



Analysis of Impediments to Fair Housing Choice

City of Warren, Ohio

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Introduction

In the early part of 2010, the Warren Community Development, Trumbull County Planning Commission, Warren-Youngstown Urban League, Trumbull County Mental Health and Recovery Board, Sunshine Inc., Habitat for Humanity, Coleman Behavioral Services, Trumbull County Transportation and Mobility Management, the Western Reserve Independent Living Center, and the Trumbull Metropolitan Housing Authority convened in a series of meetings, e-mails, and phone conversations. Over the course of the winter and spring of 2010, this committee collaborated in the collection and review of data in order to update the Analysis of Impediments to Fair Housing (AI) for Trumbull County.

The following narrative and plan provides information on the history of fair housing in the United States and its relationship to the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs, as well as other fair housing initiatives, fair housing choice, and examples of unlawful behavior related to fair housing principles. In addition, this document examines the methodology used to compile the AI, the contents of demographic profiles compiled for each township, city, and village in Trumbull County, the identification of impediments to fair housing choice, and a proposed plan of action to address those impediments.

History of Fair Housing

Title VIII of the Civil Rights Act of 1968 made it unlawful to discriminate in any aspect relating to the sale, rental, or financing of dwellings or in the provision of brokerage services or facilities in connection with the sale or rental of a dwelling because of race, color, religion, national origin, or sex. The Fair Housing Act Amendments of 1988 (Title VII of the Civil Rights Act of 1968, as amended) revised Title VIII (the Fair Housing Act) to extend protection to families with children and handicapped individuals. Application of the Fair Housing Act is not limited to those situations in which federal funds are used; it ensures the right to fair housing both publicly and privately for all individuals throughout the United States.

As a result, HUD requires each entitlement jurisdiction to certify its compliance with the Consolidated Plan Final Rule (24 CFR 91.225), and recipients of CDBG and HOME funds must administer all programs in a manner that will “affirmatively further fair housing.” As such, the AI is a HUD-mandated document that serves as a comprehensive review of local regulations, policies, and procedures with regard to fair housing, as well as an assessment of public and private sector conditions affecting fair housing within the City of Warren and Trumbull County.

2010 Analysis of Impediments to Fair Housing

What is Fair Housing Choice?

Fair housing choice is the ability of any person, regardless of race color, religion, sex, handicap, familial status, national origin, to have the same housing choices available to them as they are to all persons of similar income levels.

What Impedes Fair Housing Choice?

Housing choice becomes obstructed when actions, omissions, or decisions restrict the ability of an individual to obtain housing due to that individual's race, color, religion, sex, national origin, familial status or handicap; housing choice is also obstructed when residential units are not made available to an individual because of their race, color, religion, sex, handicap, familial status, or national origin.

What is Unlawful?

1. Refusal to sell or rent {Section 804 (a)};
2. Discrimination in terms, conditions, or privileges of sale or rental, or in the provision of services or facilities in connection therewith {Section 804 (b)};
3. Preference, limitation, or discrimination in advertising with respect to sale or rental of a dwelling unit {Section 804 (c)};
4. False representation regarding availability of a dwelling unit for inspection, sale, or rental when such dwelling is in fact available {Section 804 (d)};
5. Blockbusting. For profit, to induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or persons of a particular race, color, religion, sex, handicap, familial status, or national origin {Section 804 (e)};
6. To discriminate in the sale or rental, or to otherwise make unavailable or deny, a dwelling to any buyer or renter because of a handicap of that buyer or renter, person residing in or intending to reside in that dwelling after it is sold, rented, or made available to, or any person associated with that buyer or renter {Section 804 (f)};
7. To discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities in connection with such dwelling, because of a handicap. This includes (1) the refusal to permit reasonable modifications, (2) the refusal to make reasonable accommodation in rules, practices, or services when necessary to afford the person equal opportunity to use and enjoy the dwelling, (3) in connection with the design and construction of covered multi-family dwellings, a failure to design and construct those dwellings in such a manner that the public and common use portions of such dwellings are readily accessible and usable by handicapped persons, all doors are designed to allow passage into and within all premises within such dwellings are sufficiently wide to allow passage by handicapped person in wheelchairs, and all premises within such dwellings contain the following features of adaptive design: (a) an accessible route into and through the dwelling, (b) light switches, electrical outlets,

thermostats, and other environmental controls in accessible locations, (c) reinforcements in bathroom walls to allow installation of grab bars; and (d) usable kitchens and bathrooms such that an individual in a wheelchair can maneuver in the space. {Section 804 (f)(2)}

8. Discrimination in making or purchasing loans for residential real property purchases, and construction, improvement, repair, or maintenance of a dwelling; {Section 805 (b)(1)}
9. Discrimination in the appraisal of residential real property by taking into consideration factors of race, religion, nationality, sex, handicap, or familial status; {Section 805 (b)(2)}
10. Discrimination in the provision of brokerage services by denying access to, membership, or participation in multiple-listing service, real estate broker's organization or service, organization, or facility. {Section 806}

HUD Initiative on Impediments to Fair Housing

In 2003, HUD launched a major national advertising campaign to educate the public on rights provided under the Fair Housing Act and how to report discrimination. This campaign followed the publication of several recent HUD sponsored studies regarding:

- Housing discrimination in residential sales and rental markets nationwide;
- Public awareness of fair housing and individual response regarding discrimination;
- Discrimination in mortgage lending;
- The effectiveness of fair housing testing; and
- Compliance with the accessibility requirements of the Fair Housing Act.

Taken together, these studies reveal that discrimination in residential sales and in the rental and mortgage markets is a common experience. Only a very small percentage of those who believe that they have experienced discrimination take any action to redress the wrong. This is due, in part, to a lack of public awareness of federal, state, and local resources available to address these problems. Additionally, individuals surveyed believed that little, if anything, would come of complaints made against discriminatory actions.

The City of Warren, Trumbull County, and local fair housing advocates and agencies are aware that the abovementioned impediments exist and plan to work collaboratively to identify existing impediments, educate the public, and remove barriers to fair housing in Trumbull County.

Research Methodology

Best Practice examples of “Impediments to Fair Housing Plans” created by other communities were researched by the “Impediments to Fair Housing” team in order to understand and replicate the formats studied to create a useful and informative “Impediments to Fair Housing Plan” for Trumbull County, Ohio. The team consists of representatives from the Trumbull County Planning Commission and the Warren Community Development Agency. Data and information from various federal, state, local, non-profit and for-profit agencies were reviewed in order to gather information on the federal and state Fair Housing law included herein and other relevant topics. These agencies include but are not limited to the

United States Department of Housing and Urban Development (www.hud.gov), the United States Department of Justice; Civil Rights Division, the United States Census Bureau (www.census.gov), the Ohio Department of Development (www.odod.state.oh.us), the Coalition on Homelessness and Housing (COHHIO) (www.cohhio.org), the National Low Income Housing Coalition (www.nlihc.org), CT Consultants, Inc. (CHIP Administrator for the Cities of Girard and Niles), the Trumbull Metropolitan Housing Authority, Sunshine, Inc. (CHDO), Warren Area Board of Realtors: Agents and “Homes” publications, Northeast Ohio Legal Services, Cortland Savings and Banking Company, Farmer’s National Bank, First Place Bank, Home Savings and Loan Company, JP Morgan Chase Bank (Formerly Bank One), National City Bank and Huntington Bank. The geographic area studied includes all incorporated and unincorporated places within Trumbull County.

The census data collected for review includes demographics, income characteristics, employment and transportation profiles, and housing profiles. The United States Census Bureau Summary File 3 Sample Data were utilized in order to gather demographic information on Trumbull County’s 24 townships, 6 cities and 5 villages. The demographic profile compiled for each municipality and subdivision in Trumbull County is on reserve at the office of the Trumbull County Planning Commission and the Warren Community Development Agency due to size. (Attachment A) Data includes population, gender, age, median income, wage/salary income, race, ethnicity, household type, household size, grandparents as caregivers, veteran status, poverty status within families and for individuals, employment status, educational attainment, housing units, year structure built, plumbing kitchen facilities, house heating fuel, marital status, work status, means of transportation to work, rent, value for specified owner-occupied units, mortgage status, monthly owner costs by mortgage status, and vehicles available. It is important to note that for townships with municipalities located in full or in part within the township borders, the data listed in the demographic profile includes the municipality. Data however, was analyzed with adjustments to include only that of the unincorporated areas of the township.

Demographic Profile

Between 1970 and 2000, population in Trumbull County decreased by approximately 7,500 persons. The City of Warren, largest city and county seat, has recorded losses of almost 15,000 individuals. However, within the same timeframe, population in the State of Ohio has steadily increased from 10,652,017 to 11,353,140 persons.

According to the 2000 U.S. Census, the City of Warren currently has a population of 46,832. The racial composition in Warren is also the most diverse, with twenty five percent of the population reported as Black or African-American. Approximately one percent of the population reports they are Hispanic or Latino (of any race) and 2 percent reports two or more races.

2000	Trumbull County	Warren City	% of population living in Warren
Total Population	225,116	46,832	21%
White	203,084	33,690	72%
Black	17,778	11,802	25%
Hispanic/some other race	1,794	390	1%

SOURCE: U.S. Census Bureau/Warren Community Development

Census figures report 21,279 housing units are located within city limits; approximately 90 percent of those units are occupied. In family households, 19 percent are female-headed. The owner occupancy rate (2.5 percent) is considerably lower than the rental vacancy (11.5 percent). In addition, the proportion of owner-occupied housing grows smaller each year, and was reported at 58.4 percent compared to 41.6 percent renter-occupied housing units.

The Cities of Niles and Girard are the second and third largest cities in Trumbull County in terms of population with Niles having almost twice as many residents as Girard with a population of over 20,000 persons. The Median Incomes for both cities are well below Trumbull County's Median Income reported in 2000. Racial segregation is more prominent in the Cities of Girard and Niles compared to the City of Warren. Girard's demographic profile reveals that approximately 2 percent of the entire population is African-American and another 2 percent is a combination of races. Niles has a similar demographic breakdown. The fourth and sixth largest cities in Trumbull County, Hubbard and Newton Falls only claim 1 percent of their population as African-American while Cortland, Trumbull County's fifth largest city reports less than 1 percent of their population as African-American. In Niles and Girard family households, 13 percent are female-headed households. In Newton Falls, 12 percent are female-headed households and in Cortland and Hubbard, 10 percent of the family households are female-headed. Historically, race and female-headed households are highly correlated to income statistics. Female-headed households earn an average of 44 percent less than male workers in the city.

The Department of Housing and Urban Development (HUD) is required by law to set income limits to determine eligibility of applicants for its assisted housing programs. Section 3 of the U.S. Housing Act of 1937 provides the statutory basis for setting income limit definitions. The 1999 HUD-established median income for a family of four in Warren was \$42,500. The HUD income limit groupings are:

Low-income – Incomes do not exceed 80% of the median - \$34,000

Very Low-income – income do not exceed 50% of the median - \$21,250

Extremely low-income – income do not exceed 30% of the median - \$12,750

Census figures show that 16.2 percent of Warren’s population is below poverty level.

Income Characteristics

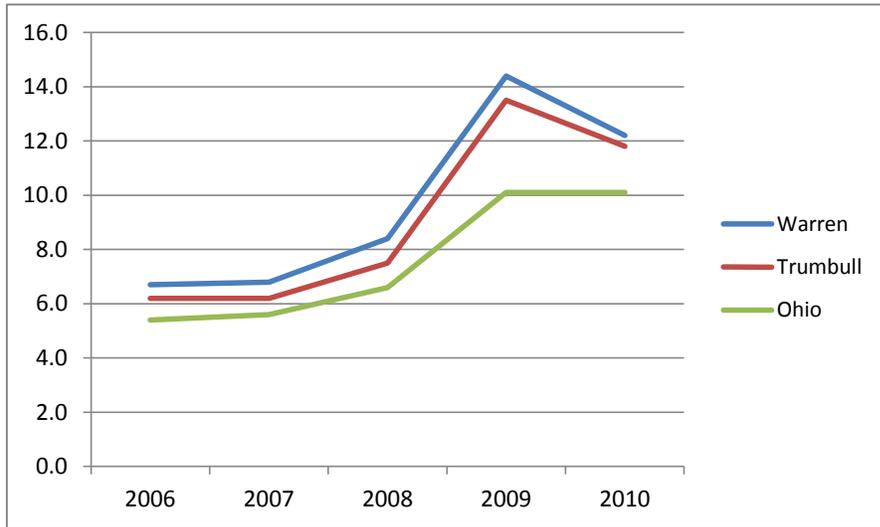
The local economy of Warren and Trumbull County was built upon a foundation of steel-making, automobile assembly and parts manufacture in the twentieth century; however, since the decline of steel and other major industry in the late-1970s, the city has sought after and established a presence in the light manufacturing, service, wholesale and retail sales industries. In order to gain competitive advantage in a world of increasing globalization and competition, local and regional manufacturing corporations have begun to implement strategic research policies and adopt technological advances which have resulted in increased diversification, investment, and productivity.

Because the regional economy has been harder hit by the current business cycle due to its greater dependence upon manufacturing, the Ohio Department of Jobs and Family Services projected only 5.8 percent employment growth for the Youngstown-Warren MSA between 2000 and 2010, roughly half the rate of growth predicted for the state as a whole. The services sector, led by health and business services, is projected to account for 60 percent of all job growth; large numbers of jobs are also forecasted in retail trade. Manufacturing employment is projected to decline, particularly in durable goods related to automobile production. Additionally, less than one-fifth of jobs created are expected to result from employment growth. Rather, employment will be generated as existing workers leave the labor force, customarily upon retirement.

Despite the uncertainty of the national economy, employment levels in the region have shown some improvement between 2009 and 2010; however, figures continue to be a major concern for both the city and the county. Unemployment rates in Warren have been consistently three to four percentage points higher than the state.

These trends are expected to continue as employment in steel- and auto-related manufacturing industries declines, and other industries –including service and trade– are unable to adequately employ those skilled and semi-skilled workers who have been made redundant or lost their jobs.

UNEMPLOYMENT RATES, 2006-2010



Source: Bureau of Labor Statistics

EMPLOYMENT PROFILE 2000

Industry	Number	Percent
Service	3,452	19
Retail/Wholesale Trade	2,280	12.5
Manufacturing	5,411	29.7
Government	2,053	11.3

Source: Profile of Selected Economic Characteristics: 2000 Census

Employment and Transportation Profile

For the first half of the 1900s, Trumbull County benefited enormously from the growth and success of the steel industry. Upon the fast moving and highly destructive decline of this industry in the 1970s and 1980s, the county’s population found relief and redemption in the automobile industry. In the late 1990s and 2000s, the automobile industry suffered (and continues to suffer) a massive overhaul which resulted in the elimination of many well-paying jobs locally.

When examining the a ten year employment trend for the Youngstown-Warren-Boardman Metropolitan Statistical Area (YWB-MSA), 19,600 jobs were lost in manufacturing between 1999 and 2008. When considering that a total of 20,900 jobs were lost during this time frame, it is clear that the manufacturing sector has suffered the worst loss. The only sector to gain jobs is educational and health services. This reveals a two point problem for the disadvantaged persons of the YWB-MSA, which includes Warren. First, the unemployment numbers for the city have steadily increased. Unemployment rates within the area have increased and as of December 2010 were at 10.8 percent in the city. This rate is higher than that of Ohio, 9.5 percent; and the Nation, 9.4 percent. Second, the loss of blue collar jobs has only been

offset slightly by an increase in predominately white collar jobs. Quite simply stated, well-paying jobs for those without advanced education and training are disappearing and a minimal number of jobs are being created, most of which require specific training and skills

As shown in the following table, the City of Warren has begun to cultivate a more educated workforce. Approximately 77 percent of all city residents hold a high school diploma, and 15 percent hold an Associate degree or higher in 2000, up from 71 and 13 percent ten years previously. Though the local proportion of educated professionals is not as high as many larger metropolitan areas, progress has been made in nearly all levels of education between the 1990 and 2000 Census, with those Graduate and Professional degree holders being the only educated category to experience a loss of residents during the decade.

CITY OF WARREN EDUCATION PROFILE

Status	1990	2000	Percent Change
No high school diploma	28.7	22.7	-6.0
High school graduate	41.4	43.7	2.3
Some college, no degree	16.3	18.5	2.2
Associate degree	3.6	4.3	0.7
Bachelor's degree	6.6	7.6	1.0
Graduate or Professional degree	3.4	3.2	-0.2

Source: US Census and Warren Community Development Department

In addition to the distinct reduction in blue collar jobs in the region, transportation to the available jobs is sparse. Aside from personal car ownership and taxi services, public transportation is minimally available. The Western Reserve Transit Authority provides minimal service into Trumbull County. The Niles-Trumbull Transit provides a call ahead transit service throughout the county, with reduced fare for Warren passengers. Warren and Trumbull County are aware of the deficiencies in public transportation and work continuously on mobility management. The Eastgate Regional Council of Governments also operates a Transit Development Program designed to improve the existing transit in Trumbull and Mahoning counties and to plan for future improvements.

Housing Profile

The Census reported a total of 21,279 housing units in the City of Warren in 2000: a loss of 506 units (2.4 percent) over the past ten years. This decline represents two consecutive decades in which the number of housing units has decreased within the city. The primary cause of continued loss of housing stock is the demolition of vacant structures that do not meet code, and are thus considered hazardous to city residents.

As shown in the table below, the most notable decrease in housing units took place in the north and west sides of the city (first and second wards), where between nine and 18 percent of housing stock was lost.

Housing on the city’s east side neighborhoods (third and fifth wards) grew, however, by 17 and six percent, respectively. This can be attributed to new housing construction in that area, including Country Club South, a single-family detached and multi-family villa development just south of the Trumbull Country Club in the city’s fifth ward, and a number of condominium and villa developments in the third ward.

HOUSING UNITS BY CITY WARD, 1990-2000

	1990		2000		Percent Change 1990-2000
	Number	Percent of City	Number	Percent of City	
First Ward	3,552	16.8	3,228	15.6	-9.1
Second Ward	3,510	16.6	2,862	13.8	-18.5
Third Ward	3,151	14.9	3,684	17.8	16.9
Fourth Ward	2,579	12.2	2,442	11.8	-5.3
Fifth Ward	3,141	14.9	3,327	16.1	5.9
Sixth Ward	2,831	13.4	2,862	13.8	1.1
Seventh Ward	2,355	11.2	2,320	11.2	-1.5

Source: US Census and Warren Community Development Department

NB: due to geographical differences between census tract boundaries and Warren city limits, figures reflect, but do not exactly match, current US Census estimates.

Housing market conditions in the City of Warren are also affected by the number of vacant and rental units present in the city. According to the 2000 Census, 9.6 percent of the housing stock was unoccupied – 2.9 percent over 1990 figures. As shown in the preceding table, the largest increase in vacant structures was recorded in those neighborhoods on the west side of the city (first and seventh wards), though the principal proportion of vacant units citywide was still located on the southwest side of the city (sixth ward). Though the increase in vacant units did not occur uniformly across the city, all wards experienced a considerable rise – a problem that must be addressed in order to stabilize neighborhood character and quality of life throughout the city. Though there were 401 fewer rental units recorded in the City of Warren during the 2000 Census, the proportion of non-owner-occupied structures increased slightly over the decade, resulting in 41.5 percent of total residential units being renter-occupied. The only neighborhoods in which rental units increased were on the west and southwest sides of the city (sixth and seventh wards). The city also has a higher proportion of renter-occupied units than its adjacent suburban communities which average an 82.5 homeownership rate.

Like vacant housing, the proliferation of rental units in the city must be addressed in order to stem the transient nature of rental-occupied housing and work toward restoring stability to the City of Warren’s older neighborhoods, enhancing quality of life for the residents of those neighborhoods and encouraging continued investment in community housing stock.

VACANT UNITS BY CITY WARD, 1990-2000

	1990		2000		Percent Change 1990-2000
	Number	Percent of City	Number	Percent of City	
First Ward	184	13.3	313	15.6	70.1
Second Ward	237	17.1	316	15.7	33.3
Third Ward	141	10.2	186	9.3	31.9
Fourth Ward	252	18.2	324	16.1	28.6
Fifth Ward	127	9.2	199	9.9	56.7
Sixth Ward	330	23.8	419	20.9	27.0
Seventh Ward	114	8.2	251	12.5	120.2

Source: US Census and Warren Community Development Department

NB: due to geographical differences between census tract boundaries and Warren city limits, figures reflect, but do not exactly match, current US Census estimates.

RENTAL UNITS BY CITY WARD, 1990-2000

	1990		2000		Percent Change 1990-2000
	Number	Percent of City	Number	Percent of City	
First Ward	1,399	17.4	1,297	16.6	-7.3
Second Ward	1,456	18.1	1,299	16.6	-10.8
Third Ward	1,175	14.6	1,059	13.5	-9.9
Fourth Ward	1,483	18.4	1,191	15.2	-19.7
Fifth Ward	862	10.7	854	10.9	-0.9
Sixth Ward	1,030	12.8	1,319	16.8	28.1
Seventh Ward	657	8.1	806	10.3	22.7

Source: US Census and Warren Community Development Department

NB: due to geographical differences between census tract boundaries and Warren city limits, figures reflect, but do not exactly match, current US Census estimates.

Of those rental units that are considered affordable for very low-income families (those earning less than 30 percent MFI), 55.9 percent are actually occupied by very low-income individuals; of those homes, 29.8 percent report “some housing problem,” which is defined as overcrowding (one or more persons per room) and/or the lack of complete kitchen or plumbing facilities. For those renter-occupied units affordable to low-income families (earning between 30 and 50 percent MFI), 47.7 percent are actually occupied by those individuals earning below 50 percent of area median family income, and 38.2 report housing problems. Additionally, of moderate-income rental units (affordable to families earning between 50 and 80 percent MFI), 54.2 percent are occupied by those earning below 80 percent MFI; 43.7 percent reported housing problems.

As evidenced in the following table, many of the units considered affordable to those earning less than the area median family income are rented by individuals earning more than the income category in which the unit is placed. This is at least in part a result of the number of rental units throughout the city; with a rental rate topping 40 percent, a myriad of choices become available to the average renter.

Of those owner-occupied units considered affordable for low-income families, less than 20 percent are actually occupied by low-income individuals. Similarly, of owner-occupied units affordable for those individuals earning between 50 and 80 percent MFI, only 29 percent are actually considered moderate-income. These figures are in part due to a reduced number of low- and moderate-income homeowners, possibly due to unawareness of the ability to own a home or the presence of other debt.

CITY AFFORDABLE HOUSING CONDITION: RENTED UNITS, 2000

	Percent Residents in Income Category	Percent with Housing Problem	Occupancy Rate
Very low-income (<30% MFI)	55.9	29.8	85.5
Low-income (30-50% MFI)	47.7	38.2	84.2
Moderate-income (50-80% MFI)	54.2	43.7	96.8
Average-income (>80% MFI)	n/a	n/a	100

Source: US Census and Warren Community Development Department

CITY AFFORDABLE HOUSING CONDITION: OWNED UNITS, 2000

	Percent Residents in Income Category	Percent with Housing Problem	Occupancy Rate
Low-income (<50% MFI)	19.7	4.1	96.8
Moderate-income (50-80% MFI)	28.9	1.5	98.4
Average-income (>80% MFI)	n/a	n/a	95.9

Source: US Census and Warren Community Development Department

Housing conditions within the City of Warren are also affected by the age of the housing stock present in the community. The expense of maintenance and rehabilitation increase sharply as housing begins to age; older housing units may also lack proper insulation and effective heating systems, increasing operating

costs over time. Nearly 85 percent of the housing stock within the city was built before 1970 and 28.4 percent of those units were constructed before 1940.

Trumbull County

The 2000 Census reported a total of 95,117 housing units in Trumbull County, an increase of 4,584 units (5.1 percent) since the 1990 Census. Approximately 3,900 of those units (85.7 percent) were constructed in suburban Trumbull County, excluding the four cities of Warren, Niles, Girard, and Hubbard.

Housing market conditions are also affected by the number of vacant and rental units present in the county. According to census figures, 6.8 percent of the housing stock (6,097 units) was unoccupied in 2000, a 36.2 percent increase over the decade; nearly 2000 of those vacant units (32.9 percent) were located within Warren. As with the city, this considerable rise in vacancy rate signals impending problems in retaining community character and quality of life throughout the county. The proportion of rental units in Trumbull County has declined between 1990 and 2000, from 26.9 percent to 25.7 percent, respectively; over one-third of rental units county-wide can be found within the City of Warren. Homeownership rates in suburban Trumbull County communities are very respectable, averaging 82.5 percent in comparison to Warren’s 58.5 percent.

COUNTY AFFORDABLE HOUSING CONDITION: RENTED UNITS, 2000

	Percent Residents in Income Category	Percent with Housing Problem	Occupancy Rate
Very low-income (<30% MFI)	44.3	22.6	86.9
Low-income (30-50% MFI)	39.5	33.6	85.6
Moderate-income (50-80% MFI)	50.5	39.1	95.9
Average-income (>80% MFI)	n/a	n/a	97.0

Source: US Census and Warren Community Development Department

As shown in the preceding table, of those rental units that are considered affordable for very low-income families (those earning less than 30 percent MFI), only 44.3 percent are actually occupied by very low-income individuals; of those homes, 22.6 percent report “some housing problem,” defined as overcrowding (one or more persons per room) and/or lack of complete kitchen or plumbing facilities. For those renter-occupied units affordable to low-income families (earning between 30 and 50 percent MFI), just under 40 percent are occupied by those individuals earning below 50 percent of area median family income, and 33.6 report housing problems. Finally, those moderate-income rental units (affordable to individuals earning between 50 and 80 percent MFI), just over half are occupied by those earning below 80 percent MFI, with 43.7 percent reporting problems.

Many of those housing units which are considered affordable to those earning below MFI are rented by individuals who earn more than the income category for which the unit qualifies. This is at least in part a result of the flexibility in the county housing market; a variety of housing choices are available to renters at prices below those of many peer communities.

COUNTY AFFORDABLE HOUSING CONDITION: OWNED UNITS, 2000

	Percent Residents in Income Category	Percent with Housing Problem	Occupancy Rate
Low-income (<50% MFI)	19.7	4.1	97.3
Moderate-income (50-80% MFI)	28.9	1.5	99.1
Average-income (>80% MFI)	n/a	n/a	98.5

Source: US Census and Warren Community Development Department

Of those owner-occupied units considered affordable for low-income families in Trumbull County, less than 20 percent are actually occupied by low-income individuals. Similarly, of owner-occupied units affordable to those who are considered moderate-income, less than 29 percent are occupied by individuals earning between 50 and 80 percent MFI.

Housing conditions within the county are also affected by the age of housing stock. Over 65 percent of the housing units within Trumbull County were built before 1970 and 21 percent of existing housing pre-dates World War II.

The value of owner-occupied housing varied throughout the county in 2000. Generally, the urbanized communities in Trumbull County reported values which were considerably lower than those of surrounding suburban communities; the City of Warren reported a median value of \$63,400, while the median value within the cities of Niles, Girard, and Hubbard was \$79,100, \$75,000 and \$82,500, respectively. Suburban communities (including Cortland and Howland, Champion and Liberty townships) averaged between \$95,700 and \$128,900.

Housing Trends

According to individuals tracking housing policy decisions in Trumbull County, future development is expected to occur in those communities outside of the City of Warren, including the suburban communities of Howland, Bazetta, and Champion townships, as well as the village of Cortland and Liberty township (a Trumbull County suburb of Youngstown).¹ These historic suburban patterns of growth are expected to continue; housing growth within the City of Warren is not expected to occur to any measurable extent over the next ten years. The quantity of infill and new construction developments will likely be surpassed by the number of demolitions undertaken to rid the city of unsafe structures which blight older neighborhoods.

¹ Housing Supply and Demand, Youngstown-Warren MSA: 1970-2000

Identification of Impediments to Fair Housing Choice

Education

Education is measured in terms of the quantity of fair housing materials distributed each year at various locations, meetings, and presentations throughout the county. As part of the fair housing education component, the City of Warren and Trumbull County promote awareness of and encourage willing compliance with fair housing laws by all entities. Landlords, real estate agents, and home sellers are less likely to know the laws regarding discrimination against minorities, disabled persons and familial status because they are less recognizable as protected classes. Thusly, concerns and problems include the lack of awareness of the laws and the protection that is available and the reluctance to file a complaint.

The Greater Warren-Youngstown Urban League, a non-profit organization serves the city as the Fair Housing consultant. The agency provides fair housing services, education and complaint investigation. In 2010, the agency received ninety-four landlord/tenant complaints, distributed 393 landlord/tenant booklets and 290 fair housing flyers. These informational items are meant to educate landlords, real estate agents, home sellers and tenants on non-discriminatory practices.

A rise in complaints taken was against landlords not providing a mailing address to the tenant. This poses a problem for the tenant to properly notify the landlord of problems in the residence and/or attempts to block the tenant from following the rent escrow process. The Greater Warren –Youngstown Urban League has collaborated with Catholic Charities and Community Legal Services to compile a brochure advising tenants of their legal rights under the rent escrow procedure and outlines the warning signs of unscrupulous landlords.

The city contracts with Consumer Credit Counseling to educate homeowners on preparing household budgets, and prioritizing finances. Of the 22 individuals/families counseled, 14 were issued homeownership loans in the city and 2 in the county for 2010.

Historic Isolation and Neighborhood Diversity

According to a study conducted by the Employment and Training Institute, School of Continuing Education, University of Wisconsin-Milwaukee in December 2002 (revised January 2003) entitled *Racial Integration in Urban America: A Block Level Analysis of African American and White Housing Patterns* the Youngstown-Warren Metropolitan Statistical Area (MSA) is average compared to the 100 largest MSA's in the nation. The African-American population comprises 10.6 percent of the MSA's overall population while the percentage of the MSA's population living on African-American-Caucasian integrated blocks is only 8.8%. An integrated block is defined as having at least 20 percent of the households either African-American or Caucasian. The researcher's conducting this study investigated several variables in order to provide new insight and new, more accurate MSA rankings for integrated neighborhoods. The new ranking for the Youngstown-Warren MSA is 44 out of 100 while the old segregation index ranking is 86 out of 100. The Youngstown-Warren MSA was ranked 86 out of 100 MSA's for neighborhood integration nationwide. In other words, 85 out of the 100 MSA's studied were more successful in attaining higher

integration percentages compared to the Youngstown-Warren MSA. The most diverse area in Trumbull County is the City of Warren with approximately 25 percent of its citizens reporting their race as African-American.

Government investment often is the seed of neighborhood redevelopment. Low-interest loans and tax credits offered by local government agencies can be utilized to remodel or construct low-income housing in Trumbull County neighborhoods. Business development or redevelopment in those neighborhoods can then spur additional investment, interest and residents to the area. As a result, adjacent property values increase and the neighborhood becomes integrated with homeowners and residents from diverse socio-economic backgrounds. Still, it must be noted that an increase in property values can erode the supply of affordable housing; consequently, redevelopment efforts must be monitored to ensure that low-income residents are not displaced.

Public Policies and Actions Affecting Publicly-Assisted Housing

Though the education of residents and elected officials may alleviate the syndrome to a certain extent, it is the belief of the project team that legislative action regarding subdivision regulations, development and zoning on a state level is the key to enforcing fair housing. The construction of public and assisted housing in Trumbull County is conducted primarily through TMHA, Sunshine, Lifelines, and local faith-based organizations. Adverse zoning actions are a concern for non-profits, community housing organizations, and private developers. Examples of blatant discriminatory acts include prejudicial comments made by local elected officials, patterns of segregation in the geographical landscape, a history of refusals to permit low-income or rental housing in particular neighborhoods, and departure from usual procedural methods. The city and county promote the equalization of municipal services, review local zoning laws and land use policies for exclusionary zoning and displacement, study sites for subsidized housing by census tract, and scrutinize the structure of planning and zoning boards county-wide.

Affordability

As the foreclosure crisis continues to disrupt families and communities, affordable housing continues to be an ongoing problem. Housing that is suitable and affordable is often the main concern for low- and moderate-income households. Due to the high cost of quality housing, these already cost-burdened households are often prevented from meeting basic needs including food, clothing, transportation, and medical care. In addition, individuals and families who are homeless, or at risk of becoming so, require the provision of short-term emergency and transitional supportive housing in order to regain the skills and confidence necessary to reenter the traditional housing market. Dozens of housing and service providers participate in the Trumbull County Housing Collaborative “Blueprint to End Homelessness” Initiative, in which affordable housing was identified as a priority for low- and moderate-income persons, especially subsidized assisted living rental units for the mentally ill and income-based assisted living facilities for seniors.

Overall though, the Warren-Youngstown Metropolitan Statistical Area (MSA) has a very low cost of living compared with the rest of the country, and the cost of housing is also far below the national average. According to the National Association of Home Builders Wells Fargo Housing Market Index, the Warren-Youngstown MSA has been included in the top ten listing of the nation’s most affordable housing markets since the fourth quarter of 2003 (with the exception of second quarter 2005). Unfortunately, the

low cost of living enjoyed by area residents is related to a depressed economy, shrinking manufacturing tax base, and an increase in minimum wage paying jobs.

According to a report published by the National Low Income Housing Coalition entitled *Out of Reach, 1999: The Gap Between Housing Costs and Income of Poor People in the United States*, a minimum-wage worker in the State of Ohio would have to work at least 78 hours a week to afford a two-bedroom apartment at Fair Market Rent (FMR). In other words, this same worker would have to earn 196 percent of the federal minimum wage, or \$10.10 per hour, in order to afford a two-bedroom apartment in this state. Currently, the hourly wage necessary to afford a two-bedroom apartment at FMR is \$13.14. The estimated mean renter hourly rate was \$12.24, which means that a worker would need to work 1.1 jobs to sustain the expense of a two-bedroom apartment.

The National Low Income Housing Coalition also reports that there is not one single jurisdiction in the entire nation where a person working full-time at the prevailing minimum wage can afford to rent a one-bedroom apartment. This trend is evident in every city, village, and subdivision in Trumbull County; the majority of households earning less than median income pay more than 35 percent of their income toward household costs. For example, in the City of Warren, 64 percent of households earning less than \$10,000 per year spend over 35 percent of their income on household costs, versus zero percent of households earning more than \$75,000 annually.

According to the public housing authority and the local community housing development office, the availability of subsidized units in desirable areas throughout Trumbull County is a concern. Some of the most affordable housing units in both the City of Warren and Trumbull County are owned and operated by the Trumbull Metropolitan Housing Authority (TMHA). Founded in 1934, TMHA provides decent, safe and sanitary accommodations for low- to moderate-income families unable to secure housing needs on the open market. TMHA currently operates a total of 1,222 public housing units in 13 developments throughout Trumbull County, and serves approximately 2,300 low- and moderate-income residents. In addition, participants in Section 8 and TMHA voucher programs make up nearly 2,400 tenants in approximately 918 units. In 2010, TMHA utilized capital funds to continue a \$1.4 million renovation at Hubbard Manor. This will upgrade common areas and implement security and access control measures. . TMHA has outlined a variety of activities in their annual and five-year plans that affirmatively further fair housing within the affordable housing market. They are also committed to counseling Section 8 tenants on the location of units located outside of areas with concentrated poverty conditions or minority households. TMHA markets the Section 8 voucher program to property owners located outside of areas with concentrated poverty conditions and high percentages of minority households.

The Family Self-Sufficiency program continues to be a catalyst for the financial autonomy of residents. A combined total of 56 public housing and Housing Choice Voucher families currently participate in asset accumulation activities and are linked to service's which help them overcome any obstacles to self-sufficiency. Since its inception, 54 families have completed the program and have received the balance of their earned escrow accounts. Additionally, the Elderly Service Coordinator has provided over 500 linkages between TMHA residents and the assistance they require to maintain a self-reliant lifestyle during 2010.

TMHA has also joined with local lending institutions to advance homeownership opportunities for Housing Choice Voucher participants and public housing residents. The importance of saving money,

improving credit, proper home maintenance and other related issues are clarified to participants so that they might share in the American dream. In 2010, two families purchased homes as a result of this program.

According to the Trumbull County Housing Collaborative, some barriers do exist with respect to TMHA affordable housing units. TMHA reports a high rate of vacancy, mostly due to screening rules and regulations currently in place, which are extremely stringent so that the agency might prevent criminals from entering communities, hence reducing criminal activity in general. Many applicants for TMHA properties also are delinquent on utility payments which can prevent clients from accessing housing authority units. A separate and more complicated barrier is perception; often, people perceive TMHA properties as undesirable due to appearance, rumor or fact.

Sunshine, a private, non-profit Community Housing Development Organization (CHDO), provides decent affordable housing to low-income households. Sunshine purchases and rehabilitates vacant single-family houses and rents them to low- and moderate-income individuals. Currently, Sunshine owns and operates 85 units.

The Community Development Department and Trumbull County Planning Commission administer a number of government-subsidized programs in order to assist residents with home purchases, rehabilitation, and utility assistance. Many programs are funded by HUD but are administered locally, including the Community Development Block Grant and HOME Investment Partnership programs, American Dream Down Payment Initiative, the Self-Help Homeownership Opportunity Program, State Small Cities CDBG, Housing Counseling Assistance Program, Low-Income Rental Assistance (Section 8) Tenant-Based Program, Supportive Housing for Persons with Disabilities (Section 811) and Consolidated Submission for Community Planning and Development Programs.

Accessibility

Persons with disabilities, both physical and mental, are a high priority for City of Warren and Trumbull County housing agencies. The Trumbull County Housing Collaborative (TCHC) Continuum of Care planning committee has been working over the last eight years to address deficiencies and gaps in emergency, transitional, and permanent housing available for persons with mental disabilities, addictions, domestic violence issues or economically challenged. The TCHC assists with the preparation of and supports grant applications to HUD and ODOD for the construction of permanent supportive housing units for persons with mental disabilities. Projects implemented over the last eight years include the development of a transitional housing facility for homeless women and children and the implementation of a shelter plus care voucher program for persons in need of housing and associated supportive services. The committee is currently working towards the implementation of preventive programs for those at-risk of becoming homeless.

Most requests fielded by the Greater Youngstown-Warren Urban League, City of Warren, and Trumbull County Planning Commission from the physically disabled population concern financial assistance for the construction of handicapped-accessible ramps. In 2004, the Trumbull County Commissioners dedicated a portion of CDBG formula program funds towards the construction of a handicap-accessible ramp at the Kinsman Township Community Center.

In 2000, an additional ramp was funded through the CDBG program for the Mesopotamia Township Community Hall. During the 90s, Trumbull County funded the construction of handicapped-accessible restrooms in the City of Girard Municipal Building and elevator installation at the McDonald Village Senior Center. Over the past ten years, the City of Warren has also utilized CDBG funds to ensure that public facilities and park amenities are accessible to the handicapped population.

While the City of Warren and Trumbull County continue working towards the improvement of housing opportunities for the disabled population and improving access to public facilities, more needs to be accomplished. The disabled population increases each year, with one out of every ten county residents reporting at least one type of disability. The ever-increasing population of aged individuals in the county also augments the disabled population.

The improvement of access to public facilities and the guarantee of fair housing for the disabled population must be reviewed in order to ensure that members of the disabled population have access to all programs and services offered throughout the county. Both the City of Warren and Trumbull County are working towards achieving full compliance with Title II of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973. Access to civic life is a fundamental part of American society; the project team's goals for improving accessibility over the coming year are included in the Action Plan.

Complaints

According to the Greater Youngstown-Warren Urban League, 94 fair housing complaints were received during calendar year 2010, most of which were landlord/tenant issues. A rise in complaints taken was against landlords not providing their mailing address to the tenant. This poses a problem for the tenant to properly notify the landlord of problems in the residence and/or attempts to block the tenant from following the rent escrow process. The Greater Warren-Youngstown Urban League has collaborated with Catholic Charities and Community Legal Services to compile a brochure advising tenants of their legal rights under the rent escrow procedure and outlines the warning signs of unscrupulous landlords. There are no ongoing housing discrimination suits brought by the Department of Justice.

All fair housing complaints for the City of Warren and Trumbull County are documented and addressed by the Greater Youngstown-Warren Urban League. The Urban League, a non-profit organization, has been serving as the local fair housing consultant for over ten years. The fair housing consultant is available to receive housing, landlord, and tenant complaints Monday through Friday between the hours of 9:00 a.m. and 5:00 p.m. Each case is logged individually, and the consultant investigates, negotiates, or remediates each situation as necessary. Assistance for any individual who wishes to file a complaint is available at the Urban League.

When appropriate, referrals are made to the Ohio Civil Rights Commission or Northeast Ohio Legal Services. The Urban League reports that a main concern of their organization is the need for education amongst those persons who have legitimate discrimination complaints. Often reluctant to file complaints as they seem to fear the process, these individuals are usually unaware of the process or do not wish to relive their negative experience.

Identification of Existing Fair Housing Programs, Services and Activities

Each year, the City of Warren and Trumbull County target CDBG and HOME resources towards the support of very low-, low-, and moderate-income households as they search for adequate housing and services. Additional funding resources are also sought to allow existing agencies and organizations to continue and expand programs that minimize the number of households living below poverty. The Consortium continues to work toward ending discrimination in local housing markets through continued support of the Housing Education & Outreach and Consumer Credit Counseling programs. The Consortium coordinates local CHDOs and area social service providers to ensure that the housing needs of very low- and low-income clients who are severely cost burdened are met, through application of several programs including the Owner-Occupied Rehabilitation program, Homeownership program, and Housing Education & Outreach Program, which helps prevent housing discrimination, especially in minority households and female-headed households with children.

The Homeownership program aims to increase the rate of homeownership in the City of Warren, especially among low- and moderate-income and minority households; all while revitalizing and stabilizing older urban neighborhoods. The program assists new homebuyers with the down payment and closing costs associated with the purchase of a single-family residence, often the principal hurdle to buying a home.

Over 40 percent of residences in the City of Warren are occupied by renters, and the vast majority of those houses are occupied by low- and moderate-income residents. In order to stem the deterioration of these units and stabilize the character and quality of life in all city neighborhoods, HOME funds will be used to develop programs with non-profit agencies and faith-based organizations to rehabilitate rental properties in Target Area neighborhoods, thus raising the quality of local housing stock.

The Owner-Occupied Housing Rehabilitation program is an efficient and effective way to expand the supply of affordable housing in the City of Warren and throughout Trumbull County. Designed to assist eligible low- and moderate-income households in upgrading and improving the condition of their properties, the program enhances older Target Area neighborhoods.

Assessment of Public and Private Fair Housing Activities

The Greater Warren-Youngstown Urban League and project team are currently developing a fair housing information program for those municipal officials and employees who have duties related to fair housing, zoning, planning, assisted housing, community and economic development.

The Urban League also coordinates with Trumbull County Commissioners, the Cities of Warren, Niles, and Girard, and the Trumbull County Planning Commission in order to develop and implement a standard fair housing program to meet requirements of the CDBG program, and to assure that Title VIII of the Civil Rights Act of 1968 (as amended), the Section 504 Rehabilitation Act of 1973, and Chapter 4112 of the Ohio Revised Code are followed. Monthly reports of activities are attached for review. A strategy for fair housing was developed and implemented to provide educational outreach and publications to all county residents. The Urban League has been administering the Trumbull County fair housing program for over ten years. Requirements, programs, activities and reports have been executed in a

timely manner; contacts with local and state fair housing operatives have been established. In addition, Urban League staff members have attended numerous fair housing conferences, seminars and workshops over the years.

Sale or Rental of Housing

According to the Urban League, African-American residents and prospective buyers found it difficult to secure home mortgages to either stay or buy in some neighborhoods. White residents do not report the same difficulty in securing funding. Often, minority individuals report unspoken racial boundaries in neighborhoods where they are not welcomed; still, these individuals often do not force the issue when seeking to purchase a home or secure a rental property. Though less blatant than they have been in the past, discriminatory practices are still evident in certain neighborhoods. Many families experience discrimination; not simply minorities. Landlords also discourage families with children from renting apartments on their property. One client in particular reported that a landlord informed her during a conversation that children were not allowed in his building. After speaking with an Urban League representative, this client was encouraged to file a complaint but refused; her immediate concern was to find safe, decent and affordable housing for her children.

Landlords, real estate agents, and home sellers are less likely to be familiar with laws regarding discrimination against minorities, disabled persons, and familial status. As a result, problems result from a lack of awareness, both of the laws and of the protection available, as well as the reluctance to file a complaint. In spite of a constant effort to encourage individuals to report and file claims of discrimination, little response is ever received. All jurisdictions in Trumbull County, and especially the City of Warren, would benefit from providing landlords and tenants with new fair housing information. The current literature is lengthy and the wording is difficult for many clients to understand.

The Urban League, City of Warren, and Trumbull County can ensure that all real estate brokers are provided with information on important fair housing laws and practices. A workshop will be conducted for brokers and appraisers in the county, in order to reach as many individuals as possible. Periodic surveys and interviews need to be conducted to determine whether or not illegal real estate practices such as steering or blockbusting exist. A sample of recorded deeds need annually review to determine if deed restrictions, trust or lease provisions are present that conflict with current fair housing laws. Surveillance of and contact with rental owners will ensure that fair housing laws are regularly discussed and that discriminatory conversions or unlawful occupancy quotas are not common practice. Contact with and surveillance of the local real estate broker's association and practices also allows for constant communication regarding fair housing regulations and serves as deterrence to local real estate firms who may promote the exclusion of minority brokers from participation in multiple listing services or restrict their access to the privileges, services or facilities enjoyed by a real estate broker's association. The assignment of brokers and areas by racial or ethnic composition may also be monitored by periodically reviewing recorded sales for the staff of the real estate brokerage firm.

HMDA Reports and CRA Provision of Financing Assistance for Dwellings

The Home Mortgage Disclosure Act (HMDA) was passed in 1975 and expanded in 1989; this legislation requires lenders to disclose information regarding home mortgage lending activity. The attached HMDA Lender Comparison Chart reveals that of seven major financial institutions located in Trumbull County, each is fairly consistent in reasons for denying loans to individuals.

The analysis shows that minority groups, including Hispanics, are more likely to be turned down for loan products than White, Non-Hispanic individuals on the basis of debt-to-income ratio and credit history. In 2005, Alan Greenspan, former Federal Reserve Board Chairman, wrote that “due to the changes in market structure coupled with such concerns suggested to us the need to revise our HMDA data collection in order to gather information on rates charged to aid us in seeing if, in fact, differences in rates are truly driven by differences in risks and costs and not tainted by discrimination.” Further screening should reveal whether discriminatory practices exist at these financial institutions.

Over the past 15 years, there has been an alarming increase in housing foreclosures throughout Trumbull County. One reason for this trend is predatory lending; sub-prime lenders are lowering standards for lending while increasing interest rates, thus augmenting their market share in the mortgage industry. The high failure rates of these loans have the most devastating impact on low- and moderate-income neighborhoods where the issues of blight and disinvestment already exist. The predatory lending characteristics of sub-prime lenders need to be examined in order to determine whether remedial action is necessary. This would include reviewing suspiciously high appraisals, balloon payment mortgages, high pre-payment penalties and excessive fees. CRA Report outlines the performance of financial institutions in terms of lending, investment and service. National City Bank is the highest ranked institution; those that did not perform well were Farmer’s National Bank, Chase Bank, and Home Savings and Loan Company.

Compliance Reviews

Enforcement sources will be identified and brought together in order to gather expert information for the continued update of the Trumbull County AI. Enforcement sources include but are not limited to: the U.S. Department of Housing and Urban Development, the U.S. Department of Justice Civil Rights Division, the Office of Fair Housing and Equal Opportunity, and the Ohio Department of Development.

- The Greater Youngstown-Warren Urban League’s Housing Director would like to implement a full-fledged testing program over the next five years, including employment of full-time program director and two to three part-time employees. In the upcoming year, the project team will identify funding sources for this initiative.
- The fair housing project team will also collect Home Mortgage Disclosure Act (HMDA) data from each banking institution reviewed for this study and compare performance results over the ensuing year.

Community Reinvestment Act (CRA)

The Community Reinvestment Act (CRA) was designed to encourage financial institutions to meet the credit needs of communities in which they operate, including low- and moderate-income neighborhoods. CRA also requires that each insured financial institution evaluate its record of service to the community on a regular basis.

- The project team will ensure that CRA standards for assessing community development activities in distressed or underserved areas and those areas impacted by natural disasters are monitored for performance and effectiveness. Many financial institutions may attempt to divert bank financing to infrastructure and middle or upper income housing that might only indirectly serve low- and moderate-income people. The agencies must implement CRA in a manner consistent with the objective of expanding access to credit for low- and moderate-income families and communities.
- The fair housing project team supports the proposal that financial institutions undergo a fair lending exam to test for compliance with anti-predatory lending and anti-discrimination laws when a bank or one of its affiliates has a high concentration of sub-prime loans to minorities, seniors, women, low-income borrowers, or communities recovering from natural disasters or experiencing credit shortages.

Fair Housing Enforcement

The planning team believes that education regarding fair housing rights and responsibilities is a necessary step to reduce discrimination in local housing markets. In order to enhance outreach activities and effectively address the challenges facing fair housing, we will develop several tools that will augment fair housing enforcement throughout Trumbull County.

- Monitoring/Enforcement: create fair housing advisory committee to review fair housing and lending complaint process annually.
- Coordinated Strategy to Prevent Impediments: currently, no system provides a coordinated strategy; the team will collaborate with Trumbull County Housing Collaborative to develop a system for data collection (HMIS).
- HMDA Analysis Lending Activity: review local lending activities. Analyze credit as barrier to low-income and minority loan applications develop credit counseling programs.
- Action Plan Support: develop a financial plan to carry out proposed action plan.

Action Plan to Address Impediments to Fair Housing Choice

Impediment

Public lacks awareness about Fair Housing Laws and violations. Greater Warren-Youngstown Urban League reported residents are unaware of how to report fair housing violations and many who are aware are reluctant to report discrimination for fear of eviction.

Actions to Eliminate Impediment

- The City of Warren and the Greater Youngstown-Warren Urban League will improve public's awareness of fair housing laws by outreach and education for all residents with emphasis placed on minorities and individuals with Limited English Proficiency.
- The City of Warren will include fair housing material and contact information to report violations on the city's web site

Impediment

Not in My Back Yard (NIMBY) represents a syndrome in which residents oppose development as inappropriate for their neighborhood, but do not necessarily express the same opposition toward such development elsewhere. The NIMBY attitude may arise when government-funded or subsidized residential projects are developed in a community; it will likely never be completely eradicated. Still, steps can be taken in order to provide a more comprehensive view of these facilities, educating those persons who oppose their development.

Actions to Eliminate Impediment

- In the upcoming year, the City of Warren and Trumbull County will work collaboratively with developers, local CHDOs and TMHA in order to gather information regarding proposed developments so that an effort will be made to plan ahead for any expected opposition. Members of the project team will familiarize themselves with zoning processes throughout the county. A review of the adjacent neighborhood and the community as a whole will be made prior to moving forward with any construction or rehabilitation plans. Local allies will be identified and consulted along with legal counsel.

Impediment

Overall, Warren has a fairly good supply of affordable housing, especially for households earning between 50 and 80 percent of the area median income. However, African-American residents and prospective buyers find it difficult to secure home mortgages.

Some neighborhoods are declining due to the high amount of vacant homes.

Actions to Eliminate Impediment

- The City will continue to offer down payment assistance to new homebuyers

- The City will continue to owner occupied rehabilitation program to help stabilize housing stock and will provide funding as necessary for demolition of deteriorated homes and code enforcement

Impediment

Some barriers do exist with respect to Trumbull Metropolitan Housing Authority (TMHA) affordable units. TMHA reports a high rate of vacancy, mostly due to screening rules and regulations, which are extremely stringent so that the agency might prevent criminals from entering the community

Many applicants are delinquent on utility payments which can prevent clients from accessing housing authority units.

TMHA properties are often perceived as undesirable due to appearance, rumor or fact.

Actions to Eliminate Impediment

- Continue to provide Family Self-Sufficiency Program in order to help families overcome any obstacles of self-sufficiency.
- The City will continue to offer incentive for housing developers/sponsors that assist in revitalization of public housing.

Impediment

Lack of emergency, transitional and permanent housing available for persons with mental disabilities, addiction, and domestic violence issues or economically challenged.

Actions to Eliminate Impediment

- Develop transitional housing facility for homeless women and children and implement a shelter plus care voucher program for persons in need of housing and associated supportive services.

Impediment

The City lacks or has limited accessibility to public facilities and housing by disabled persons.

- Continue to provide funding for handicap updates to public facilities and for renovations of housing units to meet ADA compliant.
- Identifying impediments to fair housing accessibility in Trumbull County, including a complete study of public and municipal facilities, including city and town halls, police/fire stations, sheriff's departments, courthouses, centers for health care delivery, childcare centers, community centers, recreational facilities, animal shelters and libraries. Information will be disseminated at each location regarding accessible parking, accessible routes into/through the facilities, accessible rest rooms, drinking fountains, and telephones, accessible service counters and concession stands, the provision of services at alternate, accessible locations, accessible bathing facilities at public pools, physical modifications to polling places and/or the provision of curbside or absentee balloting,

permanent and conspicuous notice to the community of ADA rights and the government's ADA obligations, establishment of an ADA grievance procedure in those communities where none currently exist, establishment of delivery systems and timeframes for provision of auxiliary aids, including qualified sign language interpreters, alternate formats (Braille, large print, or cassette tapes) and installation of assistive listening systems in assembly areas (legislative chambers, court rooms, or municipal auditoriums).

Impediment

Aside from personal car ownership and taxi services, public transportation is minimally available.

Actions to Eliminate Impediment

- Warren and Trumbull County work continuously on mobility management. The Eastgate Regional Council of Governments also operates a Transit Development Program designed to improve the existing transit in Trumbull and Mahoning counties and plan for future improvements.
- Support Western Reserve Transit Authority's pilot project to include transportation from Youngtown to Warren.

Appendix A: Signature Page

The City of Warren has completed this Analysis of Impediments to Fair Housing as part of its overall dedication to fair housing planning, as stated in the City of Warren/Warren-Trumbull HOME Consortium five-year Consolidated Housing and Community Development Plan, adopted by the City of Warren on January 2010..

Michael J. O'Brien, Mayor

NOTICE OF PUBLIC HEARING AND COMMENT PERIOD

Friday, 11 August 2006 to Monday, 28 August 2006

Two public hearings for the updated Analysis of Impediments to Fair Housing Choice will be held TUESDAY, 22 AUGUST 2006, AT 12:00 NOON AND 5:00 PM. Any and all citizens who wish to participate in the planning process should plan to attend a meeting; identical information will be presented at both sessions. Please give the 48 hours notice if you require an interpreter for the hearing impaired or translator for non-English speaking persons. Hearings are held in a handicap accessible building with accessible restroom facilities. Citizens are encouraged to submit comments via post, telephone or in person. The Analysis of Impediments to Fair Housing Choice is on display at:

Warren Community Development Department
418 Main Avenue SW, Suite 201
Warren, Ohio 44481
Phone: 330-841-2595
Fax: 330-841-2643
TDD: 330-841-2718
<http://www.warren.org/communitydevelopment.htm>

AFTERNOON MEETING

Tuesday, 22 August 2006
12:00 noon
Community Services Building
Small Conference Room
418 Main Avenue SW
Warren, Ohio 44481

EVENING MEETING

Tuesday, 22 August 2006
6:00 pm
Community Services Building
Small Conference Room
418 Main Avenue SW
Warren, Ohio 44481