



TRUMBULL COUNTY ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Submitted to the Ohio Development Services Agency
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Abstract

This report was completed to identify and develop strategies to mitigate impediments to fair housing choice throughout Trumbull County, and contains a demographic analysis, an assessment of current impediments to fair housing choice, and an action plan with actionable steps designed to reduce the effects of historic segregation and barriers to fair housing choice.

Prepared for: The Trumbull County Board of Commissioners, the city
of Warren, and the city of Niles

Prepared by: The Center for Urban and Regional Studies, Youngstown State University, May 2019

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INTRODUCTION

FEDERAL HOUSING LAW

Title VIII of the Civil Rights Act of 1968, also known as the Fair Housing Act, prohibits discrimination based on race; color; ethnic origin; disability; religion; gender; and familial status, including families with children under the age of 18 who live with parents or legal guardians, pregnant women, and persons securing custody of children under the age of 18. This includes the sale, rental, and financing of dwellings, and other housing-related transactions.

In addition, the United States Department of Housing and Urban Development (HUD) is committed to eliminating discriminating practices and racial, ethnic, social, and other barriers to fair housing. HUD strives to promote fair housing choice through Fair Housing Planning (FHP). Provisions to affirmatively further fair housing choice are long-standing components of HUD's Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs.

HUD is the federal agency which is charged with enforcing the Fair Housing Act.

OHIO FAIR HOUSING LAW

According to the State of Ohio Attorney General's *Fair Housing Guide for Landlords*:

Fair housing is a person's right to choose, without unlawful discrimination, where to live. Ohio's fair housing laws protect people who are denied housing based on myths, stereotypes or prejudices about groups of people. Ohio's discrimination laws protect everyone. The law states that it is illegal to discriminate in the sale, rental or financing of housing, or otherwise interfere with someone's housing rights based on his or her membership in the following protected classes: race, color, religion, sex, familial status (having at least one child who is younger than 18), ancestry, disability, national origin, and military status.

All housing providers, including owners, property managers, sales managers and condominium associations, are covered under Ohio's fair housing laws.

In Ohio, it is unlawful on the basis of race, color, religion, sex, national origin, ancestry, military status, disability, or familial status to:

- Refuse to rent, sell, finance, or insure housing accommodations or residential property;
- Represent to any person that housing accommodations are not available for inspection, sale, rental, or lease;
- Refuse to lend money for the purchase, construction, repair, rehabilitation, or maintenance of housing accommodations or rental property;
- Discriminate against any person in the purchase, renewal, terms and conditions of fire, extended coverage, of homeowner's or renter's insurance;
- Refuse to consider without prejudice the combined income of both spouses;

- Print, publish, or circulate any statement or advertisement which would indicate a preference or limitation;
- Deny any person membership in any multiple listing services or real estate broker's organization.

No one may take any of the following actions based on race, color, religion, sex, national origin, ancestry, military status, disability, or familial status:

- Refuse to make a mortgage loan;
- Fail to provide information regarding loans;
- Deny or make different terms for home loans, such as different interest rates, points, or fees;
- Refuse to purchase the loan or set different terms or conditions for purchasing a loan.
- In addition, it is illegal to:
- Coerce, intimidate, threaten, or interfere with anyone exercising their rights granted under the Fair Housing Act or assisting others who are exercising that right;
- Make, print, publish, or post statements or advertisements that a house or an apartment is available only to persons of a certain race, color, religion, sex, familial status, or disability.

Ohio is a substantially equivalent state, in which HUD has delegated ability to enforce fair housing laws. In Ohio, the Ohio Civil Rights Commission (OCRC) enforces state laws against discrimination. The Commission receives and investigates discrimination charges on the basis of protected class, and the Ohio Prosecutor's Office is the civil prosecutor for OCRC.

The Ohio Development Services Agency, Office of Community Development requires all communities who receive Federal financial assistance to administer their programs and activities related to housing and community development in a manner affirmatively to further the purposes of the Fair Housing Act, and consistent with other applicable provisions ensuring equal opportunity and freedom from discrimination.

Beginning in 1993, the State of Ohio required all CDBG and HOME grantees to conduct a fair housing program with standard features. A comprehensive Analysis of Impediments (AI) must be completed every five (5) years to reflect the current fair housing situation in the jurisdiction. Grantees must update the AI annually to reflect current market conditions or other factors related to fair housing choice. An AI is a review of impediments or barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting fair housing choice. The Trumbull County Planning Commission completed the last comprehensive update in 2015. The following 2019 comprehensive update covers all of Trumbull County's communities.

WHO CONDUCTED THE ANALYSIS OF IMPEDIMENTS

The 2019 Analysis of Impediments to Fair Housing Choice was conducted by the Youngstown State University Center for Urban and Regional Studies (CURS), with assistance from the Trumbull County Board of Commissioners office, city of Warren Community Development, city of Niles Housing and Zoning Department, and Trumbull Metropolitan Housing Authority.

CURS provided GIS mapping and data services to the project, assisted in the planning and facilitation of community meetings with key stakeholders, and updated the Analysis of Impediments (AI) to Fair Housing Plan for Trumbull County. CURS coordinated with the Trumbull County Grants Manager to facilitate stakeholder meetings, and will collect and analyze data and input obtained from key stakeholders.

METHODOLOGY

This comprehensive analysis of impediments to fair housing choice in Trumbull County, Ohio was developed using guidance from the *Fair Housing Planning Guide, Volume 1*, written by HUD, and *How to Analyze Impediments to Fair Housing and Develop a Plan October 2018*, written by the Ohio Development Services Agency Community Services Division Office of Community Development.

The following steps were taken to complete the report:

- CURS will be responsible for all GIS mapping and data analysis
 - Demographic, social, economic, and housing characteristics of the population (2017 US Census Bureau American Community Survey Estimates)
 - Population by race and ethnicity, sex, national origin, age, disability status, and family status
 - Income characteristics, including household income and poverty status
 - Employment and job status, including locations of job centers and the availability of public transportation to link job centers with lower income housing locations
 - Preparation of maps showing demographic, social, economic, and housing conditions in Trumbull County
 - US Census Bureau American Community Survey Estimates (2017)
 - Home Mortgage Disclosure Act (HMDA) data, 2012-2016
- CURS will coordinate with Trumbull County to engage key stakeholders
 - Office of the Trumbull County Grants Manager will coordinate, schedule, advertise, and send invitations for three stakeholder meetings
 - CURS will coordinate with Trumbull County Grants Manager to facilitate stakeholder meetings
 - CURS will collect and analyze all data and input collected at stakeholder meetings, to include in the final AI report
- Development of the final AI report
 - CURS will coordinate with the Grants Manager to develop the final AI report
 - CURS will review the Ohio Development Services Agency's guide to How to Analyze Impediments to Fair Housing and Develop a Plan to ensure compliance, and that all maps and data are current and included in the report
 - CURS will attend Analysis of Impediments to Fair Housing Choice Training, provided by the Miami Valley Fair Housing Center, in Dayton, Ohio

FUNDING

This Analysis of Impediments to Fair Housing was funded through Trumbull County's Community Development Block Grant Administration Budget and local contributions from the City of Niles and the City of Warren.

COMMUNITY PARTICIPATION PROCESS

Stakeholder input was a key component to the development of the Analysis of Impediment to Fair Housing Choice. To that end, a number of residents, city and county officials, elected officials, and other key stakeholders were engaged during the process. The public outreach process consisted of the following activities:

- Public meeting on January 10, 2019 at the city of Niles Wellness Center
- Public meeting on January 16, 2019 at the city of Warren Council Chambers
- Face-to-face interviews with key stakeholders in Trumbull County and the cities of Warren and Niles
- Conducting web-based interviews and questionnaires with key stakeholders in Trumbull County and the cities of Warren and Niles
- Public meeting on May 1, 2019 at the Raymond John Wean Foundation offices in the city of Warren

The following organizations were consulted through public meetings or stakeholder interviews throughout the process of developing an Analysis of Impediments to Fair Housing Choice in Trumbull County:

Government Offices

- City of Warren Community Development
- City of Niles Housing and Zoning Department
- Trumbull County Board of Commissioners
- Liberty Township
- Trumbull County Planning Commission

Affordable Housing Providers

- Emmanuel Community Care Center
- Trumbull Metropolitan Housing Authority
- YWCA Mahoning Valley

Fair Housing and Minority Advocacy

- Grace AME Church
- Greater Warren-Youngstown Urban League
- Trumbull County Take Flight
- Trumbull Neighborhood Partnership

Mental Health and Addiction Advocacy

- God's Refuge House
- Trumbull County Mental Health and Recovery Board

Homeless Assistance and Advocacy Providers

- Trumbull County Housing Collaborative

Realtors/Realtor Organizations

- Warren Area Board of Realtors

See Appendix A for a summary of comments from the January 10, January 16, and May 1 public meetings.

See Appendix B for the fair housing training schedule for 2018-2019.

CURRENT FAIR HOUSING LEGAL STATUS AND ASSESSMENT OF PAST GOALS

EVALUATION OF TRUMBULL COUNTY'S CURRENT FAIR HOUSING LEGAL STATUS

Trumbull County, as well as the cities of Warren and Niles, receive CDBG and HOME program funds through the Department of Housing and Urban Development (HUD). Warren, as a central city in the Youngstown-Warren-Boardman Metropolitan Statistical Area, is an entitlement city and receives its funding directly from HUD's Columbus office. Trumbull County and the city of Niles receive their funding through the Ohio Development Services Agency.

There are seven class of people who are protected under Title VIII of the Civil Rights Act of 1968, which is also known as the Fair Housing Act. The protected classes include the following:

- Color
- Race
- Religion
- Sex
- Familial Status (families with children)
- Disability
- National Origin

In addition, Ohio law includes two additional protected classes:

- Ancestry
- Military Status

The Fair Housing Act prohibits discrimination in housing-related activities, and requires grantees to "affirmatively further" fair housing (AFFH) in all housing-related activities. These requirements extend to all federal executive departments and agencies, as well as state and local recipients of federal funds. Since Trumbull County and its municipalities receive federal financial assistance to administer housing programs, and activities related to housing and community development, including CDBG and HOME funds, it is required to "affirmatively further" the purposes of the Fair Housing Act. The spirit of AFFH is to reduce and eliminate housing discrimination and segregation, and increase the supply of open and affordable housing.

FAIR HOUSING AND HOUSING-RELATED COMPLAINTS AND CONCERNS

All housing-related complaints in Trumbull County and the city of Warren are administered by Community Legal Aid. Community Legal Aid is a nonprofit law firm that serves low-income persons and families throughout northeast Ohio. Community Legal Aid maintains an office in the city of Warren. The city of Niles administers housing-related complaints through its Housing and Zoning Department.

The following is a summary of fair housing and housing-related complaints received in Trumbull County and the cities of Warren and Niles:

- Trumbull County received 20 housing-related complaints between September 2018 and January 2019. All but one complaint involved protected classes, and most complaints involved either eviction due to non-payment of rent, disputes over the refunding of security deposits, or code violations. Community Legal Aid provided attorneys and legal advice and assistance to the affected tenants. Although most of the complaints involved protect classes, it is unclear from the documentation if any disputes originated on the basis of the seven protected classes in the state of Ohio. None, according to available records, were referred to the Ohio Civil Rights Commission, although all were addressed by Community Legal Aid.
- The city of Warren received 98 housing-related complaints between January 2018 and February 2019. Most of the complaints involved protected classes, and the vast majority of complaints were focused on eviction, security deposit disputes, and code violations. Community Legal Aid provided attorneys and legal advice and assistance to the affected tenants. Although most of the complaints involved protect classes, it is unclear from the documentation if any disputes originated on the basis of the seven protected classes in the state of Ohio. None, according to available records, were referred to the Ohio Civil Rights Commission, although all were addressed by Community Legal Aid.
- The city of Niles received four housing-related complaints in 2018-19. Only one complaint was considered to be a fair housing issue and was a product of Not-In-My-Backyard (NIMBY) syndrome. The complaint was related to a family with children under the age of 18. The property owner was advised that the home was a rental and would have to be registered and inspected, and free of code violations before any tenants were permitted to move into the home. The tenant was not denied housing based on familial status. No cases, according to available records, were referred to the Ohio Civil Rights Commission, although all were addressed by the city of Niles.

ASSESSMENT OF PAST GOALS AND PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES

An Analysis of Impediments to Fair Housing Choice was completed by the Trumbull County Planning Commission in 2015. During this analysis, four clear impediments to fair housing choice were identified. Those impediments are as follows:

- Lack of affordable and accessible housing options in Trumbull County
- Landlord/tenant disputes
- Not In My Backyard (NIMBY) Syndrome
- Historic segregation

Trumbull County regularly updates a Limited English Proficiency Plan, which it posts on the county's website. This plan contains contact information for translation services, if needed. Trumbull County also distributes Department of Housing and Urban Development-generated "I Speak" cards to every public meeting, and also has them on file at the county office to distribute to any non-English speaking person, or if a person with a physical disability is not able to interpret the meeting subject matter or content. Trumbull County also travels to the homes of non-English speaking or disabled individuals to

assist them with applications for funding, if the individual is not able to travel to the county office in downtown Warren.

Trumbull County provides education and outreach, and equity training, and distributes fair housing flyers at community events such as the Trumbull County Fair. Trumbull County also distributes fair housing flyers at every meeting attended by County representatives.

The Warren Area Board of Realtors has affirmed its commitment to fair housing laws and regularly offers free fair housing and civil rights continuing education training.

Trumbull County and the city of Warren administer and answer each fair housing complaint, and then refer each complainant to Community Legal Aid for any legal advice and assistance needed.

The city of Niles maintains an online complaint form which can be used to submit complaints about properties throughout the city, but also any fair-housing issues. The city administers the complaint form and works quickly to proactively address issues and prevent further problems.

Table 1 shows a summary of Warren Community Development's completed projects between 2015 and 2018.

Table 1: Warren Community Development Summary of Completed Projects, 2015-2018

	Black/African-American		Native Hawaiian/Other Pacific Islander		Other Multi-Racial		White		White, Black/African-American		Total	
Type by Year	Cost	Persons	Cost	Persons	Cost	Persons	Cost	Persons	Cost	Persons	Cost	Persons
<u>2015</u>	\$14,395.17	4					\$393,538.76	48			\$407,933.93	52
CITY Down Payment Assistance	\$5,533.56	2					\$22,353.23	12			\$27,886.79	14
CITY Housing Rehab							\$78,613.50	9			\$78,613.50	9
COUNTY Down Payment Assistance							\$15,446.95	6			\$15,446.95	6
COUNTY Housing Rehab							\$247,297.80	16			\$247,297.80	16
Emergency Rehab	\$8,861.61	2					\$29,827.28	5			\$38,688.89	7
<u>2016</u>	\$338,628.47	31	\$5,156.84	3			\$227,057.67	29			\$570,842.98	63
CITY Down Payment Assistance	\$57,698.96	14					\$16,486.26	5			\$74,185.22	19
CITY Housing Rehab	\$208,575.71	8									\$208,575.71	8
COUNTY Down Payment Assistance			\$5,156.84	3			\$10,156.84	5			\$15,313.68	8
COUNTY Housing Rehab	\$51,401.76	6					\$168,786.75	14			\$220,188.51	20

	Black/African-American		Native Hawaiian/Other Pacific Islander		Other Multi-Racial		White		White, Black/African-American		Total	
Emergency Rehab	\$20,952.04	3					\$31,627.82	5			\$52,579.86	8
2017	\$65,251.90	8			\$46,454.87	1	\$164,604.86	20	\$354,197.40	3	\$630,509.03	32
CITY Down Payment Assistance	\$5,849.16	3					\$17,797.40	8			\$23,646.56	11
CITY Housing Rehab	\$33,624.53	1									\$33,624.53	1
COUNTY Down Payment Assistance							\$5,481.27	3			\$5,481.27	3
COUNTY Housing Rehab					\$46,454.87	1	\$141,326.19	9			\$187,781.06	10
Emergency Rehab	\$25,778.21	4									\$25,778.21	4
Multi-Family Projects									\$354,197.40	3	\$354,197.40	3
2018	\$135,416.54	17					\$373,775.16	26			\$509,191.70	43
CHDO Reserve (CR) - Rehab							\$120,418.21	2			\$120,418.21	2
CITY Down Payment Assistance	\$11,608.79	10					\$33,290.03	10			\$44,898.82	20
CITY Housing Rehab	\$116,637.58	5					\$125,317.82	7			\$241,955.40	12
COUNTY Housing Rehab							\$64,369.10	2			\$64,369.10	2
Emergency Rehab	\$7,170.17	2					\$30,380.00	5			\$37,550.17	7
Grand Total	\$553,692.08	60	\$5,156.84	3	\$46,454.87	1	\$1,158,976.45	123	\$354,197.40	3	\$2,118,477.64	190

An online survey was designed and distributed to agencies that provide housing or advocate fair housing choice throughout Trumbull County, in April and May 2019. Responses were received from four agencies:

- The Salvation Army (Warren, Ohio)
- Warren City Schools
- Someplace Safe
- Trumbull County Housing Collaborative/Trumbull Metropolitan Housing Authority

Collectively, the aforementioned agencies provide housing, social services, shelter for domestic violence victims, and education to residents of Trumbull County and the cities of Warren and Niles. Services provided include mass feeding, food pantry and showers, referrals to available services, educational services, shelter, assistance and advocacy for victims of domestic violence, legal advice and case management, and affordable housing.

The agencies that responded to the survey reported an increase in mental illness among clients, and also a slight increase in clients who speak English as a second language. The agencies also reported that clients have difficulties navigating the fair housing process, particularly when homeless, and also report that criminal history, evictions, poor credit scores, and outstanding rent and utility balances are impediments to fair housing choice for their clients. Income discrimination is also an issue, as many landlords throughout Trumbull County refuse to rent to tenants based upon the type of income they receive. Income discrimination seems to be a particular issue regarding Section 8 or Housing Choice vouchers.

None of the agencies that responded administer fair housing programs, although they do refer clients to Catholic Charities or Rapid Rehousing, or to the Trumbull County Commissioners Office or Community Legal Aid if there is a legal issue related to fair housing. The agencies do actively market housing opportunities and assist such groups as homeless individuals and families.

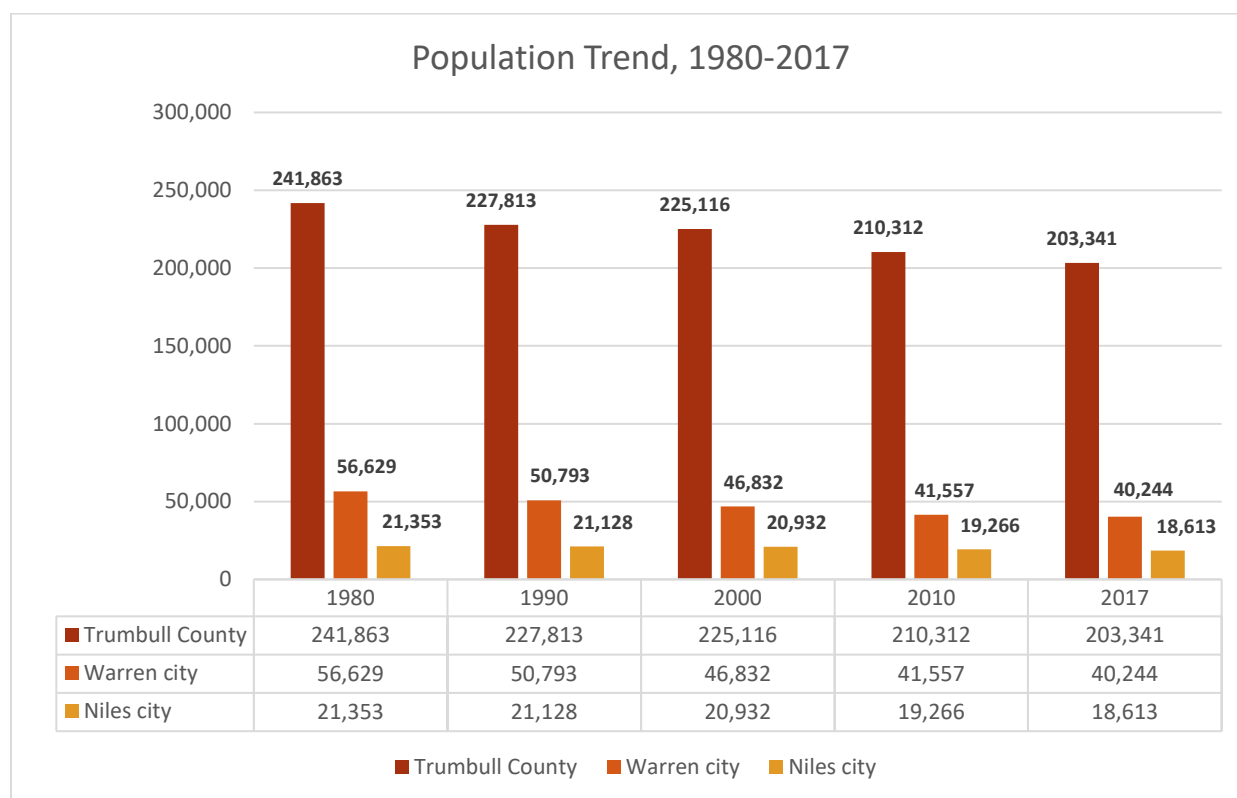
DEMOGRAPHIC ANALYSIS

TOTAL POPULATION

Trumbull County is located in northeast Ohio, along the Ohio-Pennsylvania boundary, between Cleveland and Pittsburgh. The county was incorporated on July 10, 1800, and was the seventh county established in the Northwest Territory. The county consists of seven cities, including Cortland, Girard, Hubbard, Newton Falls, Niles, Warren, and Youngstown; five villages, including Lordstown, McDonald, Orangeville, West Farmington, and Yankee Lake; and 24 townships.

The total population of Trumbull County was 203,341, according to 2017 American Community Survey (Census) estimates, a decrease of approximately 3.3% from the 2010 Decennial Census count of 210,312. The cities of Warren and Niles also lost population between 2010 and 2017, at 3.2% and 3.4%, respectively. Between 1980 and 2017, Trumbull County lost 15.9% of its total population, while the cities of Warren and Niles lost 28.9% and 12.8%, respectively. In recent years, the downward population trend can mostly be explained by a negative natural increase (more deaths than births), at a rate at which is greater than the net immigration to the county. Figure 1 shows the population trend in Trumbull County between 1980 and 2017.

Figure 1: Population Trend, 1980-2017



Of the 203,341 persons living in Trumbull County in 2017, 51.2% were female, while 48.8% were male. This rate was consistent among the cities of Warren and Niles, and the Trumbull County portion of the

urbanized area. A total of 104,130 females lived in Trumbull County in 2017, while 20,618 lived in the city of Warren and 9,886 lived in the city of Niles.

Table 1 shows the population breakdown by gender in Trumbull County in 2017.

Table 2: Population and Gender Breakdown

Geography	Trumbull County	Niles	Warren	UZA Trumbull
Total population	203,341	18,613	40,244	147,753
Male population	99,211	8,727	19,626	71,103
Female population	104,130	9,886	20,618	76,650
Male population percent	48.8%	46.9%	48.8%	48.1%
Female population percent	51.2%	53.1%	51.2%	51.9%

According to 2017 Census estimates, there were only 99 active members of the armed forces in the labor force in Trumbull County, and none reported in the cities of Warren and Niles. The Census Bureau defines active military personnel as on active duty with the United States Army, Air Force, Navy, Marine Corps, or Coast Guard. Because the Census Bureau counts residents at their usual place of residence, those members of a household stationed elsewhere either stateside or overseas are not to be included on the census form. Therefore, we have not included a map of active military members by census tract throughout Trumbull County, although they are a protected class in the state of Ohio and should be regarded as such.

RACE AND ETHNICITY, ORIGIN, AND ANCESTRY

Trumbull County, and the city of Warren in particular, are highly segregated along racial and ethnic lines. The population of Trumbull County was overwhelmingly White, with 87.4% of the population White alone and not Hispanic, according to 2017 Census estimates. However, 91% of the minority population lived in the county's urban cores (Trumbull County portion of the Youngstown OH-PA 2010 Urbanized Area). The remainder of the county was 96% White, with few areas of significant minority population. The population of Warren was mostly White, at 66.2%, while 27.1% of the population was Black or African-American. The city of Niles was predominantly White, at 90.3%, while only 5.7% of the population was Black or African-American. American Indians and Alaskan Natives, Asians, Native Hawaiians and Other Pacific Islanders, and those identifying with two or more races constituted only 2.8% of the population across Trumbull County. The Hispanic or Latino population made up only 1.7% of the total population, and this included Hispanics or Latinos of any race.

Table 2 shows the breakdown of population by race and ethnicity in Trumbull County.

Table 3: Race and Hispanic or Latino by Race, 2017

	Trumbull County		Niles		Warren		Youngstown OH-PA UZA (Trumbull County part)	
Total Population	203,341		18,613		40,244		147,753	
Not Hispanic or Latino:	199,911	98.3%	18,314	98.4%	39,165	97.3%	144,867	98.0%
White alone	177,674	87.4%	16,814	90.3%	26,628	66.2%	124,214	84.1%
Black or African American alone	16,600	8.2%	1,067	5.7%	10,892	27.1%	15,974	10.8%
American Indian and Alaska Native alone	315	0.2%	0	0.0%	28	0.1%	315	0.2%
Asian alone	997	0.5%	25	0.1%	151	0.4%	807	0.5%
Native Hawaiian and Other Pacific Islander alone	10	0.0%	0	0.0%	0	0.0%	0	0.0%
Some other race alone	199	0.1%	0	0.0%	97	0.2%	150	0.1%
Two or more races:	4,116	2.0%	408	2.2%	1,369	3.4%	3,407	2.3%
Two races including Some other race	118	0.1%	87	0.5%	10	0.0%	111	0.1%
Two races excluding Some other race, and three or more races	3,998	2.0%	321	1.7%	1,359	3.4%	3,296	2.2%
Hispanic or Latino:	3,430	1.7%	299	1.6%	1,079	2.7%	2,886	2.0%
White alone	2,430	1.2%	205	1.1%	552	1.4%	1,938	1.3%
Black or African American alone	385	0.2%	0	0.0%	243	0.6%	385	0.3%
American Indian and Alaska Native alone	27	0.0%	0	0.0%	27	0.1%	27	0.0%
Asian alone	4	0.0%	0	0.0%	0	0.0%	4	0.0%
Native Hawaiian and Other Pacific Islander alone	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Some other race alone	171	0.1%	36	0.2%	58	0.1%	121	0.1%
Two or more races:	413	0.2%	58	0.3%	199	0.5%	411	0.3%
Two races including Some other race	218	0.1%	27	0.1%	103	0.3%	216	0.1%
Two races excluding Some other race, and	195	0.1%	31	0.2%	96	0.2%	195	0.1%

	Trumbull County		Niles		Warren		Youngstown OH-PA UZA (Trumbull County part)	
three or more races								

Only 1.5% of the population in Trumbull County was foreign born in 2017, according to Census estimates. This rate was fairly consistent among the city of Warren and the Trumbull County portion of the urbanized area, although less than 1% of the population in Niles was foreign born in 2017. Pockets of foreign born population exist in Howland and Liberty Townships, the majority of which were born in Asia, and in the city of Girard, the majority of which were born in Europe. The remainder of the foreign born population in Trumbull County is scattered primarily throughout the southern half of the county.

In Trumbull County, 85.8% of the population reported either single or multiple ancestry in 2017, according to Census estimates. This rate was fairly consistent among the cities of Warren and Niles, and in the Trumbull County portion of the urbanized area. Among those persons reporting ancestry, the most frequently reported groups were American, German, Italian, Irish, English, Polish, and Slovak. A large number of persons also reported other groups or were unclassified or not reported.

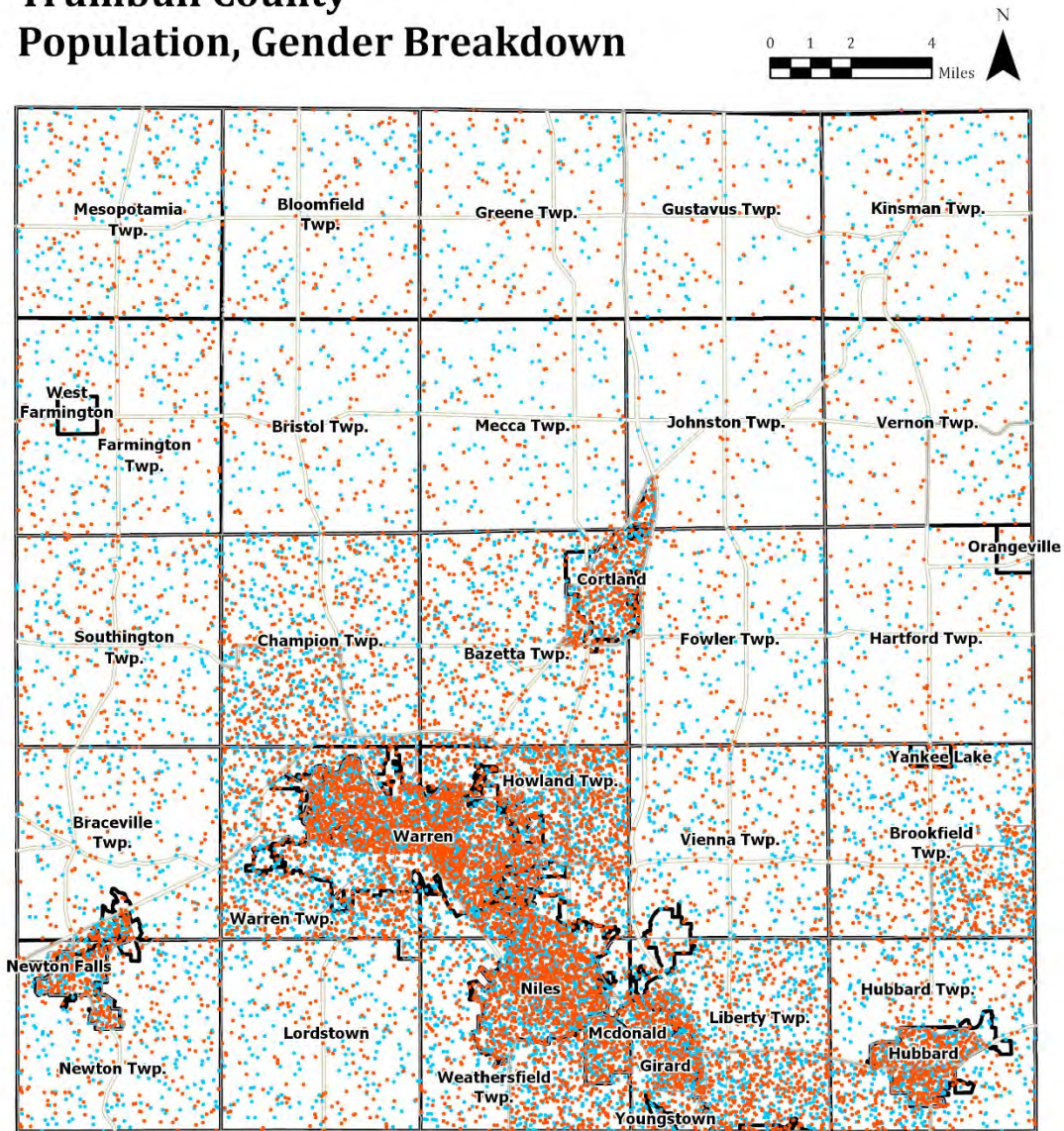
Table 3 shows the total number of foreign born persons, and those reporting ancestry in Trumbull County in 2017.

Table 4: Foreign Born and Ancestry Reported

Geography	Trumbull County	Niles	Warren	UZA Trumbull
Total population	203,341	18,613	40,244	147,753
Foreign born population	2,983	159	583	2,562
Percent, foreign born population	1.5%	0.9%	1.4%	1.7%
Ancestry reported-single	111,720	9,997	26,002	83,101
Ancestry reported-multiple	62,769	6,194	9,667	45,467
Ancestry not specified	28,852	2,422	4,575	19,185
Ancestry total, percent	85.8%	87.0%	88.6%	87.0%

The following pages contain maps showing social characteristics of the population of Trumbull County in 2017.

Trumbull County Population, Gender Breakdown

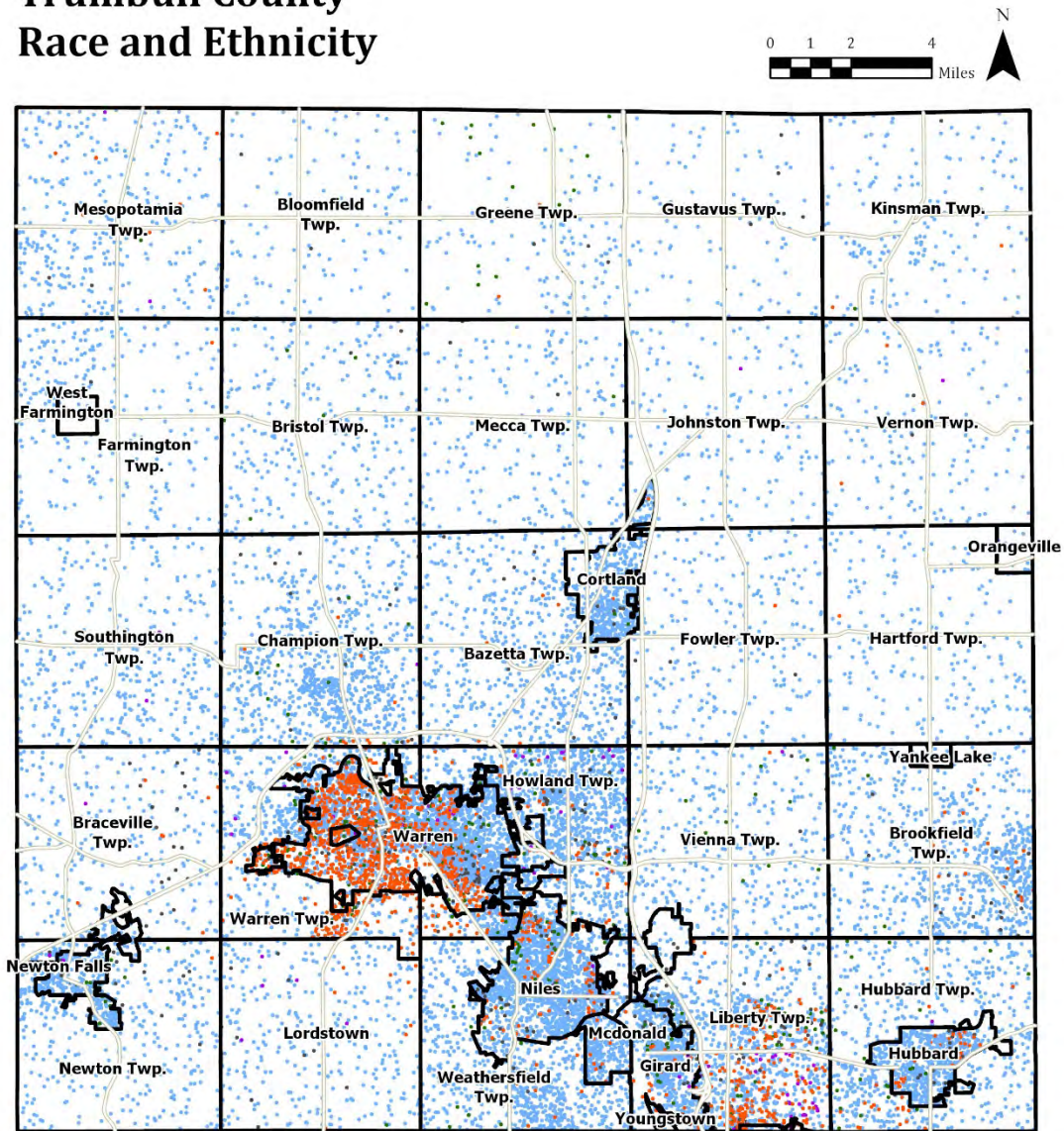


1 Dot = 10 Persons
• Female Population
• Male Population
▭ Political Subdivision
— Roads



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Youngstown State University
Source: Trumbull County
Enterprise GIS files, US
Census Bureau American
Community Survey 5-yr Est.
4/24/2019 11:17 AM

Trumbull County Race and Ethnicity



Race and Ethnicity

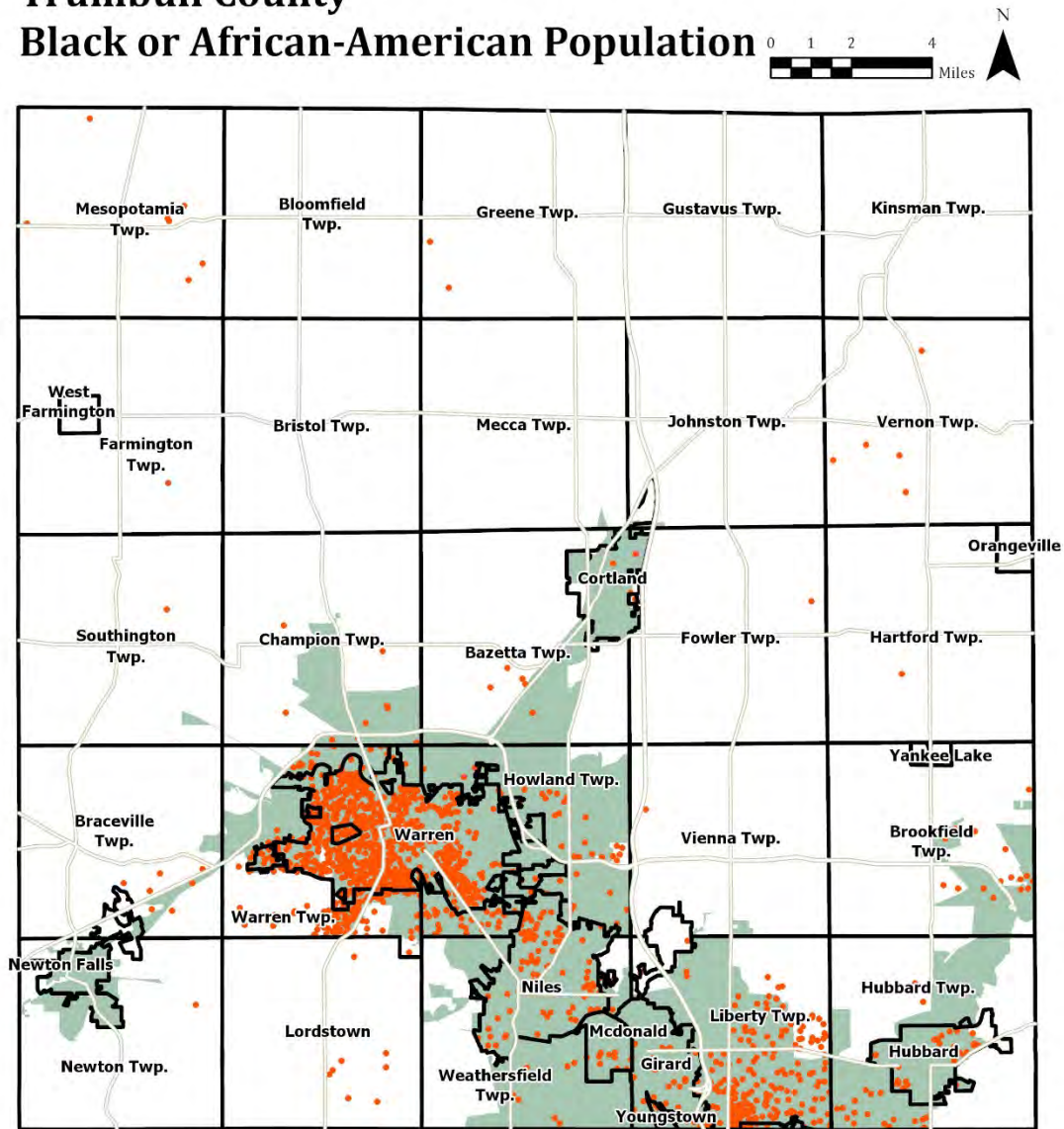
1 dot = 10 persons

- Black or African-American alone
- Hispanic or Latino
- Asian alone
- Other minority
- White alone



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Trumbull County Black or African-American Population

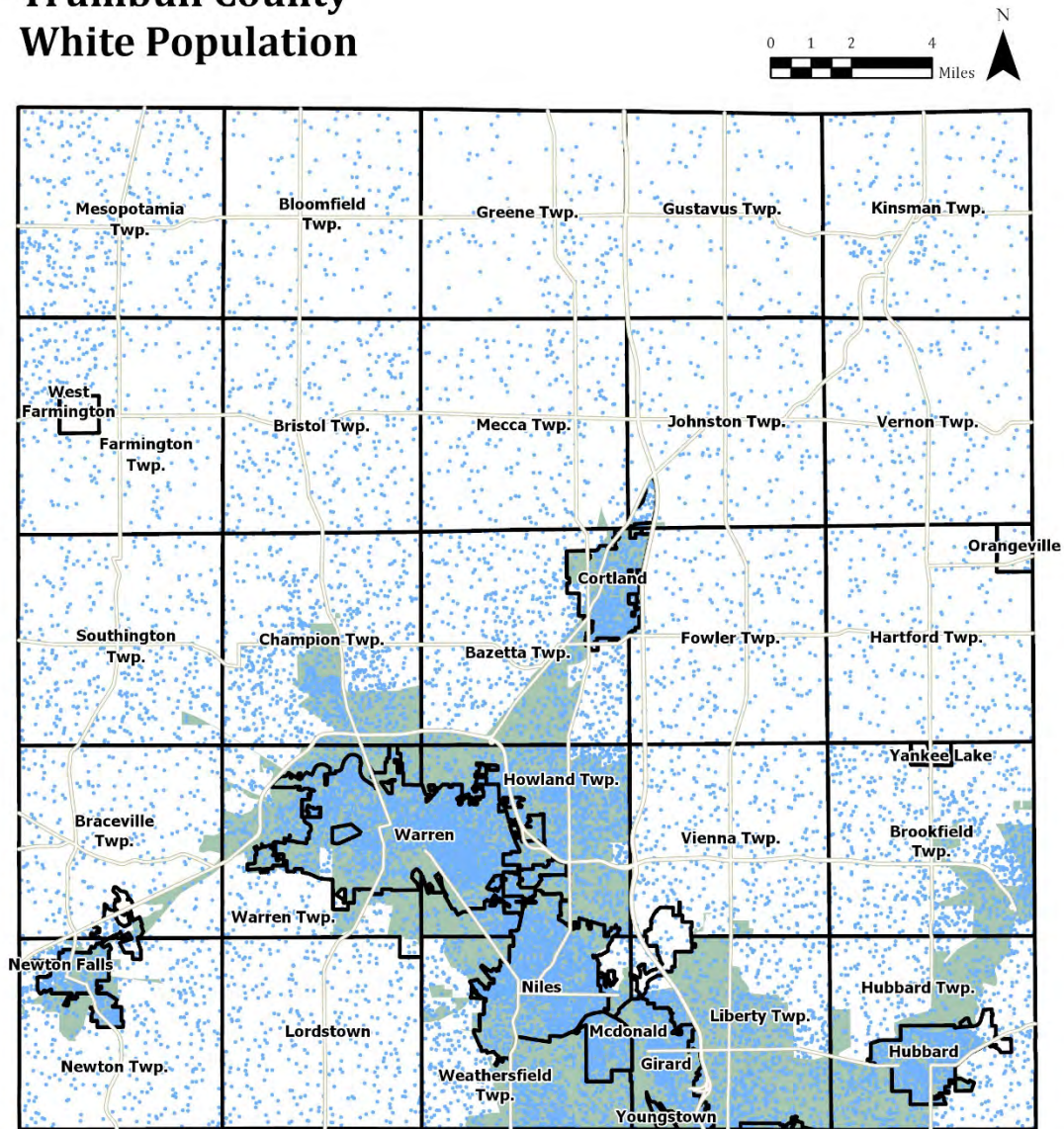


Race and Ethnicity (Black)
 1 dot = 10 persons
 • Black or African-American alone
 ■ Youngstown OH-PA Urbanized Area
 □ Political Subdivision
 — Roads



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Trumbull County White Population



Race and Ethnicity (White)

1 dot = 10 persons

• White alone

■ Youngstown OH-PA Urbanized Area

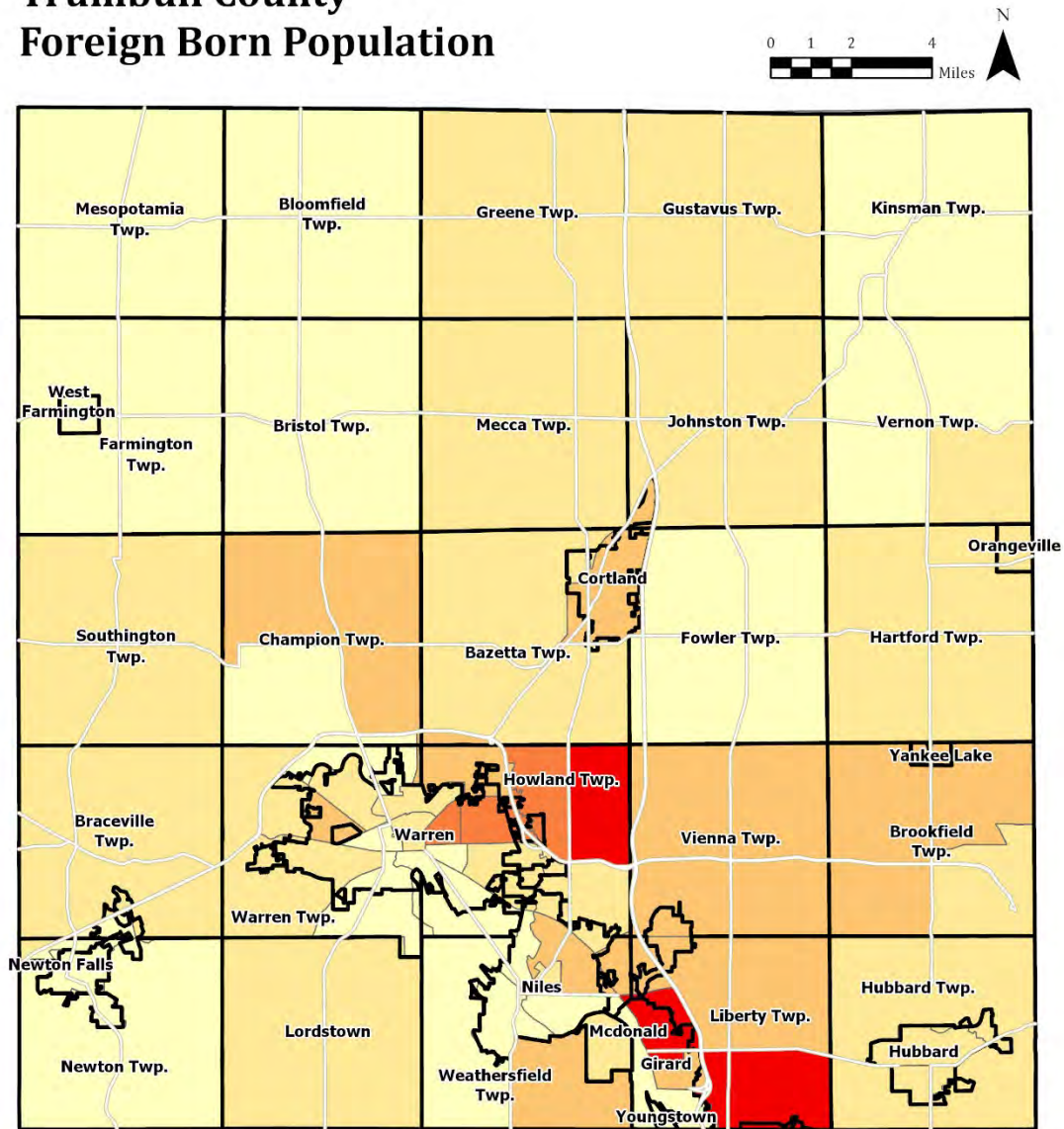
□ Political Subdivision

— Roads



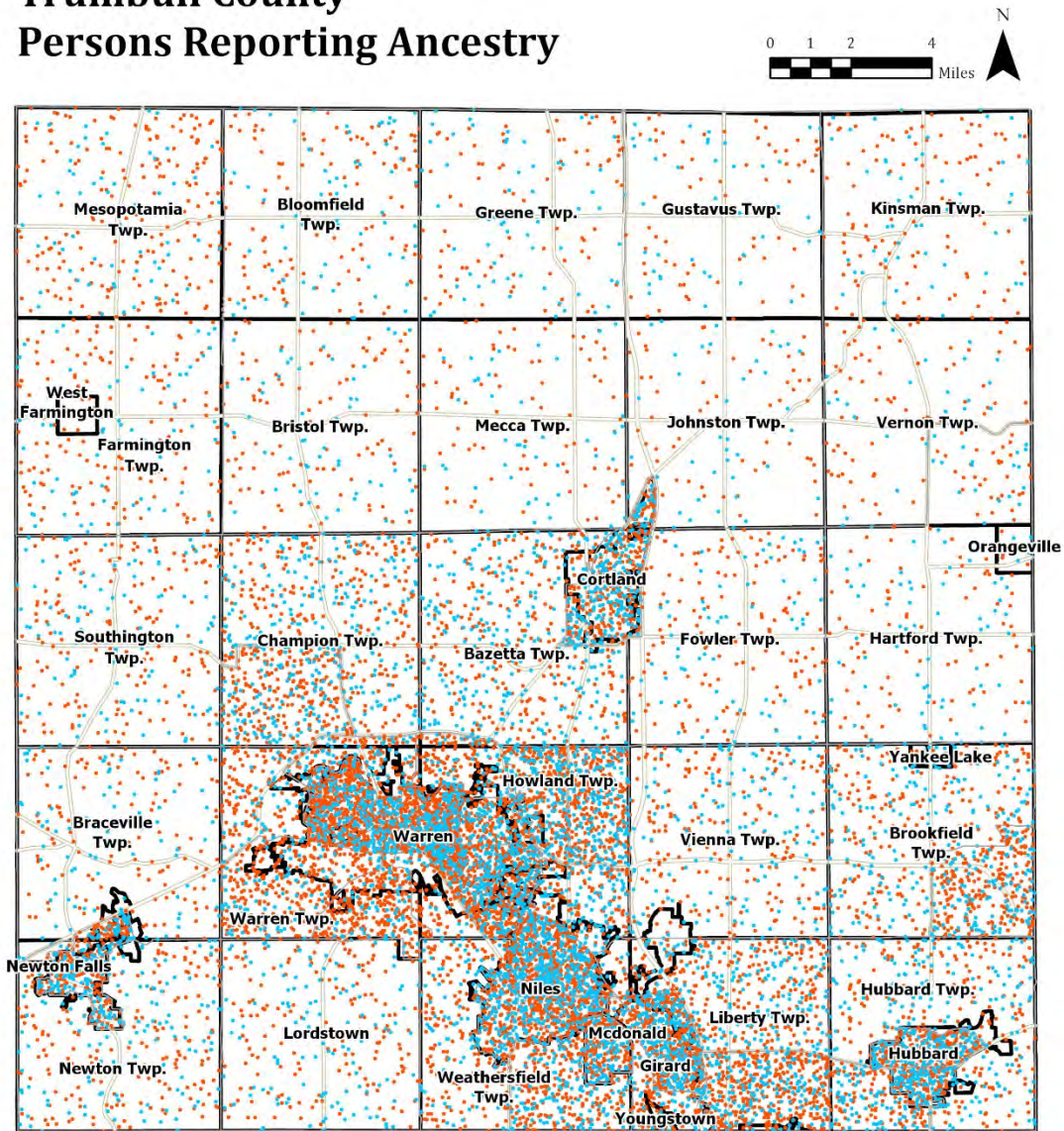
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Trumbull County Foreign Born Population



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 Enterprise GIS files, US
 Census Bureau American
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Trumbull County Persons Reporting Ancestry



1 Dot = 10 Persons

- Persons reporting multiple ancestry
- Persons reporting single ancestry

▭ Political Subdivision

— Roads



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 Census Bureau American
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FAMILY CHARACTERISTICS

There were a total of 23,154 families with related children under the age of 18 living in Trumbull County in 2017, according to Census estimates. Of those families, 13.4% had a female householder with no husband present. In Warren, 30.5% of families with related children under the age of 18 had female householders, while in Niles the rate of female householders with related children under the age of 18 was 17.4%. Countywide, in the urban core, the rate of female householders with their own children under the age of 18 was 16.5%. In Niles, the rate of male householders having related children under the age of 18 was 8.5%, while in Warren the rate was 4.8%, and countywide the rate was 4.2%. The rate of male householders with related children under the age of 18 in the urban core was 4.6%.

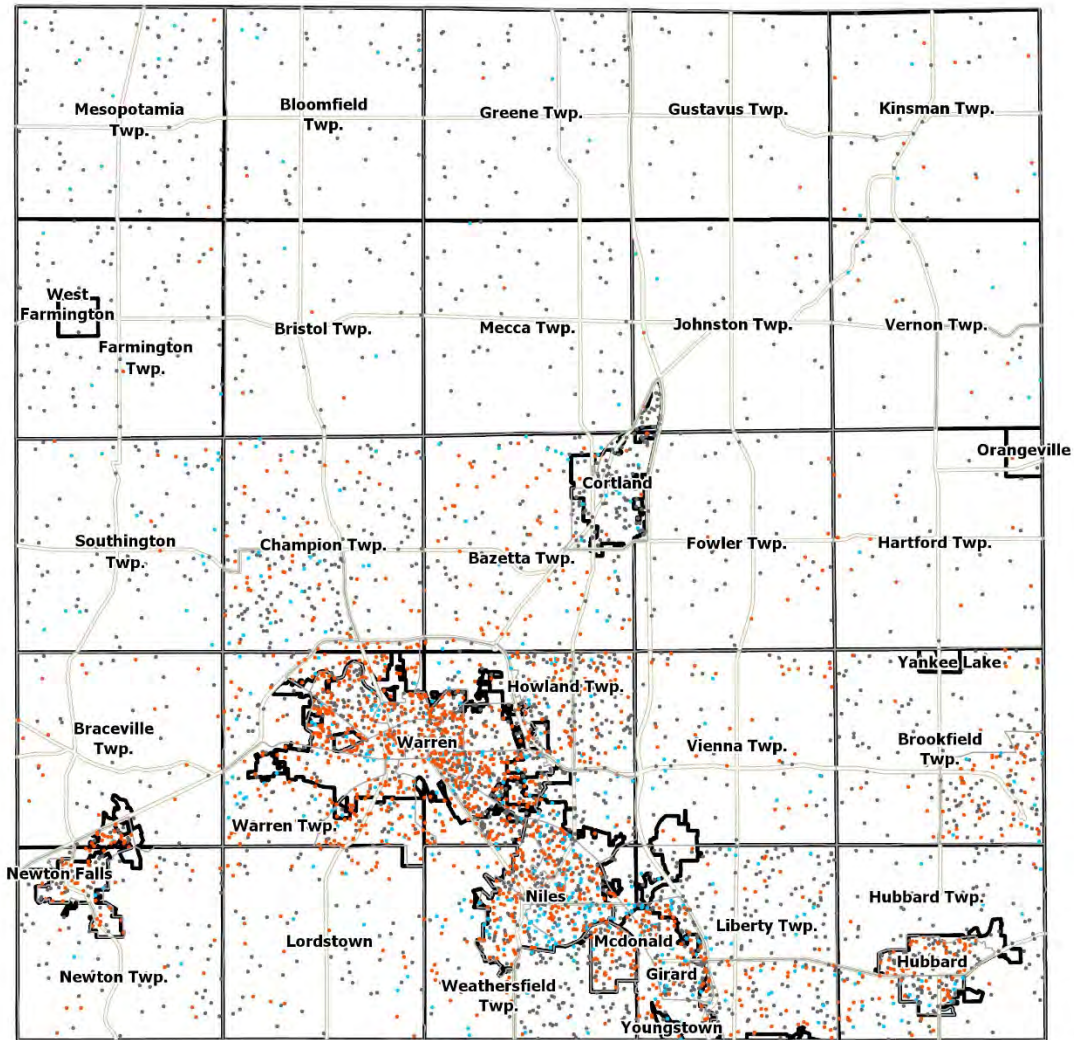
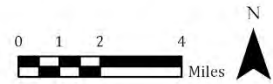
Table 4 shows characteristics of families in Trumbull County in 2017.

Table 5: Family Status, 2017

Geography	Trumbull County	Niles	Warren	UZA Trumbull
Families	55,323	4,866	9,284	39,378
Married couple family	39,361	2,895	4,535	26,172
Married couple family with related children under the age of 18	13,446	990	1,716	8,784
Percent – married couple family	24.3%	20.3%	18.5%	22.3%
Other families	15,962	1,971	4,749	13,206
Male householder, no wife present, with related children under the age of 18	2,311	416	449	1,805
Percent – male householder	4.2%	8.5%	4.8%	4.6%
Female householder, no husband present, with related children under the age of 18	7,397	849	2,832	6,505
Percent – female householder	13.4%	17.4%	30.5%	16.5%

The following page contains a map showing family characteristics in Trumbull County in 2017.

Trumbull County Families, Related Children Under 18



1 Dot = 5 Families

- Female householder, no husband present, related children under 18
- Male householder, no wife present, related children under 18
- Married couple family, related children under 18
- ▭ Political Subdivision
- Roads



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 Source: Trumbull County
 Enterprise GIS files, US
 Census Bureau American
 Community Survey 5-yr Est.
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ECONOMIC CHARACTERISTICS

Poverty was particularly concentrated in the city of Warren in 2017. The poverty rate in the city of Warren was much higher than the county at large, at 34.6%, while the poverty rate in Niles (18.2%) was slightly about the county rate of 17.2%. When removing the city of Warren, the poverty rate in Trumbull County in 2017 was 13.1%. Fully 38.3% of the persons living below the poverty level in Trumbull County were located in the city of Warren.

The median household income in Trumbull County in 2017 was \$45,380, and \$29,241 and \$40,390 in the cities of Warren and Niles, respectively. The city of Warren had the lowest median household income of any jurisdiction in the county in 2017. Pockets of the city of Warren and Warren Township had the lowest median household income, as well as the highest rates of poverty, in Trumbull County in 2017.

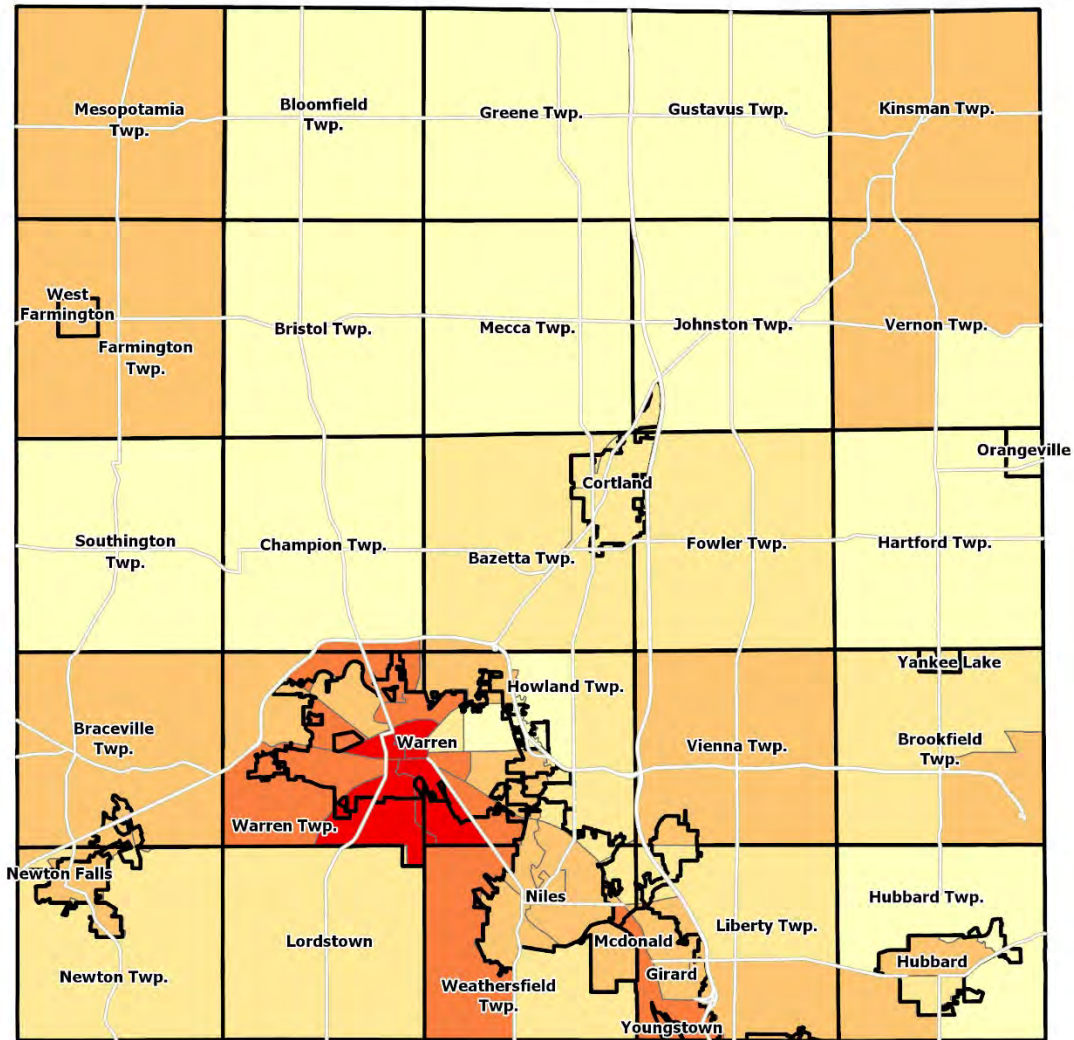
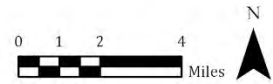
Table 5 shows economic characteristics in Trumbull County in 2017.

Table 6: Economic Characteristics

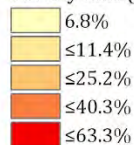
Geography	Trumbull County	Niles	Warren	UZA Trumbull
Population for whom poverty status has been determined	199,476	18,351	37,856	144,189
Persons with income below the poverty level	34,254	3,344	13,108	28,812
Poverty rate	17.2%	18.2%	34.6%	20.0%
Median household income	\$45,380	\$40,390	\$29,241	\$41,641

The following pages contain maps showing economic characteristics of the population of Trumbull County in 2017.

Trumbull County Persons Living Below Poverty Level



Poverty Rate (Persons with income below the poverty level)

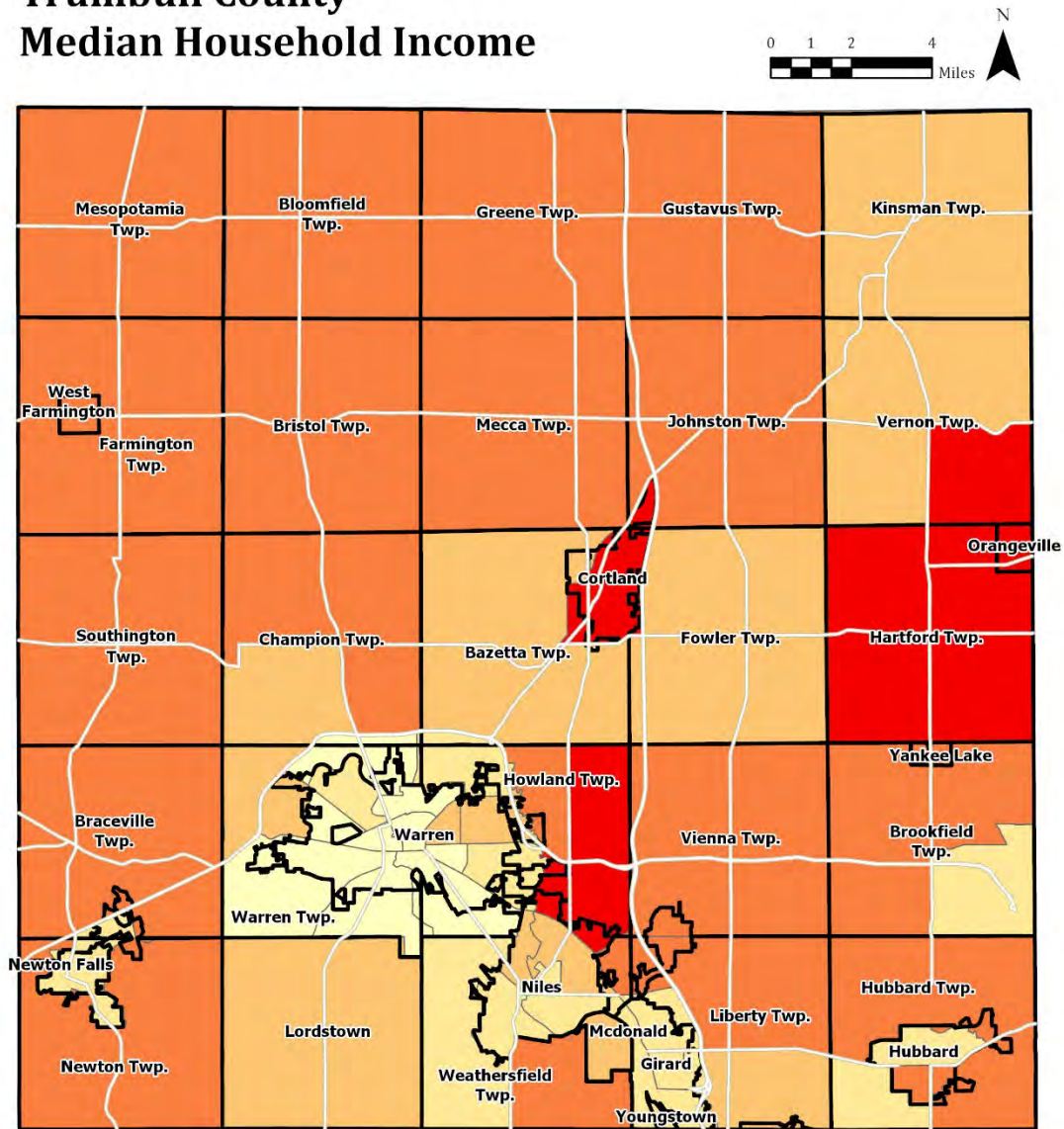


Political Subdivision
 Roads



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 Youngstown State University
 Source: Trumbull County
 Enterprise GIS files, US
 Census Bureau American
 Community Survey 5-yr Est.
 4/24/2019 9:42 AM

Trumbull County Median Household Income



Median Household Income

≤\$29,861

≤\$42,237

≤\$51,656

≤\$61,847

≤\$84,250

Political Subdivision

Roads



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 Source: Trumbull County
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 Community Survey 5-yr Est.
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HOUSING CHARACTERISTICS

There are a total of 86,709 occupied housing units in Trumbull County, according to 2017 Census estimates. Only 29.4% of the occupied housing units are rentals countywide. However, 49.1% of the occupied housing units in Warren are rentals, while 45.7% are rentals in Niles. Outside of Warren and Niles, only 21.7% of the occupied housing units are rentals. The concentration of rental properties in the urban core limits the opportunity to provide safe and affordable rental housing in areas of Trumbull County that have historically been predominately white and also wealthier.

In addition, the housing stock throughout the county, and particularly in the city of Warren, is very old. The median year an owner-occupied residential structure was built in Warren is 1955, while countywide the median year of construction is 1963. That number is very similar in the urban core, as well, at 1961. The age of the housing stock creates not only a lead hazard housing issue, but also issues with retrofitting older homes to make them accessible to those dealing with physical as well as mental and sensory disabilities. In Trumbull County, the majority of the population living with a disability lives in areas having the oldest housing stock.

The median value of owner-occupied housing units in Trumbull County was \$101,600 in 2017. The housing stock in the city of Warren was valued at only \$62,500, while the city of Niles was valued at \$81,800. The median contract rent in the county was \$522 in 2017, while in Warren it was \$481 and in Niles \$564. Over 50% of the rental units in the city of Warren had a contract rent under \$500 per month, while countywide the percentage was 40.1. The city of Niles had the most expensive rental housing out of the three entities, with only 30.8% of the rentals having contract rent under \$500 per month. The cities of Warren and Niles both have rental registry programs. The Niles rental registry program is particularly robust, and captures the majority of the city's rental units.

Table 6 shows housing characteristics in Trumbull County in 2017.

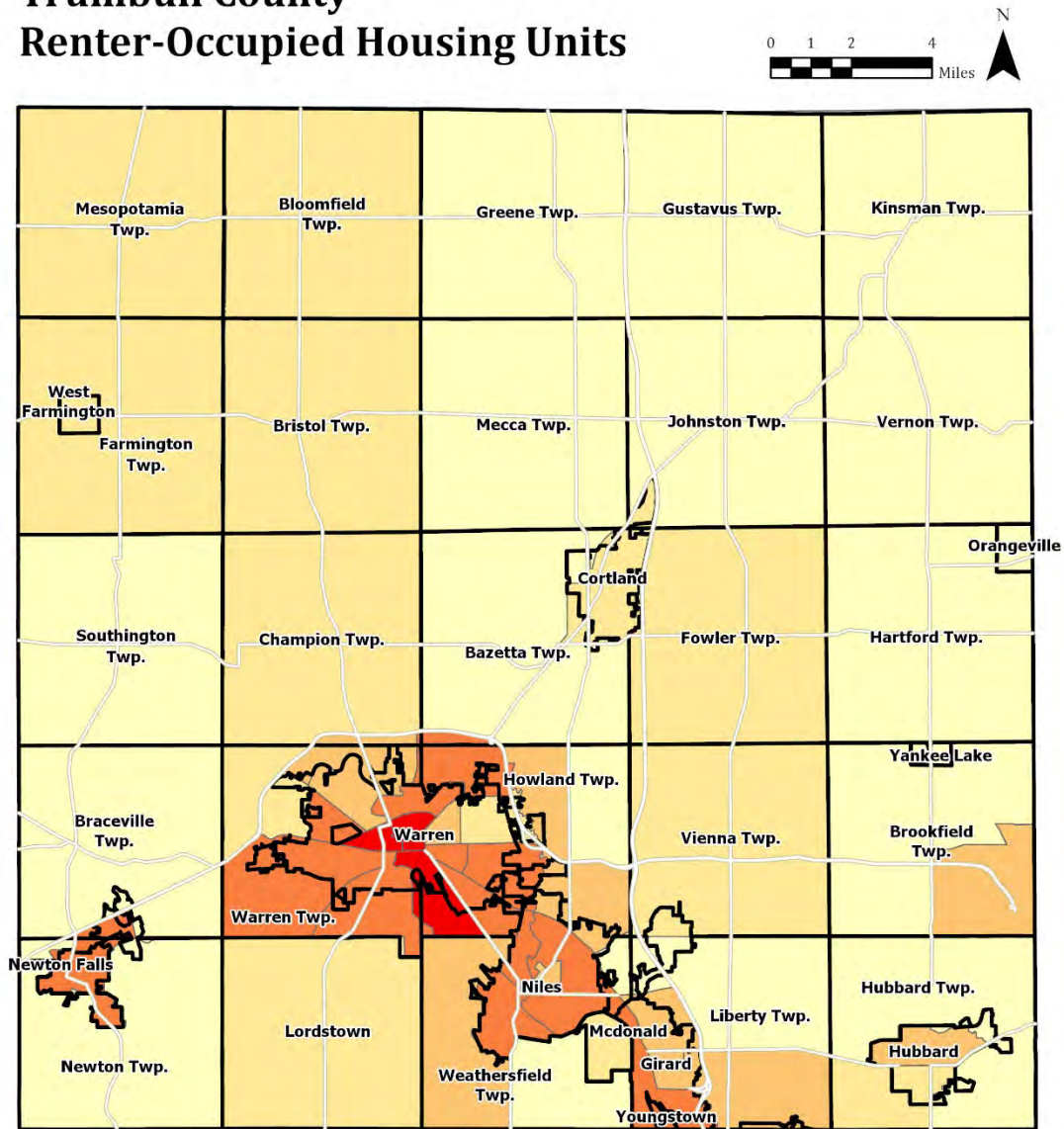
Table 7: Housing Characteristics

Geography	Trumbull County	Niles	Warren	UZA Trumbull
Occupied housing units	86,709	8,239	17,361	64,898
Owner occupied housing units	61,185	4,475	8,832	42,559
Renter occupied housing units	25,524	3,764	8,529	22,339
Percent of housing units renter occupied	29.4%	45.7%	49.1%	34.4%
Median year residential structure built	1963	1960	1955	1961
Median value of owner occupied housing units	\$101,600	\$81,800	\$62,500	\$90,200
Median contract rent	\$522	\$564	\$481	\$522
Housing units with rent under \$500 per month	10,235	1,158	4,439	9,104

Geography	Trumbull County	Niles	Warren	UZA Trumbull
Percent of housing units with rent under \$500 per month	40.1%	30.8%	52.0%	40.8%

The following pages contain maps showing housing characteristics in Trumbull County in 2017.

Trumbull County Renter-Occupied Housing Units



Percent Renter-Occupied (Occupied Housing Units)

≤16.2%

≤25.0%

≤39.3%

≤52.2%

≤68.9%

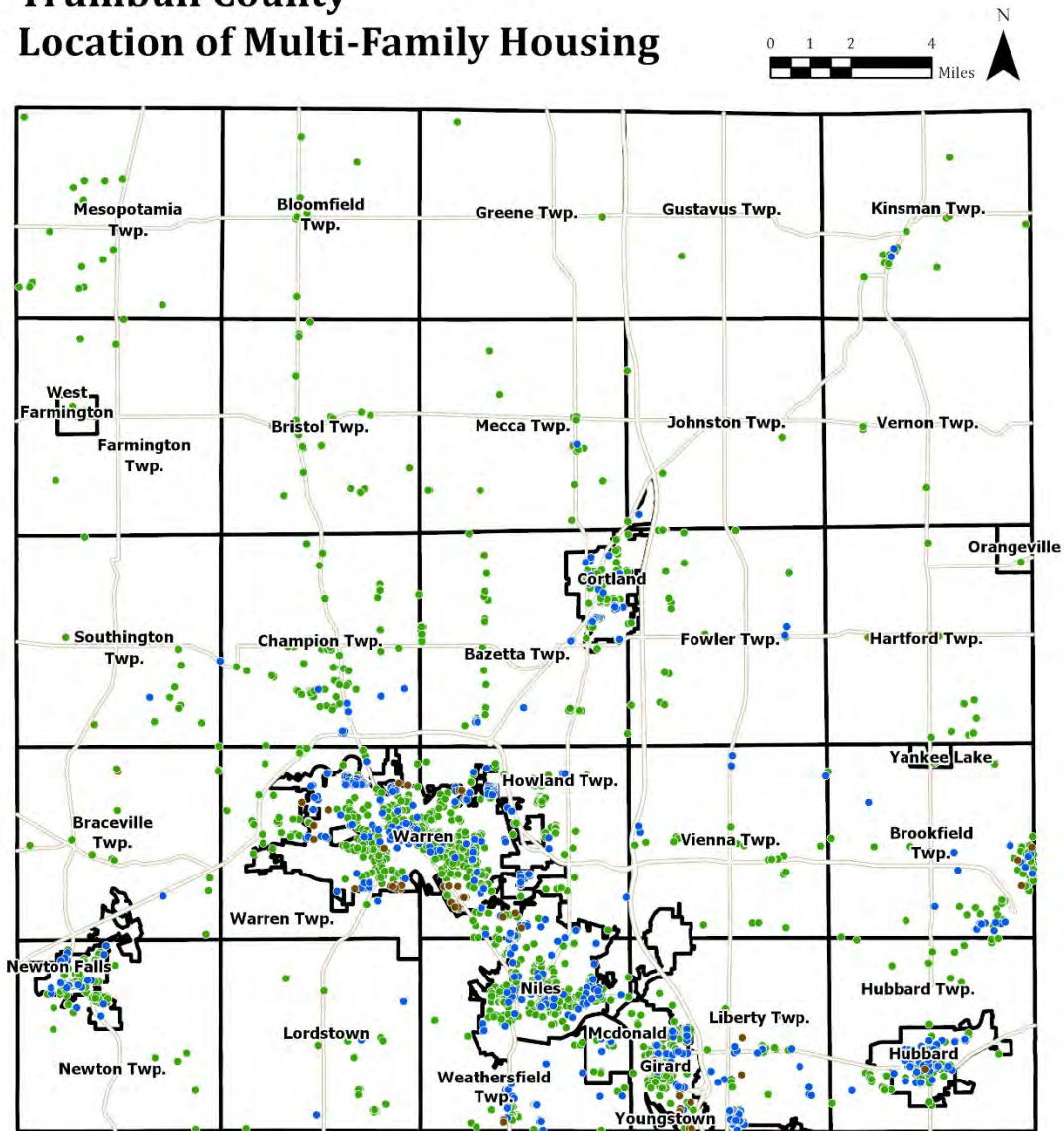
Political Subdivision

Roads



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 Youngstown State University
 Source: Trumbull County
 Enterprise GIS files, US
 Census Bureau American
 Community Survey 5-yr Est.
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Trumbull County Location of Multi-Family Housing

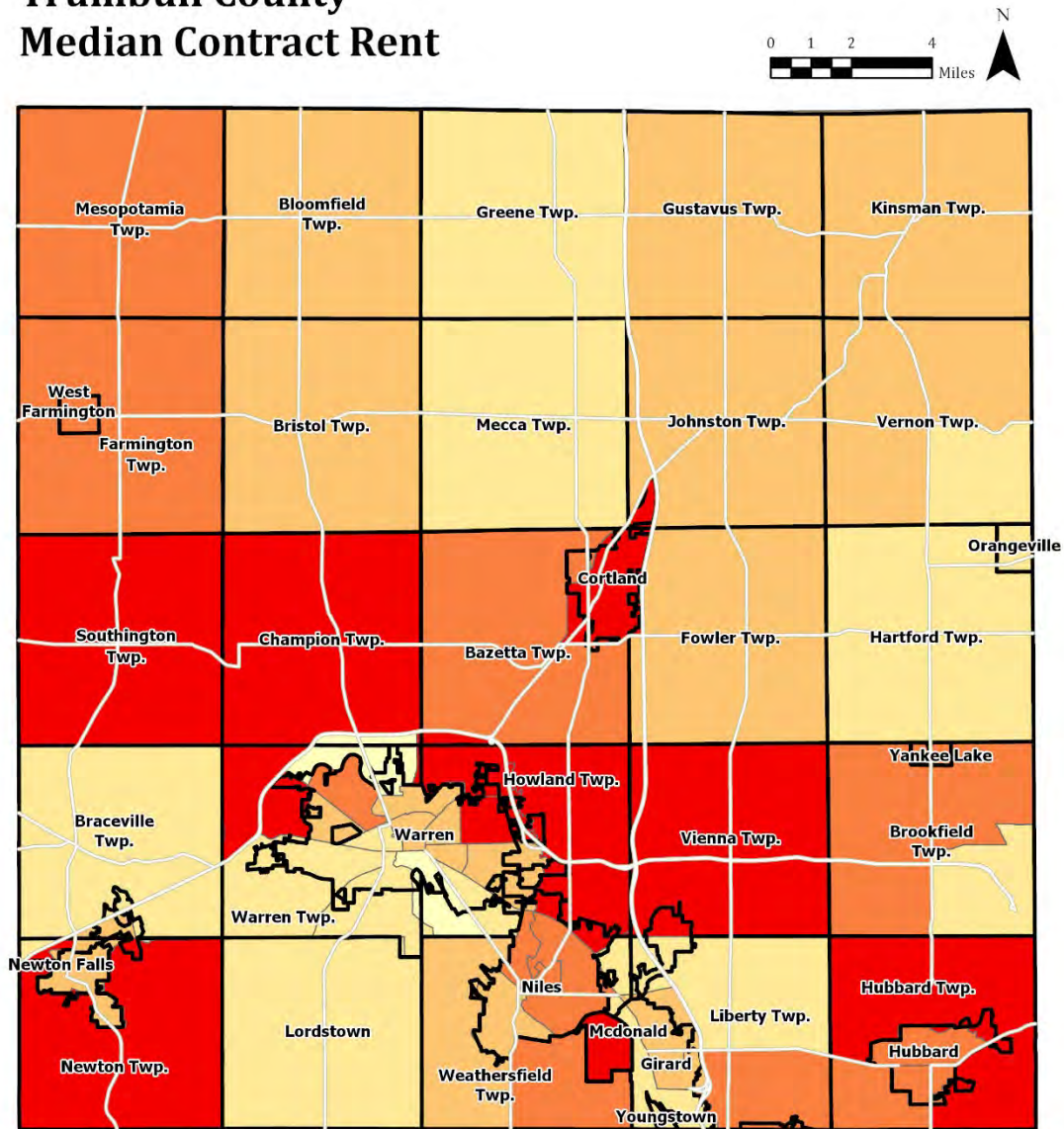


- Multi-Family Housing
- Two- and Three-Family Units
 - Apartments 4+ Units
 - TMHA Property
 - ▭ Political Subdivision
 - Roads



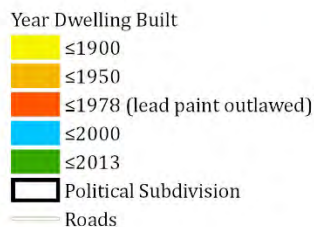
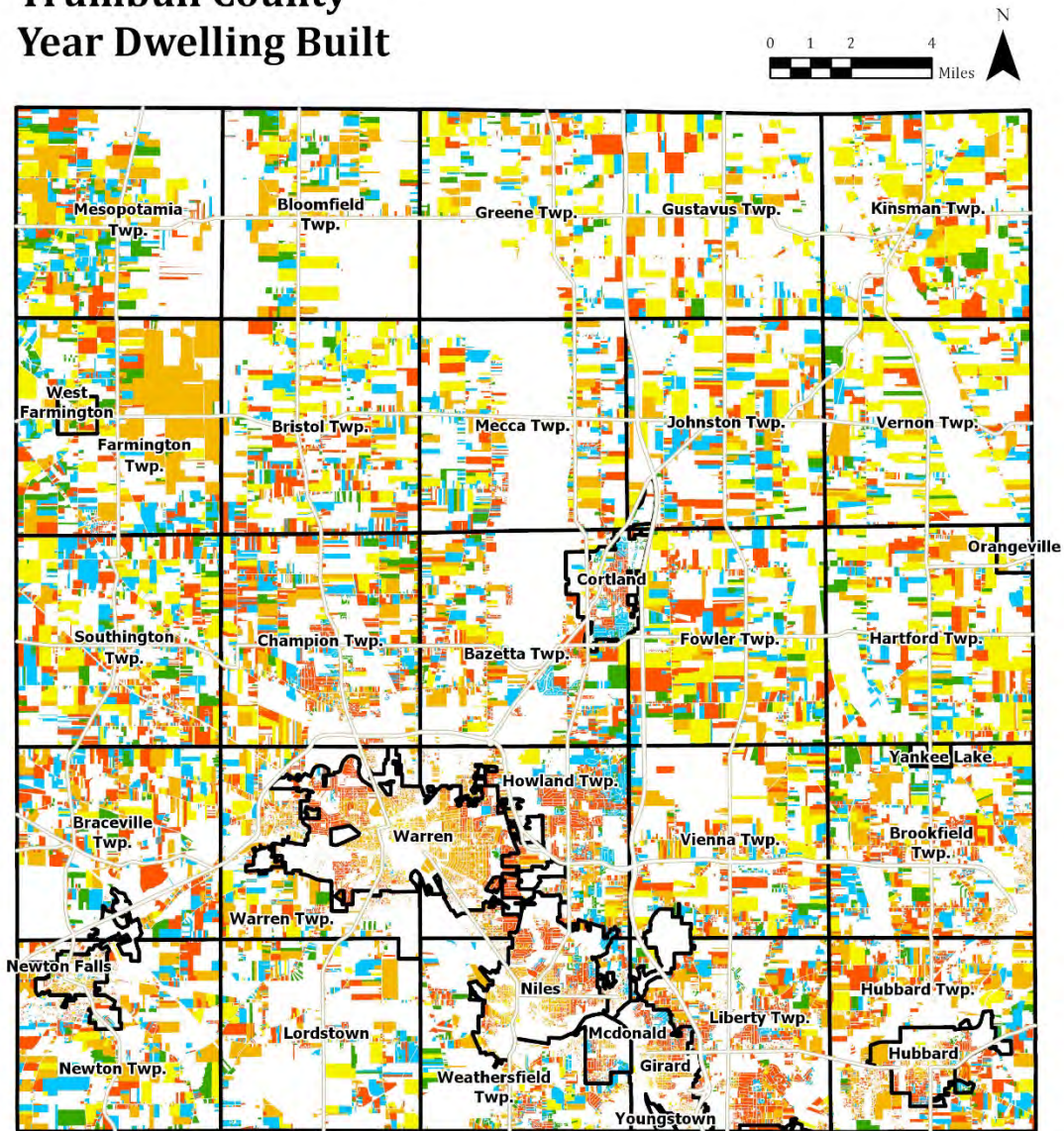
Prepared by: The Center for
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 Youngstown State University
 Source: Trumbull County
 Enterprise GIS files,
 Trumbull County Auditor
 Land Use Codes
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Trumbull County Median Contract Rent



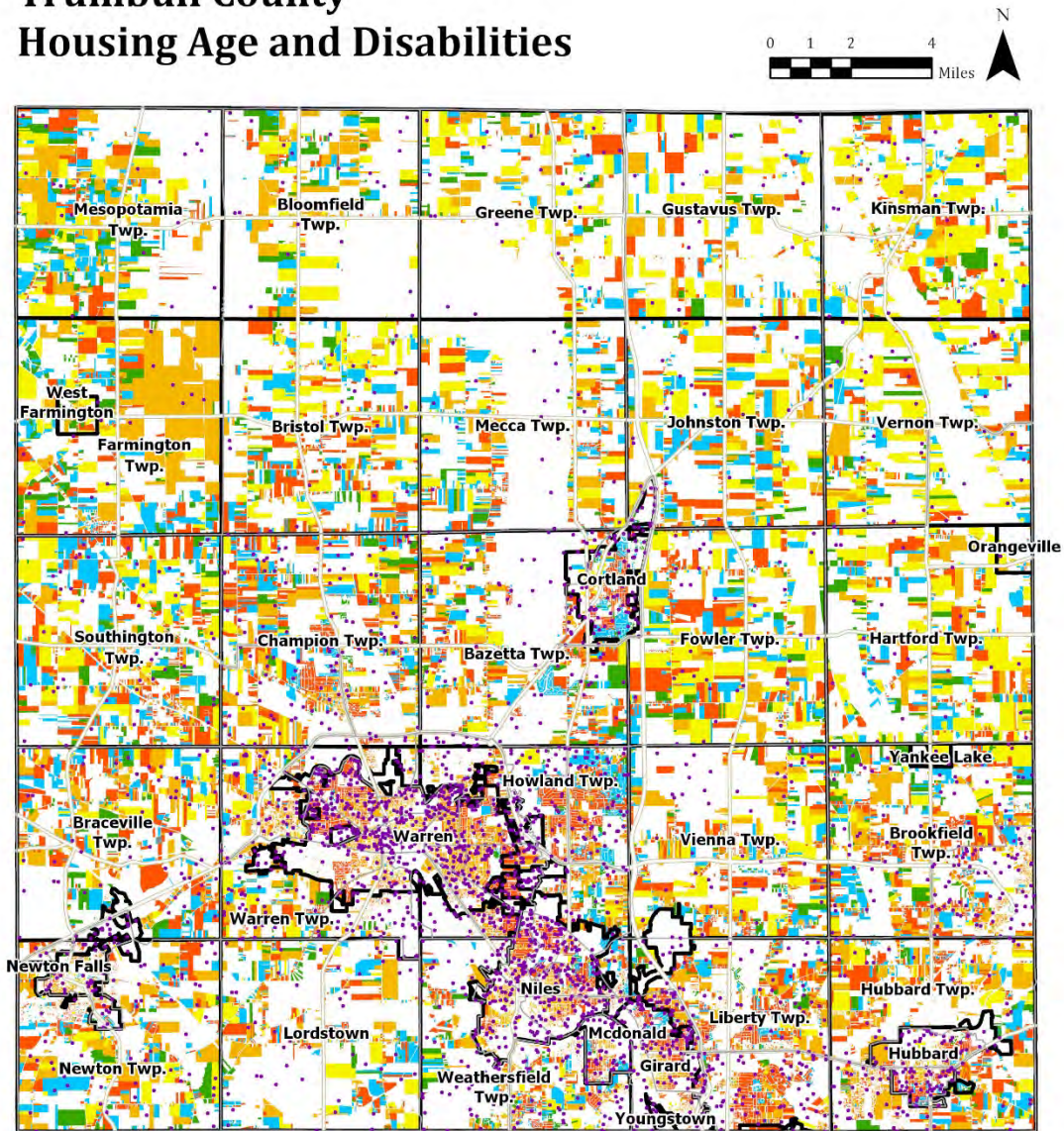
Prepared by: The Center for
 Urban and Regional Studies
 Youngstown State University
 Source: Trumbull County
 Enterprise GIS files, US
 Census Bureau American
 Community Survey 5-yr Est.
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Trumbull County Year Dwelling Built



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 Source: Trumbull County
 Enterprise GIS files,
 Trumbull County Auditor
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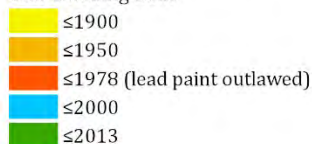
Trumbull County Housing Age and Disabilities



1 Dot = 10 Persons

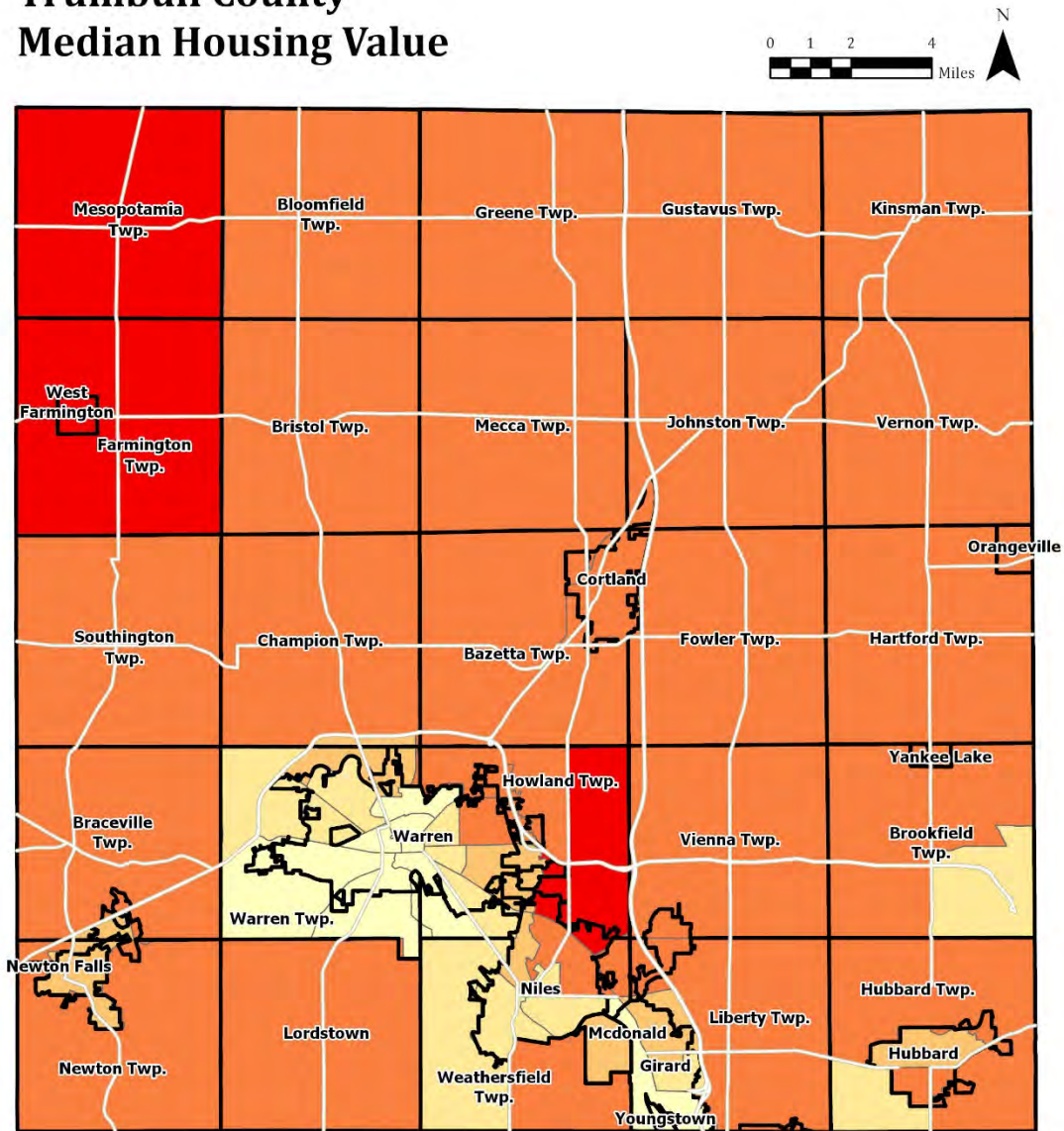
• Person with a Disability

Year Dwelling Built



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Urban and Regional Studies
Youngstown State University
Source: Trumbull County
Enterprise GIS files, US
Census Bureau American
Community Survey 5-yr Est.
4/23/2019 1:19 PM

Trumbull County Median Housing Value



Median Value of Owner Occupied Housing

≤\$47,700

≤\$75,300

≤\$97,600

≤\$148,400

≤\$194,700

Political Subdivision

Roads



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 Urban and Regional Studies
 Youngstown State University
 Source: Trumbull County
 Enterprise GIS files, US
 Census Bureau American
 Community Survey 5-yr Est.
 4/24/2019 10:03 AM

AFFORDABLE HOUSING PROVIDERS

Trumbull County Housing Authority (TMHA) is a leader in providing clean, safe, and affordable housing to low-income residents in Trumbull County. According to TMHA, the agency also strives to promote self-sufficiency and upward mobility by developing public-private partnerships, homeownership, and entrepreneurial opportunities throughout the county. TMHA was established on June 20, 1934 and the Warren Housing Authority.

The YWCA Mahoning Valley provides 12 units of Permanent Supportive Housing for homeless single women, and women with families. This facility is called the WINGS, and is located in Warren.

The Emmanuel Community Care Center (ECCC) provides four units of Permanent Supportive Housing, with two two-bedroom units, and two one-bedroom units. ECCC houses single parents with children, and transitional aged youth who are homeless and have a disability. ECCC works with Coleman Professional Services Shelter Plus Care Program, and is located in Girard.

TMHA provides a total of 1,065 Section 8 Housing Choice Voucher (HCV) Program vouchers in Trumbull County. The HCV program assists low-income families, the elderly, and the disabled in finding safe and affordable housing throughout the county, and provides vouchers to assist with housing-related expenses.

Trumbull Neighborhood Partnership (TNP) receives funding from the Warren-Trumbull HOME Consortium. This funding is from the HUD Community Development Block Grant program, and is used to create lead safe, affordable housing for low-to-moderate income residents. TNP has completed three homes in the city of Warren, and will be commencing work on three additional homes in Trumbull County in 2019, two in the city of Warren and one in Liberty Township.

Table 7 contains a list of affordable housing unit locations in Trumbull County.

Table 8: Affordable Housing Unit Locations in Trumbull County

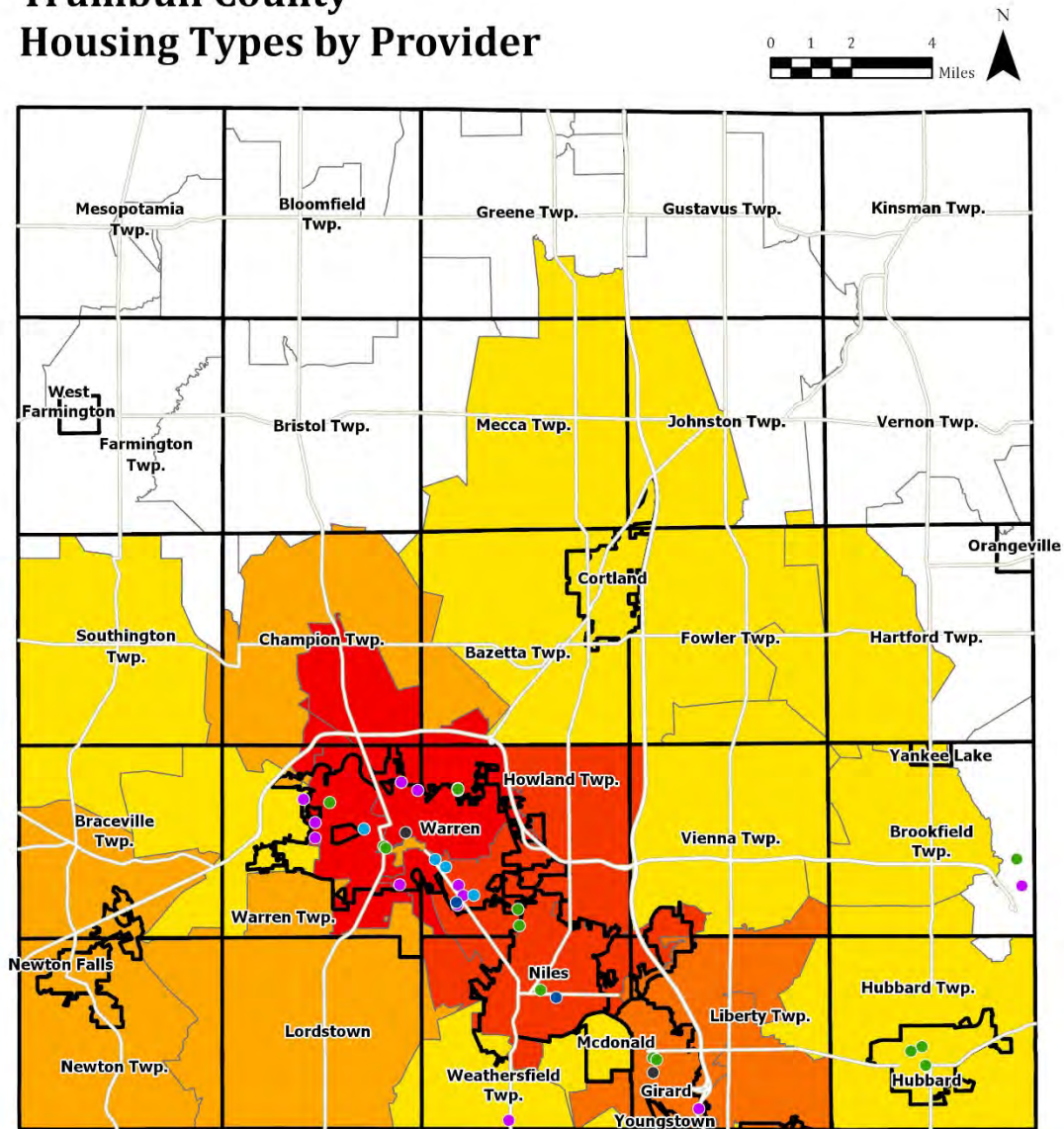
Facility Name	Address	City	State	ZIP Code	Type	Entity
Emmanuel Community Care Center	2 N State Street	Girard	Ohio	44420	Permanent Supportive	Emmanuel Community Care Center
Bentley Apartments	42 S Bentley Ave	Niles	Ohio	44446	Affordable family units	TMHA
Draper Street	Draper Street SE	Warren	Ohio	44484	Affordable family units	TMHA
Eagle Creek	216 Myron St.	Hubbard	Ohio	44425	Disabled Elderly	TMHA
Eastview	4420 Youngstown Rd. SE	Warren	Ohio	44484	Disabled Elderly	TMHA
Girard Manor	430 Washington Ave.	Girard	Ohio	44420	Disabled Elderly	TMHA

Heaton House	1123 North Rd.	Niles	Ohio	44446	Disabled Elderly	TMHA
Hubbard Manor	105 West Liberty St.	Hubbard	Ohio	44425	Disabled Elderly	TMHA
McKinley Towers	425 Seneca St.	Niles	Ohio	44446	Disabled Elderly	TMHA
Morgandale Commons	2345 Plaza Ave. NE	Warren	Ohio	44483	Disabled Elderly	TMHA
Northview	511 North Ave.	Girard	Ohio	44420	Disabled Elderly	TMHA
Parkman Landing Senior Apartments	2501 Parkman Rd. NW	Warren	Ohio	44485	Disabled Elderly	TMHA
Riverview-Buckeye	700 Buckeye St.	Warren	Ohio	44485	Disabled Elderly	TMHA
The Elms	2300 Plaza Ave. NE	Warren	Ohio	44483	Disabled Elderly	TMHA
Tod	250 Tod Ave. NW	Warren	Ohio	44485	Disabled Elderly	TMHA
Valley West	529 Brookfield Ave.	Masury	Ohio	44438	Disabled Elderly	TMHA
West Park Manor	601 West Park Ave.	Hubbard	Ohio	44425	Disabled Elderly	TMHA
Clearwater	3295 Clearwater NW	Warren	Ohio	44485	Family	TMHA
Fairview Gardens	2035 Benton St. SE	Warren	Ohio	44484	Family	TMHA
Forest Ridge	Orchard Ct.	Mineral Ridge	Ohio	44440	Family	TMHA
Girard Scattered	Trumbull Hill	Girard	Ohio	44420	Family	TMHA
Highland Terrace	377 Lane Dr. SW	Warren	Ohio	44483	Family	TMHA
Hilltop Gardens	8111 Addison Rd.	Masury	Ohio	44420	Family	TMHA
Kenmore Apartments	2325 Plaza Ave.	Warren	Ohio	44484	Family	TMHA
Lancer Court	Lancer Ct. NW	Warren	Ohio	44485	Family	TMHA
Maryland	434 Maryland St. NE	Warren	Ohio	44483	Family	TMHA
Reo Court	Reo Ct. NW	Warren	Ohio	44483	Family	TMHA
Rio Terra	3600 Rio Vista	Leavittsburg	Ohio	44430	Family	TMHA
Trumbull Homes	1970 Hazelwood Ave. SE	Warren	Ohio	44484	Family	TMHA

Wick Street Homes	2330 Wick St.	Warren	Ohio	44484	Family	TMHA
Youth Build	1180 Parkman Rd. NW	Warren	Ohio	44485	Youth Build	TMHA
Youth Build	1110 Youngstown Rd. SE	Warren	Ohio	44484	Youth Build	TMHA
Youth Build	941 East Ave. SE	Warren	Ohio	44484	Youth Build	TMHA
Youth Build	2696 Wick St. SE	Warren	Ohio	44484	Youth Build	TMHA
YWCA Mahoning Valley	121 Monroe Street	Warren	Ohio	44483	Permanent Supportive	YWCA Mahoning Valley

The following page contains a map showing the current location of affordable housing in Trumbull County.

Trumbull County Housing Types by Provider



Prepared by: The Center for
 Urban and Regional Studies
 Youngstown State University
 Source: Trumbull County
 Enterprise GIS files, TMHA,
 Trumbull County Housing
 Collaborative
 4/19/2019 2:17 PM

MAJOR EMPLOYERS AND MASS TRANSIT LINES

According to current data from *Reference USA*, there are a total of 137 employers with 100 or more employees in Trumbull County. Most of these employers are concentrated in the urban core, in the cities of Warren and Niles, and also Howland and Liberty Townships. Other major employers are scattered throughout the remainder of the county.

Multiple mass transit bus routes service the southern portion of Trumbull County, although only one, the 28 Warren Express extends into the county at a significant distance. All fixed routes are operated by the Western Reserve Transit Authority (WRTA), based in the city of Youngstown. WRTA fixed routes in Trumbull County include the following:

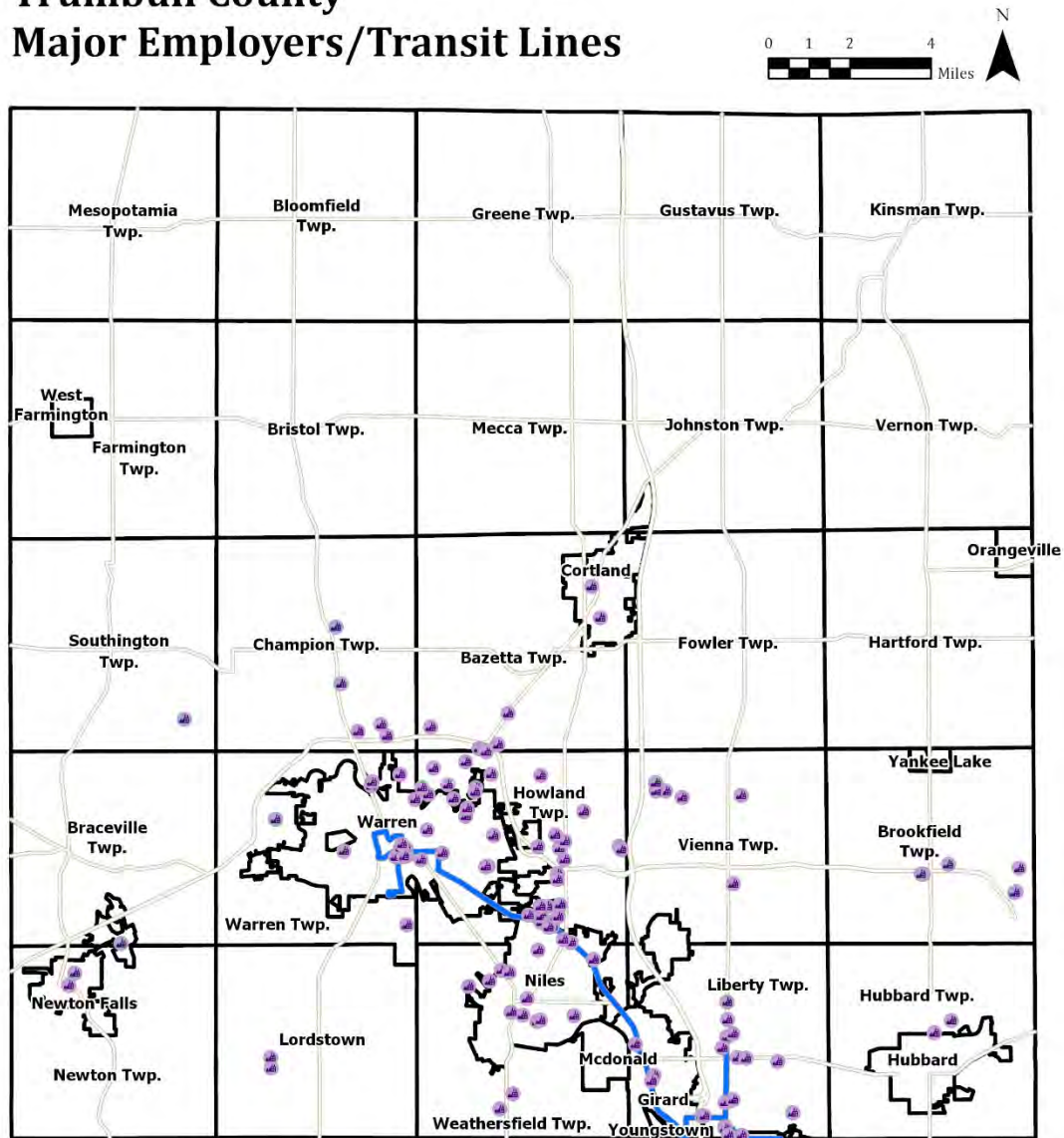
- 1 Elm
 - Servicing retail and medical along Gypsy Lane and Belmont Avenue in Liberty Township
- 10 Belmont
 - Servicing retail along Belmont Avenue in Liberty Township
- 14 Mosier
 - Servicing retail and medical along Gypsy Lane and Belmont Avenue in Liberty Township
- 28 Warren Express
 - Servicing retail, medical, and other major employers and activity generators along US Route 422 from the county boundary in Girard to the neighborhoods in central Warren

Trumbull County Transit is a joint venture between the Trumbull County Commissioners and the Trumbull County Transit Board, and offers individual point-to-point rides on a first-come, first-serve basis Monday-Friday from 7:00am-6:00pm, and on weekends and holidays from 8:00am-3:00pm. Rides are provided to any destination within Trumbull County, with a focus on senior riders.

Trumbull County Job and Family Services, the Senior Levy, SCOPE Senior Services, and Trumbull Area Agency on Aging District 11 also provide limited transportation services throughout Trumbull County.

The following page contains a map showing the current location of major employers (100+ employees) and transit lines in Trumbull County.

Trumbull County Major Employers/Transit Lines



- Major Employers, 100+ Employees
- WRTA Fixed Routes
- Political Subdivision
- Roads



Prepared by: The Center for
 Urban and Regional Studies
 Youngstown State University
 Source: Trumbull County
 Enterprise GIS files, WRTA,
 Reference USA - Major
 Employers - 100+ Employees
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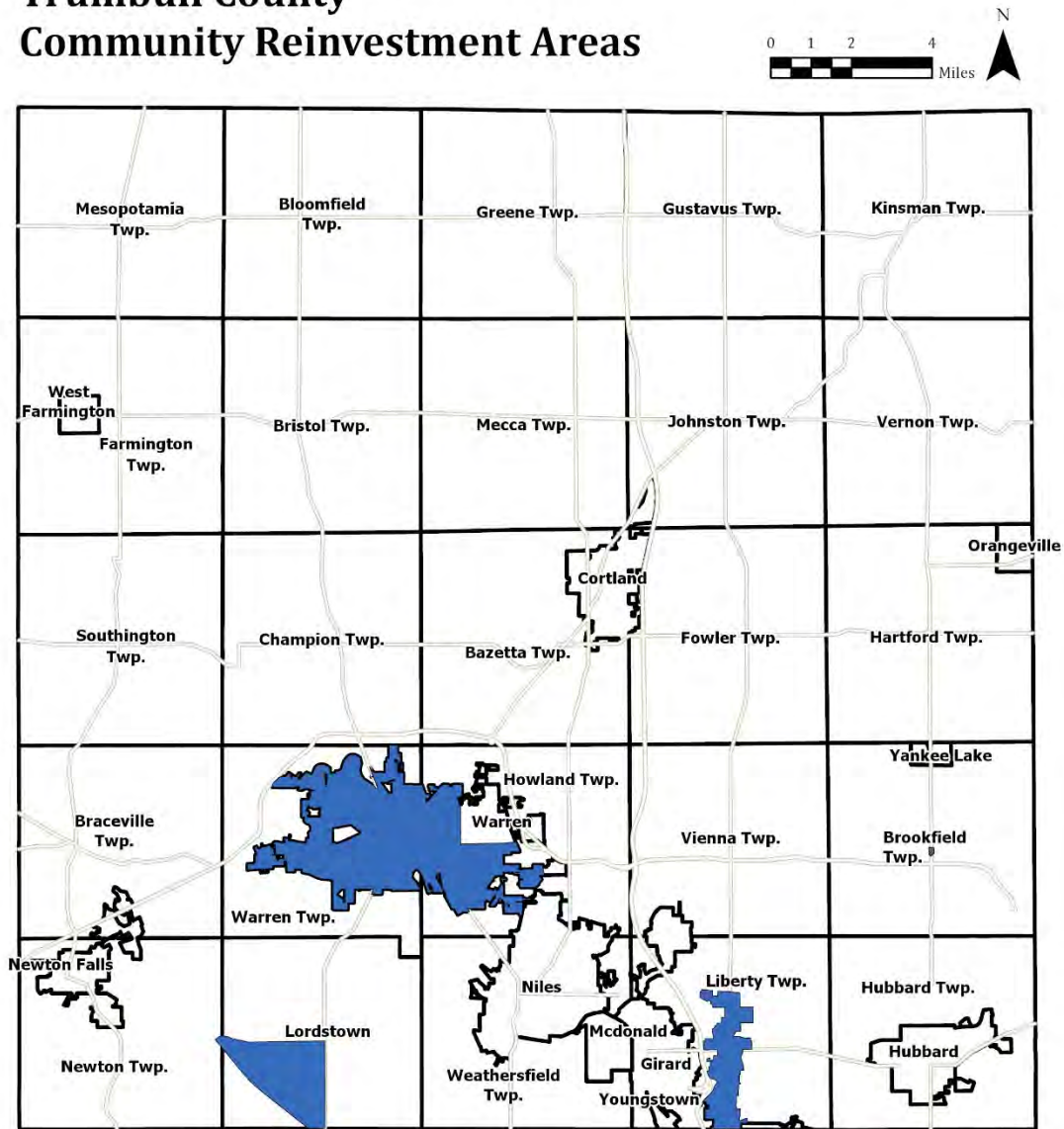
COMMUNITY REINVESTMENT AREAS

A Community Reinvestment Area (CRA) is an area of land in which property owners can receive tax incentives for investing in real property improvements and development. Eligible activities include new construction or rehabilitation of housing, or commercial structures. CRAs are typically located in areas of disinvestment and abandonment, where investment has historically been discouraged. The CRA program was created in 1977 and underwent significant revisions in 1994. A total of four CRAs are located in Trumbull County, and include the following:

- City of Warren Community Reinvestment Area
- Village of Lordstown Community Reinvestment Area
- Liberty Township Community Reinvestment Area (existing and expanded)
- Brookfield Township Community Reinvestment Area

The following page contains a map showing the current location of CRAs in Trumbull County.

Trumbull County Community Reinvestment Areas



- Trumbull County Community Reinvestment Areas
- Political Subdivision
- Roads



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 Urban and Regional Studies
 Youngstown State University
 Source: Trumbull County
 Enterprise GIS files, Ohio
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 Cty Planning Commission
 4/23/2019 7:25 AM

COMMUNITY REINVESTMENT AND HOME MORTGAGE DISCLOSURE ACTS

Lending institutions are evaluated through the Community Reinvestment Act (CRA) to ensure that they are meeting the needs of the borrowers in their communities, particularly in low-income areas. The CRA was established as part of the Housing and Community Lending Act of 1977, and lending institutions are evaluated based on mortgage lending, small business lending, community development lending, and employee volunteerism. Table 8 shows the CRA Performance Evaluations for banks that lend and have branch offices in Trumbull County.

Table 9: Banks that Lend and Have Branch Offices in Trumbull County

Institution Name	Date of Report	Type	Lending Test	Investment Test	Service Test	Community Development Test	Overall Rating
First National Bank of Pennsylvania	8/10/2015	Large Bank	High satisfactory	Low satisfactory	High satisfactory	-	Satisfactory
First Place Bank	2/3/2011	Large Bank	High satisfactory	High satisfactory	High satisfactory	-	Satisfactory
Home Federal Saving & Loan Association of Niles	11/20/2018	Small Bank	Satisfactory	-	-	-	Satisfactory
JP Morgan Chase	12/31/2013	Large Bank	High satisfactory	Outstanding	High satisfactory	-	Satisfactory
KeyBank, N.A.	1/11/2016	Large Bank	High satisfactory	Outstanding	Outstanding	-	Outstanding
PNC Bank, N.A.	7/8/2012	Large Bank	Outstanding	Outstanding	High satisfactory	-	Outstanding
The Farmers National Bank of Canfield	2/5/2018	Intermediate Small Bank	Satisfactory	-	-	Satisfactory	Satisfactory
The Huntington National Bank	5/9/2016	Large Bank	High satisfactory	Outstanding	Outstanding	-	Outstanding
U.S. Bank National Association	3/31/2012	Large Bank	Outstanding	Outstanding	Outstanding	-	Satisfactory

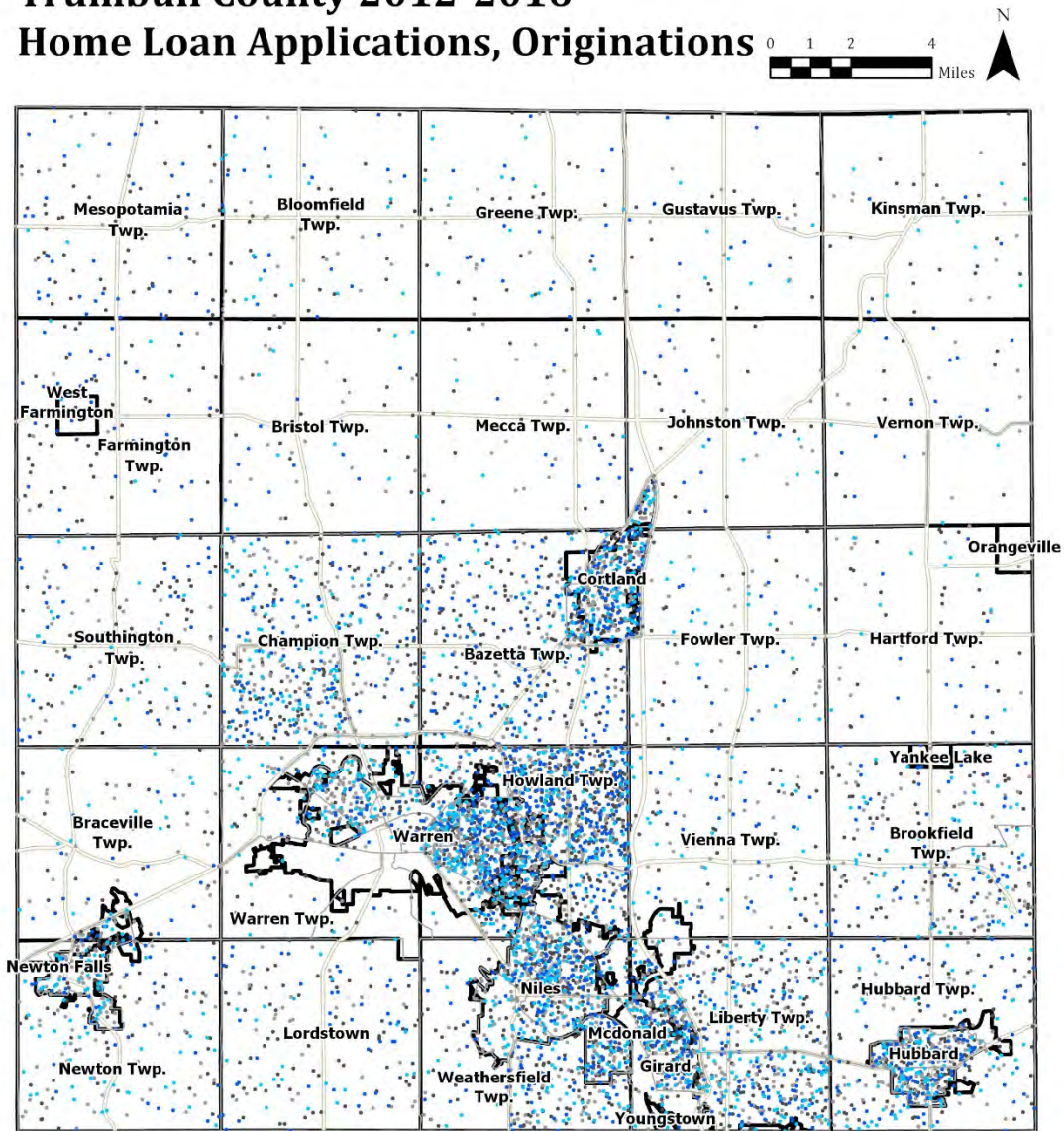
The Federal Financial Institutions Examination Council (FFIEC) was established in 1979 to provide uniform standards and promote uniformity in the supervision of financial institutions. The FFIEC is an interagency council and is made up of members from the Federal Reserve System, Federal Deposit Insurance Corporation, National Credit Union Administration, Office of the Comptroller of the Currency, and Consumer Financial Protection Bureau. Among the council's various reports are the Home Mortgage Disclosure Act (HMDA) aggregate and disclosure reports, which require lending institutions to submit annual disclosures about lending activity related to home mortgages and home improvements. Table 9 shows HMDA-reported loan applications and originations in Trumbull County between 2012 and 2016. These include conventional loans, and those through the Federal Housing Administration (FHA), Farm Security Administration/Rural Housing Service (FSA/RHS), and Veterans Administration (VA).

Table 10: HMDA Totals - Loan Applications and Originations in Trumbull County, 2012-2016

Year	Type	Number/Amount
Total	Total FHA, FSA/RHS, & VA Loan Applications	3,939
	Total Conventional Loan Applications	4,949
	Total FHA, FSA/RHS, & VA Loan Originations	2,955
	Total FHA, FSA/RHS, & VA Loan Originations, Amount	\$290,005,000
	Total Conventional Loan Originations	3,610
	Total Conventional Loan Originations, Amount	\$394,158,000
2012	Total FHA, FSA/RHS, & VA Loan Applications	672
	Total Conventional Loan Applications	814
	Total FHA, FSA/RHS, & VA Loan Originations	489
	Total FHA, FSA/RHS, & VA Loan Originations, Amount	\$47,064,000
	Total Conventional Loan Originations	572
	Total Conventional Loan Originations, Amount	\$60,508,000
2013	Total FHA, FSA/RHS, & VA Loan Applications	700
	Total Conventional Loan Applications	880
	Total FHA, FSA/RHS, & VA Loan Originations	501
	Total FHA, FSA/RHS, & VA Loan Originations, Amount	\$47,325,000
	Total Conventional Loan Originations	633
	Total Conventional Loan Originations, Amount	\$71,553,000
2014	Total FHA, FSA/RHS, & VA Loan Applications	753
	Total Conventional Loan Applications	984
	Total FHA, FSA/RHS, & VA Loan Originations	558
	Total FHA, FSA/RHS, & VA Loan Originations, Amount	\$52,854,000
	Total Conventional Loan Originations	707
	Total Conventional Loan Originations, Amount	\$74,228,000
2015	Total FHA, FSA/RHS, & VA Loan Applications	804
	Total Conventional Loan Applications	1,056
	Total FHA, FSA/RHS, & VA Loan Originations	639
	Total FHA, FSA/RHS, & VA Loan Originations, Amount	\$63,759,000
	Total Conventional Loan Originations	786
	Total Conventional Loan Originations, Amount	\$86,858,000
2016	Total FHA, FSA/RHS, & VA Loan Applications	1,010
	Total Conventional Loan Applications	1,215
	Total FHA, FSA/RHS, & VA Loan Originations	768
	Total FHA, FSA/RHS, & VA Loan Originations, Amount	\$79,003,000
	Total Conventional Loan Originations	912
	Total Conventional Loan Originations, Amount	\$101,011,000

The following maps show the distribution of loan applications received, and loans originated, throughout Trumbull County between 2012 and 2016. Loan types include conventional, and those through the FHA, FSA/RHS, and VA. Very few loan applications were received, and likewise very few loans were originated, in the areas of the county with a high concentration of minority population between 2012 and 2016. In fact, the highest of concentration of loan applications and originations was in the areas with the least concentration of minority population during this period.

Trumbull County 2012-2016 Home Loan Applications, Originations



1 Dot = 2 Applications

- Originated Loans, FHA+
- Originated Loans, Conventional
- Loan Applications, FHA+
- Loan Applications, Conventional

▬ Political Subdivision

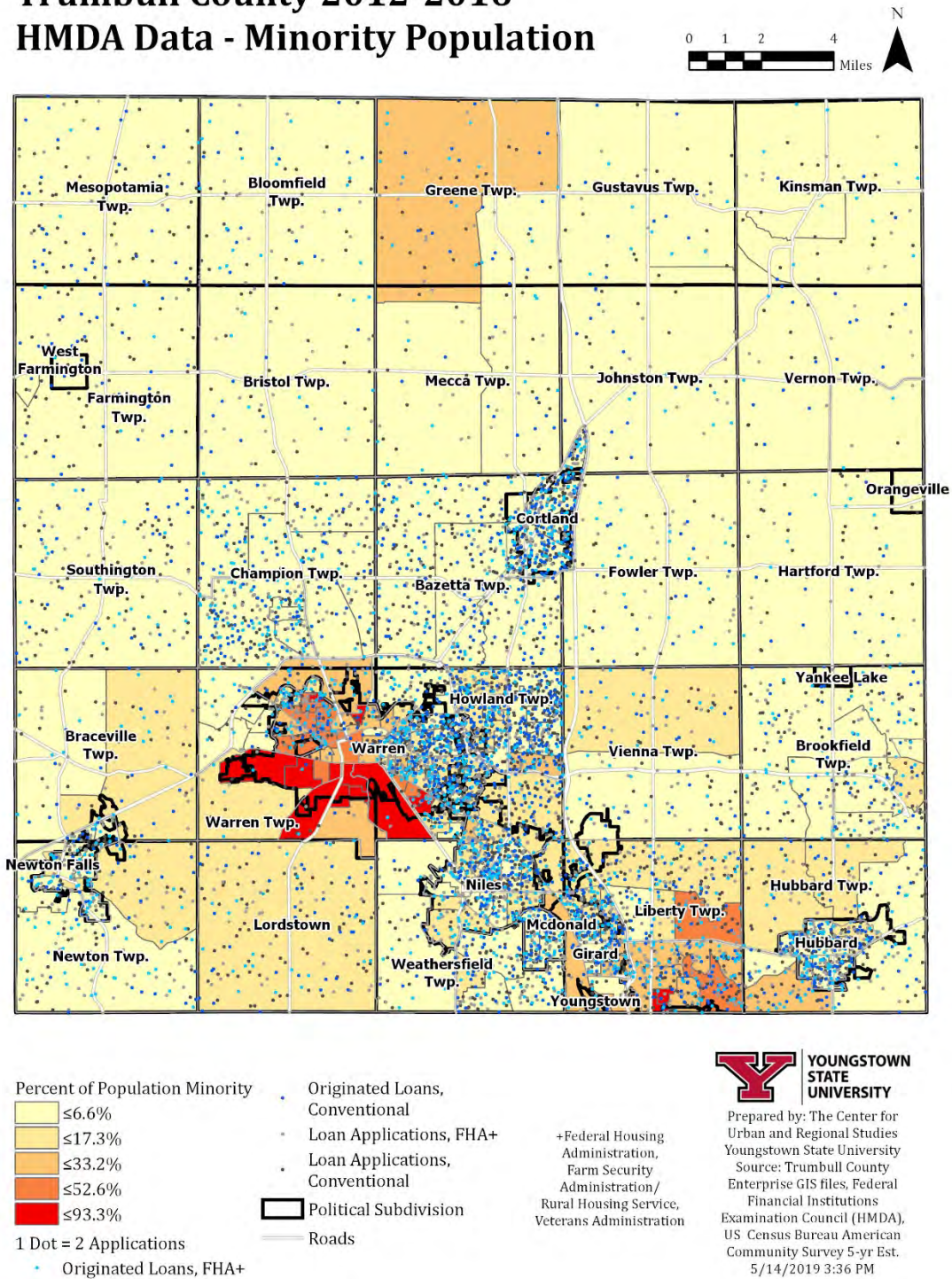
— Roads

+Federal Housing Administration,
 Farm Security Administration/
 Rural Housing Service,
 Veterans Administration



Prepared by: The Center for
 Urban and Regional Studies
 Youngstown State University
 Source: Trumbull County
 Enterprise GIS files, Federal
 Financial Institutions
 Examination Council (HMDA)
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Trumbull County 2012-2016 HMDA Data - Minority Population



IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

IMPEDIMENTS TO FAIR HOUSING CHOICE

Impediments to Fair Housing Choice include:

- Historic segregation
 - Includes institutionalized segregation due to historic redlining and other policies that targeted persons of color and other currently protected classes
- Not-In-My-Backyard (NIMBY) syndrome
- Lack of public transportation to address historic segregation and provide access to medical facilities, employment centers, and other activity generators such as shopping centers
- Access to housing for persons with disabilities
 - The housing stock in Trumbull County, and in particular the city of Warren, is aged and difficult and expensive to retrofit
- Lack of affordable housing in rural areas of the county, particularly in areas that historically have had a predominately white population
- Institutionalized segregation through federal and state policy
 - CDBG and HOME Investments Partnership Program funds through HUD
 - Tax credits, which must be used in low-income areas, thus hamstringing efforts to end historic segregation
- Placement of recovery or sober houses throughout the county
 - Cities of Warren and Warren Township
 - NIMBY syndrome is an issue throughout the county when discussing placement of recovery or sober houses

PERSONS WHO ARE “LEAST LIKELY TO APPLY”

The least likely groups to reach out for assistance through the Fair Housing Program’s complaint intake mechanism are senior and disabled persons, as well as any non-English speaking persons. Reaching out to the agencies that serve these special populations is critical towards keeping these protected groups of people informed of their rights under the Fair Housing Act.

Disabled persons in Trumbull County are served through the Western Reserve Independent Living Center and the Trumbull County Mental Health and Recovery Board and their sub-contractors, while Youth Build and Commonwealth of Youngstown frequently assist with ramp construction.

Other entities that provide services to the elderly and disabled population in Trumbull County include Area Agency on Aging District XI, SCOPE of Trumbull County, Emmanuel Community Care Center, Catholic Charities, the Trumbull County Senior Levy Office, the Veteran’s Services Office (local and federal), the Trumbull County Transit System, Western Reserve Transit Authority, and Trumbull County Department of Job and Family Services. Many of these service and housing providers are members of a group known as the Trumbull County Housing Collaborative.

CONCLUSIONS AND ACTION STEPS

CONCLUSIONS

Trumbull County is a diverse but highly segregated place, particularly in its urban core. The population of the county is overwhelmingly White, although the vast majority of the minority population, particularly the Black or African-American population, lives within the urban core. The remaining areas in Trumbull County are almost entirely comprised of White persons. This historic segregation runs generations deep, and its roots can be traced to institutionalized racism such as redlining and restrictive covenants which often specified that a property could only be sold to a White person. In fact, the issues of redlining and restrictive covenants made it almost impossible for a person of color to purchase real property from the 1930s to the passage of the Civil Rights Act in 1964.

Due to the aforementioned issues, a number of impediments to fair housing choice have been identified in Trumbull County. Those include, but are not limited to, a lack of education about fair housing issues available not only to landlords but to tenants, as well; a plethora of affordable housing, but a lack of accessible housing to those persons with disabilities; the aforementioned historic segregation issues that continue to plague Trumbull County as well as the Mahoning Valley region in general; and a pervasive “Not In My Backyard” (NIMBY) syndrome that also runs generations deep throughout the county and region.

Therefore, four broad goals are proposed to address the issues of impediments to fair housing choice in Trumbull County: 1.) education, 2.) reducing segregation, 3.) increasing the supply of accessible housing, and 4.) the development of a team to ensure that the goals and action steps outlined below are implemented in a timely fashion.

ACTION STEPS TO ADDRESS IMPEDIMENTS TO FAIR HOUSING CHOICE

There are four broad goals to address impediments to fair housing choice in Trumbull County, and the cities of Warren and Niles. Those include:

- Increase fair housing training and outreach opportunities in Trumbull County, and target tenants, landlords, realtors, concerned citizens, and elected officials
- Reduce historic and institutional segregation across Trumbull County
- Increase supply of accessible and affordable housing for those persons with disabilities
- Establish a baseline and best practices to track impediments to fair housing choice to affirmatively further fair housing

Action steps to address historical segregation may include earmarking a certain percentage of grant dollars from HOME, CHIP, and other housing-related programs, to be expended within less segregated census tracts of the county.

Education is a critical component. The Warren Area Board of Realtors (WABOR) facilitates their own fair housing events and Trumbull County sponsors an annual continuing education training for realtors. In

2019, Trumbull County along with collaborating partners including the Community Foundation of the Mahoning Valley, the Raymond John Wean Foundation, the Trumbull County Historical Society, Trumbull Neighborhood Partnership, the Trumbull County Land Reutilization Corporation, the City of Warren and the Warren Area Board of Realtors organized a public event entitled Equity for All: A Discussion on Redlining, Historical Segregation and Social Inclusion in conjunction with countywide planning for the Analysis of Implements for Fair Housing. The event included a panel discussion highlighting Dr. Jason Reece, a Professor at Ohio University with a specialization in redlining practices, who provided a summation and explanation of the effects of Redlining in Warren. Dr. Reece was joined by two other scholars, Dr. Cryshanna A. Jackson Leftwich and Kayla S. Griffin, J.D./M.P.A. for a moderated panel discussion (Sara Daugherty, Moderator) on equity and social inclusion. Questions and comments were also received from the public as part of the panel discussion. Over 250 persons attended the sponsored event.

The goal of the Equity for All Event was to increase awareness of historical redlining practices and how those practices still impact communities today. The goal is organize more events like this one and to create conversation, spark interest, and drive change in fair housing policy and community perspective on the current state of housing.

The county should take the lead and produce a Public Service Announcement (PSA), and include well-known figures to speak about fair housing rights. This PSA should be aired on local television stations and radio. In addition, the implementation team should create a social media page for complaint intake and education purposes, as many residents, especially low-income residents, do not have access to cable television but do have cell phones and access to social media.

Local officials should also work with local and state elected leaders to change regulations at the state level that lead to segregation, including requirements that CDBG and HOME funds, and tax credits be used for housing in low-income areas. Consideration should also be given to adding the LGBTQ (Lesbian, Gay, Bisexual, Transgender, and Questioning) community and those with criminal records to protect class status, and enacting laws to prevent income discrimination and the refusal by some landlords to rent to those who use programs such as the Section 8 or Housing Choice Voucher Program.

Education and outreach related to NIMBY syndrome should be targeted to realtors, appraisers, developers, and elected officials.

A review of zoning restrictions countywide will be completed by 2021. Potential funders include the New Horizons Grant Program, and potential partners include local entities such as Trumbull Neighborhood Partnership, Raymond John Wean Foundation, Community Foundation of the Mahoning Valley, City Club, the Trumbull County Land Reutilization Corporation, Empowering and Strengthening Ohio's People (ESOP), elected officials from all of the county's townships, villages and cities, the Trumbull County Planning Commission, the Warren Community Development Office, the Trumbull County Zoning Inspectors Association and the Warren Area Board of Realtors (WABOR).

Finally, there is a need to retrofit older housing, particularly in the urban core, but also in rural areas where the housing stock is also aged, to make it accessible to persons with disabilities. In Trumbull

County, 14.6% of the civilian noninstitutionalized population had a disability in 2017. In the city of Warren, the disability rate was 17.5%, and in the city of Niles, it was 17.1%. When accounting only for the population age 65 and over, 33.1% have a disability in Trumbull County, and 39.7% and 40.0% have a disability in the cities of Warren and Niles, respectively.

The construction of single-family affordable homes within or adjacent to middle-income neighborhoods, using assistance through the Federal Home Loan Bank of Pittsburgh or the Federal Home Loan Bank of Cincinnati Affordable Housing Program, would address the issues of historic segregation and the lack of accessible housing stock. These homes could be affordable to buyers earning 50 percent to 80 percent of the median income of the Youngstown-Warren-Boardman Metropolitan Statistical Area. Applicants who make the homes available to households having a member with special needs receive a competitive advantage. The following steps will be necessary to securing funds through Federal Home Loan Banks:

- Designate a non-profit or government entity as the developer
- Designate a sponsor for the application that is a member of the Federal Home Loan Bank to which the agencies are applying
- Secure land that can be acquired for a reasonable price, and to enhance the competitiveness of the application acquire 25 percent of the land through the land bank

Home ownership programs through Federal Home Loan Banks require household income to not exceed 80 percent of the area median income or the state median income based on household size (whichever is higher). The cost to the prospective homeowner cannot be less than 15 percent or more than 35 percent of household income (costs include mortgage payment, taxes, and insurance).

However, since a large number of points are awarded based on location, including being in a Low and Moderate Income (LMI) census tract, homes built in conjunction with the elimination of blight, and in a tract where there are limited opportunities for home ownership, it is difficult if not impossible to acquire funds in an area where there are middle-income residents. Federal Home Loan Banks are chartered by the Federal Government and thus have specific competitive criteria set largely within the bounds of the government. Therefore, it is imperative to lobby elected officials to require the Federal Home Loan Banks to change their criteria to favor and permit projects in middle-income neighborhoods.

Low Income Housing Tax Credit Programs for rental opportunities for LMI persons can also be utilized to develop affordable housing units that are accessible to persons with disabilities, although again competitive criteria and financial incentives favor projects in low-income areas, and may not be as feasible in middle-income neighborhoods.

The following pages outline a plan of action that should be undertaken by Trumbull County, the cities of Warren and Niles, and their partners to implement the steps necessary to increase fair housing choice and affirmatively further fair housing in Trumbull County.

ACTION PLAN

The following are action steps that should be taken by Trumbull County, and the cities of Warren and Niles, to affirmatively further fair housing.

Goal	Action Steps	Cost	Funding Type	Timeframe	Project Partners
Increase fair housing training and outreach opportunities in Trumbull County, and target tenants, landlords, realtors, concerned citizens, and elected officials	Provide additional fair housing education and outreach opportunities to Landlords and Tenants	Low	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Warren Area Board of Realtors
	Provide outreach to schools and other groups that deal with fair housing issues	Low	CDBG	Long	Lead: Trumbull County Partners: Local school districts
	Produce a Public Service Announcement about fair housing, including success stories. Include local public officials and celebrities.	Medium	CDBG	Short	Lead: Trumbull County, cities of Warren and Niles Partners: Local production company, local media
	Develop a combined and comprehensive registry of landlords in the cities of Warren and Niles, and the remainder of Trumbull County	Medium	CDBG	Medium	Lead: Trumbull County, cities of Warren and Niles Partners: YSU
	Require all landlords to undergo fair housing training as a requirement to receiving an occupancy permit for rental housing units	Low	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles

Goal	Action Steps	Cost	Funding Type	Timeframe	Project Partners
Reduce historic and institutional segregation across Trumbull County	Diversify the location construction of low-income housing	High	CDBG County/cities Local non-profits Developers	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Other Trumbull County communities, local non-profits, developers
	Work to change regulations at the state level that lead to segregation, including requirement that CDBG and HOME funds, and tax credits be used in low-income areas	Low	CDBG County/cities	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Residents, elected officials
	Consider limited testing as a measure to confirm or deny the existence of housing discrimination	Medium	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Ohio Development Services Agency
	Develop one affordable housing unit in a rural area of Trumbull County	High	CDBG County/cities Local non-profits Developers	Medium	Lead: Trumbull County, cities of Warren and Niles Partners: Other Trumbull County communities, local non-profits, developers
	Work with elected officials to adopt legislation that affirmatively furthers fair housing, including changing criteria to enable the development of affordable housing projects within middle-income neighborhoods	Low	CDBG County/cities	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Residents, elected officials

Goal	Action Steps	Cost	Funding Type	Timeframe	Project Partners
Increase supply of accessible and affordable housing for those persons with disabilities	Work with local elected officials and landlords to identify available affordable housing that is or can be retrofitted for accessibility for those persons with disabilities	Medium	CDBG County/cities Developers	Medium	Lead: Trumbull County, cities of Warren and Niles Partners: Landlords, developers, YSU
Establish a baseline and best practices to track impediments to fair housing choice to affirmatively further fair housing	Continue to track all data related to fair housing, including demographic changes, housing conditions, HMDA loan applications and originations, and fair housing complaints	Medium	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: YSU
	Review housing-related complaints to Community Legal Aid in Trumbull County and the city of Warren, and housing-related complaints to the city of Niles to determine the location and causes of fair housing issues	Low	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Community Legal Aid
	Conduct a countywide analysis of zoning enforcement and recovery housing	High	CDBG	Medium	Lead: Trumbull County Partners: Ohio Development Services Agency

APPENDIX A: COMMENTS FROM PUBLIC MEETINGS

The following are comments recorded from public discussion that took place in the city of Niles on January 10, 2019; and the city of Warren on January 16, 2019.

CITY OF NILES: JANUARY 10, 2019

“Not In My Back Yard” (NIMBY)

- Domestic Violence Issues
- Group Homes (NIMBY)
- Also, “low-income” housing

Affordable Housing

- Perception issue with subsidized housing
- Real impediment – very low income
- Artificial inflation of rent due to subsidies
- Capacity issues at government level

Action Steps

1. NIMBY
 - a. Education/public outreach
 - i. Already in community
 - ii. Process for complaints
 - b. Communication
 - c. Background checks/Regulation
 - d. Monitor “up and coming”/potential problems/issues
 - e. Privacy issues
 - i. Particularly domestic issues leading to eviction
2. Lack of Affordable and Accessible Housing Options in Trumbull County
 - a. Law requiring all types of income as legitimate
 - b. Development of new housing
 - c. Rehabbing existing housing
 - d. Low income tax credit
 - e. Organize landlords in a more formal way
 - i. Then work with other agencies
3. Landlord/Tenant Disputes
 - a. Educate landlords and tenants about fair housing issues
 - b. Educate tenants about paying rent
 - i. Rent must be current
 - c. Outreach effort to educate tenants and landlords about the law/fair housing
4. Historic Segregation

- a. Better public transportation
 - i. More often
 - ii. More service areas
- b. Access to job centers, medical, etc.
- c. School district
 - i. Education perception
- d. CRA Expansion
- e. Diversify construction of low-income housing (location)

Landlord-Tenant

- Fair housing issue when tenant is denied housing on basis of race, gender, etc.
- Landlord fees for repeated calls
 - Fees that communities charge
 - Niles – 3 calls per year except domestic violence
 - Warren - nothing

Historic Segregation

- Regulations that lead to segregation
- Historical redlining
- Clustering low income housing
- Must accept medical documentation for service animals
- Outreach to various groups
 - Including schools, send information home w/kids

Nimbyism

- Group homes – permits
- Nimby group homes – where
- Group home ordinance – regulated
 - 1,000 ft from each other

Public outreach – educating public

Be proactive

Low-income housing

Fear of working with section 8, government capacity issues?

CITY OF WARREN: JANUARY 16, 2019

Historic Segregation

- Significant transient population
- Lack of a social structure
- Break cycle/upward mobility
- Lack of cooperation from local officials

Action Steps:

- Long-term community building
 - Incentivize people to stay in community long-term
- Consumer financial counseling and education
- Access to transportation
 - Public transit
- Evaluate possibility of revitalizing vacant/abandoned property
- Non-profit developer
- Look at HMDA/CRA Data

Landlord/Tenant Disputes

- Discriminatory practices?
- How do you know?
 - Testing
 - Reports
 - Publication review of ads
- Issues with landlords not maintaining properties or making reasonable accommodations

Action Steps:

- Landlord education
- Comprehensive landlord/rental list
 - Rental registration
- Education as a part of rental registration process
- Incentive to take training?
 - Landlords
- Penalties for not registering
- Training videos online
- Partner with WGH videos – high school students, ATWGH community service credit, WSCNTV.com, TCTC, KSU

Lack of Affordable and Accessible Housing Options in Trumbull County

- Lack of minority representation in some areas
- Lack of affordable housing in rural areas
- Lack of permanent supportive housing
- Tax credits cannot be used in higher income areas
 - Must have low-income tenants
 - Also – see limits only for rentals
- Transportation access

Action Steps:

- Need statewide planning initiatives
- Legislative action
 - Tax credit housing
- Need more partnerships
 - Commitment from TMHA
- Pair S+C with tax credits and match with HOME dollars
- VA \$ VASH

NIMBY Syndrome

- Warren township/city
 - Recovery center houses
 - NE side recovery center
- Rental properties

Action Steps:

- Ensure zoning laws are in compliance with FH law
- Education success stories
 - Discuss cert. although not a FH requirement
- Code enforcement active
- DPA Programs
- Buy/rehab programs
- Subsidy programs
- FHLB

Definition of family

- Warren zoning currently reviewing

Examples of successes for education even in other areas

Group homes – code enforcement

- Could lead to fair housing issues as long as zoning applies to whole population, not just group homes

Not just group homes

Also want higher incomes in lower income areas

More partnerships

- More commitment from TMHA

Need to focus more on long-term community building

- Getting people to move to areas and stay

Warren rentals – through health department

Rental registration

Partnership with schools to provide educational vides

- WSCNTV.com

Raise minimum wage

Go after pay day lenders

CITY OF WARREN, RAYMOND JOHN WEAN FOUNDATION: MAY 1, 2019

Income discrimination

- Part of local fair housing law in California, protected class

Parcel level rental property data

- Analysis can be done using parcel-level data and County Auditor data

Historical mapping of sprawl and population loss

USDA/TCLRC can be contacted to be partners in the development of at least one affordable housing unit in a rural or historically predominantly White part of Trumbull County

Countywide zoning analysis and update is a high-cost action item

- Will research New Horizons Grant to undertake project

Promote infill of subsidized housing in medium-income neighborhoods as a way to combat historic segregation that exists throughout Trumbull County

- Partner local non-profit community development corporations with Federal Home Loan Bank or utilize tax credits for new construction
- Lobby for use of tax credits in areas other than low-income neighborhoods

Extend protected class status to persons with a criminal record

- Has been done in Cook County, Illinois

Need more fixed bus routes to get people to parts of the county other than the Route 422 corridor, such as major employers

Incentivize middle income persons to relocate in the city of Warren to further reduce historic segregation in the city and Trumbull County

APPENDIX B: FAIR HOUSING TRAINING SCHEDULE, 2018-2019

<u>CDBG Target Area</u>	<u>Training Location</u>	<u>Description of Training*</u>	<u>Quarter</u>	<u>Actual Date and Time</u>	<u>Responsible Party</u>	<u>Confirm</u>
Girard City Target Area	Girard Multi-Generational Center	Landlords' Responsibilities and Tenants' Rights as related to the Fair Housing Act	1st	5-Mar-18	Community Legal Aid	Completed
Colonial Drive - Liberty Township Target Area/MVREIA	Liberty Township Public Library	Landlords' Responsibilities and Tenants' Rights as related to the Fair Housing Act	2nd	25-Jun-18	Community Legal Aid	Confirmed
Zoning Officials	Monthly Association Meeting - Trumbull County Commissioners Office	Overview of Federal, State & Local Fair Housing Laws	2nd	27-Jun-18	Trumbull County	Confirmed
Trumbull County Bar Association	120 High Street NW, Warren, Ohio 44481	Lawyers representing landlords and tenants related to the Fair Housing Act	3rd	18-Jul-18	Community Legal Aid	Completed
ECCC and Beatitude House	Saint Rose Church; Rosetta Hall	Landlords' Responsibilities and Tenants' Rights as related to the Fair Housing Act	4th	23-Oct-18	Community Legal Aid	Completed
General Public and Continuing Education for Realtors	Hollywood Gaming Casino, 655 N-Canfield- Niles Road, Youngstown, OH 44515	Fair Housing; Respecting Diversity in Changing America	5th	7-Mar-19	WABOR and Trumbull County	Completed

<u>CDBG Target Area</u>	<u>Training Location</u>	<u>Description of Training*</u>	<u>Quarter</u>	<u>Actual Date and Time</u>	<u>Responsible Party</u>	<u>Confirm</u>
General Public	Packard Music Hall, 1703 Mahoning Avenue, Warren, Ohio 44483	Equity for All; Discussion on Redlining, Historical Segregation & Social Inclusion	6th	23-May-19	Trumbull County, City of Warren and Partners	Confirmed
Brookfield Township Target Area	Brookfield Township Administration Building, 6844 Strimbu Drive, Brookfield, Ohio 44403	The Fair Housing Act & Zoning: Landlord & Tenants Rights and Responsibilities	6th	19-Jun-19	Community Legal Aid	Confirmed
Harmon Street - Warren City Target Area	Trumbull Metropolitan Housing Authority 4076 Youngstown Road SE Warren, Ohio 44484	Landlords' Responsibilities and Tenants' Rights as related to the Fair Housing Act	7th	30-Jul-19	Community Legal Aid	Confirmed
General Public	TBD	Overview of Federal, State & Local Fair Housing Laws	8th	TBD - will be between 10/1/19 and 12/31/19	Trumbull County	TBD

APPENDIX C: 2019 Analysis of Impediments to Fair Housing Choice; Newly Identified Impediments and Action Plan for 2019 to 2024 AND 2015 (previous) Analysis of Impediments Action Plan Annual Evaluation of Impediments, Outcomes & Results

2019 IMPEDIMENTS, FAIR HOUSING CONCERNS, OR PROBLEMS

After conducting and completing the eight-month long planning process in coordination with Youngstown state University Center for Urban Research, the cities of Warren and Niles and local Stakeholders, Trumbull County compiled the 2019 Analysis of Impediments To Fair Housing Plan and identified the following impediments to fair housing.

These identified impediments are the focus of Trumbull County's Action Plan for the next 5 years:

- Increase fair housing training and outreach opportunities in Trumbull County, and target tenants, landlords, realtors, concerned citizens, and elected officials
- Reduce historic and institutional segregation across Trumbull County
- Increase supply of accessible and affordable housing for those persons with disabilities
- Establish a baseline and best practices to track impediments to fair housing choice to affirmatively further fair housing

A complete copy of the entire 2019 Analysis of Impediments to Fair Housing Plan will be submitted to the State of Ohio Development Services Agency on or before July 1, 2019. The draft plan is currently available to the public for review and comments.

2019 ACTION PLAN TO ADDRESS IMPEDIMENTS TO FAIR HOUSING

Trumbull County Commissioner's office staff will take the following measures to promote awareness and encourage willing compliance with all Fair Housing laws:

Action steps to address historical segregation may include earmarking a certain percentage of grant dollars from HOME, CHIP, and other housing-related programs, to be expended within less segregated census tracts of the county.

Education is a critical component. The Warren Area Board of Realtors (WABOR) facilitates their own fair housing events, while Trumbull County sponsors an annual continuing education training for realtors. Trumbull County also hosted the 1st Equity for All event to shed light on historic redlining practices in Trumbull County and the negative impact it has today on persons of color. The county intends to lead and produce a Public Service Announcement (PSA), and include well-known figures to speak about fair housing rights. This PSA will be aired on local television stations and radio. In addition, the AI implementation team will create a social media page for complaint intake and education purposes, as many residents, especially low-income residents, do not have access to cable television but do have cell phones and access to social media.

Education and outreach related to NIMBY syndrome will be targeted to realtors, appraisers, developers, and elected officials.

A review of zoning restrictions countywide will be completed by 2021. Potential funding includes the New Horizons Grant and potential funding partners include local entities such as Trumbull Neighborhood Partnership, Raymond John Wean Foundation, Community Foundation of the Mahoning Valley, City Club, Empowering and Strengthening Ohio's People (ESOP), Trumbull County Planning Commission and Warren Area Board of Realtors.

Finally, there is a need to retrofit older housing, particularly in the urban core, but also in rural areas where the housing stock is also aged, to make it accessible to persons with disabilities. In Trumbull County, 14.6% of the civilian noninstitutionalized population had a disability in 2017. In the City of Warren, the disability rate was 17.5%, and in the City of Niles, it was 17.1%. When accounting only for the population age 65 and over, 33.1% have a disability in Trumbull County, and 39.7% and 40.0% have a disability in the Cities of Warren and Niles, respectively.

ACTION PLAN – 2019 TO 2024

The following are action steps that are being proposed by Trumbull County, and the cities of Warren and Niles, to affirmatively further fair housing.

Goal	Action Steps	Cost	Funding Type	Timeframe	Project Partners
Increase fair housing training and outreach opportunities in Trumbull County, and target tenants, landlords, realtors,	Provide additional fair housing education and outreach opportunities to Landlords and Tenants	Low	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Warren Area Board of Realtors
	Provide outreach to schools and other groups that deal with fair housing issues	Low	CDBG	Long	Lead: Trumbull County Partners: Local school districts

Goal	Action Steps	Cost	Funding Type	Timeframe	Project Partners
concerned citizens, and elected officials	Produce a Public Service Announcement about fair housing, including success stories. Include local public officials and celebrities.	Medium	CDBG	Short	Lead: Trumbull County, cities of Warren and Niles Partners: Local production company, local media
	Develop a combined and comprehensive registry of landlords in the cities of Warren and Niles, and the remainder of Trumbull County	Medium	CDBG	Medium	Lead: Trumbull County, cities of Warren and Niles Partners: YSU
	Require all landlords to undergo fair housing training as a requirement to receiving an occupancy permit for rental housing units	Low	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles
Reduce historic and institutional segregation across Trumbull County	Diversify the location construction of low-income housing	High	CDBG County/cities Local non-profits Developers	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Other Trumbull County communities, local non-profits, developers
	Work to change regulations at the state level that lead to segregation, including requirement that CDBG and HOME funds, and tax credits be used in low-income areas	Low	CDBG County/cities	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Residents, elected officials
	Consider limited testing as a measure to confirm or deny the existence of housing discrimination	Medium	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Ohio Development Services Agency
	Develop one affordable housing unit in a rural area of Trumbull County	High	CDBG County/cities Local non-profits Developers	Medium	Lead: Trumbull County, cities of Warren and Niles Partners: Other Trumbull County communities, local non-profits, developers
	Work with local elected officials to adopt policies that affirmatively further fair housing	Low	CDBG County/cities	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Residents, elected officials
Increase supply of accessible and affordable housing for those persons with disabilities	Work with local elected officials and landlords to identify available affordable housing that is or can be retrofitted for accessibility for those persons with disabilities	Medium	CDBG County/cities Developers	Medium	Lead: Trumbull County, cities of Warren and Niles Partners: Landlords, developers, YSU

Goal	Action Steps	Cost	Funding Type	Timeframe	Project Partners
Establish a baseline and best practices to track impediments to fair housing choice to affirmatively further fair housing	Continue to track all data related to fair housing, including demographic changes, housing conditions, HMDA loan applications and originations, and fair housing complaints	Medium	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: YSU
	Review housing-related complaints to Community Legal Aid in Trumbull County and the city of Warren, and housing-related complaints to the city of Niles to determine the location and causes of fair housing issues	Low	CDBG	Long	Lead: Trumbull County, cities of Warren and Niles Partners: Community Legal Aid
	Conduct a countywide analysis of zoning enforcement and recovery housing	Medium	CDBG	Medium	Lead: Trumbull County Partners: Ohio Development Services Agency

2017-2019 EVALUATION OF OUTCOMES AND RESULTS FOR AI ACTION PLAN COMPLETED IN 2015

AFFORDABLE AND ACCESSIBLE HOUSING

1. Trumbull County Commissioner's office staff continues to work with the Trumbull County Housing Collaborative to promote affordable and accessible housing opportunities by attending bi-monthly meetings for updates on services and assistance available and using a strong referral network system.
2. Trumbull County through the Warren-Trumbull Home Consortium offers grants to income-eligible persons to promote affordable housing and homeownership opportunities throughout Trumbull County.
3. Trumbull County offices provided housing related assistance to hundreds of homeowners to address health, safety, energy deficiencies and accessibility issues to residents throughout Trumbull County.
4. Trumbull County through the Warren-Trumbull Home Consortium provides Down Payment Assistance to low- and moderate-income households.
5. Trumbull County provides referrals to the Area Agency on Aging and works with the Western Reserve Independent Living Center to promote accessibility.

LANDLORD / TENANT DISPUTES

1. Trumbull County Commissioner's office staff worked with Community Legal Aid to provide Training for landlords and property managers.
2. Trumbull County Commissioner's office staff provided referrals to Community Legal Aid to assist with landlord / tenant disputes and dispositions with over 50 individuals assisted in 2018.

NOT IN MY BACKYARD (NIMBY) SYNDROME

1. Trumbull County Commissioner's office staff continues to work with the Mental Health and Recovery Board (TCMHRB) to provide outreach and education to the benefits of constructing different types of housing throughout Trumbull County.
2. Trumbull County Commissioner's office staff and Community Legal Aid continued to provide training and education to local Zoning Officials and their roles in eliminating NIMBY Syndrome.

HISTORIC SEGREGATION

1. Trumbull County Commissioner's office staff worked with the Fair Housing Resource Center to provide extensive training and education on prohibited steering of buyers and key points on eliminating historic segregation to local Realtors.
2. Trumbull County Commissioner's office staff continues to promote development of affordable housing in the rural areas of Trumbull County.
3. Trumbull County Commissioner's office staff raised over \$7,500 in order to conduct the Equity for All Event on May 23rd, 2019. See attached flyer. Over 200 persons attended the event held at Packard Music Hall in order to hear about the history of redlining and segregation in Trumbull County and how it translates to inequity today for persons of color.

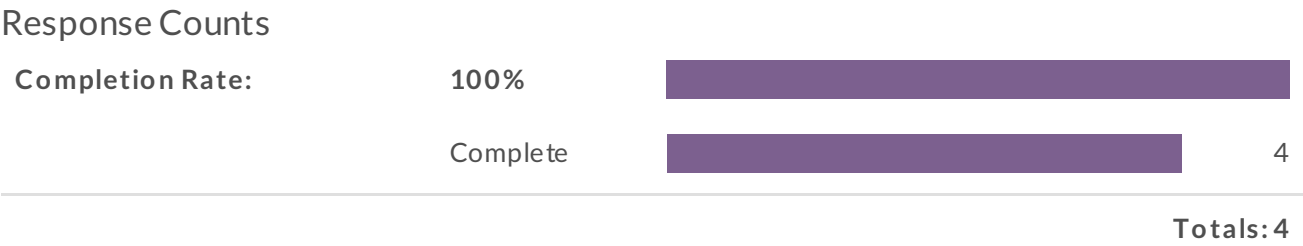
EDUCATION

1. Community Legal Aid provided six Fair Housing and Education Sessions to landlords / tenants, zoning officials and elected officials throughout Trumbull County.
2. Trumbull County Commissioner's office staff provided three additional training programs in coordination with the Fair Housing Resource Network, the Warren Area Board of Realtors, the Trumbull County Zoning Officials Association and the General Public.
3. Trumbull County Commissioner's office staff and Community Legal Aid distributed over 4,000 Fair Housing Brochures.
4. Trumbull County Commissioner's office staff attended Racial Equity Training in 2019.

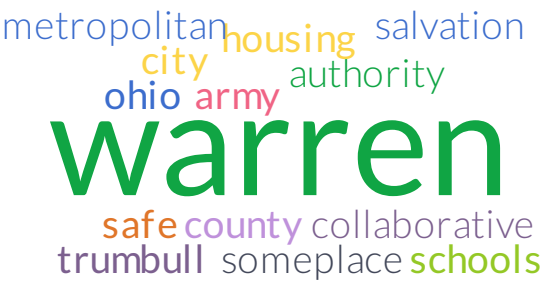
DATA COLLECTION

1. Trumbull County continues to collect and review CRA and HMDA data.
2. Trumbull County continues to collect and review OCRC complaints.

Appendix D: Report for Trumbull County Analysis of Impediments to Fair Housing Choice

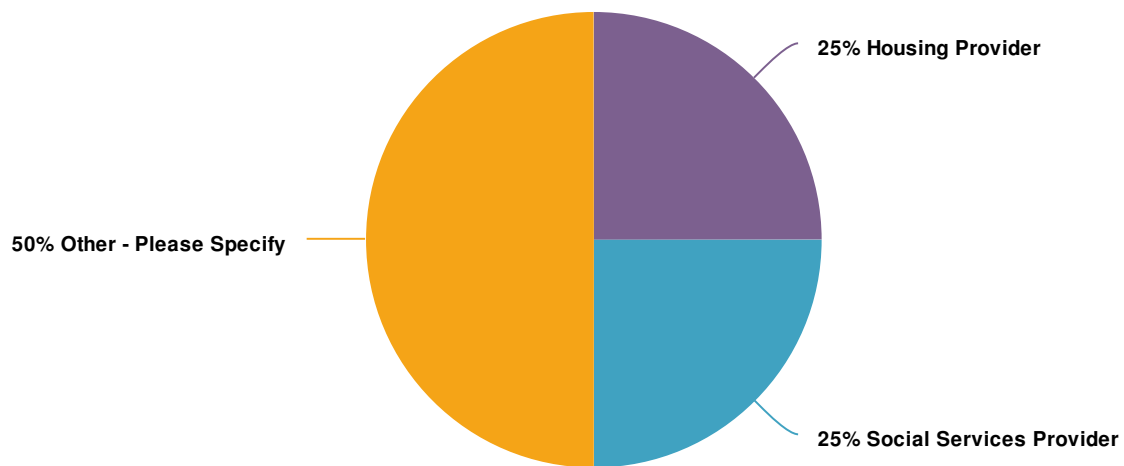


1. What is the name of your organization?



Count	Response
1	Someplace Safe
1	The Salvation Army (Warren, Ohio)
1	Trumbull County Housing Collaborative/Trumbull Metropolitan Housing Authority
1	Warren City Schools

2. Which of the following best describes your organization?



Value		Percent	Responses
Housing Provider	<div><div></div></div>	25.0%	1
Social Services Provider	<div><div></div></div>	25.0%	1
Other - Please Specify	<div><div></div></div>	50.0%	2
			Totals: 4

Other - Please Specify	Count
DV Shelter	1
Education	1
Totals	2

3. What services do you provide to the protected classes in Ohio (color, race, religion, sex, familial status-families with children, disability, national origin, ancestry, military status-active military)?



Count	Response
1	Affordable Housing
1	Educational services regardless of race, religion, disability, national origin
1	Mass feeding, food pantry, showers, referrals
1	Shelter, Advocacy, Legal, Case Management.

4. Have there been any changes in the demographics you have served since 2015, such as non-English speaking persons or persons with disabilities?

numbers population
 evidence higher
 stayed anecdotal serve
 reduced esl clients
 mental lot illness
 suggest student slightly

Count	Response
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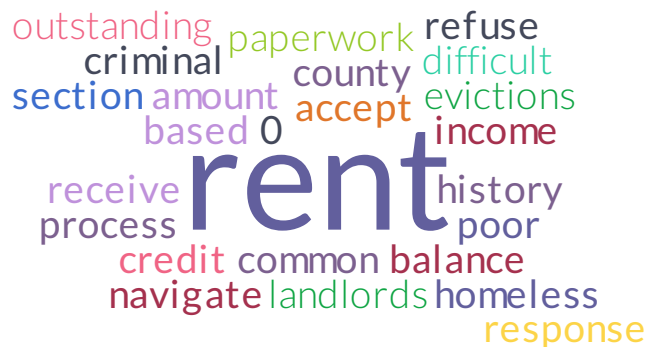
1	Anecdotal evidence would suggest we are seeing slightly higher numbers of ESL clients
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1	Has stayed about the same
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1	No, reduced student population to serve
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1	yes, more so. A lot of mental illness.
---	--

5. Please list any impediments to fair housing choice encountered by your clients, of which you are aware.



Count Response

1	Criminal History, Evictions, Poor credit, Outstanding Rent Balance/ Utilities.
1	Difficult to navigate the process, especially once they are homeless; tremendous amount of paperwork; wait times
1	None
1	There are many landlords in Trumbull County that refuse to rent to tenants based upon the type of income they receive - "We don't accept Section 8" would be the common response

6. Does your organization administer any fair housing-related programs? If so, how many people are served, what funds are available, and are there any gaps in funding or in who is served?



Count	Response
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2	No
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1	No, mostly refer to shelters and Catholic Charities or Rapid Rehousing
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1	We refer to Commissioner's Office or Legal Aid if a family has a fair housing issue
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7. Does your organization proactively target those “least likely to apply” – those that did not know better housing was available, or did not know they were welcome in certain neighborhoods in throughout the county?



Count	Response
1	We actively market our housing opportunities
1	We do not proactively target any specific group
1	Yes, Through our Case Management Department.
1	Yes, we do identify families that are homeless.