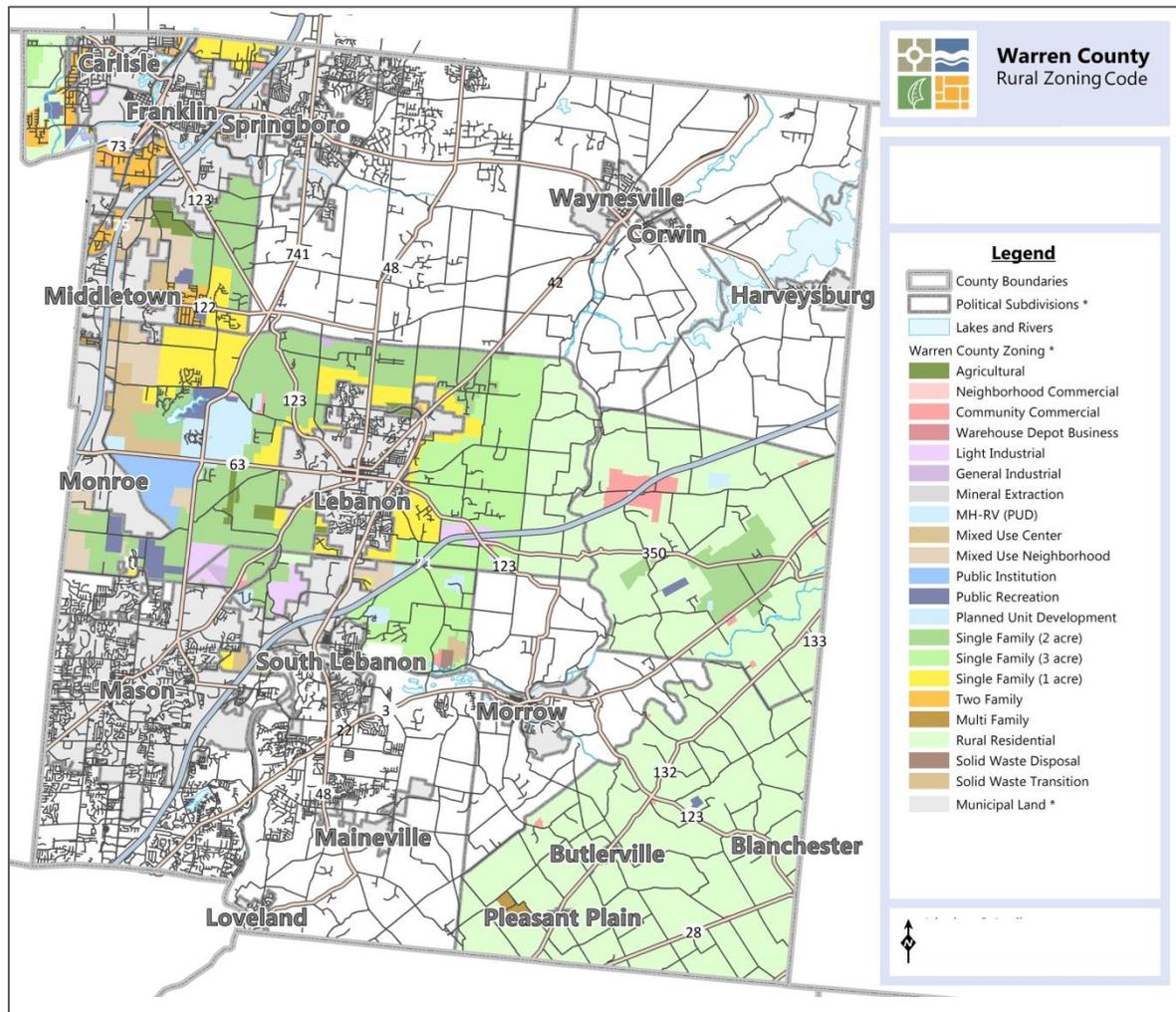
4. Updates Zoning Codes to Address Mixed Use; Cluster Development; The Range of Permitted Housing Types; and to Eliminate Impediments for Group and Recovery Homes.

- a) Mixed Uses Developments: Updated zoning codes should include higher density districts, encourage infill, revitalization, and promote mixed-use districts. The County code allows both a mix of residential types (single family, duplex and multifamily units) and a mix of residential and commercial. The new County regulations, finalized in 2012, promotes affordable housing by allowing smaller lot sizes and frontages and by eliminating barriers to the kinds of development that can make urban mixed-use districts so exciting and vibrant (e.g., residential development on top of commercial space). This type of development (higher density & mixed-use) is encouraged only on the western portion of the County and in Wayne Township where utilities, infrastructures and services are available. Mixed-Use developments are just starting to be embraced by developers in the Cincinnati region. The County's first neo-traditional development, Union Village, should be the centerpiece of a "marketing" initiative that promotes mixed use developments and educates developers on both the economic and social benefits of these types of communities.
- b) Cluster Development: Warren County Zoning Department's cluster subdivisions are permitted in certain parts of the county. However, the requirement of up to 40% open space in many municipalities creates a situation where lower priced homes are economically unfeasible for cluster developments. The required open space percentage will need to be explored to gauge the balance between providing opportunities for fair housing choice through lower cost development and the quality of life the open space provision provides. In addition, to address overly restrictive or costly development regulatory standards the county is considering permitting narrower streets, a relaxation of parking requirements, and/or density bonuses in planned unit developments for affordable units. Several of Warren County's jurisdictions limit patio homes, zero-lot-line housing and accessory dwelling units and other types of small lot housing. Warren County official should hold meetings to explain the impact these provisions have on fair housing choice.
- c) Range of Permitted Housing Types: Revise zoning policies to allow development of a range of housing types "as of right". Greater housing diversity and affordability may be achieved by revising zoning policies to allow a range of housing types, rather than requiring a special review process or disallowing certain types of structures entirely. Warren County Regional Planning Commission has begun an education campaign to make officials aware of alternative possibilities for pattern of growth. The missing middle movement's response to the public's demand for affordable walkable living parlays with



the goals of fair housing choice by providing the template for diverse and integrated communities with a range of housing types. Public officials in Warren County are establishing a strategy that builds on the zoning code updates of 2012 to encourage missing middle housing.

Figure 5.1: Zoning Classification



- d) Group and Recovery Homes: Several county jurisdictions include location criteria for group home and institutional care facilities as well as other impediments including minimum site size (greater than the district requirement), specialized access for specific road classifications, and landscaping beyond that required for single family development. The Fair Housing Amendments Act (FHAA) makes it unlawful to refuse "to make reasonable accommodations" in rules, policies, practices, or services, when such accommodations may be necessary to afford a disabled person equal opportunity to use and enjoy a dwelling. Zoning codes should be updated to include language that indicated that the Board of Appeals (BZA) may grant variances when considered a



reasonable accommodation under the Fair FHAA. This would allow the BZA to make reasonable accommodations in zoning practices. Currently, several zoning codes do not identify Recovery Homes. This use should be defined and permitted in order to facilitate their establishment.

Figure 5.2: Missing Middle Diagram



5. Expand the Lebanon Loop and Continue to Improve the Employment & Housing Transportation Linkage

Warren County Transit has discussed the possibility of expanding the Lebanon Loop to include the industrial center south of Lebanon as well as South Lebanon. This route will allow the public, including those who live in low-income areas, to have better access to transportation for jobs, doctor appointments and recreational activities. The county should conduct a data-driven approach that evaluates service effectiveness and operational efficiency of the Lebanon Loop, based on boarding data. The purpose of this analysis is to assess strategies for aligning and expanding the route with the level of demand. In addition the county should work towards the implementation on the 2017 Transit Action Plan, developing strategies to maximize the effectiveness of transit resources of other providers and

Map 5.2: Expand Lebanon Pilot Loop



— Discussed Loop to the South



that positions the network to meet the growing demand for service. It would also be prudent to identify other communities such as the City of Franklin that could support a transit program similar to the Lebanon Loop. However, the short term focus should be the expansion and improved efficiency of the Lebanon Loop. Additional funds would be required in order to accomplish these strategies and to expand the Lebanon Loop. The existing on-demand transit service should be maintained and the public transit providers should continue to map out a flex routes that enhance that reduces the housing and work location disconnect. Housing and transit are intricately connected, thus jurisdictions should emphasize the importance of having an adequate supply of housing, and especially affordable housing, in employment centers and near transit routes. Examples of potential strategies should include:

- Preserving existing housing choice near major employers.
- Performing housing impact studies, in conjunction with large employers, to analyze the availability of affordable housing for their workers in proximity to work locations.
- Supporting transportation improvements that allow low-income households to access jobs in surrounding suburbs.

6. Provide Accessible Housing for the Aging and People with Disabilities

One impediment that was identified is a lack of accessible housing for the aging and persons with disabilities. This is addressed by working with the Warren County Board of Developmental Disabilities (WCDD) which has an established relationship with private care facilities to provide housing for disabled persons and through the Community Housing Assistance Program (CHAP), a non-profit organization that finances and supervises housing for adult persons with disabilities. The homes provided are designed to house one or two persons on long-term basis in an effort to receive adequate care. CHAP purchases houses, conducts any necessary renovations and repairs, and rents them to the disabled that are at the level of reasonable self sufficiency.

One strategy would be to identify more landlords to meet the demand and to fund an increase in the output of CHAP homes. Agency leaders have met to discuss ways to do this. CHAP currently owns 37 units and has a waiting list of approximately 30 persons and growing. Funding is a major factor regarding the lack of housing in this program. The major source of income is the rent from individuals. Since their rent cannot be more than 30% of their income, some housing vouchers are available through Section 8. The WCBDD also offers rent subsidies.

In order to meet the increased need for accessible housing for the aging and people with disabilities the county jurisdictions should examine ways to promote visitability in zoning codes. The intent is to design dwelling units that can be easily modified, with little cost, to



ensure usability by everyone, regardless of a person's age, size, abilities or disabilities. Policy makers should consider including incentives in the zoning code that encourages the development of homes that meet "Visitability" design elements and work with the local Home Builders Associations to educate builders about the advantages of Visitability. Target audiences are groups of consumers and advocates who themselves have disabilities; local developers, landlords, and realtors. In addition the Building Department should track the number and location of homes that meet visitability standards.

- 7. Improve Lending Policies and Practices:** Given higher denial rates for select protected classes, it is important that the County' Fair Housing Office work with HOME to market responsible loan products and counseling targeted to communities and borrowers experiencing unequal access to loans. HMDA data for Warren County should be monitored on an ongoing basis to analyze overall lending patterns in the county. In addition, lending patterns of individual lenders should be analyzed, to gauge how effective the CRA programs of individual lenders are in reaching all communities to ensure that people of all races and ethnicities have equal access to loans.



LONG TERM RECOMMENDATIONS

Warren County has experienced considerable growth over the last ten years. Most of the new housing units are priced over \$200,000. As discussed in the impediments section, the cost of land and utilities makes it difficult for developers to build affordable housing and this has a disproportionate impact to minorities and other protected classes. For low-to-moderate income families, a new house is completely out of their price range. The following sections features long range initiatives geared toward solving the disconnect between market forces and the need for quality housing choice.

1. Support the Use of the Low Income Housing Tax Credit (LIHTC) program

The Low Income Housing Tax Credit (LIHTC) program was created in 1986 and is the largest source of new affordable housing in the United States. According to the National Housing Law Project, there are about 2,000,000 tax credit units today and this number continues to grow by an estimated 100,000 annually. The program is administered by the Internal Revenue Service (IRS). The LIHTC program does not provide housing subsidies. Instead, the program provides tax incentives, written into the Internal Revenue Code, to encourage developers to create affordable housing. These tax credits are provided to each State based on population and are distributed to the State’s designated tax credit allocating agency. In turn, these agencies distribute the tax credits based on the State’s affordable housing needs with broad outlines of program requirements from the federal government. This is done through the Qualified Allocation Plan (QAP) process. On their own, tax credit subsidies provide a moderate level of affordability through rent restrictions.

However, many units or tenancies are subsidized through additional sources of federal or state funding, which allow for deeper affordability to lower-income families. Developers utilizing this program usually seek the support of county agencies and local elected officials. Development agencies should work with developers on the appropriate type of development; acceptable locations; and develop a strategic

Table 5.1: Low Income Tax Credit Example
American Property Tax Counsel

Income Comparison: Impact of LIHTCs

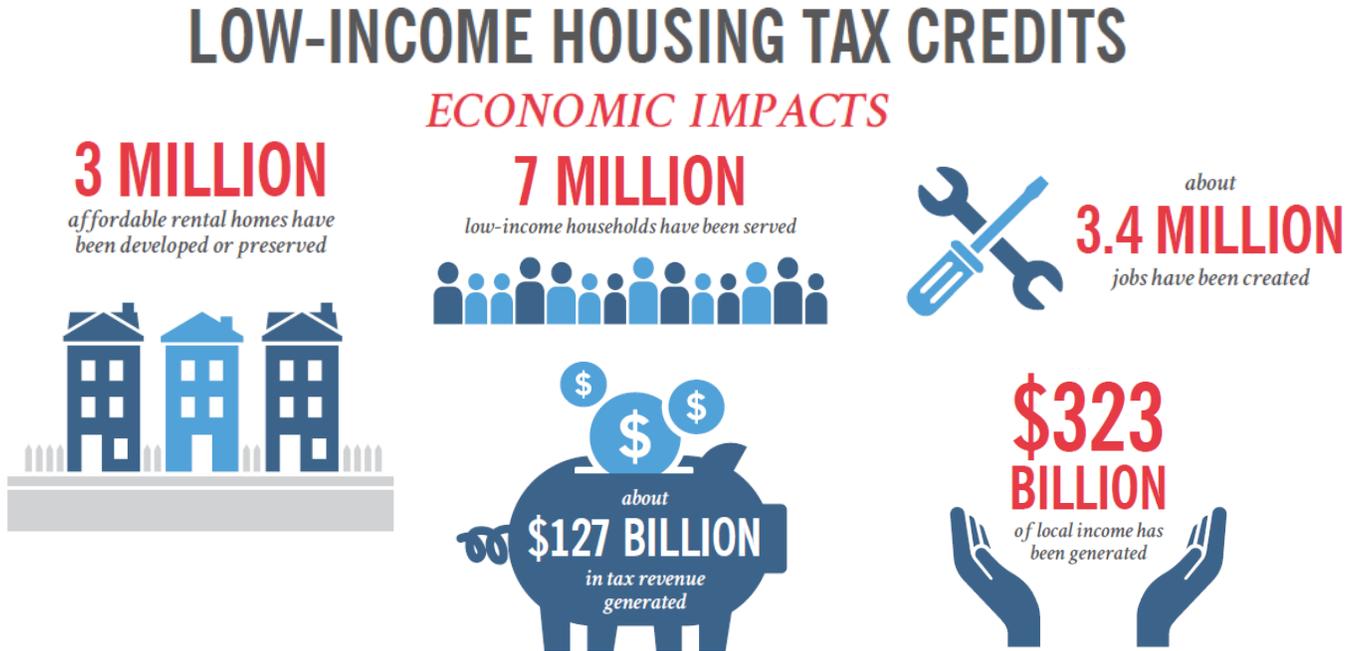
This hypothetical example shows how excluding \$200,000 in Low-Income Housing Tax Credits from property income can lower taxable value dramatically.

Hypothetical Income Comparison—Impact of LIHTCs		
	Value With LIHTCs	Value Without LIHTCs
Income		
Rent	\$500,000	\$500,000
Tax Credits	<u>\$200,000</u>	0
Total Income	\$700,000	\$500,000
Total Operating Expenses	\$150,000	\$150,000
Net Operating Income	\$550,000	\$350,000
Cap Rate	9%	9%
Taxable Value	\$6.1 million	\$3.9 million



approach to the spatial development of LIHTC properties. Development agencies should also help coordinate communication by parties at a state, city and individual project level.

Figures 5.4: Low Income Tax Credit Impact - Bipartisan Policy Center



2. Establish a Housing Advisory Board and Housing Trust Fund

The Warren County, Ohio Board of Commissioners could establish a Housing Trust Fund and a Housing Advisory Board. The Housing Trust Fund Implementation Task Force would develop recommendations on establishing a trust fund to address low-income housing needs in the community.

In Ohio, counties are required to establish Housing Advisory Boards to review strategies and any funding that allocates local resources for housing, including analyzing the anticipated impact on existing housing patterns, submitting a fair housing impact statement, and a planning for affirmative marketing. The Warren County Commissioners could appoint Housing Advisory Board members to administer the trust fund. The Housing Advisory Board primary focus is to develop by-laws for the operation of the Board as well as set program guidelines and annual program goals based on the recommendations of the Task Force.



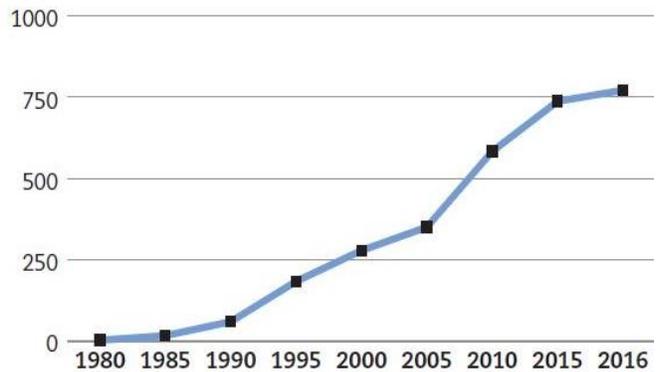
The Board would also recommend an annual budget for Trust Fund programs and administer and monitor expenditures from the Trust Fund. The Board would submit a complete package of selected proposals to the Board of County Commissioners for action and report annually to the Board of County Commissioners and the community on activities of the Trust Fund. The Housing Advisory Board would provide advice on affordable housing issues.

Two possible funding sources could be used to finance the trust fund. State unclaimed funds that are "timed out" could be returned to the county of origin to be dedicated to a local housing trust fund. The County Commissioners could also review the possibility of an increase in the conveyance fee of one mil as an initial on-going revenue source to support the housing trust fund. This would require the passage of state enabling legislation to enable the increase in the conveyance fee.

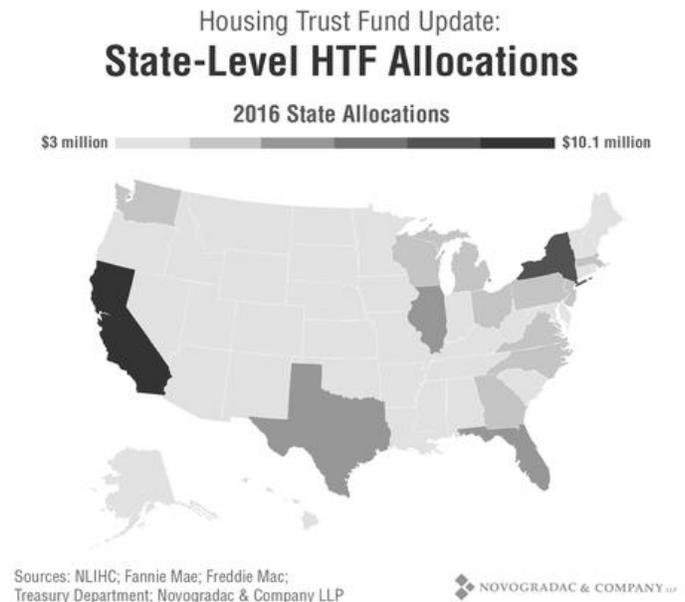
The trust fund dollars could focus on four programmatic areas, with a priority on activities that prevent homelessness and promote housing stability for very low income households. Possible program areas are:

- Secure long-term, deep rent subsidies (e.g., preserve Section 8 project-based units or develop public housing or shelter plus care units).
- Short-term emergency assistance to avoid eviction or to avoid and/or end homelessness (e.g., one-time assistance for unpaid rent, first month rent, and/ or security deposit).
- Middle- or long-term shallow rent subsidies, tenant-based or project-based (e.g., monthly rent subsidy of about \$100-\$200, not based on tenant's income).
- Innovative programs, including a vacant and abandoned housing program.

Table 5.2: Growth of Housing Trust Funds



Map 5.3: Housing Trust Funds





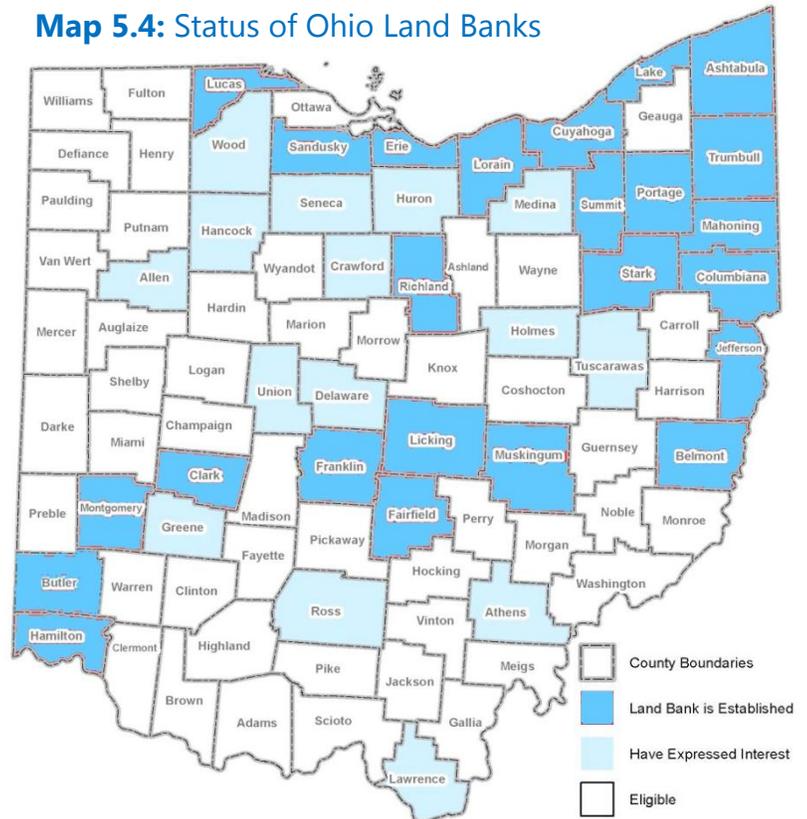
3. Land Bank

Land banks are not financial institutions. They are public or community-owned entities created for a single purpose: to acquire, manage, maintain, and repurpose vacant, abandoned, and foreclosed properties, the worst abandoned houses, forgotten buildings, and empty lots. Communities now operate formal land bank programs across the country. Land Bank programs give communities the opportunity to repurpose abandoned properties in a manner consistent with the communities' values and needs.

Tax collection is the principal interaction with abandoned properties -as owners typically do not pay taxes on abandoned property. The effective use of the governments' superior tax lien can be the primary mechanism of acquisition of the properties. The land bank model captures a revenue stream from valuable properties that are foreclosed on and utilizes those financial resources to manage the properties held by the land bank. It is imperative that any such public system include a strong foreclosure prevention effort. This source of internal subsidy is founded on the notion that a land bank is better positioned than a public auction to convert valuable properties to productive use, and can utilize the earnings from land sales to rehabilitate homes for low income individuals. The best land banks develop strategic partnerships with nonprofits, community organizations, lenders, and local governments to leverage the resources available to deal with the most distressed land in the community.

Land banks are typically eligible for foundation grants due to its corporate structure or governmental status. When a land bank is in its formative stages and initially developing its capacity to operate, it may need to rely heavily upon foundation grants to cover operating costs. Such grant funding allows a land bank to build its capacity to operating programs that will potentially generate resources to operate the programs of the land bank. Federal grants funded through HUD's Neighborhood Stabilization Program (NSP) may provide acquisition, maintenance and operating funds for land

Map 5.4: Status of Ohio Land Banks





banks for a maximum period of ten years. In addition, land banks can be used in conjunction with the HOME and CDBG programs with certain specific limitations. Many land banks have the authority to keep properties in their inventory and rent them to both commercial and residential tenants. A rental program is often necessary in the current economy due to the difficulty in securing financing for real estate. Further, the provision of stable and quality rental properties to the market is an important aspect of any stable real estate market, and this program may be within the overall mission of the land bank.



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