City of Bowling Green

Analysis of Impediments to Fair Housing Choice July, 2010

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I. Introduction

The City of Bowling Green is an Entitlement community under the United States Department of Housing & Urban Development's Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each Entitlement community must "affirmatively further fair housing." In order to achieve this, the community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice. Fair housing choice is defined as: "the ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices."

The Fair Housing Analysis consists of the following six conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financing assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publiclyassisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

A. Conducting the Analysis of Impediments to Fair Housing Choice

The City of Bowling Green's Grants Administrator conducted and prepared the 2010-2014 Analysis of Impediments to Fair Housing Choice. It will be forwarded to HUD along with the City's Five-Year Consolidated Plan submission. The study was performed over a six-month period beginning in December 2009 and concluding in June 2010. The City's last Analysis of Impediments was written in 2005. However, the City has conducted an annual review, analysis and updates of the 2005 document, since that time.

B. Methodology Used

The following approach was used to conduct the City of Bowling Green's Analysis of Impediments to Fair Housing Choice:

1. Research -

- A review of the City's Zoning Ordinance, Comprehensive Plan, and a variety of relevant policies and procedures was undertaken;
- Demographic data for the City was analyzed from the U.S.
 Census Bureau, HUD-CHAS data/tables and various other sources; and
- An assessment of local real estate and mortgage practices was conducted.

2. Interviews/Surveys-

- An interview was held with the Henry Metropolitan Housing Authority, who administers the local Section 8 voucher program for Bowling Green;
- A phone interview was conducted with a representative of the Ohio Civil Rights Commission;
- The student housing office of Bowling Green State University was interviewed;
- An interview was held with a representative of the Bowling Green Community Development Foundation;
- A general population survey was posted on the City of Bowling Green website, distributed onboard the B.G. Transit (local public transportation system) and made available to the public in a variety of government and social service settings;
- The local board of realtors and real estate firms were surveyed;
- A representative of the Wood County Health Department was interviewed regarding lead paint hazard estimates;
- The City of Bowling Green Planning Director was interviewed;
- Local banks and home lending institutions were surveyed; and
- Various community and social service/advocacy agencies were surveyed.

3. Analysis of Data -

- Low/Mod income areas were identified;
- A search for concentrations of minority persons was conducted; and
- Fair housing awareness in the community was evaluated;

C. Funding for the Analysis of Impediments to Fair Housing Choice

In terms of funding for the Analysis of Impediments to Fair Housing Choice, the City of Bowling Green Grants Administrator (who conducted this study and wrote the Analysis) was paid from the City's General Fund. All general administrative costs for preparing the Analysis of Impediments to Fair Housing Choice (e.g. printer cartridges, paper, etc.) were funded using CDBG general administrative funds.

D. Potential Impediments to Fair Housing Choice

The City of Bowling Green identified the following potential impediments to Fair Housing Choice in the course of developing this Analysis of Impediments to Fair Housing Choice:

Lack of Public Understanding of Fair Housing Laws: In April, 2010, the City of Bowling Green circulated a number of surveys to the public in an effort to gauge the public's understanding of Fair Housing laws. Very few completed surveys were received back by the City. This may be an indication that the public lacks an understanding of what Fair Housing laws are truly all about. Another indication of this is found in the types of calls received by the Fair Housing Officer. The majority of calls received are landlord-tenant related—further indicating the public's lack of understanding in regard to Fair Housing laws.

Public Lack of Knowledge about Local Fair Housing Program's Existence:

Almost 63 percent of citizens surveyed (April 2010) indicated they knew who to contact in the event a fair housing issue arose. Even though the majority indicated their understanding of who to contact regarding fair housing issues, 37 percent were uncertain who to contact. This, coupled with the fact that response to the public survey and the survey distributed to social service agencies received very low response rates, indicates more publicity is needed to raise the public's and social service organization's awareness about the program's existence locally.

Newspaper Advertisements Indicate Occasional Discriminatory Practices in Relation to Rental Housing: In the past five years, the City's Housing Specialist has encountered a couple of instances wherein advertisement language contained phrasing not compliant with Fair Housing laws. In response, the Fair Housing Officer has consistently educated rental agents and the newspapers about this matter, and this issue appears to be resolved (with no evidence of recent instances). Nevertheless, with staff turnover at local newspapers and the transient nature of some rental agents, there is an ongoing need to educate rental agents and newspapers as well as to monitor advertisements to ensure compliance.

Lack of Affordable Housing's Impact on Consumer Choice: A review of local and federal data indicates that local housing lacks affordability. There is no indication that local policies and procedures (including zoning ordinances and building codes) play a role in this. It is most likely that Bowling Green's identity as a university town creates a high demand for housing which subsequently increases housing costs. Various measures can be taken to increase access to affordable housing for persons with low and moderate income levels.

E. Recommendations and Proposed Actions

Recommendations and proposed actions for the identified potential impediments to fair housing choice are listed below.

Impediment: Lack of Public Understanding of Fair Housing Laws

Recommendation: Undertake efforts to maintain and increase education/outreach programs

Proposed Action(s):

- Fair Housing Officer to distribute supply of Landlord-Tenant Booklets and Fair Housing Program brochures to all agencies participating in the "No Wrong Door" program and Bowling Green Housing Agency no less than twice annually FY 2010-2014.
- Fair Housing Officer to continue to ensure Landlord-Tenant Booklets and Fair Housing Program brochures are kept in stock in the City Administration Building and Utilities Office continuously FY 2010-2014. Stock supply to be monitored monthly by Fair Housing Officer.
- Fair Housing Officer to make no fewer than four Fair Housing training
 presentations annually FY 2010-2014. Two of the four presentations must be
 provided to a predominantly low- and moderate-income audience. Fair
 Housing Officer to provide quarterly status updates to the Grants
 Administrator to include when, where, how many attended and the training
 agenda. At least one presentation is to be made each quarter annually.
 Quarterly progress reports due to the Grants Administrator quarterly FY 20102014.
- Fair Housing Officer to provide and distribute in various public locations (most especially those serving persons with low and moderate incomes) 500 brochures describing Bowling Green's Fair Housing Program, and 150 booklets outlining landlord/tenant's rights and responsibilities no less than annually with ongoing replenishment of supplies as needed.

Impediment: Public Lack of Knowledge about Local Fair Housing Program's Existence

Recommendation: Undertake activities which publicize fair housing guidelines

Proposed Action(s):

• Fair Housing Officer to prepare and place public service announcements and advertising (to include newspapers published in Spanish) which addresses fair housing guidelines on quarterly basis throughout FY 2010-2014. Provide quarterly progress reports to Grants Administrator throughout the aforementioned timeframe. Fair Housing Officer to provide Grants Administrator with quarterly progress reports quarterly FY 2010-2014.

 Fair Housing Officer to meet at least quarterly (FY 2010-2014) with representatives from various agencies to include Rural Opportunities, BGSU advocacy organizations, and the Migrant Health Center in an effort to raise awareness of Fair Housing Program's existence/role and gauge ongoing public needs. Status reports due to Grants Administrator on quarterly basis throughout the aforementioned period.

Impediment: Newspaper advertisements indicate occasional discriminatory practices in relation to rental housing

Recommendation: Weekly monitoring of local newspaper advertisements

Proposed Action(s):

• Fair Housing Officer to monitor local newspaper advertising related to rental housing and address any discriminatory issues revealed on a weekly basis throughout FY 2010-2014. Quarterly status reports to be presented to City Grants Administrator during the aforementioned timeframe.

Impediment: Lack of Affordable Housing's Impact on Consumer Choice

Recommendation: Maintain and increase the supply of affordable housing programs

Proposed Action(s):

- Maintain the City of Bowling Green's Housing Revolving Loan Fund FY 2010-2014 in order to provide down-payment assistance, owner-occupied rehabilitation and acquisition/rehab housing programs for persons with lowand moderate-incomes.
- Maintain the tenant-based rental assistance program for approximately 119
 Section 8 vouchers FY 2010-2014.
- Maintain affordable housing programs FY 2010-2014 using CDBG funds.
 Programs include Rental Rehabilitation, Mobile Home Repair and Elderly Emergency Home Repair.

II. Jurisdictional Background Data

The local demographic and socio-economic characteristics of Bowling Green were first evaluated as a basis for determining and identifying any potential impediments to fair housing choice. This information provided a basis for enabling the City to review trends and potential housing issues.

A. Demographic Data

In an effort to assess the City's most current population trends, data from the U.S. Census Bureau's 2006-2008 American Community Survey was heavily utilized to develop the most recent Analysis of Impediments to Fair Housing Choice. Even though the data contained within this report is an estimate, it is believed to provide a more relevant summary of the current, local demographics than those set forth in the 2000 U.S. Census. This being said, 2000 U.S. Census data was used in those instances where no recent estimates or data were available and to provide comparative information. When the 2010 U.S. Census data is published, the City of Bowling Green will conduct a new Analysis of Impediments to Fair Housing Choice using the updated information from this source.

Bowling Green Population Trends 1970-2000

Year	Population
1970	21,552
1980	25,728
1990	28,176
2000	29,636

Source: 2000 U.S. Census Data

Past data from the U.S. Census Bureau indicates the city's local population has continued to grow for a number of decades.

Most Recent Population Estimates

Items	Number of Persons	Percentage of Population
Total		
population	30,989	100%
Male	14,662	47.30%
Female	16,327	52.70%

Source: U.S. Census Bureau, 2006-2008 American Community Survey

The U.S. Census Bureau's 2006-2008 American Community Survey estimates that Bowling Green's population is currently 30,989. This estimate projects a five percent (5%) increase over 29,636, the population per 2000 U.S. Census data.

Estimated Racial Demographics (2006-2008) and Comparative 2000 Data

Items	Number of Persons (present)	Percentage of Population (present)	Percentage of Population (in 2000)
One race	30,660	99%	99%
White	28,055	91%	92%
Black or African American	1,530	5%	3%
American Indian and Alaska Native	0	0%	0%
Asian	774	3%	2%
Native Hawaiian and Other Pacific			
Islander	17	0%	0%
Some other race	284	1%	2%
Two or more races	329	1%	2%
Hispanic or Latino (of any race)	1,044	3%	4%

Sources: U.S. Census Bureau, 2006-2008 American Community and 2000 U.S. Census Data

The estimates provided in the U.S. Census Bureau's 2006-2008 American Community Survey indicate that the City's minority population has generally increased in comparison to the data presented in the 2000 U.S. Census. The 2006-2008 estimates record the total minority population at 3,978. This is an increase of 15%--in comparison to 3,448 persons (per the 2000 U.S. Census). According to the U.S. Census Bureau's 2006-2008 American Community Survey, the City's two largest minority populations are Black or African American (5%) and Hispanic or Latino (of any race) at 3%.

Race Concentration by Census Tract

Census Tract	Tract Minority Percentage
216	9%
217.01	7%
217.02	11%
218	9%
219	11%
220	5%

Source: 2009 FFIEC Census Report-Summary Census Population Information (www.ffiec.gov/census/report)

According to the most recent Census data, there appear to be no discernable minority concentrations within Bowling Green.

Estimated Age of Population 2006-2008

Items	Number of Persons	Percentage of Population
Under 5 years	820	3%
18 years and		
over	28,028	90%
65 years and		
over	2,471	8%

Source: U.S. Census Bureau, 2006-2008 American Community Survey

Compared to 2000 U.S. Census data, the 2006-2008 estimates indicate a decrease of almost 25% in the number of persons under the age of 5 years, an increase of nearly 9% in those ages 18 and over, and an increase of 9% of persons 65 years and over.

Household Occupancy Estimates 2006-2008

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Items	Number of Households	Percentage
Total Housing Units	11,874	100%
Occupied Housing Units	11,035	93%
Total Vacant Housing		
Units	839	7%

Source: U.S. Census Bureau, 2006-2008 American Community Survey

Household occupancy estimates were taken from the American Community Survey 2006 through 2008. Local housing occupancy (for both owner and renter occupied units) is estimated at 93 percent; whereas the vacancy rate is 7 percent. Currently (June 2010), per the City of Bowling Green Planning Directory, estimates the vacancy rate to be much higher (over 20%). Representatives from Bowling Green State University provided a status update (May 2010) on fall enrollment. Enrollment is anticipated to be significantly higher (fall 2010) than it has been in any time this past decade. If this is accurate, it might close the vacancy gap to some degree.

Occupancy Status by Race

Items	Number of Households	Percentage
Total Occupied Housing Units	10,141	97%
Total Vacant Housing Units	299	3%
Owner Occupied	4,242	42%
White Non-Hispanic	4,068	96%
Black Non-Hispanic	39	1%
Hispanic	53	1%
Native American Non-Hispanic	0	0%
Asian Non-Hispanic	65	2%
Pacific Islander Non-Hispanic	0	0%
Renter Occupied	5,899	58%
White Non-Hispanic	5,245	89%
Black Non-Hispanic	218	4%
Hispanic	202	3%
Native American Non-Hispanic	0	0%
Asian Non-Hispanic	134	2%
Pacific Islander Non-Hispanic	0	0%

Source: SOCDS CHAS Data (2000)

Although the data is not as recent as that contained in the American Community Survey (2006-2008), CHAS data provides available breakdowns for occupancy status by race (whereas this level of detail is not available through the American Community Survey). According to CHAS data, renter-occupied housing units (58%) outnumber owner-occupied structures (42%). Please note that the survey for 2006-2008 estimates a decreased occupancy rate and increase in the vacancy rate when compared to CHAS data (2000).

Head of Household Type Estimates

	Number of	
Items	Persons	Percentage
Total Number of Households	11,035	100%
Female householder, no		
husband present, family	678	6%
Householder, 65 years and		
over	665	6%

Source: U.S. Census Bureau, 2006-2008 American Community Survey

Estimates from the American Community Survey (2006-2008) indicate there is a small percentage of female head of household and elderly (over age 65) head of

household representation locally. Census 2000 data indicates that female householder, no husband present, with family representation was slightly higher ten years ago (765 persons/7.5%). Householder, 65 years and over, was also greater at the time of the 2000 Census (718 persons/7%).

B. Income Characteristics

Where data was available, the U.S. Census Bureau 2006-2008 American Community Survey was used for analysis. In some instances, 2000 U.S. Census Data was used to provide greater detail.

Percentage of Families and People Below Poverty Level

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Items	Percentage
All families	2.8%
With related children under 18 years	6.4%
With related children under 5 years only	16.3%
Married couple families	0.0%
With related children under 18 years	0.0%
With related children under 5 years only	0.1%
Families with female householder, no husband present	15.0%
With related children under 18 years	30.1%
With related children under 5 years only	71.9%
All people	27.7%
Under 18 years	6.5%
Related children under 18 years	6.5%
Related children under 5 years	10.4%
Related children 5 to 17 years	4.7%
18 years and over	30.5%
18 to 64 years	34.1%
65 to 64 years	3.2%
People in families	2.6%
Unrelated individuals 15 years and over	55.9%

Source: U.S. Census Bureau 2006-2008 American Community Survey

It is estimated that 2.8 percent of families and 27 percent of all persons in Bowling Green live in poverty. Fifteen percent of families with a female householder (no husband present) live below poverty level.

Estimated and Comparative Poverty Demographics

Census Tract	Percentage Below Poverty Line	2009 HUD Estimated Median Family Income	2000 Median Family Income	2009 Estimated Median Family Income
216	6.7%	\$61,800	\$65,228	\$79,969
217.01	42.0%	\$61,800	\$47,500	\$58,234
217.02	37.2%	\$61,800	\$38,021	\$46,616
218	71.9%	\$61,800	\$8,750	\$10,728
219	21.4%	\$61,800	\$47,361	\$58,067
220	6.6%	\$61,800	\$52,292	\$64,111

Source: 2009 FFIEC Census Report-Summary Census Housing Information (www.ffiec.gov/census/report)

Census tract 218 has the highest poverty saturation. That tract is predominantly inhabited by Bowling Green State University students who occupy rental housing there. Other local census tracts with higher incidence of poverty are 217.01, 217.02 and 219.

Median Income (in 1999) by Census Tract and Gender

	Median income in 1999 (dollars)		Census III	Median of time, round w	earnings of full- year- workers lars)
Census Tract	Households	Families	Per capita income in 1999 (dollars)	Male	Female
216	\$52,474	\$65,228	\$23,083	\$44,028	\$28,679
217.01	\$24,020	\$47,500	\$13,621	\$35,142	\$25,300
217.02	\$21,878	\$38,021	\$14,134	\$25,821	\$21,596
218	\$17,500	\$8,750	\$4,007	\$6,917	\$6,977
219	\$30,569	\$47,361	\$19,411	\$31,639	\$24,847
220	\$46,452	\$52,292	\$17,938	\$35,224	\$25,000

Source: 2000 U.S. Census Data

Again, 2000 U.S. Census data provided additional insight as it set forth income breakdowns by both census tract and gender. Census Tract 218 earnings appear to be extraordinarily-lower in relation to others within the city; however, the majority of the occupants living there are full-time students at Bowling Green State

University. In every census tract except for 218, there is a marked disparity between male and female full-time, year-round incomes.

C. Employment and Transportation Profile

Continued job creation is highly needed in Bowling Green. Ongoing workforce development is also desired. The City's Revolving Loan fund (RLF) uses loan repayment income to assist business start-up and expansion with low-income loans. These loans are required to develop jobs for low-moderate income persons. It is anticipated that no less than 7 new jobs will be created annually September 1, 2010 through August 31, 2014. This program originated through CDBG funding, but is now self-sustaining and administered through the City of Bowling Green in conjunction with administrative assistance from the Bowling Green Community Development Foundation.

The City's Fair Housing Officer has provided information to the Bowing Green Community Development Foundation (BGCDF) to ensure that employees understand how to market in a non-discriminatory manner. This includes information related to recognizing and reporting fair lending or problems that the BGCDF and/or its clients experience during any phase of the development of a project. A quantity of the City's Fair Housing Program brochures has also been provided to the BGCDF for client use.

Employment Status Estimates

Linployment Status Estimates			
Items	Number of Persons	Percentage	
Population 16 years and			
over	28,517	100%	
In labor force	19,122	67%	
Civilian labor force	19,083	67%	
Employed	16,692	59%	
Unemployed	2,391	8%	
Armed Forces	39	0%	
Not in labor force	9,395	33%	
Females 16 years and over	15,167	100%	
In labor force	9,432	62%	
Civilian labor force	9,419	62%	
Employed	8,316	55%	

Source: U.S. Census Bureau 2006-2008 American Community Survey

The City's employment and transportation profile is based upon estimates from the U.S. Census Bureau 2006-2008 American Community Survey. Operating data from the B.G. Transit, the local public transportation system was also utilized.

Estimated Occupations

Estimated Occup	ations	
	Number of	
Items	Persons	Percentage
Employed civilian population 16 years		
and over	16,692	100%
OCCUPATION	,	
Management, professional, and related		
occupations	5,911	35%
Service occupations	3,939	24%
Sales and office occupations	4,534	27%
Farming, fishing, and forestry		
occupations	27	0%
Construction, extraction, maintenance		
and repair occupations	855	5%
Production, transportation and material		
moving occupations	1,426	9%
INDUSTRY		
Agriculture, forestry, fishing and hunting,		
and mining	46	0%
Construction	362	2%
Manufacturing	1,331	8%
Wholesale trade	276	2%
Retail trade	2,500	15%
Transportation and warehousing, and		
utilities	567	3%
Information	214	1%
Finance and insurance, and real estate		
and rental and leasing	486	3%
Professional, scientific, and management,		
and administrative and waste		
management services	1,229	7%
Educational services, and health care and		
social assistance	6,398	38%
Arts, entertainment, and recreation, and		
accommodation, and food services	1,229	7%
Other services, except public		
administration	299	2%
Public administration	590	4%

Source: U.S. Census Bureau 2006-2008 American Community Survey

According to the Bowling Green Community Development Foundation (April 2010), Bowling Green State University employs the greatest number of employees in the city. The second largest employer is Wood County Government. Other sizeable employers within the city limits include: Wood County Hospital, Cooper Standard, Bowling Green Board of Education, State of Ohio Government, City of Bowling Green Government, Poggemeyer Design Group and Marathon Special Products.

Estimates on Commuting to Work

Items	Number of Persons	Percentage	
Workers, 16 years and over	15,896	100%	
Car, truck, or van drove alone	10,954	69%	
Car, truck, or van carpooled	1,305	8%	
Public transportation (excluding taxicab)	87	1%	
Walked	2,892	18%	
Other means	375	2%	
Worked at home	283	2%	

Source: U.S. Census Bureau 2006-2008 American Community Survey

According to the U.S. Census Bureau 2006-2008 American Community Survey, the estimated mean travel time to work is 15.8 minutes. The City does a have demandresponse, curb-to-curb public transportation system, the B.G. Transit which operates within the City's corporation limits. In 2009, the transit system delivered a total of 37,675 rides. The most recent customer satisfaction survey was conducted in February 2009. In response to the question, "Overall, I am happy with the service," 97 percent of the survey respondents provided a response of either "excellent" or "very good."

The B.G. Transit is financed using grant funds from the Federal Transit Administration, the Ohio Department of Transportation, Community Development Block Grant dollars as well as General Funds on behalf of the City of Bowling Green and transit fare revenues. The City of Bowling Green also supports the continued operation of the public transit system through the donation of administrative oversight (City of Bowling Green Grants Administrator) and the in-kind provision of mechanical labor to maintain/repair the vehicles.

There are also two for-profit, privately-owned and operated taxi services operating in Bowling Green. Both operations provide options for service 24 hours a day, 7 days a week.

D. Housing Profile

According to the U.S. Census Bureau 2006-2008 American Community Survey, there are a total of 11,874 housing units in Bowling Green. Of these units, 11,035 were occupied, and 839 were vacant.

Estimated Types of Housing Units

Estimated Types of Housing Office				
Number of Units	Percentage			
11,874	100%			
4,703	40%			
420	4%			
768	7%			
735	6%			
1,558	13%			
1,811	15%			
1,321	11%			
558	5%			
0	0%			
	Number of Units 11,874 4,703 420 768 735 1,558 1,811 1,321			

Source: U.S. Census Bureau 2006-2008 American Community Survey

Total Housing Units by Census Tract

	Number of Housing		
Census Tract	Units		
216	3,207		
217.01	1,685		
217.02	2,723		
218	151		
219	3,493		
220	857		

Source: 2009 FFIEC Census Report-Summary Census Housing Information (www.ffiec.gov/census/report)

Census Tract	Owner Occupied Units	Renter Occupied Units
216	2,422	641
217.01	450	1,186
217.02	513	2,111
218	7	142
219	1384	1953
220	671	140

Source: 2009 FFIEC Census Report-Summary Census Housing Information (www.ffiec.gov/census/report)

Census tract 217.02 contains the most housing units. The majority of those units are occupied rentals. Census tracts 217.01, 218 and 219 have a greater number of occupied rental units than occupied owner units.

Estimated Number of Rooms per Housing Unit

	Number	
Items	of Units	Percentage
1 room	291	3%
2 rooms	793	7%
3 rooms	1,531	13%
4 rooms	3,096	26%
5 rooms	1,806	15%
6 rooms	1,266	11%
7 rooms	991	8%
8 rooms	1,231	10%
9 rooms	869	7%
Median rooms	5	(X)

Source: U.S. Census Bureau 2006-2008 American Community Survey

Year Structure Built Estimates

Items	Number of Units	Percentage
Built 2005 or later	336	3%
Built 2000 to 2004	1,459	12%
Built 1990 to 1999	1,935	16%
Built 1980 to 1989	1,234	10%
Built 1970 to 1979	2,562	22%
Built 1960 to 1969	1,304	11%
Built 1950 to 1959	802	7%
Built 1940 to 1949	218	2%
Built 1939 or earlier	2,024	17%

Source: U.S. Census Bureau 2006-2008 American Community Survey

According to a representative of the Wood County Health Department, there have been four instances of lead poisoning, locally, in the past year. Lead-based hazard estimates for Bowling Green were provided by the Wood County Health Department, and are found in the two tables displayed directly below.

Owner-Occupied Lead-Based Paint Hazard Estimates

Era	2 BR	With LBP	With < 6	With < 6 With LBP	With < 6 With LBP With LMI
Pre					
1940	778	700	122	47	36
1940-					
59	206	165	29	11	8
1960-					
79	2,131	1,321	230	88	43
Totals	3,115	2,186	381	146	87

Source: Wood County Health Department

Renter-Occupied Lead-Based Paint Hazard Estimates

Era	2 BR	With LBP	With < 6	With < 6 With LBP	With < 6 With LBP With LMI
Pre 1940	491	442	77	30	23
1930- 59	99	79	14	5	4
1960- 79	1,718	1,065	185	71	35
Totals	2,308	1,586	276	106	62

Source: Wood County Health Department

Housing Problems for Renters with Disabilities

	Extra		AII	Total
	Elderly	Elderly	Others	Renters
Total Renter Households	100	88	206	394
Percent with Housing				
Problems	30.0%	22.7%	23.8%	25.1%

Source: SOCDS CHAS Data (2000)

Housing Problems for Homeowners with Disabilities

_				
	Extra		All	Total
	Elderly	Elderly	Others	Owners
Total Owner Households	131	164	195	490
Percent with Housing				
Problems	7.6%	39.0%	32.8%	28.2%

Source: SOCDS CHAS Data (2000)

The U.S. Census Bureau 2006-2008 American Community Survey provided no disability status estimates. As a result, CHAS Data (2000) was utilized. "Extra elderly" is defined as a one or two person household with at least one person in residence who is 75 years of age or older. "Elderly" households have no more than two members residing there; one of which is age 62 to 74 years old. "All others" represent those households that do not meet the above-specified age criteria and have at least one person in the in residence with a long-lasting condition that substantially limits daily living activities (bathing, walking, etc.) or a physical, mental or emotion condition (lasting longer than 6 months) that creates difficulty with bathing, dressing, or getting around the house. Amongst both renter and owner households (as a whole) with mobility and self-care limitations, the percent with problems is similar (renters (25%) and owners (28.2%). The population showing the most need was the extra-elderly homeowners with 39 percent recording some type of housing problems (such as condition or affordability).

Estimates for Mortgage Status and Selected Monthly Owner Costs

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	Number of			
Items	Housing Units	Percentage		
With a mortgage	3,302	71%		
Less than \$300	20	1%		
\$300 to \$499	82	3%		
\$500 to 699	167	5%		
\$700 to \$999	531	16%		
\$1,000 to \$1,499	1,312	40%		
\$1,500 to \$1,999	627	19%		
\$2,000 or more	563	11%		
Median (dollars)	\$1,329	(X)		
Housing Units without a				
mortgage	1,325	29%		
Median (dollars)	\$426	(X)		

Source: U.S. Census Bureau 2006-2008 American Community Survey

Forty percent (40%) of the owner-occupied housing units with a mortgage were in the \$1,000 to \$1,999 range. Housing units with a mortgage comprised 71 percent of the local stock whereas those without a mortgage represented 29%.

Estimates for Selected Monthly Owner Costs as Percentage of Household Income

Items	Number of Housing Units	Percentage
Less than 20.0		
percent	1,601	49%
20.0 to 24.9 percent	375	11%
25.0 to 29.9 percent	485	15%
30.0 to 34.9 percent	270	8%
35.0 percent or more	571	17%
Not computed	0	(X)

Source: U.S. Census Bureau 2006-2008 American Community Survey

The greatest majority of owner households (49%) spend less than 20 percent of their monthly owner costs as a percentage of household income. Nearly 26 percent of owner households spent 30 percent or more of their household income on housing.

Estimated Gross Rent

Items	Number of Housing Units	Percentage			
Occupied units paying rent	6,211	100%			
Less than \$200	101	2%			
\$200 to \$299	157	3%			
\$300 to \$499	1,390	22%			
\$500 to \$749	3,052	49%			
\$750 to \$999	887	14%			
\$1,000 to \$1,499	435	7%			
\$1,500 or more	189	3%			
Median (dollars)	\$596	(X)			
No rent paid	197	(X)			

Source: U.S. Census Bureau 2006-2008 American Community Survey

The majority (49%) of rental housing units were in the \$500 to \$749 range.

Estimated Gross Rent as a Percentage of Household Income (GRAPI)

Items	Number of Housing Units	Percentage
Occupied units paying rent (excluding where GRAPI cannot be computed)	6,188	100%
Less than 15.0 percent	719	12%
15.0 to 19.9 percent	439	7%
20.0 to 24.9 percent	868	14%
25.0 to 29.9 percent	578	9%
30.0 to 34.9 percent	401	7%
35.0 percent or more	3,183	51%
Not computed	220	(X)

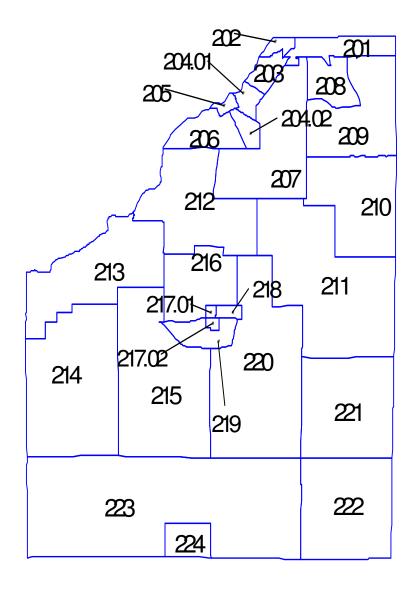
Source: U.S. Census Bureau 2006-2008 American Community Survey

Fifty-one percent of renter unit households spend 35 percent or more of their household income on housing costs.

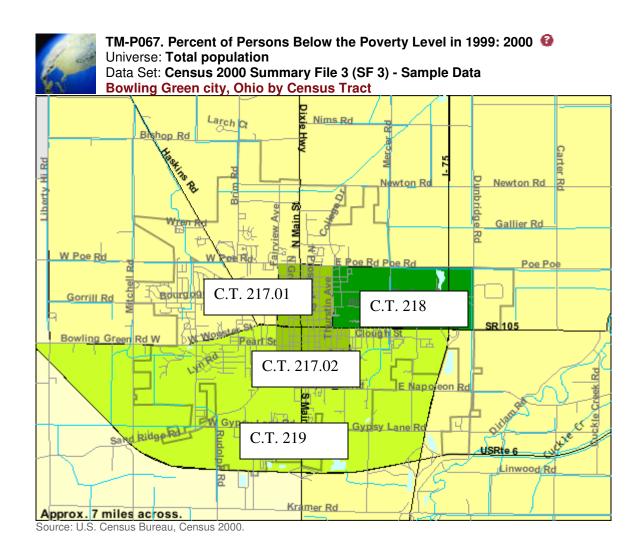
E. Maps

The attached maps illustrate the 2000 U.S. Census statistics for Bowling Green by census tract.

- A map displaying the location of the census tracts in Bowling Green (216, 217.01, 217.02, 218, 219 and 220) as well as the location of the city's four primarily low-moderate income census tracts (217.01, 217.02, 218 and 219).
- Individuals living below poverty level by block group.
- Racial Characteristics maps for the two highest (percentagewise) minority populations represented in Bowling Green
 - o Percentage of Black or African American Population
 - Percentage of Hispanic or Latino Population

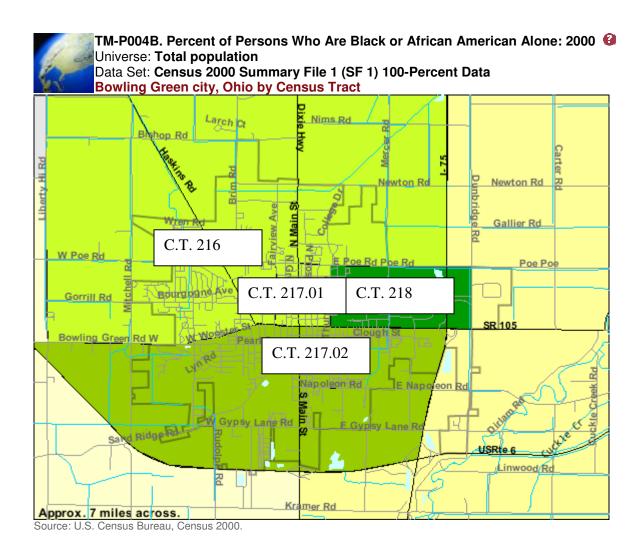


The map above displays Wood County (as broken out by census tract). Census tracts 216, 217.01, 217.02, 218, 219 and 220 are located in the city limits of Bowling Green, Ohio. Bowling Green's census tracts 217.01, 217.02, 218, and 219 are primarily low-moderate income inhabited.

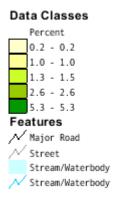


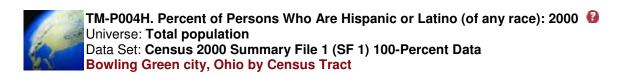
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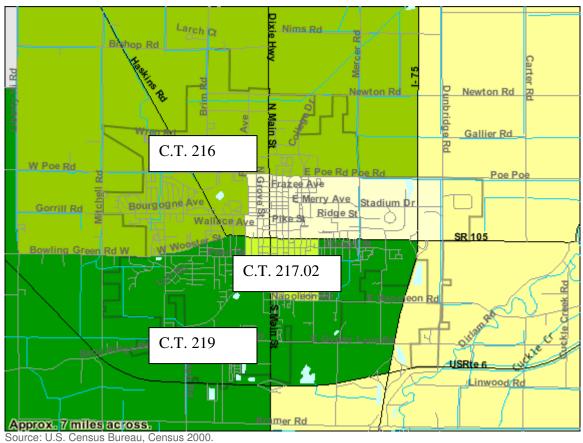




Legend







Legend



III. **Evaluation of Bowling Green's Current Fair Housing Profile**

Fair Housing Complaints/Charges of Discrimination A.

The Ohio Civil Rights Commission reports there have been no Fair Housing complaints or charges of discrimination in the past five-year period (July 2005 through June 2010).

B. Fair Housing Discrimination Suits

As per the Ohio Civil Rights Commission, there have been no Fair Housing discrimination suits in the past five-year period (July 2005- June 2010).

C. Identification of Other Fair Housing Concerns or Problems

The City undertook a comprehensive study of existing public policies/practices regarding zoning and building codes. There appears to be no impact on the achievement of fair housing choice as it relates to these issues. More detail is contained in Section IV (D) of this Analysis.

Institutional practices in the banking and real estate communities (as they relate to buying, selling, and house rentals that may affect the achievement of fair housing choice) were reviewed by the City of Bowling Green. The City's review included these material practices: housing/loan rental application procedures, forms used, residential residency requirements, approval procedure for loans and insurance, types of advertising used by the real estate and lending industry, types of real estate multiple approvals by race, ethnicity, gender, etc. The City found no concerns that current practices impede access to fair housing choice. More detail on this review is found in Section IV (A) and (B) of this Analysis.

There have been no fair housing suits in Bowling Green in the past five years. An analysis of the nature and extent of fair housing calls/complaints received was undertaken. Further fair housing educational efforts are warranted. More detail is found in Section IV (G) of this Analysis.

There have been no instances of segregation or incidents of racial violence in Bowling Green. The City of Bowling Green has adopted and fully adheres to a Minority Business Enterprise Plan to ensure contract conditions within the City are compliant with Fair Housing laws. Furthermore, the City of Bowling Green has fully complied with its fair housing certification annually, and has every intention of doing so in the future.

IV. Identification of Impediments to Fair Housing Choice

A. The Sale or Rental of Housing

The City of Bowling Green's Fair Housing Officer is also the Housing Specialist. In his capacity as the Housing Specialist, he implements several programs which deal with the sale (and purchase) of owner-occupied housing as well as the rental of housing; namely, the Rental Rehabilitation Program, the Down-payment Assistance Program and the Down-payment Assistance/Rehabilitation Program. In the course of his work with these programs, he has an even greater insight into the City's real estate practices than most. In an effort to ensure ongoing communications with professionals within this field, he has joined the Wood County Board of Realtors Association. He conducts at least one Fair Housing presentation to this group, each year, in an effort to educate them further about the Fair Housing laws and their application to real estate practices.

In an effort to gain further insight into practices related to fair housing, the City of Bowling Green surveyed real estate firms locally. Only three real estate firms responded to the survey. Nevertheless the information provided was quite useful. All those responding conduct sales audits to ensure compliance with Ohio State and Real Estate Association requirements related to fair housing issues. One respondent noted that every sales transaction file is audited. All respondents indicated that Civil Rights education is provided (3 hours every 3 years). One real estate brokerage firm also distributes a quarterly newsletter to staff entitled, "Friends of Fair Housing."

According to West's Encyclopedia of American Law, edition 2 (2008), the term "steering" is defined as "The process whereby builders, brokers, and rental property managers induce purchasers or lessees of real property to buy land or rent premises in neighborhoods composed of persons of the same race. Steering can include any words or actions by a real estate sale representatives or broker that are intended to influence the choice of a prospective buyer or tenant." The practice of steering is illegal and violates Fair Housing laws.

In terms of racial or other forms of discriminatory steering, the City of Bowling Green's Fair Housing Officer has seen no evidence of this illegal practice. The Fair Housing Officer maintains ongoing communications and conducts at least one Fair Housing presentation annually with the Wood County Board of Realtors and the Wood County Apartment Association as a means of educations realtors and landlords further about Fair Housing issues. The Fair Housing Officer also conducts no less than four presentations annually to audiences that are primarily comprised of persons with low incomes. During these programs, illegal practices such as steering and blockbusting are discussed. This better ensures that the public understands these practices are illegal and how to report them. During the past five years, no

evidence exists to suggest that real estate companies have illegally manipulated the market through steering practices.

Webster's New World Law Dictionary (2006) defines "blockbusting" as "The inducement of people by a real estate agent to sell real property quickly, and frequently for less than what the property is worth, by spreading rumors about ethnic minorities moving into the neighborhood and thereby generating business for the real estate agent." The Fair Housing Officer reports no there is no indication this illegal activity exists in Bowling Green.

Deed restrictions, trust or lease provisions that prevent the purchase or occupancy of housing on the basis of membership in a protected class are illegal and unenforceable. Bowling Green property deeds are recorded in the office of the Wood County Recorder. According to a representative of the Wood County Recorder's office, there are no restrictive covenants (existing or on record) in Bowling Green which bar the purchase or occupancy of a home and/or property to a protected class of individuals. The City of Bowling Green Fair Housing Officer also reports that there has been no evidence of restrictive lease agreements.

Per the local Fair Housing Officer, there has been no conversion of apartments in Bowling Green to all-adult.

It is illegal for property management firms or landlords to seek racial or other discriminatory forms of quotas. Access to housing cannot be denied in an effort to establish or maintain a quota related to race or any protected class. According to the Toledo Fair Housing Center, as long as a landlord has rental openings, they must accept any person who meets established legal rental criteria. During the past five years, the Fair Housing Officer has found no evidence of landlords or property management firms seeking illegal occupancy quotas.

The City's education of landlords and the public at large about illegal housing practices (and how to report them) has ensured compliant results. In addition to ongoing Fair Housing presentations, the City's Fair Housing Officer conducts monthly distributions of Fair Housing Program brochures (in English and in Spanish) at a variety of businesses, government sites and social service agencies serving persons with low incomes. The City has also developed an informative landlord-tenant booklet which is a free resource also made available to the public in these same locations.

During the past five years, the Fair Housing Officer has observed no negative community attitudes related to persons protected by Fair Housing laws. Bankers, service providers, and realtors/brokers were also surveyed regarding negative community attitudes/incidents as related to persons protected by Fair Housing laws. Additionally, no respondents indicated a belief that negative attitudes existed.

According to the Fair Housing Officer, nothing indicates that rental complexes unduly restrict access for families with children or persons with disabilities such as high security deposits or restricting in which buildings families or persons with disabilities can reside. There has been no evidence uncovered to suggest that families with children or persons with disabilities are restricted to first floor units. Additionally, no instances of families with children residing in an apartment complex being limited to the times when children have access to facilities (pool, community room, etc.) have been identified.

B. Provision of Housing Brokerage Services

The Canons of Ethics for the Real Estate Industry (Article 2) states, "It is the duty of the broker to protect the public against fraud, misrepresentation or unethical practices in real estate transactions. The licensee should endeavor to eliminate in the community, any practices which could be damaging to the public or to the integrity of the real estate profession." The Canons serve as the code of conduct real estate professionals must follow in the course of doing business. Real estate brokers and salespersons must be licensed and undergo prior classroom instruction prior to licensure (includes civil rights and real estate law education). Additionally, the State of Ohio requires real estate brokers and salespersons to complete 30 hours of continuing education every three years (includes civil rights education).

The Fair Housing Officer has utilized his own observations in conjunction with interviews with local brokers to make these determinations:

- there is no evidence that minority brokers have been or are excluded from participation in multiple listing services in Bowling Green or the surrounding area.
- there is also no evidence that minority participation in the Wood County Realtors Association is excluded or restricted.
- no indication exists that minority brokers have restricted use of privileges, services or facilities;
- there is no evidence that real estate brokerage services are assigning brokers based on the race or ethnicity of the brokers and the racial or ethnic composition of census tracts and/or neighborhoods; and
- there also appears to be ample and equal opportunity for minority persons and persons with disabilities to become brokers.

C. Provision of Financing Assistance for Dwellings

The primary lending institutions located in Bowling Green include:

- Fifth Third Bank;
- First Federal Bank;
- Huntington Bank;
- Key Bank; and

National City Bank.

The City of Bowling Green's Fair Housing Officer is also the Housing Specialist. In his capacity as the Housing Specialist, he coordinates several down-payment assistance programs which require prospective homeowners to secure additional funding for home purchases. This provides him with an exceptional vantage point into the City's banking practices. For the past several years, the Fair Housing Officer has conducted (annually) one Fair Housing presentation to a large gathering of banking professionals that conduct business in Bowling Green. This has enabled him to educate these individuals further about the Fair Housing laws and the application of them to banking practices.

A survey amongst local banking institutions located in Bowling Green (April 2010) was conducted by the City of Bowling Green's Grants Administrator. The purpose was to gain even further insight into local banks' lending practices as they relate to Fair Housing laws. Six completed surveys were returned to the City. Results indicate five of the six local lending institutions responding to the survey conduct fair lending audits or comparable measures. One institution reports it conducts such audits daily in association with all loan applications received. Another bank reports that an independent third-party performs these audits. One hundred percent of the responding institutions provide their staff with fair lending or other civil rights-related education. Two local banks provide said training to staff on a quarterly basis. All local banks responding to the survey indicate they market conventional mortgage and home improvement loans in a way that encourages minority applicants.

According to survey results and the City's Fair Housing Officer's assessment, no evidence exists of discriminatory lending patterns, practices and disclosures. Local banks are conventional prime lending institutions which do not engage in or support any type of predatory lending practices. Several local companies do offer sub-prime loans; however, there is no evidence that they are engaging in predatory lending practices. No evidence has been found to suggest that predatory lenders are targeting minority populations and/or low-moderate income neighborhoods within the city. Likewise, there is no evidence that predatory or other types of abusive practices resulted in fast foreclosures or the vacation of properties.

The City of Bowling Green conducts no less than four Fair Housing Program presentations throughout the year. Most of those in attendance are persons who have historically been victims of predatory lending (the elderly, persons of color and persons with disabilities). A portion of each presentation is dedicated to helping educate participants about predatory lending. Anyone receiving funding through one of the City's Down-payment Assistance Programs must attend Homebuyer Counseling courses.

Policy Matters Ohio's report entitled, "Foreclosure Growth in Ohio 2009" was analyzed to assess the foreclosure situation locally. Unfortunately, there was no data available to the city of Bowling Green specifically. Rather, the report was based upon County data. Wood County had 106 new foreclosure filings in 1995; compared to 582 in 2008 (449.1% change between these two periods). In terms of how Wood County ranked in growth between 1995 and 2008, it was 59 out of 88 counties. Although the recent growth in the number of foreclosures is noteworthy, it is not unique or even as significant as that recorded in other counties. Take, for example, Henry County, which borders Wood County. Henry County recorded an increase of 1985.7% in the number of new foreclosures filed between 1995 and 2008—and ranked as first out of 88 counties.

The City of Bowling Green surveyed local lending institutions to determine if Fair Housing violations were present. Those who responded indicate their institutions are conducting regular audits to ensure no differential treatment of protected persons occurs and all civil rights policies and standards are being upheld. These institutions also indicated staff received training to ensure proper implementation of policies and standards related to civil rights matters.

There is nothing to indicate discriminatory appraisal and underwriting practices. This assessment is based upon both the City's recent survey results and input received from the Fair Housing Officer. Locally, there is a pool of qualified appraisers possessing a familiarity with the various types and markets citywide. The City of Bowling Green does review foreclosure data to assess the impact upon the community. The Fair Housing Officer has found no evidence to suggest foreclosures occurred as a result of faulty, discriminatory underwriting or appraisal practices.

"Disinvestment" is defined as "Divestiture, liquidation, or sale of a segment of a firm. Disinvestment may occur for a number of reasons including a poor outlook for a particular line of business or a firm's need to raise additional capital for other more promising segments of its business (http://financial-dictionary.thefreedictionary.com/p/Disinvestment.)" The Fair Housing Officer has witnessed no indication that any disinvestment practices have occurred or are occurring at Bowling Green lending institutions.

The Fair Housing Officer has seen no evidence of redlining activities within Bowling Green. "Redlining" is a "discriminatory practice, involving lenders which refuse to lend money or extend credit to borrowers in targeted areas of a community (http://homebuying.about.com/od/glossarygr/g/053107Redlining.htm)."

Racial steering—deliberately guiding loan applicants or potential purchasers toward or away from certain types of loans or geographic areas because of race—is illegal. Denying loans or services on the basis of an applicant's status as a member of a protected class is also illegal

(http://www.federalreserve.gov/boarddocs/supmanual/cch/200601/fair_lend_fhact.p

df). The City's Fair Housing Officer has observed no instances that racial credit steering is occurring locally. Nor has any evidence of racial credit steering been identified.

The City also viewed Home Mortgage Disclosure Act (HMDA) data as part of the overall assessment of the sale of housing locally. The HMDA was enacted by Congress in 1975 and implemented by the Federal Reserve Board's Regulation C, requires lending institutions to report public loan data. This information is used to:

- determine whether financial institutions are serving the housing needs of their communities;
- assist public officials in distributing public-sector investments so as to attract private investment to areas where it is needed; and
- identify possible discriminatory lending patterns.

The regulation is applicable to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions. The HMDA data below relates to home purchase loans on one- to four-family and manufactured home dwellings.

Disposition of Conventional Home Loan Applications by Census Tract in 2008

by delibus frace in 2000					
Census Tract	# Loans Originated	# Approved, Not Accepted	# Applications Denied	# Applications Withdrawn	# Files Closed Due to Incompleteness
216	57	8	9	1	1
217.01	6	1	3	1	0
217.02	13	0	7	3	1
218	0	0	0	0	0
219	48	7	10	4	1
220	15	3	1	2	0

Source: Home Mortgage Disclosure Act Aggregate Table 1 (www.ffiec.gov/hmda)

The greatest number of conventional loans originated in census tracts 216 and 219. Application denials were highest (in terms of percentage) in census tracts 217.01 and 217.02.

Disposition of FHA, FSA/RHS & VA Home Loan Applications by Census Tract in 2008

	# Loans Originated	# Approved, Not Accepted	# Applications Denied	# Applications Withdrawn	# Files Closed Due to Incompleteness
216	16	0	1	0	0
217.01	7	0	0	0	1
217.02	7	0	4	0	0
218	0	0	0	0	0
219	7	0	1	2	0
220	6	0	0	3	0

Source: Home Mortgage Disclosure Act Aggregate Table 1 (www.ffiec.gov/hmda)

Originations were relatively light in 2008 for FHA, FSA/RHS and VA home loans and generally reflective of trends nationally. The greatest number of loans originated in census tract 216. Census tract 217.01 had the highest application denial rate (57%).

There is an equitable distribution of full-service banking branches, offices and ATM's located throughout the City. Full-service bank branches are also located in the neighborhoods (census tracts) that are primarily comprised of low- and moderate-income households. A couple of bank branch offices closed in 2007 following the sale of Sky Bank. What happened; however, is that new branches opened within those same areas. ATM's, check cashing, and payday loan stores are found throughout the city. These institutions are not being used as substitutes for full-service banks in low-moderate income neighborhoods.

The City's CDBG and Revolving Loan-funded housing programs require that proof of insurance be kept on file for every property purchased and/or rehabilitated. As a result, the City's Fair Housing Officer/Housing Specialist is in a position to be aware of any concerns regarding homeowner insurance policies being issued to program participants.

Any homeowner policy that prevents the writing of replacement or guaranteed replacement cost policies for older homes is discriminatory. The City's Fair Housing Officer notes that there has been no evidence of insurance companies preventing the writing of replacement or guaranteed replacement cost policies for older homes. There have been exceptions in instances where unusual architectural features may exist that would be considered to be excessively expensive to duplicate, repair or replace. The Fair Housing Officer also has noted no evidence of another discriminatory practice; that being insurance companies having marketing programs

that exclude writing multi-line coverage for the city or certain neighborhoods within the city. Furthermore, no insurance companies have policies that prohibit the writing of replacement or guaranteed replacement cost coverage with homes with market values that fall significantly below the estimated cost to replace the home.

D. Public Policies and Actions Affecting the Approval of Sites and Other Building Requirements Used in the Approval Process for the Construction of Publicly-assisted Housing

City services (e.g. Police, Fire/Rescue, trash pickup, etc.) are provided equally to all residents. Furthermore, services are provided equally throughout every neighborhood within the City of Bowling Green.

The City of Bowling Green's Comprehensive Master Plan includes a Housing Section that has been adopted by the City Council. This plan includes estimates which include anticipated growth and various other components to include recommendations intended to direct the present and future physical, social and economic development within Bowling Green.

The City of Bowling Green's policies, procedures and practices affecting the approval of sites and other building requirements used the approval process for the construction of publicly-assisted housing are not restrictive; nor do they negatively impact persons who are protected under Fair Housing laws. The City's zoning ordinance and map, development and subdivision regulations and other land use controls conform to the Master Plan, providing sufficient land use and density categories and sufficient land zoned/mapped to permit the building of affordable housing. The zoning ordinance does not set minimum building size requirements that exceed the local housing and health code standards. There are no established impact fees. The Wood County Building Code encourages language regarding housing rehabilitation through gradated regulatory requirements applicable as different levels of work in existing buildings. The Wood County Building Code utilizes/adopted a recent (published within last five years) version of a nationally recognized model building code. The City of Bowling Green does not require affordable housing projects to undergo public review or special hearings when the project is otherwise in full compliance with the zoning ordinance and other development regulations. Per the City's legal counsel, all local zoning laws, policies, and practices guarantee they are in compliance with the federal fair housing laws and up-to-date with legal decisions. The City has reviewed criteria for placement of group homes. There are no restrictions that conflict with the Fair Housing Act and judicial decisions. There are no local occupancy ordinances restricting the number of people in a family when buying a home. The City's definition of a "family" does not conflict with the definition set forth within the Fair Housing Act. The City has no ordinances that criminalize homeless persons (which would thereby make it difficult for said persons to qualify for subsidized or other types of housing). Local zoning ordinances and building codes have no impact on lower income housing (e.g. no lot

size requirements). There are no court decisions or settlements which affect the City's zoning ordinances, building codes or other policies and regulations relating to the provision of housing for lower income households and persons with disabilities. The City of Bowling Green fully welcomes the placement of supportive housing locally. There are no concentrations of low and moderate income housing in any areas within the corporation limits of Bowling Green. The City of Bowling Green's Anti-displacement and Relocation Assistance Plan was adopted September 1992 and revised April 2003. The plan requires the City to replace all occupied and vacant housing that is demolished as a direct result of activities related to or supported by CDBG funding.

A current roster for the City of Bowling Green's Zoning Board of Appeals and Planning Commission is located in Appendix A.

There are no public housing units in Bowling Green. Bowling Green Housing Authority is currently under contract with the City of Bowling Green to provide a baseline of 119 Section 8 vouchers to assist qualified residents locally. During FY 2010, it is anticipated that at least \$405,000 will be made available to the community for the administration of the Section 8 voucher program.

In March, 2010, the City of Bowling Green conducted an interview with the Director of the Bowling Green Housing Agency who administers the Section 8 voucher program locally. He indicates there is no pattern regarding the concentration of tenants participating in the program by race or ethnicity. Regarding the participation of persons with disabilities, there are no program participation limits or exclusions. There are no court lawsuits involving tenant selection and assignment policies and procedures. Voucher holders can use vouchers they receive from this jurisdiction outside of the geographic jurisdiction through the portability process. Also through the portability process, holders who have received their vouchers from other iurisdictions are assisted in residing in Bowling Green. Maps and lists indicating the location of possible rental units are available upon request. Upon request, voucher holders are assisted by the Bowling Green Housing Agency in finding suitable housing (maps and lists are provided). The assistance includes providing up-to-date information to minority home seekers (in particular) about the various facilities and services that are available in all neighborhoods. Assistance also includes providing suitable housing with accessible design features for persons with disabilities. The agency has completed its Section 504 assessment of the need, among households with various types of disabilities, and developed a plan for providing such housing opportunities. Voucher holders are encouraged to look for housing in neighborhoods that are not traditional residential areas for the holder in question (particularly minority voucher holders). Section 8 voucher tenants are able to choose their own unit and assistance in locating a unit is provided upon request. This helps to promote the availability of accessible existing housing resources that are suitable for the mobility impaired. All participants in the Section 8 voucher program receive clear information concerning their housing rights and the steps they should take in

the event housing discrimination is encountered. The policy/procedure addressing displaced Section 8 tenants is as follows: Tenants are given vouchers to locate a new unit. If tenants are able to stay and wish to stay, there are no requirements to re-locate. Again, if relocating, tenants choose their own unit. There appear to be no impediments to fair housing choice as it relates to the Section 8 voucher program.

E. The Administrative Policies Concerning Community Development and Housing activities such as Urban Homesteading Multi-family Rehabilitation, and Activities Causing Displacement, which Affect Opportunities of Minority Households to elect Housing Inside or Outside Areas of Minority Concentration

All City of Bowling Green policies and procedures related to Community Development and Housing activities are crafted to ensure that citizens have access to said programs/activities in an equal manner regardless of whether or not a person is a member of a protected class. All assistance is provided on a first-come, first-serve basis—assuming the applicant meets low-moderate income eligibility requirements. City of Bowling Green sites and facilities are fully accessible. Public hearings held for federally-funded programs (e.g. the Community Development Block Grant (CDBG)), are advertised in accordance with federal guidelines, held in accessible locations, and encourage persons requiring special accommodations to contact the City, so arrangements can be made for them. The City has adopted a Limited English Proficiency Plan for the CDBG Program. This ensures greater access may be provided.

In June 2003, the City adopted a Minority Business Enterprise Plan (see Appendix B). The plan provides enhanced opportunities for the participation of businesses owned and operated by minorities, in projects or activities funded (in whole or in part) through the City's Community Development Block Grant (CDBG) program. Furthermore, the City of Bowling Green's commitment to maintaining the principle of equal employment opportunity and achieving affirmative action progress is evidenced in the adoption of the Commitment to Equal Employment Opportunity and Affirmative Action. The City's Business Revolving Loan Fund (RLF) provides funding for business start-up and expansion in exchange for the creation of jobs for persons with low incomes.

The City of Bowling Green's Anti-displacement and Relocation Assistance Plan was adopted September 1992 and revised April 2003. The plan requires the City to replace all occupied and vacant housing that is demolished as a direct result of activities related to or supported by CDBG funding. This plan is located in Appendix C.

There is a lack of affordable housing in Bowling Green. The City of Bowling Green utilizes CDBG funding to ensure persons with low incomes have greater accessibility to decent and affordable housing. The CDBG-funded housing programs include:

- Rental Rehabilitation;
- Mobile Home Repair; and
- Elderly Emergency Home Repair.

Funds from prior Community Housing Improvement Program grants were utilized to establish the City of Bowling Green's Housing Revolving Loan Fund (RLF). In an effort to increase homeownership and housing decency, the Housing RLF is used to provide these forms of assistance to persons with low incomes:

- Down-payment Assistance;
- Down-payment/rehabilitation Assistance; and
- Owner-occupied housing rehabilitation.

The revitalization of lower-income neighborhoods is important to the City of Bowling Green. In 2009, the City of Bowling Green was awarded a Neighborhood Stabilization Program (NSP) grant from the Ohio Department of Development. NSP funding is utilized to assist persons with low incomes through the provision of down-payment/housing rehabilitation assistance. All properties purchased and rehabilitated must have been vacant for at least 90 days and located in a specific target area with low-moderate income saturation. This program has been quite successful to date. All planned program outcomes were met within the first six months in existence. As a result two added units of housing down-payment/rehabilitation were awarded to the City of Bowling Green in 2010 on behalf of the Ohio Department of Development.

The City has a Community Reinvestment Area (CRA) program. It is administered by the Bowling Green Community Development Foundation. CRA's are specific areas of land in which property owners can receive tax abatement for investing in real property improvements. The CRA program is a direct incentive tax exemption benefiting property owners to renovate existing or construct new buildings. The CRA has resulted in enhanced economic development locally.

The Fair Housing Officer has observed no evidence of there being specific groups within Bowling Green that have more severe problems obtaining adequate housing as a result of language barriers, physical or mental disabilities or other conditions that might affect one's ability to secure safe, decent housing.

In 2009, the City of Bowling Green was awarded a Neighborhood Stabilization Program (NSP) grant from the Ohio Department of Development. NSP funding is utilized to assist persons with low incomes through the provision of down-payment/housing rehabilitation assistance. All properties purchased and rehabilitated must have been vacant for at least 90 days and located in a specific target area with low-moderate income saturation.

Although the following are not targeted at any specific neighborhoods, the CDBG-funded Rental Rehabilitation, Mobile Home Repair and Elderly Emergency Home Repair programs do assist property owners (and thus, neighborhoods) to revitalize housing units occupied by persons with low incomes. The City's Housing Revolving Loan Fund also assists persons with low incomes to address housing revitalization with the Owner Occupied Rehabilitation and Down-payment Assistance/Rehabilitation programs.

The City of Bowling Green does not currently have a HOME Investment Trust Fund.

The City of Bowling Green has a Housing Revolving Loan Fund (RLF). This fund was established using program income earned from prior Community Housing Improvement Program (CHIP) grants. The fund is authorized through an agreement between the City and the Ohio Department of Development. The Housing RLF funds these programs for income eligible applicants:

- Down-payment Assistance;
- Down-payment Assistance/Rehabilitation; and
- Owner Occupied Rehabilitation.

Property taxes are established by Wood County and not by the City of Bowling Green. There have been no recent property tax increases for Wood County.

No subsidized housing has been demolished in Bowling Green. Furthermore, no demolition of subsidized housing is currently planned.

F. Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing within a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to help remedy the discriminatory condition, including actions involving the expenditure of funds made available under this part.

Not applicable. There has been no determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing within Bowling Green.

G. Assessment of Current Public and Private Fair Housing Programs/Activities in the Jurisdiction

The City of Bowling Green's Fair Housing Program serves to educate the public about the existence of Fair Housing laws and provide information/resources to those who are victims of discrimination. The City of Bowling Green Fair Housing Program does not conduct testing or investigations. The City's Fair Housing Officer will provide information to landlords, etc. in an effort to educate and resolve pending issues. In those instances where the Fair Housing laws have been breached, the City's Fair Housing Officer contacts the Ohio Civil Rights Commission to report the matter. It is the Ohio Civil Rights Commission that subsequently conducts investigations and determines the disposition of these matters. The Ohio Civil Rights Commission is also available to answer questions/provide guidance to the Fair Housing Officer regarding Fair Housing matters. The Fair Housing Center of Toledo operates independently from the City of Bowling Green. Their program conducts Fair Housing investigations/testing, and also provides education, locally. The Fair Housing Center of Toledo has also been available to provide information to the City's Fair Housing Officer upon request.

One of the prime duties of the City's Fair Housing Officer is to educate the public about fair housing. Annually, the Fair Housing Officer conducts no fewer than four Fair Housing presentations throughout the community. The majority of those persons attending have low incomes. Presentations, however, are also provided to bankers, realtors and service providers in an effort to educate them about fair housing issues. The City's Fair Housing Program brochure is a valuable educational resource. As of 2009, the Fair Housing Program brochure is available in both English and Spanish. These brochures are distributed frequently throughout the year to a variety of social service agencies, businesses and governmental entities. The brochure is also distributed during Fair Housing Program presentations. As funds permit, the Fair Housing Officer also places Fair Housing Program advertisements in local newspapers and other promotional publications to raise public awareness.

The City of Bowling Green conducted a citywide survey (April 2010) in order to assess the effectiveness of its Fair Housing Program marketing efforts. The survey form (found in Appendix D with all theq survey forms used) was posted on the City's website, where citizens could download and complete it for submission. It was also distributed to members of the City of Bowling Green's Human Relations Committee. The surveys were also made available to citizens at:

- prominent social service agencies;
- various businesses serving persons with low and moderate incomes; and
- government buildings.

Response to the general population survey was meager (8 surveys were completed and returned to the City of Bowling Green). The information received was helpful,

however. Of those responding, almost 63 percent indicated they knew who to contact in the event a fair housing issue arose. Even though the majority indicated their understanding of who to contact in the event of a fair housing issue, 37 percent were uncertain who to contact. *This information (as well as the poor survey response rate) indicates that further educational efforts, on the City's part, are necessary.*

All public hearings for federally-funded grant programs advertise that the City can arrange for translators with adequate notice. The City has ongoing communications with PathStone and Bowling Green State University, two organizations who work closely with linguistically-isolated persons. In FY 2005, FY 2006, and FY 2007, the City of Bowling Green utilized CDBG funding to conduct sidewalk reconstructions in low-moderate income areas to ensure greater accessibility for persons with disabilities. The City also maintains communications with The Ability Center and Wood Lane, two service providers for persons with disabilities. A survey of local social service providers indicates that more Fair Housing marketing efforts are needed to ensure that a broader range of local service providers know about the local Fair Housing Program.

The Fair Housing Officer receives a number of calls and email inquiries related to landlord-tenant issues. His procedure has been to offer local resources to those seeking further information of this nature. Listed below are the Fair Housing-related calls received by the City's Fair Housing Officer during the period July 2005 through the present (June 2010):

Fair Housing Calls Received by City of Bowling Green 2005-2010

Date	Issue of Concern	Disposition of Issue
	Landlord unwilling to	Landlord permitted service
9/2/2009	permit service animal	animal to reside in the unit
	Renter complained there	
	was insufficient accessible	Landlord increased supply
12/13/2007	parking	of accessible parking
	Landlord unwilling to	Landlord permitted service
5/8/2007	permit service animal	animal to reside in the unit
	Landlord unwilling to	Landlord permitted service
2/16/2007	permit service animal	animal to reside in the unit
	Landlord unwilling to	Landlord permitted service
1/24/2007	permit service animal	animal to reside in the unit
	Landlord unwilling to	Landlord permitted service
12/1/2006	permit service animal	animal to reside in the unit

All issues brought to the attention of the local Fair Housing Officer were successfully resolved; negating the need for the affected individuals to file a formal Fair Housing complaint or suit through the Ohio Civil Rights Commission. *The record indicates*

that some landlords require further education on fair housing issues, especially regarding service animals.

The Fair Housing Officer reviews the local newspapers each week to ensure that "for rent" advertisements do not contain discriminatory language. In February 2006, both of the two local newspapers (BG News and Sentinel-Tribune) ran advertisements with language that was unacceptable. On March 1, 2006 the Fair Housing Officer met with representatives of these publications to provide education on what constitutes discriminatory advertising for rental housing. The representatives were receptive to the Fair Housing Officer's message. A letter outlining the Fair Housing Officer's concerns and the action he took to educate the local media sources was sent to the Ohio Civil Rights Commission, Toledo office. Since that time, the Fair Housing Officer has continued to monitor the rental advertisements in the local newspapers each week, and has not encountered any further advertising issues. The Fair Housing Officer reports that local newspapers use the non-discrimination disclaimer in their advertising section. *Nevertheless, in* light of the fact that there have been issues in the past, and in an effort to address newspaper office staff turnover, local newspaper advertisement monitoring (on a weekly basis) still continues to be vitally needed.

V. Conclusions and Recommendations

Bowling Green's potential impediments to fair housing choice, recommendations and proposed actions are fully discussed in Section I (C) and (D) of this analysis. A table summarizing the impediments, recommendations and proposed actions are also located in Appendix E.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE FOR THE CITY OF BOWLING GREEN, OHIO

VI. Certification

I hereby certify that this Analysis Impediments to Fair Housing Choice for the City of
Bowling Green, Ohio is in compliance with the intent and directives of the
Community Development Block Grant program regulations.

John B. Quinn, Mayor	
, ,	
Date	