

<b>I. PROGRAM PARTICIPANTS</b>	<b>7</b>
<b>II. EXECUTIVE SUMMARY</b>	<b>7</b>
<b>Jurisdiction Table 1: Prioritization of Contributing Factors by AFH Designated Fair Housing Issue</b>	<b>10</b>
Segregation/Integration	10
Disparities in Access to Opportunity	12
Disproportionate Housing Needs	15
Publicly Supported Housing	17
Disability & Access	20
Fair Housing Enforcement	21
<b>Jurisdiction Table 2: Assessment of Fair Housing Goals</b>	<b>23</b>
Goal #1 Strengthen fair housing education, investigation, enforcement, and administration	23
Goal #2 Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, lenders, safety forces, elected/appointed officials, and the general public	24
Goal #3 Continually monitor local zoning codes for discriminatory elements	25
Goal #4 Provide greater access to all types of transportation for all persons in the community to access areas of opportunity by advocating for and supplementing the services provided through the public transportation providers.	26
Goal #5 Increase the amount of affordable housing in areas with greater access to opportunity through: expanded landlord participation in HCV Program, increased QAP equity, and increased acceptance of other subsidized programming	27
Goal #6 Evaluate the prevalence of hate crimes that occur in the county and the extent to which such crimes are formally reported in national databases to establish and document that such crimes limit a person’s fair housing choices.	28
Goal #7 Provide increased fair housing information to the general public with particular attention to persons in protected classes.	29
<b>III COMMUNITY PARTICIPATION PROCESS</b>	<b>31</b>
III.1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.	31
<b>IV. ASSESSMENT OF PAST GOALS, ACTIONS AND STRATEGIES</b>	<b>46</b>
IV.1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:	46
IV.1.a. Discuss what progress has been made toward their achievement.	46
IV.1.b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and	50
IV.1.c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.	51
IV.1.d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.	51

<b>V. FAIR HOUSING ANALYSIS</b>	<b>53</b>
<b>A. Demographic Summary</b>	<b>53</b>
V.A.1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).	53
V.A.2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.	57
<b>V. Fair Housing Analysis &gt; B. General Issues</b>	<b>59</b>
V. Fair Housing Analysis > B. General Issues > i. Segregation/Integration > 1. Analysis	59
V.B.i.1.a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.	59
V.B.i.1.b. Explain how these segregation levels have changed over time (since 1990).	61
V.B.i.1.c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.	62
V.B.i.1.d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.	64
V.B.i.1.e. Discuss how patterns of segregation have changed over time (since 1990).	64
V.B.i.1.f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.	65
V.B.i.2. Additional Information	65
V.B.i.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.	65
V.B.i.2.b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.	65
V.B.i.3. Contributing Factors of Segregation	66
<b>V. Fair Housing Analysis B. General Issues ii. R/ECAPs</b>	<b>67</b>
V.B.ii.1. Analysis	67
V.B.ii.1.a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.	67
V.B.ii.1.b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?	67
V.B.ii.1.c. Describe how R/ECAPs have changed over time (since 1990).	67
V.B.ii.2. Additional Information	67
V.B.ii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.	67
V.B.ii.2.b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.	67
V.B.ii.3. Contributing Factors of R/ECAPs	67
<b>V. Fair Housing Analysis B. General Issues</b>	<b>68</b>
iii. Disparities in Access to Opportunity - V.B.iii.1. Analysis	68
V.B.iii.1.a. Educational Opportunities - V.B.iii.1.a.i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.	68
V.B.iii.1.a.ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.	68
V.B.iii.1.a.iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school Which protected class groups are least successful in accessing proficient schools?	70
<b>V. Fair Housing Analysis &gt; B. General Issues</b>	<b>72</b>
iii. Disparities in Access to Opportunity 1. Analysis b. Employment Opportunities Employment	72
V.B.iii.1.b.i. Describe any disparities in access to jobs and labor markets by protected class groups.	72
V.B.iii.1.b.ii. How does a person's place of residence affect their ability to obtain a job?	73

V.B.iii.1.b.iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?	73
<b>V. Fair Housing Analysis B. General Issues</b>	<b>73</b>
iii. Disparities in Access to Opportunity V.B.iii.1.c. Transportation Opportunities	73
V.B.iii.1.c.i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.	73
V.B.iii.1.c.ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?	74
V.B.iii.1.c.iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.	75
<b>V. Fair Housing Analysis B. General Issues</b>	<b>75</b>
iii. Disparities in Access to Opportunity d. Low Poverty Exposure Opportunities V.B.iii.1.d.	75
V.B.iii.1.d.i. Describe any disparities in exposure to poverty by protected class groups.	75
V.B.iii.1.d.ii. What role does a person's place of residence play in their exposure to poverty?	76
V.B.iii.1.d.iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?	76
V.B.iii.1.d.iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas	76
V. Fair Housing Analysis B. General Issues iii. Disparities in Access to Opportunity e & f.	77
V.B.iii.1.e.i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.	77
V.B.iii.1.e.ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?	78
V.B.iii.1.f. Patterns in Disparities in Access to Opportunity	79
V.B.iii.1.f.i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.	79
V.B.iii.2. Additional Information V.B.iii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.	80
V.B.iii.2.b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).	81
V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity	81
<b>V. Fair Housing Analysis B. General Issues</b>	<b>83</b>
iv. Disproportionate Housing Needs	83
V.B.iv.1. Analysis V.B.iv.1.a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?	83
<b>V.B.iv.1.b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?</b>	<b>84</b>
V.B.iv.1.c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.	85

V.B.iv.1.d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.	85
V.B.iv.2. Additional Information	86
V.B.iv.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.	86
V.B.iv.2.b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.	87
V.B.iv.3. Contributing Factors of Disproportionate Housing Needs	87
<b>V. Fair Housing Analysis &gt; C. Publicly Supported Housing Analysis</b>	<b>88</b>
V. Fair Housing Analysis > C. Publicly Supported Housing Analysis > 1. Analysis > a. Publicly Supported Housing Demographics	88
V.C.1.a.i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?	88
V.C.1.a.ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.	90
V.C.1.b. Publicly Supported Housing Location and Occupancy	94
V.C.1.b.i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.	94
V.C.1.b.ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?	95
V.C.1.b.iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPs compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?	96
V.C.1.b.iv.(A). Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.	96
V.C.1.b.iv.(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.	97
V.C.1.b.v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.	98
V.C.1.c. Disparities in Access to Opportunity	98
V.C.1.c.i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.	98
V.C.2. Additional Information	99
V.C.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.	99

V.C.2.b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.	99
V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy	100
<b>V. Fair Housing Analysis &gt; D. Disability and Access Analysis</b>	<b>101</b>
V.D.1. Population Profile	101
V.D.1.a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?	101
V.D.1.b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.	101
V.D.2. Housing Accessibility	102
V.D.2.a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.	102
V.D.2.b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?	103
V.D.2.c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?	104
V.D.3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings	107
V.D.3.a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?	107
V.D.3.b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.	<b>Error! Bookmark not defined.</b>
V.D.4. Disparities in Access to Opportunity	109
V.D.4.a. To what extent are persons with disabilities able to access the following?	109
V.D.4.b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.	112
V.D.4.c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.	113
V.D.5. Disproportionate Housing Needs	114
V.D.5.a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.	114
V.D.6. Additional Information	115
V.D.6.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.	115
V.D.6.b. The program participant may also describe other information relevant to its assessment of disability and access issues.	115
V.D.7. Disability and Access Issues Contributing Factors	116
<b>V.E. Fair Housing Analysis E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis</b>	<b>117</b>
V.E.1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.	117
V.E.2. Describe any state or local fair housing laws. What characteristics are protected under each law?	117
V.E.3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.	118
V.E.4. Additional Information	118

V.E.4.a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.	118
V.E.4.b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.	119
V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors	120
<b>VI. FAIR HOUSING GOALS AND PRIORITIES</b>	<b>121</b>
<b>1. Prioritization of Contributing Factors</b>	<b>121</b>
<b>For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice of access to opportunity, or negatively impact fair housing or civil rights compliance.</b>	<b>121</b>
V. Fair Housing Analysis > B. General Issues > i. Segregation/Integration > 3. Contributing Factors of Segregation	122
V. Fair Housing Analysis > B. General Issues > ii. R/ECAPs > 3. Contributing Factors of R/ECAPs	122
V. Fair Housing Analysis > B. General Issues > iii. Disparities in Access to Opportunity > 3. Contributing Factors of Disparities in Access to Opportunity	122
V. Fair Housing Analysis > B. General Issues > iv. Disproportionate Housing Needs > 3. Contributing Factors of Disproportionate Housing Needs	123
V. Fair Housing Analysis > C. Publicly Supported Housing Analysis > 3. Contributing Factors of Publicly Supported Housing Location and Occupancy	123
V. Fair Housing Analysis > D. Disability and Access Analysis > 7. Disability and Access Issues Contributing Factors	124
V. Fair Housing Analysis > E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis > 5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors	124
<b>VI. Fair Housing Goals and Priorities &gt; 2. Fair Housing Goals</b>	<b>124</b>
Jurisdiction Table 19: Assessment of Fair Housing Goals (same as Jurisdiction Table 2)	125
Goal #1 Strengthen fair housing education, investigation, enforcement, and administration	125
Goal #2 Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, lenders, safety forces, elected/appointed officials, and the general public	126
Goal #3 Continually monitor local zoning codes for discriminatory elements	127
Goal #4 Provide greater access to all types of transportation for all persons in the community to access areas of opportunity by advocating for and supplementing the services provided through the public transportation providers.	128
Goal #5 Increase the amount of affordable housing in areas with greater access to opportunity through: expanded landlord participation in HCV Program, increased QAP equity, and increased acceptance of other subsidized programming	129
Goal #6 Evaluate the prevalence of hate crimes that occur in the county and the extent to which such crimes are formally reported in national databases to establish and document that such crimes limit a person's fair housing choices.	130
Goal #7 Provide increased fair housing information to the general public with particular attention to persons in protected classes.	131
<b>JURISDICTION GENERATED TABLES</b>	<b>133</b>
<b>SUPPORTING DOCUMENTS</b>	<b>134</b>
<b>AFFH TOOL MAPS</b>	<b>136</b>
<b>AFFH TOOL TABLES</b>	<b>137</b>

# Lake County, Ohio Assessment of Fair Housing 2017

## I. Program Participants

<b>Participant Id</b>	<b>Name</b>	<b>Lead</b>
<b>356000168</b>	<b>Lake County, Ohio</b>	<b>Yes</b>
<b>OH025</b>	<b>Lake Metropolitan Housing Authority, Ohio</b>	<b>No</b>

## II. Executive Summary

### Process Overview

Lake County, as a recipient of CDBG and HOME funding from HUD prepares a Consolidated Plan every five years with the most recent covering the period from October 1, 2012 through September 30, 2017. Due to the adoption of the Affirmatively Furthering Fair Housing Rule at the end of 2015 and the implementation schedule established therein Lake County became one of the early submitters. The Lake County Citizen Participation Plan was updated to reflect requirements of the Assessment of Fair Housing (AFH) process. Following the directives from HUD that encouraged collaboration, the County entered into a Collaboration Agreement with Lake Metropolitan Housing Authority whose five year planning process was separated from that of the County by only a matter of three months. Lake County, acting as lead and having a close long term working and contractual relationship with Fair Housing Resource Center, Inc., extended an existing contract with FHRC to include consultation services to assist in the preparation of the AFH. This partnership began the AFH process with energy and excitement. The process of preparing the AFH included reviewing AFH materials made available, establishing a timeline of tasks to be performed, assigning those tasks between County / Lake MHA / FHRC, performing outreach, structuring the message to community leaders, performing analysis of the data and maps, and obtaining input from stakeholders and community members. Then it was time to review the community input and begin to write independently and collaboratively while continuing to conduct the necessary day to day business of administering federal funds in service to our communities. Then it was time to write and edit more and solicit more information. Good plans continue to grow, evolve and respond to challenges. This is and will be a good plan, a good assessment and the preparers acknowledge that there are sections and topics that will benefit from additional examination and written discussion.

Reflecting upon this process it would have been beneficial to have attended the three day training earlier than late November but all who did attend came away with some renewed energy and an improved understanding that the AFH should have a balanced approach within the overall HUD planning process and a sense of affirmation that capacities vary across the country and region. There was reassurance offered that the AFH is a part of that process that can and will feed into a robust and thorough Consolidated Plan. That balanced approach includes demonstrations of respect and an acknowledgment of the value of the contributions and services of all participants, all partners, all related agencies, and yes the individual residents in the performance of the multifaceted HUD mission. Due to differing and sometime oppositional missions, regulations and goals under the HUD umbrella, the partners involved in this assessment (Lake County, Lake MHA and FHRC) can be at odds on a variety of topics and issues. However, processes such as this assessment are ripe with opportunity to work collaboratively on at least one major shared goal: to assist and support individuals in finding and or maintaining safe and affordable housing. From zoning, to reasonable accommodations to policies involving credit or criminal records and evictions, all can be approached with a spirit of open-mindedness, more education and a desire for all interested parties to gain and use a deeper understanding of respective missions, regulations and goals.

The Consolidated Plan notes an assessment of various demographic information, solicitation and comment on housing and other needs, an analysis of the housing market, establishment of strategies and priorities to use the allocated funding to meet those needs identified. And through the Action Plan developed for each fiscal year the County specifies funding and anticipated benefits of the eligible projects and activities. Based on the AFFH Rule the Assessment of Fair Housing now acts as precursor to the Consolidated Plan which may work to the advantage of the jurisdiction and to further HUD's mission. The scope of the AFH is far broader than the Consolidated Plan and the act of completing it at an urban county level has prompted the development of new relationships outside of the norm. Those new relationships within the fields of business, education, health, and transportation are necessary to truly avail fair housing choice and opportunities for all residents.

The goal of this document, the Assessment of Fair Housing (AFH) for Lake County Ohio is to identify fair housing issues within our jurisdiction, identify potential contributing factors to fair housing choice, and recommend actions that the County can take in partnership with other stakeholders and partners to eliminate fair housing issues identified or remove or reduce the impact of those contributing factors that interfere with fair housing choice.

Fair Housing issues have been identified in two previous Analysis of Impediments and are noted in this document. While progress has been made in addressing those impediments, they remain present. Those issues are greater than and extend beyond one community, one county, one region, and even one state. Those issues or impediments exist throughout this nation. The methods and steps to remove those impediments through positive actions has been detailed in the various Fair Housing Action Plans. Those Fair Housing Action Plans similarly have been included in the text that

follows. The Fair Housing Issues of Lake County Ohio in summary include: 1. Lack of Racial and Ethnic Diversity in the Lake County Urban County; 2. Segregation within Lake County Urban County; 3. Lack of Interest in and Support for Fair Housing by Local Communities; 4. Inadequate Local Fair Housing laws; 5. Lack of Quality Affordable Housing & Concentration of Low-Income Housing in Painesville; 6. Discrimination in Rental Housing Market; 7. Racial Disparities in Mortgage Lending; 8. Restrictive Local Zoning and Occupancy Codes; 9. Lack of Adequate Access to Public Transportation; 10. Lack of Reporting and / or Recording Hate Crimes. An earlier Analysis of Impediments to Fair Housing noted many of these same fair housing issues with just slightly different terminology and interestingly for the time a more regional approach to the topic.

### **Analysis to reach the goals**

Frankly with the timeframe available to prepare this first AFH, the analysis of information and the prioritization of goals and processes fell to those leaders and staff most familiar with the regulations and operational realities of working with HUD funds. The freeform anonymous commentary from the surveys more often than not validated that there is need and desire for affordable housing throughout the County and a desire to reach out for opportunities that improve the individual and collective quality of life of persons and households in our area.

### **Significant contributing factors**

The information listed in the Contributing Factor Table below will be discussed additionally in each corresponding analysis section. Each category and example provided in the list of significant contributing factors provided by HUD and added locally resonated with the persons drafting the AFH as well as with the agencies, governmental entities and residents that contributed their time, effort, thoughts and opinions. While there was agreement that each of those contributing factors had a part in forming the housing climate there was a variety of opinion on the weight and impact of certain significant contributing factors.

The analysis of the data identified in this report coupled with the application of local knowledge of policies, practices, and data assisted the County and the Housing Authority in the identification of significant contributing factors that impact fair housing choice in the area. The contributing factors were assigned three (3) priority levels as follows:

- High – factors that limit or deny fair housing choice, factors that limit or deny access to opportunity, or negatively impact fair housing or civil rights compliance;
- Moderate – less urgent priorities or those that build on prior actions;
- Low – limited direct impact on fair housing issues

These contributing factors are accompanied by a description of those factors as well as a justification for the priority ranking and assisted the County and the Housing Authority in setting fair housing

goals. These fair housing goals will help overcome significant contributing factors identified in this AFH document as well as be incorporated into subsequent planning processes, including strategies, actions and funding priorities established in the Consolidated Plan and the PHA plan. The following table lists the contributing factors; levels of priority utilizing the scale detailed above and are listed in order of each section of the fair housing issues analysis identified in this report.

<u>Jurisdiction Table 1: Prioritization of Contributing Factors by AFH Designated Fair Housing Issue</u>		
Segregation/Integration		
Contributing Factor	Priority	Discussion
<b>Community Opposition</b>	High	<p>Community opposition is prevalent within Lake County as evidenced by comments made at community meetings and on the survey conducted. The county and FHRC received a substantial amount of negative feedback from community residents during multiple forums and surveys in regards to existing developments and proposals on the incorporation of additional public housing opportunities for the low income residents. Most community members expressed concerns for the development of new subsidized housing developments being built within the area with concerns on property values, increased minorities, and attracting “those people” to our community.</p> <p><b>We have identified this as a high priority contributing factor as the prevalence of community opposition limits housing choice and denies access to opportunities for nearly all categories of protected classes in Lake County.</b></p>
<b>Private Discrimination</b>	High	<p>There is evidence that discriminatory housing practices exist throughout the County. The Fair Housing Resource Center, Inc. authored a report, Discrimination in the Tri-County Housing Market, 2011-2014[1] that looked at discrimination in the housing market for the Tri-County area of Lake, Geauga and Ashtabula Counties. The report concluded that systemic testing results yielded “that discrimination occurs for 1 out of every 3 persons when seeking rental homes in the area. Specifically, evidence revealed various forms of discrimination against residents including: imposing questionable occupancy standards that discriminate against families with children; refusing to make accommodations to policies for persons with disabilities; outright refusals to consider applicants because of their handicap, race, or national origin; outright refusals by lenders to work with Blacks seeking home mortgages and lastly, presence of exclusionary zoning within the area. Current intake of complaints indicates the same type of discriminatory practices continue.</p>

		<b>We have identified this as a high priority contributing/factor as the prevalence of Private discrimination limits housing choice and denies access to opportunities for nearly all categories of protected classes in Lake County.</b>
<b>Location and Type of Affordable Housing</b>	High	The concentration of affordable housing in few areas of the LCUC limits fair housing choice and results in families not having access to opportunity.
<b>Lack of private investment in specific neighborhoods</b>	Low	<p>The majority of subdivisions being created in Lake County contain larger lots and homes with high square footage, which are unaffordable. Many communities have minimum lot sizes or minimum house sizes, which prevents developers from building affordable housing. Other cities are completely built out and there is little to no construction occurring. What little new construction has occurred, the price of the rental housing is at the highest end of the rental spectrum making such housing unaffordable to the average renter.</p> <p>The need for affordable housing has increased and outpaced the level of private investment available. This is due to the interest in making profitable investments. Without a subsidy source nothing occurs,</p> <p><b>We have identified this as a low priority because, while the factor is present in Lake County, it does not appear to limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance.</b></p>
<b>Lack of public investment in specific neighborhoods</b>	Low	<p>Over the last few years, the multi-family construction market nearly stopped building new projects and State Government failed to invest in affordable housing programs. A recently published report by the Ohio Legal Aid Programs indicated that Ohio’s Low-Income Housing Tax Credit program “did not provide housing in low-economic areas for families with children.” While this issue is clearly a local one and has received the attention of our local governmental officials, very little attention has been given to affordable housing at the federal level. The concerns regarding affordable housing, coupled with the state of the economy, creates an environment where there are too many individuals living in cost burdened housing without any future relief. The County has provided funding with CDBG/HOME dollars to public investment projects as appropriate. The County utilizes every opportunity to continue to provide financial assistance to new projects and has listed this as a low priority as it highlights work already undertaken in the County. <b>We have identified this as a low priority because, while the factor is present in Lake County, it does not appear to limit or deny fair housing choice or access to</b></p>

		<b>opportunity or negatively impact fair housing or civil rights compliance.</b>
--	--	--

Disparities in Access to Opportunity		
Contributing Factor	Priority	Discussion
<b>Access to Financial Services</b>	High	<p>There are a high number of financial institutions with physical locations throughout the area. However, there is direct evidence of inequitable treatment in receiving mortgage financing, equal access to financing information and equal access to mortgage modifications.</p> <p><b>We have identified this as a high priority contributing factor as the difference in availability of certain financial products limits housing choice and denies access to opportunities for nearly all categories of protected classes in Lake County.</b></p>
<b>Lending Discrimination</b>	High	<p>The analysis demonstrated that racial disparities in mortgage loan application denial rates were found throughout the county. High-cost lending revealed similar racial and ethnic disparities.</p> <p><b>We have identified this as a high priority contributing factor as the prevalence of Lending Discrimination limits housing choice and denies access to opportunities for nearly all categories of protected classes in Lake County.</b></p>
<b>Transportation: Availability, type Frequency &amp; Reliability</b>	High	<p>Transportation is an important factor in relation to housing choice, as its availability can often determine where an individual or family can or cannot live. Although Lake County has its own public transportation system to assist those who do not have access to a private vehicle, its routes are limited. Laketrans and the Greater Cleveland RTA have a reciprocal transfer agreement in place to assist riders in having regional access to transportation services.</p> <p>Laketrans offers Dial-a-Ride, a door to door shared ride service. Issues with this service include advance reservation timer frame of 2 – 10 business days, duration of pick up windows, and operating times. These issues combine to create challenges for those wishing to use as an alternate form of transportation for work purposes.</p>

<p><b>Lack of Regional Cooperation</b></p>	<p>Medium</p>	<p>Use and develop contacts and influence within the Northeast Ohio Region particularly the Northeast Ohio Area-wide Coordinating Agency (NOACA) to aid in promotion of affirmatively furthering fair housing principles and expanded transportation needs.</p>
<p><b>Land Use and Zoning Laws</b></p>	<p>High</p>	<p><b>We have identified this as a high priority contributing factor as the existence of outdated zoning limits housing choice and denies access to opportunities for nearly all categories of protected classes, specifically those noted below,</b></p> <p>The existence of exclusionary zoning practices create barriers in our community and limits housing choice. The Fair Housing Resource Center, Inc. (FHRC) had addressed this issue directly by conducting a thorough analysis of the zoning ordinances in Lake County to determine the extent of discrimination against persons with disabilities. This study was conducted in 2012 and the agency found direct evidence of exclusionary zoning ordinances and local land use policies that prohibited group homes for persons with disabilities building in their communities. The implementation of space limitations came in various forms from minimum build requirements, setbacks and space limitations from other neighboring properties. The presence of density restrictions are inconsistent with the Fair Housing Act.</p> <p>Additionally, there is an existence of definitions of family that has a discriminatory effect on housing choice. Many local zoning ordinances include great impediments to fair housing for families with children. Some localities offer no multi-family housing, have very high minimum local acreage build requirements and restrictive definitions of "family." Several communities have zoning codes that might restrict certain types of housing from being built, specifically group homes. Group homes are not permitted as a matter of right in many districts throughout the County. Thus, group homes must endure the Conditional Use Permit process instead. This CUP process is a potentially discriminatory one as it requires public notice and public hearings. Studies have shown that this process brings out vocal NIMBY opposition resulting in decision makers bowing to the opposition and denying the project or making it so conditional it becomes infeasible. Most localities have no allowance in the ordinances for homes for</p>

		recovering addicts or alcoholics and quite a few exclude homes for such individuals regardless of their status in recovery.
<b>Location of Employers</b>	Low	<p>According to the Ohio Department of Development, Lake County has more than 3.75 times the number of Service-Providing businesses with an average weekly wage \$655.00 than Good-Producing businesses with an average weekly wage of \$1,148. The majority of the service related industries run through the central corridor of the County, on a local transportation bus route. The location of these areas do not appear to be a significant factor contributing to disparities in access to opportunity. Rather, what does contribute to disparities in access to opportunity is the high amount of service related business (retail, restaurants) with lower weekly wages.</p> <p><b>We have identified this as a low priority because, while the factor is present in Lake County, it does not appear to limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance.</b></p>
<b>Location of Environmental Health Hazards</b>	Low	<p>The Environmental Health Hazards present in Lake County have existed for a long time some as early as WWII. Areas of manufacturing that were polluted have undergone remediation, Redevelopment of aging housing stock carries with it challenges due to asbestos and lead. The lack of sewer in some areas makes housing development dependent upon septic systems. When those systems fail it can cause health issues.</p> <p><b>We have identified this as a low priority because, while the factor is present in Lake County, it does not appear to limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance.</b></p>
<b>Location of Proficient School and School Assignment Policies</b>	High	<p>There is a strong link between school enrollment policies for the 8 school districts in the County and neighborhood segregation. Data indicates that the schools listed with the highest proficiency ratings are located in districts that do not allow open enrollment. Conversely, the schools that allow open enrollment to any district are ones with the lowest performing schools according to the recently published, 2016 Ohio School Report Cards. Local knowledge of school enrollment policies in the County includes the fact that there is a mandate that students attend their neighborhood school, thus neighborhood segregation</p>

		<p>affects access to proficient schools. The racial/ethnic demographics of the schools mirror the demographics of the surrounding neighborhoods. The City of Painesville District is located in the most segregated communities in the County clearly establishing the premise that neighborhood segregation affects access to proficient schools.</p> <p><b>We have identified this as a high priority contributing/factor as the existence of school assignment policies in relation to the location of proficient schools may limit housing choice and deny access to opportunities for nearly all categories of protected classes in Lake County.</b></p>
<b>Location and Type of Affordable Housing</b>	High	<p>Concentration of affordable housing in few areas of the LCUC limits choice and results in people not having access to opportunity.</p>
<b>Private Discrimination</b>	High	<p><b>We have identified this as a high priority contributing/factor as the prevalence of Private discrimination limits housing choice and denies access to opportunities for nearly all categories of protected classes in Lake County.</b></p> <p>Continued discriminatory acts including: denying reasonable accommodations and/or modifications, recent evidence of racial steering in the homebuyer process, the use of different lease terms by landlords (higher monthly rental rates, higher security deposits, stricter screening requirements) and denials due to household size for families with children inconsistent local occupancy codes.</p>
Disproportionate Housing Needs		
<b>Contributing Factor</b>	<b>Priority</b>	<b>Discussion</b>
<b>The Availability of Affordable Units in Range of Sizes</b>	High	<p>Overall, the cost of renting in Lake County has increased from 2000 to 2014. Currently, the median costs for persons with a mortgage is \$1,357 in Lake County compared to \$808.00 for the median cost of rent. Lack of affordable housing affects single persons and larger families. Single persons cannot afford rents on 1-bdrm units and are often concentrated in a low-opportunity neighborhood. Whereas, larger families are severely cost</p>

		<p>burden due to the inadequate supply of housing with more than 3 bedrooms and the few that exist are priced out of reach for the county's average income for a family.</p> <p><b>We have identified this as a high priority contributing/factor as the lack of available / affordable housing units in a range of sizes limits housing choice and denies access to opportunities for nearly all categories of protected classes in Lake County.</b></p>
<b>Displacement of Residents Due to Economic Pressures</b>	Low	<p>Generally, there are three major categories that lend to residents being displaced for economic pressures: Loss of Employment, Health Related Job Loss and Aging Residents. While Lake County, Ohio's current unemployment rate is at a low 4.5%, many local residents are still out of work. Although the unemployment rate crested at 12% in 2012 and there has been many indicators that there is economic recovery occurring, many local residents are still without a job.</p>
<b>Lack of private investments in specific neighborhoods</b>	Low	<p>Over the last few years, the multi-family construction market nearly stopped building new projects and State Government failed to invest in affordable housing programs. A recently published report by the Ohio Legal Aid Programs indicated that Ohio's Low-Income Housing Tax Credit program "did not provide housing in low-economic areas for families with children." While this issue is clearly a local one and has received the attention of our local governmental officials, very little attention has been given to affordable housing at the federal level. The concerns regarding affordable housing, coupled with the state of the economy, creates an environment where there are too many individuals living in cost burdened housing without any future relief. The County has provided funding with CDBG/HOME dollars to public investment projects as appropriate. The County utilizes every opportunity to continue to provide financial assistance to new projects and has listed this as a low priority as it highlights work already undertaken in the County</p> <p><b>.We have identified this as a low priority because, while the factor is present in Lake County, it does not appear to limit or deny fair housing choice or access to opportunity or negatively impact fair housing or civil rights compliance.</b></p>
<b>Lack of public investments in specific neighborhoods</b>	Low	<p>See discussion outlined under <i>Segregation, Lack of Public Investments in Specific Neighborhoods</i> above.</p>

<b>Land Use &amp; Zoning</b>	High	See discussion outlined in <i>Section: Disparities in Access to Housing</i> outlined above.
<b>Lending Discrimination</b>	High	See discussion outlined above in <i>Section: Disparities in Access to Housing</i> .
<b>Publicly Supported Housing</b>		
<b>Contributing Factor</b>	<b>Priority</b>	<b>Discussion</b>
<b>Admission &amp; Occupancy Policies and Procedures Including Preferences in Publicly Supported Housing</b>	High	<p><b>We have identified this as a high priority contributing factor because the application of certain policies detailed below limits housing choice and denies access to opportunities for nearly all protected classes in Lake County.</b></p> <p>Policies and procedures including Occupancy Limits, Reasonable Accommodation/Modification Requests, Credit and Criminal Record Policies, Eviction Policies and Procedures contribute to limiting housing choice within our community. Housing providers that are unfamiliar with occupancy rules can create a discriminatory effect for families with children. Increased dialogue and education related to identifying and processing reasonable accommodation and modification requests would help better assure a disabled person’s rights to housing free from barrier. Other practices that may impact choice include: Credit requirements and varied criminal record policies. Publicly Supported Housing entities must balance providing housing to those in need, with ensuring integrity of the housing programs. Eviction policies and procedures need to be reviewed to ensure compliance with Ohio landlord tenant law.</p>
<b>Land Use &amp; Zoning</b>	High	See discussion outlined above in <i>Section: Disparities in Access to Housing</i>
<b>Community Opposition</b>	High	See discussion outlined above in <i>Section: Segregation/Integration</i> .
<b>Impediments to mobility</b>	High	Some of the most desirable neighborhoods do not have a significant number of units available in the FMR range. This priority ties directly in with community opposition and source of income discrimination.
<b>Lack of Regional Cooperation</b>	Low	The term “regional cooperation” here refers to formal networks or coalitions of organizations, people, and entities

		<p>working together to plan for regional development. Cooperation in regional planning can be a useful approach to coordinate responses to identified fair housing issues and contributing factors because fair housing issues and contributing factors not only cross multiple sectors—including housing, education, transportation, and commercial and economic development—but these issues are often not constrained by political-geographic boundaries. When there are regional patterns in segregation or RE/CAP, access to opportunity, disproportionate housing needs, or the concentration of affordable housing there may be a lack of regional cooperation and fair housing choice may be restricted.</p>
<p><b>Source of Income Discrimination</b></p>	<p>High</p>	<p>The denial of housing to persons with a housing choice voucher or other rental subsidy including security deposit assistance based on their source of income is a common practice throughout the area. Thus, many individuals who receive these subsidies are denied housing in areas of opportunity based on this fact alone. Additionally, after waiting months or years on a waiting list to finally obtain a Section 8 voucher, the search begins to finding a landlord willing to accept their voucher within the required time frame. Many landlords refuse to rent to potential tenants who receive housing assistance, and reject them based solely on their form of payment, a federal housing subsidy. While searching rental advertisements, mainly advertisements can be found online stating “No Section 8.” Too often, many voucher holders lose their “cherished voucher” simply because they cannot find housing from willing providers, thus making them start the long process all over again. Voucher holders face blatant discrimination when searching for housing in the Lake County area.</p> <p><b>We have identified this as a high priority contributing factor because discrimination based on source of income limits housing choice and denies access to opportunities for nearly all protected classes in Lake County.</b></p>
<p><b>Impediments to Mobility</b></p>	<p>High</p>	<p>Many different protected classes face barriers when attempting to move to a neighborhood or area of choice. Throughout our region, individuals find difficulties in finding affordable housing in regions of opportunity. The high housing costs prevent individuals of low income from accessing high opportunity communities. There is limited</p>

		<p>access to employment opportunities, transportation and proficient school systems in low income neighborhoods.</p> <p>The jurisdiction of Lake County has multiple mobility counseling organizations, but faces housing cost barriers that prevent individuals from gaining access to areas of choice. Families with children and individuals with disabilities have limited access to funding that can provide them with access to local transportation, employment opportunities and proficient school systems.</p> <p>One of the key impediments to mobility is the current market rents and the fair market rent. Individuals with section 8 vouchers have limited access to affordable units in areas of low poverty. Current market rents have substantially increased to where section 8 voucher recipients have limited access to housing in areas of choice. A resident can afford a 2 bedroom unit in Fairport Harbor that has very limited access to employment and transportation, but cannot afford a 2 bedroom unit in Mentor where opportunity is at its highest. Due to the fair market rents, it puts restrictions on voucher recipients and in turn creates substantial segregation in low income neighborhoods.</p>
<p><b>Site Selection Policies, Practices and Decisions for Publically Supported Housing, Including Discretionary Aspects of Qualified Allocation Plans and Other Programs</b></p>	<p>High</p>	<p>The term “siting selection” refers here to the placement of new publicly supported housing developments. Placement of new housing refers to new construction or acquisition with rehabilitation of previously unsubsidized housing. State and local policies, practices, and decisions can significantly affect the location of new publicly supported housing. Local policies, practices, and decisions that may influence where developments are sited include, but are not limited to, local funding approval processes, zoning and land use laws, local approval of LIHTC applications, and donations of land and other municipal contributions. For example, for LIHTC developments, the priorities and requirements set out in the governing Qualified Allocation Plan (QAP) influence where developments are located through significant provisions in QAPs such as local veto or support requirements and criteria and points awarded for project location.</p> <p>The LIHTC is and has been highly competitive. By awarding a ranking point system to areas of greatest need and poverty the program has reinforced patterns of concentration. Point award systems for suburban-rural</p>

		areas that require million dollar investments in the immediate area to be developed also is a housing deterrent.
Disability & Access		
<b>Contributing Factor</b>	<b>Priority</b>	<b>Discussion</b>
<b>Land use &amp; Zoning Laws</b>	High	See discussion outlined in <i>Section: Disparities in Access to Housing</i> outlined above.
<b>Lack of Affordable, Accessible in a range of unit sizes</b>	High	<p><b>We have identified this as a high priority contributing factor because the lack of available / affordable housing units in a range of sizes limits housing choice and denies access to opportunities for nearly all protected classes in Lake County but particularly on those persons with disabilities.</b></p> <p>Agencies serving disabled population indicated that additional stand-alone housing units were needed because of the poor condition of older housing stock, and the design does not meet the needs of a person with mobility limitations.</p>
<b>State of Local Laws, Policies, or Practices that Discourage Individuals with Disabilities from being Placed in or Living in Apartments, Family Homes, and other Integrated Settings</b>	High	<p><b>We have identified this as a high priority contributing factor because the existence of policies that impose limits and restrictions on persons with disabilities limits housing choice and denies access to opportunities for the named protected classes in Lake County.</b></p> <p>The State of Ohio does have an Olmstead Plan titled “Ohio’s Strategic Plan to Improve Long-Term Services and Supports for People with Disabilities”[2] which states they are committed to advancing the principle that people with disabilities and the aging population are served in the most appropriate integrated settings. The Lake County Board of Developmental Disabilities 2014-2016 Strategic Plan[3] incorporated the State’s plan as a strategic goal for this period. Specifically, the Lake County Board of Developmental Disabilities is working towards “integrating individuals they serve within the community while collaborating with outside organizations to maximize current service offerings and explore new opportunities.”</p> <p>However despite the State’s efforts, many persons with disabilities and their families complained to Disabilities</p>

		Rights Ohio (DRO), claiming that Ohio’s system does not give them the opportunities to live, work and spend time in their communities. The issues the DRO identified were the following:1. Long waiting lists for waiver programs requiring people to wait over 13 Years for services they would need to reside within the community; 2. The wages for well-trained staff are so low that direct care staff who support people with developmental disabilities in the community are below poverty levels resulting in excessive turnover and 3. More individuals resided in large facilities and sheltered workshops in Ohio than any other state.
--	--	--

Fair Housing Enforcement

Contributing Factor	Priority	Discussion
<b>Lack of Reporting/and or Recording Hate Crimes</b>	High	<p>Most jurisdictions in Lake County do not report hate crimes to the FBI, nor do they keep their own statistics on hate crimes, only recording instances of “ethnic intimidation” (and not actions taken against individuals because of other protected characteristics). Although hate crime reporting is not mandated by the FBI, jurisdictions that do so raise awareness of discrimination occurring in their own communities. Some local authorities do not classify these incidents as hate crimes. Strong enforcement of hate crime laws can have a deterrent impact and can limit the potential for a hate crime incident to grow into a cycle of violence and widespread community disturbances. In a partnership with civic leaders, law enforcement officials have found they can advance community relations by demonstrating a commitment to be both tough on hate crime perpetrators and sensitive to the needs of hate crime victims.</p> <p><b>We have identified this as a high priority contributing factor because the lack of consistent policy in hate crime reporting or recording limits housing choice and denies access to opportunities for nearly all protected classes in Lake County.</b></p>
<b>Lack of Local Fair Housing Laws and Local Public Enforcement of Fair Housing Laws</b>	High	Courts have not focused on fair housing issues. One fair housing case regarding a design and construction issue of a new apartment complex was filed over 12 years ago in 2004, is still open on the docket and has been pending a decision for a Motion for Summary Judgment since

		<p>2007. The lack of information or priority on these issues results in denial of fair housing protections to some persons.</p> <p>Some members of local law enforcement do not understand fair housing rights and may perpetuate the discriminatory behavior rather than eliminate it. Members of local governments, including cities, towns, villages and townships similarly do not place an emphasis on fair housing and as a result may impede fair housing investigations, rather than assist in the process.</p> <p><b>We have identified this as a high priority contributing factor because the lack of local fair housing law and lack of enforcement limits housing choice and denies access to opportunities for nearly all protected classes in Lake County.</b></p>
<b>Community Opposition</b>	High	<i>See discussion outlined above in Section: Segregation.</i>
<b>Lack of Resources for Fair Housing Organizations</b>	High	<p>There is a lack of financial resources for fair housing matters. The LCUC contracts with the local fair housing office to conduct the fair housing work of the community. However, due to the severe limitations in CDBG funding over the last decade, the county has limited funding available.</p> <p><b>We have identified this as a high priority contributing factor because the lack of resources for Fair Housing Organizations limits housing choice and denies access to opportunities for nearly all protected classes in Lake County.</b></p>

[1] Discrimination in the Tri-County Housing Market, Final Report 2011-2014 was authored by The Fair housing Resource Center, Inc., and submitted to HUD FHEO office.

[2] <http://www.ohioaccess.ohio.gov/pdf/ohioaccessrpt2004.pdf>

[3] <http://lakebdd.org/news-forms/documents/LCBDDThreeYearOperatingPlanRevised617Usethisversion.pdf>

Jurisdiction Table 2: Assessment of Fair Housing Goals

Goal #1	Contributing Factors	Fair Housing Issue	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Strengthen fair housing education, investigation, enforcement, and administration</b></p>	<p>Lack of resources for fair housing agencies and organizations</p> <p>Private discrimination</p> <p>Source of income</p>	<p>Fair Housing Enforcement</p> <p>Segregation /Integration</p> <p>Publicly supported housing</p>	<p>Annually contract for professional fair housing services related to education, outreach, and enforcement</p> <p>Annually train County and PHA staff in fair housing practices, including training staff on identifying discriminatory practices and also techniques to communicate with individuals with language and/or cultural barriers.</p> <p>Within 1 year, the County develop and implement an LEP plan</p> <p>Within 1 year review the current scoring criteria requirements of CDBG/HOME applications to evaluate and possibly make changes to improve effectiveness &amp; responsiveness of the applicants' compliance regarding AFFH</p> <p>The County will obtain annual reporting of source of income discrimination through its contract for professional fair housing services: to include quantitative and qualitative data as available.</p>	<p>Lake MHA</p> <p>Lake County</p>

**DISCUSSION:** This goal's purpose is to address the fair housing issues of Fair Housing Enforcement, Segregation/Integration, and Publicly supported housing. There is a chronic underfunding of enforcement, investigation, and outreach in Lake County. Without sufficient financial resources, progress in affirmatively furthering fair housing will not occur. In order to overcome the listed contributing factors, a multi-pronged approach will be taken to increase the level of education, investigation, and enforcement related to fair housing. In order to mitigate these contributing factors dedicated education, outreach and enforcement efforts are noted in the metrics above.

Goal #2	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, lenders, safety forces, elected/appointed officials, and the general public</b></p>	<p>Community opposition</p> <p>Lack of local fair housing laws, local public enforcement of fair housing laws and support of fair housing</p> <p>Admissions &amp; occupancy policies and procedures, including preferences in publicly supported housing</p> <p>Lending discrimination</p> <p>Lack of private investment in specific neighborhoods</p> <p>Private discrimination</p> <p>State or local laws, policies or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated living settings</p> <p>Source of income</p>	<p>Fair Housing Enforcement</p> <p>Disparities in Access to Opportunity</p> <p>Publicly Supported Housing</p> <p>Disproportionate Housing Needs</p> <p>Disability and access</p> <p>Segregation/Integration</p>	<p>Within 1 year, create a page on Lake MHA’s website for fair housing information, including information on reasonable accommodation and modification requests, as well as resources for how to report suspected discrimination.</p> <p>Annually review the HMDA data analyzed by fair housing agencies in the region and disseminate fair housing lending reports via email link to area lenders and public officials serving Lake County and the region.</p> <p>Annually will participate in one of the following: Lake Geauga Area Assn REALTORS NE Ohio Planning and Zoning Workshop, Lake County Chamber event, to distribute fair housing information.</p> <p>Establish contact and develop rapport with leadership of safety forces and school superintendents during year 1 &amp; 2 to increase the knowledge and awareness of fair housing of these groups.</p> <p>Annually during fair housing month April distribute fair housing information related to disability and access and other contributing factors pertinent to the specific entities named in the goal by email.</p> <p>Make the entities named in this goal aware of local and regional fair housing trainings at least annually via email, social media, County/LMHA websites and other means.</p>	<p>Lake MHA</p> <p>Lake County</p>

**DISCUSSION:** It is clear that fair housing education and outreach are continued needs in Lake County. As such, the County and PHA will work to improve the level of fair housing knowledge and understanding among local housing developers, real estate professionals, lenders, safety forces, elected/appointed officials, and the general public. A multi-pronged approach will be taken to address the noted contributing factors through increased distribution of fair housing material and consistent participation with local partners.

Goal #3	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Continually monitor local zoning codes for discriminatory elements</b></p>	<p>Land use and zoning laws</p> <p>Location and type of affordable housing</p> <p>Availability of affordable units in a range of sizes</p> <p>Community Opposition</p> <p>Lack of affordable, accessible housing in a range of unit sizes</p> <p>State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings</p>	<p>Disparities in Access to Opportunity</p> <p>Segregation/Integration</p> <p>Disproportionate Housing Needs</p> <p>Publicly Supported Housing</p> <p>Disability and Access</p>	<p>In year 1 Obtain from HUD or funded FHIP agency the complete application and reporting documentation related to Zoning Analysis of Lake County performed in 2012-15. Review report findings to identify communities that have zoning issues that may contribute to discriminatory practices or inhibit AFFH.</p> <p>In year 2 Explore and share grant opportunities provided through American Planning Association (APA) to develop best practices for those communities with identified AFFH issues</p> <p>Within 3 to 5 years propose to Board of Lake County Commissioners that they adopt a policy to deny CDBG/HOME funding to those communities whose zoning ordinances are identified as having regulations or definitions that contribute to discriminatory practices, and have not modified to remove those identified practices</p> <p>By year 2 and on an as needed basis in response to emerging issues share Olmstead information by email with all communities in Lake County.</p>	<p>Lake County</p> <p>Lake MHA</p>

**DISCUSSION:**

Older zoning ordinances and other regulations that may not be in line with the AFFH rule can hinder housing choice, both explicitly and implicitly. As a result, municipalities that discriminate and/or do not affirmatively further fair housing choice in their zoning ordinances may be funded. This emphasizes the need for the County to review existing report findings to identify communities with such zoning and propose changes in order to alleviate the contributing factors. There is resistance in the community and within certain municipalities as it relates to housing for the disabled population.

Goal #4	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Provide greater access to all types of transportation for all persons in the community to access areas of opportunity by advocating for and supplementing the services provided through the public transportation providers.</b></p>	<p>The availability, type, frequency, and reliability of public transportation</p> <p>Lack of regional cooperation</p>	<p>Disparities in Access to Opportunity</p>	<p>Within 1 year, use and expand existing networks (Coalition for Housing &amp; Support Services ...) to promote and support LakeTran’s education and technology efforts</p> <p>Within 1 year use existing seats at the table to advocate for expanded service to reach underserved areas and time periods beyond Route 20 corridor and first shift work hours. Lake County elected officials are board members of the Northeast Ohio Area-wide Coordinating Agency (NOACA).</p> <p>Within 2 years, explore feasibility of partnership with alternative transportation providers i.e. Uber, to serve those persons/areas/times outside of LakeTran’s existing system</p> <p>Maintain involvement with NOACA’s planning processes and stay abreast of planning, funding and participation opportunities through periodic review of the NOACA Facebook page and through attendance or participation in public meetings.</p>	<p>Lake County</p> <p>Lake MHA</p>

**DISCUSSION:**

Transportation is an important factor in relation to housing choice, as its availability can often determine where an individual or family can live and/or work. Although Lake County has its own public transportation system to assist those who do not have access to a private vehicle, its routes are limited. Expanded service, via alternative public and private means, is needed to reach underserved areas beyond Route 20 and first shift work hours.

Goal #5	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Increase the amount of affordable housing in areas with greater access to opportunity through: expanded landlord participation in HCV Program, increased QAP equity, and increased acceptance of other subsidized programming</b></p>	<p>Location and type of affordable housing</p> <p>Lack of private investments in specific neighborhoods</p> <p>Location of proficient schools and school assignment policies</p> <p>Siting selection policies, practices and decisions for publicly supported housing, including discretionally aspects of Qualified Allocation Plans and other programs.</p> <p>Impediments to mobility</p>	<p>Segregation/Integration</p> <p>Disparities in Access to Opportunity</p> <p>Publicly Supported Housing</p>	<p>Within 6 months, the Lake MHA will survey all current participating HCV landlords to examine the factors that influence their participation and solicit feedback for program improvement</p> <p>Within 1-2 years the Lake MHA will initiate targeted outreach to increase participation of private landlords, particularly those in higher opportunity neighborhoods</p> <p>By year 3 PHA will incorporate an evaluation process for HCV portability households to examine all factors related to mobility choice: site selection, length of stay, relocation reasons, and destination.</p> <p>By year 2, and as updates are available, provide demographic data coupled with fair housing information to the 8 local school districts to aid in the schools' planning process and to assist them in being inclusive and responsive to the community they serve.</p>	<p>Lake MHA</p> <p>Lake County</p>

**DISCUSSION:**

There is not enough affordable housing in Lake County to satisfy need. In addition to the quantity of affordable housing, the location of affordable housing is a major influence on segregation and integration. Lake County and the PHA will work with private landlords, schools, public, private, and non-profit sectors on specific initiatives designed to expand opportunity for members of protected classes throughout the County. Surveying participating PHA landlords and voucher holders will be primary tools for achieving this goal.

Goal #6	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Evaluate the prevalence of hate crimes that occur in the county and the extent to which such crimes are formally reported in national databases to establish and document that such crimes limit a person’s fair housing choices.</b></p>	<p>Lack of reporting and or recording of Hate Crimes</p>	<p>Fair Housing Enforcement</p>	<p>During year one establish contact and develop rapport with leadership of safety forces and school superintendents during year 1.</p> <p>The county will collect data on hate crimes through its contract for professional fair housing services and share with safety forces and school superintendents by year three.</p>	<p>Lake County</p>

**DISCUSSION:**

Most jurisdictions in Lake County do not report hate crimes to the FBI. Additionally, some local police departments do not keep statistics on hate crimes. Although hate crime reporting is not mandated by the FBI, jurisdictions that do so raise awareness of discrimination occurring in their own communities. In a partnership with civic leaders, law enforcement officials have found they can advance community relations by demonstrating a commitment to be both tough on hate crime perpetrators and sensitive to the needs of hate crime victims. Increased education and focus needs to be placed on local safety forces to help these agencies understand the importance of reporting hate crimes and the connection to community fair housing issues.

Goal #7	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Provide increased fair housing information to the general public with particular attention to persons in protected classes.</b></p>	<p>Community Opposition Access to financial services and lending discrimination</p>	<p>Segregation Publicly supported housing Disparities in access to opportunity</p>	<p>Annually continue to support education and outreach efforts funded through the professional fair housing services contract: including quarterly newsletter and one education/outreach event with alternating focus on populations of the various protected classes, and the general public.</p> <p>Establish contact and develop rapport with financial institutions / lenders during year 1 &amp; 2 to aid them in planning for and meeting CRA obligations by sharing identified fair housing community needs.</p> <p>By year three coordinate and host a “Bankers’ Breakfast” to promote existing and new programs: IDA, low interest loans, down payment and financial literacy. In years 3-5 both county and MHA to refer consumer base.</p>	<p>Lake County Lake MHA</p>

**DISCUSSION:**

Racial disparities in mortgage loan application denial rates were found throughout the county. High-cost lending revealed similar racial and ethnic disparities. There are a high number of financial institutions with physical locations throughout the area. However, there is direct evidence of inequitable treatment in receiving mortgage financing, equal access to financing information and equal access to mortgage modifications.

This goal is intended to focus on informing members of protected classes about their respective fair housing rights while educating area financial institutions and becoming a part of the planning process for carrying out its CRA obligations.

Lake County and the Lake Metropolitan Housing Authority first submitted an AFH to HUD on January 11, 2017. That AFH was not accepted for reasons detailed in a March 10, 2017 letter from HUD's Fair Housing and Equal Opportunity Office. To address the deficiencies initially identified by HUD, the County and LakeMHA accepted technical assistance from Abt Associates, who provided two days of onsite assistance as well as performing review of proposed subsequent revisions made to the AFH. Any and all changes are reflected in this version of the AFH.

[1] Discrimination in the Tri-County Housing Market, Final Report 2011-2014 was authored by The Fair housing Resource Center, Inc., and submitted to HUD FHEO office.

[2] <http://www.ohioaccess.ohio.gov/pdf/ohioaccessrpt2004.pdf>

[3] <http://lakebdd.org/newsforms/documents/LCBDDThreeYearOperatingPlanRevised617Usethisversion.pdf>

## III Community Participation Process

III.1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

### **Outreach Activities**

In order to maximize community response and participation, FHRC and Lake County participated in various outreach activities. The first priority for the community participation process was a community survey distributed via social media and at various in-person events. This survey asked for community opinions on the various fair housing issues discussed in the AFH guide. Two separate versions of the survey were made, in an attempt to garner participation from the average citizen and professionals. The extended survey geared towards professionals asked for more commentary and elaboration than the short survey, and was sent to local nonprofits, businesses, and government employees.

In order to encourage discussion and garner more elaborate responses than the survey could potentially provide, two community forums were hosted by FHRC, Lake County, and LMHA on September 22nd and October 26th. The hour-long roundtable meetings were meant to facilitate meaningful conversation between citizens about fair housing, which allowed for a deeper understanding of the community's views of Lake County's fair housing progress or lack thereof. Besides from the planned roundtable meetings, participants brought the AFH to the attention of the community at several other community events put on by relevant organizations. The timeline of these secondary events is as follows:

08/09/2016: The meeting of the Coalition for Housing and Support Services of Lake County Inc. - Attended by representatives from FHRC, Lake County government (Chairperson), and Lake Metropolitan Housing Authority to discuss the AFH.

08/18/2016: Lake County Continuum of Care meeting chaired by staff person of Lake County government provided time to discuss the AFH, the survey instruments and the relationship to the Consolidated Plan.

08/30/2016: A representatives from Lake County government, FHRC and Lake MHA attended a meeting of the Lake County Chamber of Commerce to encourage input from the business community

09/27/2016: A representative from FHRC attended a community forum hosted by the Lake County NAACP and the county concerning race and police, garnering survey responses and community input.

10/18/2016: Lake County Economic Development forum - Attended by Lake County government representatives and Lake MHA

### **Media Contact**

During the course of our outreach efforts, various media outlets were contacted in order to ensure the distribution information to all Lake County citizens. These media contacts were primarily used in marketing for the two community roundtables, but also assisted in disseminating the online survey.

Press releases developed by Lake County staff and distributed via email and fax. Press releases also posted on Board of Lake County Commissioner website. Cougar Radio, Lake County's local FM station, advertised the survey and two community roundtables on social media and on air, starting 2 weeks prior to both community meetings (09/05/2016 and 10/10/2016). The News Herald, a Lake County newspaper based out of Willoughby, ran articles on 9/20/16 and 10/20/16 detailing the community meetings and providing the link to the online survey. The Lake County Gazette and Tribune, a Lake County newspaper based out of Madison, was contacted with a press release and ran an article detailing the AFH and community meeting. Mentor Public Access Channel was contacted and ran an advertisement provided by FHRC continuously from 9/12/2016-9/22/2016 and again from 10/05/2016-10/26/2016 Painesville Public Access Channel was contacted and ran an advertisement provided by FHRC continuously from 9/15/2016-9/22/2016 and again from 10/10/2016-10/26/2016.

Through the guidance and input of these organizations, FHRC was able to ensure the results of the community process reflected the voices of all Lake County citizens, with a focus on the protected classes.

### **Communications and Marketing Strategies**

In order to ensure that the results of the community participation process are accurate, FHRC designed all communications with the broadest possible audience in mind. All materials that were to be distributed to the general public were written in a simple, concise way at a basic reading level to ensure understanding and comprehension. This includes the shortened community survey, the flyer, and the press release distributed to all media outlets. The shortened survey is primarily multiple choice, and explains all topics and phrases that could be considered jargon.

In an attempt to reach a broad audience, FHRC also created a comprehensive marketing strategy combining both traditional media and news sources and social media, as listed above. The use of

social media increased participation in the online survey, and ensured that many Lake County residents who might not typically participate in a community forum were included in the results. Cards with the link to the survey were placed by the computers in several local libraries as well, giving those who do not own a computer the option to be included in the results as well.

FHRC also catered a portion of the community participation process to those in the professional realm, through the creation of a more complex and detailed survey and outreach to organizations dedicated to professionals in various fields, including non-profit work, real estate, and the business community. This ensured that these important segments of the Lake County population are included in the results as well.

Lake County staff modified the existing short survey to be used by Lake MHA in early December 2016. With that version of the survey Lake MHA was able to solicit AFH survey input from approximately 15% of its public housing residents. However, since the HCV residents are scattered throughout the county, obtaining their input posed more of a challenge. Lake MHA does not consider the AFH to be over at the time of submission and, therefore, will move forward with collecting additional information from its HCV residents. During the months of January-March 2017, all residents scheduled for recertification appointments at the office will be asked to complete a survey regarding fair housing. When all surveys are collected the responses will be entered into Survey Monkey to generate comparative results. The responses to all levels of the survey will be helpful local data in the formulation of the Consolidated Plan and the Lake MHA's five year plan.

NAACP, in an attempt to include the voices of those facing racial or ethnic discrimination Standing Up for Racial Justice, in an attempt to include the voices of those passionate about issues of race relations and discrimination. Disability rights organizations including: New Directions, Extended Housing, Signature Health, Lake County Developmental Disability Board, among others.

### **Reaching Underrepresented Populations**

In an effort to reach the broadest spectrum of the public, several organizations were consulted to ensure the community participation piece includes those who are typically underrepresented in the planning process, such as persons who are limited English proficient (LEP) and persons with disabilities. These nonprofits and private organizations assisted FHRC in understanding and communicating the problems faced by the people they represent. In order to ensure the inclusion of those with disabilities, Services for Independent Living and the Lake County Board of Development were contacted. To help us understand the unique issues faced by LEP individuals, HOLA was contacted, as well as several churches whose congregations represent a diverse population, of which many LEP individuals are a part of. Other organizations consulted that represent potentially underrepresented populations include:

Social media contacts also proved invaluable in the dissemination of the survey and all information regarding the AFH, and several key organizations and people were contacted in the pursuit of distribution of the survey and information regarding the roundtable meetings:

Every city with a social media account was contacted, and the flyer provided by FHRC as well as the link to the survey were posted on the various social media accounts and websites for the following cities and jurisdictions:

- Concord Township, Kirtland City, Madison Township, Mentor City, Mentor-on-the-Lake City, Painesville City, Painesville Township, Wickliffe City, Willoughby City, Willowick City

Various nonprofits and community pages were also contacted, and assisted FHRC by posting the event and survey to their Facebook pages, including the Central YMCA, Beacon Health (mental health provider), the Lake County Chambers of Commerce, Lifeline, Inc. (Community Action Agency) and several private groups of interested Lake County Citizens. The survey was disseminated through several email mailing lists, including those provided by the Lake-Geauga Area Association of Realtors, the Lake County Chambers of Commerce, and The Coalition for Housing and Support Services of Lake County Inc., the Lake County Continuum of Care, and Showing Up for Racial Justice. An article about the survey and community participation was disseminated throughout the county in Fair Housing Resource Center, Inc. Quarterly newsletter.

### **III.2. Provide a list of organizations consulted during the community participation process.**

In an effort to reach the broadest spectrum of the public, several organizations were consulted to assist with the community participation piece. These nonprofits, government departments, and private organizations assisted FHRC in understanding and communicating fair housing problems as experienced by the various individuals, groups, and sectors that make up Lake County. Some of these were listed in part 1 due to their assistance in providing information, opinions, and contact with protected classes or underrepresented populations.

- NAACP
- HOLA – Grass Roots Latino Organization
- Services for Independent Living
- Lake-Geauga Recovery Centers
- Signature Health
- Lake County Department of Jobs and Family Services
- The Veteran's Administration

- The Men's Center – Lakeland Community Collage
- The Women's Center – Lakeland Community College
- Lake Erie College Students
- Lakeland Community College
- Standing Up for Racial Justice – Racial justice organization
- Lake/Geauga Habitat for Humanity
- Lake/Geauga Area Association of Realtors
- Lake County Development Council
- Lake County Chambers of Commerce
- Lake County Continuum of Care
- Lake County Department of Utilities
- Lake County General Health District
- The Coalition for Housing & Supportive Services Lake County, Inc.
- Lake County Educational Service Center
- Lake & Geauga Area Association of Realtors
- Lake County Council on Aging
- The Ohio Civil Rights Commission
- Project Hope for the Homeless
- Forbes House – Domestic Violence Shelter
- Move to Amend – coalition dedicated to social and economic justice
- Housing Research & Advocacy Organization
- LMHA – Lake Metropolitan Housing Authority
- Various local churches
- LakeTran – Public Transit Agency

Through the guidance and input of these organizations and personal contacts throughout the community, FHRC, the consultant and program participants attempted to ensure the results of the community process reflected the voices of all Lake County citizens.

### **III.3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.**

Efforts to elicit community participation were relatively successful in the depth and breadth of our discussions. However, each individual outreach attempt varied in its' success.

The online survey seemed to have the most success in terms of where it was circulated, and seemed to reach a more diverse group of individuals than our community meetings did. It was filled out by 158 individuals, which is below what we had determined our ideal sample size (at 384, with 95% confidence and 5% +/-). However, it does leave us with a statistically significant sample size when the margin of error is increased to +/- 7%. The individual responses also provided many telling and useful comments on the state of Lake County and where we need to be, and most respondents who wrote the optional comment section were incredibly helpful to our overall analysis of what issues seemed to be most pervasive in the everyday lives of Lake County residents. A note, however, on the online surveys: late into the polling period, we discovered an error in the format of the survey. Certain questions did not allow a citizen to opt out of answering if they disagreed. Those questions are marked in section 4, and any answers clarified in the comment section were removed from the total results. See section 4 for a full analysis of the commentary provided by the survey.

The community meetings brought a mixed bag of outstanding successes and disappointing turnouts. The first meeting, scheduled for 9/22/2016, was problematic in that the turnout was low, with 15 residents in total, including several city/county employees. During the first meeting, the format of the meeting was not conducive to the conversations that HUD has encouraged us to have with residents, with too much time spent discussing what the AFH is and what the maps and tables provided by HUD meant, rather than really delving into the fair housing issues that are prevalent in the community. However, the largest success of the first meeting was that community interest was clearly sparked, with several residents approaching FHRC for extra surveys to take home to friends, families, and neighbors.

The second community meeting, which took place on 10/26/2016, had far more of a discussion-based format, and saw an increased number of citizens attend, not just government employees, with 10 new citizens, as well as 3 repeat attendees, and 6 government/county employees. There was also a far more diverse crowd in this group, which created a far more active, engaging, and impassioned discussion about the issues. The commentary proved to be valuable to our final analysis of community opinions, and allowed these citizens to elaborate in ways that the survey did not encourage.

The last major outlet for receiving community input was outreach with organizations, companies, and groups that helped us get the full picture of Lake County. These included the real estate sector, the business sector, the nonprofit sector, local churches, and government officials. We sent the long-form survey to these groups, as well as the link to the online version, which asked for an identification of what organization you represent, which allowed us to track the responses to the

best of our ability. A majority of responses came from the nonprofit sector and government officials. This survey was far more intensive than the community survey, and provided incredibly valuable evaluations of the way that Lake County handles fair housing issues. We did not receive as many responses as hoped, and a common sentiment expressed in the comments provided at the end of the survey put the blame on the length of the survey combined with busy schedules.

Both the short form survey and the long form survey results are included in the uploaded attachments as Adobe Acrobat and Excel files - four in total.

The timing of the AFH process, coinciding with an election cycle of national, state and local significance, impacted the level of participation from the widest possible audience.

#### **III.4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.**

For this summary, the commentary will be divided into five sections: Online survey responses, the first Community Meeting (9/22/2016), the second Community Meeting (10/26/2016), responses/commentary from the extended survey, and conclusions derived from outreach activity. Notable comments will be chosen for two reasons—either to illustrate a recurring sentiment or to illustrate a notable issue that has been overlooked in most conversations about fair housing.

For this summary, commentary will be divided into five sections: 1.) Online survey responses, 2.) The first Community Meeting (9/22/2016), 3.) The second Community Meeting (10/26/2016), 4.) Responses and commentary from the extended survey, and 5.) Conclusions derived from outreach activity. Notable comments will be chosen for two reasons - either to illustrate a recurring sentiment or to illustrate a notable issue that has been overlooked in most conversations about fair housing.

In the duration of the community outreach process, the decision has been made to not include comments or views that a) make statements that are simply untrue based upon data that citizens had access to, i.e. misrepresenting statistics about population to a degree that changes the conclusions one would draw from them b) make statements that can be clearly identified as discriminatory without adding to the value of the conversation or c) show a clear misunderstanding of fair housing principles, what the question asked for, or the data presented by HUD.

All comments considered for the notable comments sections approach sensitive topics in an equally sensitive manner. It is worth noting that comments that may be reflective of the problems that protected classes face (i.e. racist, sexist, or offensive remarks) were incredibly prevalent in the surveys, perhaps due to the anonymity. These comments are included as an important key to understanding the environment that some of the protected classes are subjected to in Lake County.

## **1.) Online Survey Responses:**

### **Notable comments:**

#### **ON ACCESS TO DECENT HOUSING:**

- *"Sometimes it's the neighborhood/neighbors that don't want these individuals and not necessarily the landlords. The pendulum is swinging back and people are more openly racist."*
- *"The only difference to access is based on finances. If they can afford the housing they desire, they can access it."*
- *"If my rental burned down today I would be unable to find another reasonably priced ground floor rental without steps elsewhere in Mentor."*
- *"As individual on disability, I get section 8. I had a very difficult time finding a one bedroom on the west end of Lake County. I had to leave the Lake County to find a safe affordable housing in Cuyahoga County. It's very sad. I found out two years ago my one bedroom voucher was \$571.00. No city except Painesville City has that amount to accept section 8. That's ridiculous."*

#### **ON SEGREGATION**

- *"It seems that the only city in this county with any appreciable racial diversity is Painesville. I believe this is a function of poverty and housing opportunity for those who are impoverished. Further, minority classes fall below the poverty income level at two times the rate of whites so the conclusion is logical: diversity is higher where low-income housing opportunities are abundant and diversity is lower in communities where there is a shortage of low-income housing opportunities.  
\*<https://www.census.gov/prod/2013pubs/acsbr11-17.pdf>"*
- *"It is the reason why a lot of people move from Cuyahoga to Lake County." (On their answer of "yes" to the question "Do you feel there are high levels of racial segregation within Lake County?")*
- *"Painesville holds a bigger population of Hispanic and African American, more so than other cities, because other cities make them feel unwelcome"*
- *"Unfortunately, segregation is caused by increases in crime not any of the above. Families want their families to live in a safe area regardless of race, religion etc. When people moving into govt housing are not screened for previous crimes and then begin their life of crime in the new neighborhood, good families (regardless of race/religion, relocate."*

## **ON ACCESSING OPPORTUNITY IN LAKE COUNTY**

- *"Lack of busing is inconceivable to me. I can only begin to understand the financial limitations of school districts these days. Passing a levy is challenging due to an aging population and persons on fixed incomes"*
- *"Lake County has decent schools throughout, and it is not the job of the school districts to provide equal services across districts."*
- *"School policies respond to low funding which results from low taxation because of low income populations. If anything, the dividing lines that determine which communities attend which schools are to blame. However, policies like pay to play and other things that charge families and teachers to make up for low funding have dramatic consequences on student participation and quality of teachers"*
- *"Dial-a-Ride is available but often needs to be scheduled too far in advance to meet the client's needs, and some clients have been dropped after needing to cancel rides several times. It is also not available 7 days a week which may prevent some from attending church or reaching their jobs."*
- *"Housing is too far away from fixed bus route stops. Not everyone can make use of Dial a Ride because it takes too long to get places. Time of day hampers Laketrans from providing rides to and from jobs that are 2nd & 3rd shift and some weekends. Laketrans bus routes miss many employer sites."*

## **ON HOUSING PROBLEMS IN LAKE COUNTY**

- *"Elderly owners and renters are some of the most cost burdened. Lower income renter households of all protected classes experience cost burden and experience instability as a result."*
- *"Persons in public housing are subjected to bed bug infestation with no aggressive treatment by landlords, public housing authorities or the health district. Substandard housing for section 8, low rent without section 8, damaged, run down, high heat and cooling cost due to structure and windows. There is no recourse for the people living in these conditions because they lack the money, resources and legal help to fight for their rights. Therefore, they live in these conditions and no landlords are held accountable."*
- *"Disabled have trouble finding HOUSING that is not over burdensome or substandard 1950-60 pre-ADA HOUSING. You couldn't find a replacement for if you had to move."*

- *"African American and Hispanics in Painesville City seem concentrated on streets with severe housing and zoning neglect. Enforcement of zoning would significantly improve their quality of life, zoning is unequally enforced."*

Lake MHA provided information on actions taken in response to the issue of bed bugs noting that this problem has presented across the nation in a variety of housing types, not all publicly subsidized. "During just calendar years 2015 and 2016, the housing authority has expended nearly \$45,000 in bedbug-related treatment and supplies and has gone above and beyond in attempting to combat this nuisance problem that has affected both private and public entities across the nation. The housing authority also expended an additional \$15,000 to purchase its own heat treating equipment. Since the problem has grown exponentially across the region, scheduling appointments with local exterminating companies could sometime require extended wait times. The purchase of the equipment has allowed the housing authority to treat units in a more expeditious manner. None of the aforementioned expenditures were included in annual operating budgets provided by HUD, yet the housing authority had to make this matter a priority in order for our tenants to live as comfortably as possible."

**2.) Community Meeting** During just calendar years 2015 and 2016, the housing authority has expended nearly \$45,000 in bedbug-related treatment and supplies and has gone above and beyond in attempting to combat this nuisance problem that has affected both private and public entities across the nation. The housing authority also expended an additional \$15,000 to purchase its own heat treating equipment. Since the problem has grown exponentially across the region, scheduling appointments with local exterminating companies could sometime require extended wait times. The purchase of the equipment has allowed the housing authority to treat units in a more expeditious manner. None of the aforementioned expenditures were included in annual operating budgets provided by HUD, yet the housing authority had to make this matter a priority in order for our tenants to live as comfortably as possible. **(9/22/2016)**

As mentioned earlier, participation for this meeting was not as robust or as discussion-based as had been intended, but valuable points and commentary were still made by those in attendance. The group of citizens that came to this meeting largely reflected a viewpoint that Lake County should not change their public housing, zoning policies, or worry about access to opportunity. There was a clear difference in the views held by this group and the views held by some of the city/county employees present, including a police officer, a teacher, and a city council member. The meeting was respectful, though some citizens present were clearly upset by the depiction of Lake County's lack of diversity as a negative. The question was asked several times about what the "ideal" level of diversity would be. Rather than direct quotations, as used for the survey notable comments section, the following is an outlined summary of the major points discussed during the meeting, based on the agenda used.

## **Notable Comments**

### SEGREGATION

- *Several community members expressed concern over the perceived negativity towards Lake County's high percentage of white citizens, asking if there was an "ideal" racial makeup.*
- *The segregation in Lake County is caused by "economics, not race" was a talking point repeated by most citizens present.*
- *The funneling of public housing, mental health services, and disability services into Painesville City causes problems for Painesville police.*

### EDUCATION AND EMPLOYMENT

- *There was overall concern over the quality of schools in Lake County, particularly in Painesville City.*
- *Employment is easy to find, but not in the low-income areas.*
- *In choosing your location, you choose the quality of your child's education, so families should work hard to ensure their child is getting a good education, and the costs shouldn't go to families who have worked hard.*
- *Too much falls to the teacher in low-income neighborhoods, and it becomes difficult for them to work with students in classrooms with huge class sizes and many at-home issues. However, as one teacher in the room was quick to point out, at-home issues are not unique to low-income students, they can just have more of an influence when the family is low-income.*

### TRANSPORTATION AND POVERTY

- *LakeTran is problematic due to its limited schedule, lack of rural stops, and rising cost. While they try to make public transportation accessible, the consensus was that they have failed on many levels, though many pointed out the issue of funding.*
- *Third shift workers and minimum wage jobs that operate on late-night schedules cannot depend on public transportation, which causes issues.*
- *Poverty seems to be most prevalent in areas like Painesville, Eastlake, and Willoughby, with a clear difference from those areas and areas like Concord of Kirtland Hills.*

### ENVIRONMENTAL HEALTH

- *Section 8 and Public Housing is often built in more industrial areas, and that has caused problems in the past.*

## ACCESS TO OPPORTUNITY

- *According to many of the citizen's present, everyone has opportunity and most problems derive from economic constraints. When asked if a particular group faces more economic constraints, the response was that "anyone who works" does not.*
- *A differing view was given by several others in the meeting who claimed that the disabled, black, and Hispanic communities face the worst access issues.*

## HOUSING NEEDS

- *Some expressed concern that public housing can devalue the homes of neighbors, and claimed that Lake County does well to focus it in one area.*
- *There was relative agreement that most public, section 8, and low-income housing is focused in Painesville.*
- *Lake County is overall a good place to live, but Hispanic and Black families in particular can face severe housing burdens. There was disagreement as to why, but a general consensus that this is true.*

### **3.) Community Meeting (10/26/2016)**

At the second community meeting, there was far more discussion and valuable insights provided due to a more discussion oriented structure. While it still followed the outline provided in the last community meeting, there was far more in-depth analysis of the issues by the community members who attended. The meeting was more impassioned than the first, a more diverse range of opinion. Rather than direct quotations, as used for the survey notable comments section, the following is an outlined summary of the major points discussed during the meeting, based on the agenda used.

#### **Notable Comments:**

## SEGREGATION

- *There was more concern over perceived negativity towards Lake County's high percentage of white citizens, asking if there was an "ideal" racial makeup. This topic dominated the discussion of segregation.*
- *The problem doesn't lie in Lake County being a majority white, it lies in the fact that minorities feel uncomfortable in Lake County or couldn't afford to live in Lake County, which the county should attempt to rectify.*

## EDUCATION AND EMPLOYMENT

- *Schools no longer give a basic education due to all of the special programs (Common Core)*

- *Family is key to a child being successful in school.*
- *Finances and where you live determine the quality of education, and most schools in Lake County do not offer open enrollment, meaning lower-income children do not get to enroll in proficient schools.*
- *Poor children do not get the same opportunities as richer children due to programs like "pay to play" becoming common. This affects mostly single parent households and racial minorities, like black and Hispanic children.*
- *However, another group argued, that pay-to-play just forces parents to pay and be responsible for their own child, as they should.*
- *Jobs are leaving Lake County due to high taxes/no incentive to stay.*
- *Trade jobs are open and available in the county, but too many are encouraged to get a 4 year degree instead.*

#### TRANSPORTATION AND POVERTY

- *Due to limitations of LakeTran, those who rely on public transportation are not free to live anywhere in the county.*
- *LakeTran provides no benefit to those who work late shifts.*
- *People move to Lake County to escape city life, including public transportation, so it could push property values down.*

#### ENVIRONMENTAL HEALTH

- *There's an aging housing stock, with issues with lead-based paint, and many of these are rented by low-income individuals.*
- *Drugs can be prevalent in neighborhoods with a lot of transient rental housing, which is especially problematic given the heroin epidemic.*
- *Industrial areas can cause problems for surrounding communities.*

#### ACCESS TO OPPORTUNITY

- *Access to opportunity has been decreasing due to the movement of jobs out of Lake County and the lack of focus on trade jobs.*
- *Undocumented immigrants may be impeding opportunity for other Lake County residents, and e-verify is not used.*

## HOUSING NEEDS

- *Exclusionary zoning makes it difficult for poorer families to be able to live in certain communities*
- *While HUD made a rule about those zoning rules, few cities/communities have been able to enact the new rule due to lack of funds or a small local government.*
- *Low-income housing could decrease the value of surrounding homes.*

### **4. Extended Survey Responses**

The extended survey was distributed primarily to professionals, and was meant to garner more in-depth commentary from a group with more experience dealing with the issues. These individuals came from non-profits, city governments, the business community, etc. This survey allowed for a much more detailed, intricate, and personalized response.

#### **Notable Comments:**

##### ON SEGREGATION

- *"It appears that non-profits and other communities in Lake County encourage Painesville to build new group homes. Ranges from LMI to mentally ill to homeless to substance abuse and a combination of those. All are concentrated in Painesville."*
- *"Low income residents are disproportionately afflicted by the factors above. They are at the mercy of the availability. So the checked items will always create, maintain or contribute to segregation of the protected classes"*
- *"There is subtle community opposition in that they community is not welcoming of families new to the community. In 2007 only 11% of the housing in the community consisted of rental property. Today, the percentage is over 30%. Much of the change was due to the economic down turn. The city offers some community revitalization money. It is limited and in minds of business and property owners it does not provide appropriate incentive."*

##### ON ACCESSING OPPORTUNITY:

- *"Painesville City Schools are very diverse, but teacher retention rates are far below where they should be."*
- *"Mainly geographic and economic differences can make it difficult for protected classes to get into a 'proficient' school."*

- *"Whether outright discrimination or cliques within an employer group exclusion occurs frequently. People who are comfortably in control want to keep it the way it is unless they are motivated by something to change. They are challenged and uncomfortable with changes."*
- *"I feel that sexual orientation should be a protected class--i.e. gay and transgender persons" (in relation to employment opportunity)*
- *"(There are) environmental pollutants in N. Painesville. Also lead paint in older housing stock impacts health of children."*
- *"Black men/women/children tend to live in low-income neighborhoods where these (access to opportunity) problems exist more."*

#### ON HOUSING PROBLEMS

- *"If we had a community revitalization strategy that all or most entities contributed to and were in favor of, then we could promote and accomplish change. Issues like transportation could then be taken to the regional level for cooperation as needed."*
- *"(There is a) concentration of affordable housing in higher crime, higher poverty, lower opportunity neighborhoods."*

#### **5. Conclusions Derived from Community Participation Process**

- Painesville City seems to bear most of the burdens of housing issues, education issues, and issues of access to opportunity in the eyes of the community.

This conclusion was echoed in every community meeting, most survey responses, and by most of the groups we consulted. Painesville was the city that was talked about most often in relation to housing issues, poverty issues, racial makeup/segregation, and access to opportunity.

- **Low-Income, Section 8, and Public Housing are centered in a few areas, and wealthy communities are largely unaffected by these housing programs. Those from the wealthy communities seem to have individual oppositions to expanding the availability of these programs especially if that means expanding into their communities.**

Another contentious issue was the availability and geographic location of low-income housing programs. This proved to be one of the most popular issues.

- **The perception of segregation in Lake County by its residents remains a contested issue, with an almost even split between residents of the City of Painesville and other communities.**

## IV. Assessment of Past Goals, Actions and Strategies

IV.1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

### *IV.1.a. Discuss what progress has been made toward their achievement.*

The last Analysis of Impediments to Fair Housing for Lake County was undertaken in 2010 and the one prior to that was conducted in 1998. Both of these analyses were prepared by the Housing Research and Advocacy Center of Cleveland and its' precursor Metropolitan Strategy Group. Experienced staff from Lake County assisted with both and Fair Housing Resource Center assisted with the most recent. Several impediments were identified. These impediments, and the progress that has been made towards overcoming them, are listed below. The 2011 Fair Housing Action Plan prepared by FHRC, Inc. provided the framework for future strategies to further equal opportunities in housing to all residents within the jurisdiction, enabling residents to more readily seek, obtain, use and enjoy the housing that exists within the region.

### **Impediment: Lack of Racial and Ethnic Diversity in the Lake County Urban County**

**Actions Taken:** FHRC assisted the County in its efforts to affirmatively further fair housing and provide consultation services to the County with working with AFFH activities including affirmative fair housing marketing plans. FHRC assisted the County in promoting fair housing and diversity to help eliminate the presence of segregation within County.

**Progress Toward Past Goals:** The County continued renewing their agreement with FHRC subsequent to 2010 that incorporated an element of fair housing education and outreach to LCUC communities. Additionally on a yearly basis, FHRC conducted both rental testing and sales testing to help eradicate fair housing matters. Lastly, each yearly contract included fair housing intake assessment interviews, investigations and complaint based testing for all fair housing allegations.

The County, through its subcontract FHRC assisted with the dissemination of fair housing brochures that we written in Spanish in an effort to reach this community. All of FHRC's written materials were printed in Spanish. Additionally, in 2014, FHRC conducted a systemic testing program that focused on measuring the level of discriminatory treatment deaf persons encounter when home seeking throughout the County. With the help of this project, FHRC created partnerships with ASL interpreters who services are called upon for many trainings, educational sessions and client communications as needed

### **Impediment: Segregation within Lake County Urban County**

**Actions Taken:** FHRC and LCUC worked collaboratively to conduct thorough investigations of allegations of discrimination within the LCUC;

**Progress Toward Past Goals:** The County implemented a new mandatory requirement for all applicants for the CDBG and HOME programs to include a written Affirmative Fair Housing Marketing Plan in their applications. The requirements for the Plan included the requirement to identify those groups of persons who are normally not likely to apply for the housing without special outreach efforts because of existing racial or ethnic patterns, location of housing in the Primary Metropolitan Statistical Areas, price or other factors. The Plan included affirmative marketing strategies to inform members of these groups of the available housing, and to make them feel welcome to apply. Twenty percent (20%) of the total number of units to be constructed and/or rehabilitated must be targeted to the groups identified in the Plan as “least likely to apply.”

### **Impediment: Lack of Interest in and Support for Fair Housing by Local Communities**

**Actions Taken:** FHRC and LCUC worked collaboratively worked to encourage cities and villages to adopt fair housing ordinances and to provide sample ordinances to work from.

**Progress Toward Past Goals:** Additionally, since 2013 the County has created a mandatory requirement for CDBG & HOME funds eligibility for all applicants to "plan, undertake and document the manner in which their proposed activities, if funded, will affirmatively further fair housing." All applicants are required to prepare and submit a narrative that describes the activities to be undertaken during the contract year to meet the obligation to affirmatively further fair housing. Additionally, the County requires all applicants to detail their marketing strategy to reach the underserved populations, declare what protected classes the proposed project will benefit and how the classes will benefit, and how the applicant will document and report on Affirmatively Furthering Fair Housing Activities. All eligible applicants must attend fair housing training and have a Resolution adopted supporting fair housing. These additional eligibility requirements assists the County to recommend funding for applications that will benefit the county and provides a message to the applicants of their responsibility towards AFH efforts. This requirement directly addresses several of the Impediments listed above.

### **Impediment: Inadequate Local Fair Housing laws**

**Actions Taken:** FHRC and LCUC worked collaboratively worked to encourage cities and villages to adopt fair housing ordinances and to provide sample ordinances to work from. The count staff also supported efforts to try to block the amendment to the state fair housing law.

### **Impediment: Lack of Quality Affordable Housing & Concentration of Low-Income Housing in Painesville**

**Actions Taken:** Lake County and Lake MHA worked collaboratively to develop new units of affordable Public Housing outside the City of Painesville in Willoughby. Lake County has also used HOME funds to support the development of group homes for persons with developmental disabilities in locations outside of Painesville.

### **Impediment: Discrimination in Rental Housing Market**

**Actions Taken:** FHRC conducted a thorough fair housing monitoring of all activities within the county and conducted systemic testing of all the protected classes with an emphasis on Hispanic testing. The county has supported FHRC's grant seeking through research assistance and securing and providing certificates of consistency with the Consolidated Plan.

### **Impediment: Racial Disparities in Mortgage Lending**

**Actions Taken:** FHRC assisted the County with their efforts towards eliminating racial disparities in mortgage lending present within the county. FHRC and LCUC conducted fair housing/fair lending education and outreach events with a focus on the distribution of Spanish language materials. FHRC and LCUC conducted / funded a wide range of education/outreach opportunities to providing county residents with counseling and info about mortgage lending options and access.

**Progress Toward Past Goals:** County worked with the Fair Housing Resource Center, the local fair housing and housing counseling agency, to ensure that residents had access to information about mortgage lending options, as well as adequate access to homebuyer counseling and other related services. Also, the County supported FHRC's mortgage lending testing program and encouraged enforcement efforts. The County provided financial funding to FHRC for foreclosure prevention counseling in order to expand its efforts to ensure that current homeowners have access to foreclosure counseling and other resources to enable them to maintain homeownership where feasible, thereby helping stabilize local communities and the housing market in the LCUC;

### **Impediment: Restrictive Local Zoning and Occupancy Codes**

**Actions Taken:** FHRC conducted and LCUC supported FHRC's efforts to obtain and review zoning texts from all 23 communities in Lake County.

**Progress Toward Past Goals:** Lake County as a governmental entity notes that there is limited power or authority in zoning codes in the various community types (township, city, village) located

within its borders as a matter of state law. The County has informed local communities that it will assist them and provide technical assistance in the updating of their local ordinances. The County has held annual conferences with the American Planning Association and invited members of the local community to attend. The County had arranged for FHRC's Executive Director to be a speaker at the conferences to speak on the issue of fair housing and zoning.

**Impediment: Lack of Adequate Access to Public Transportation**

**Actions Taken:** Several of the board members of Laketrans are appointed by the County. Laketrans provides services consistent with available funding. County has continued to support Laketrans' outreach efforts even through severe funding cuts experienced via formal and informal means.

**Impediment: Lack of Reporting and/or Recording Hate Crimes**

**Actions Taken:** No progress was made on this issue by the County.

Prior to the 2010 Analysis of Impediments, the 1998 AI study listed seven impediments to fair housing and recommended actions to amend each one. These were identified as:

**1. Housing Discrimination** - The AI found that housing discrimination was an impediment to fair housing, based on complaint data and testing results. It cited discrimination occurring in various forms, including communities and landlords "imposing questionable occupancy standards that discriminate against families with children; refusing to make accommodations to policies for persons with disabilities, or outright refusals to consider applicants because of their handicap, race, or national origin." Recommended actions included continuing "current fair housing complaint intake, investigational and educational efforts," expanding education and outreach, and raising awareness of housing rights.

**2. Lack of Racial Diversity** - In 1998, the County had a very small population of African-Americans (1.6% of the population). The AI concluded that the lack of racial diversity, compounded with the lower income of racial minorities, contributed to segregation in the County. It cited this fact as a "self-reinforcing impediment." The AI recommended marketing strategies to attract a more diverse population of residents to the County.

**3. Affordability** - The limited amount of affordable housing in the County led to a lack of housing choice. The AI recommended working closely with Lake Metropolitan Housing Authority and using County resources to develop additional units of affordable housing.

**4. Home Ownership** - The AI listed barriers to home ownership for low and moderate income households, including a "limited understanding of home buying process," low credit ratings, and

lack of cash for down payment costs. Recommended actions included continuing to offer down payment assistance.

**5. Discrimination Complaint Process** - The AI found that the actual governmental fair housing complaint process was an impediment, in that people who were discriminated against felt reluctant to formally complain for a number of reasons. Recommendations included developing “alternative avenues through which complainants can have issues of housing discrimination addressed,” expanding housing testing, providing copies of model fair housing ordinances to communities, promoting fair housing law, and expanding the “capacity of complaint intake, investigation, and processing.”

**6. Zoning** - The 1998 AI found that certain jurisdictions had local zoning codes that made it difficult to provide group housing, an impediment specific to those who are disabled and require or desire this type of housing. The AI recommended informing these communities of the possible consequences of these ordinances.

**7. Hispanic Population** - The AI stated there is housing discrimination specifically suffered by the Hispanic population due to language, legal, and cultural barriers. Recommended actions included closely working with agencies and churches that provide services to the Hispanic population, increasing fair housing education to both landlords and tenants, recruiting and training Hispanic testers, and continuing to fund English as a Second Language programs.

*IV.1.b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences); and*

Based on the ten impediments identified in the 2010 Analysis of Impediments the LCUC jurisdiction and Lake MHA indicate the following:

**Success:** Expanding the AFFH requirements in the CDBG/HOME application process provided a motivation for applicants to engage and understand the broad impact of fair housing choice. The LCUC has supported FHRC through an annual CDBG award and has supported their numerous successful federal grant applications.

**Shortfall:** Sadly there was little to nothing that was or could be done related to Hate Crimes and Police and with expansion of public transportation. However a joint effort of safety forces and County Prosecutor's Office with the NAACP has emerged and staff will participate.

**Unintended consequences:** The County is uncertain if there are any unintended consequences resulting directly from any unmet goal performance. The local fair housing office, Fair Housing Resource Center, Inc. has reported an increase in intolerant, and abusive language and behavior in 2017.

Lake County and Lake MHA have worked together and separately to achieve fair housing goals and continue to collaborate on projects that affirmatively further fair housing and expand the available,

accessible and affordable housing supply. Lastly, the impediments identified in 2010 remain the same today. However, great strides have been made to address the issues identified above.

*IV.1.c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.*

The County needs to continue the efforts identified towards achieving the stated goals. The County should invest additional time and effort in conducting a county-wide education and outreach initiative that mirrors the efforts of the Fair Housing Resource Center, Inc. Education and outreach actions are prioritized in this AFH and will help carry the fair housing message. Specifically many county residents are unaware that the message of the Fair Housing Resource Center is actually that of the Lake County. The presence of the County logo on all supported educational initiatives will help highlight the collaboration and partnership with the local fair housing office. All offices within County government should assert this strong message to community members and not leave those responsibilities solely to the Planning & Community Development Office. By working together, reaching out and collaborating with leaders in education, business, and development and with elected officials the effort to incorporate AFFH practices will be the norm rather than something novel.

*IV.1.d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.*

Several past goals were included (although reworded) in this AFH based on their continued relevance to fair housing issues within Lake County. However, metrics and timelines were specified for each goal to improve the County's and Housing Authority's ability to demonstrate and achieve progress. The goals established in the 2017 AFH are a true expanded collaboration between LCUC, Lake MHA and FHRC, Inc. While they have focused metrics, the AFH goals are more broad and inclusive of the entire community since our experience has demonstrated that the mission of fair housing cannot be carried out in a vacuum. The preparation of the AFH has prompted staff involved to reach out to agencies, communities, and businesses that we have had no routine contact. Since the last fair housing analysis, both the County and the Housing Authority experienced difficulty achieving certain fair housing goals. Some goals were beyond the financial or legal capacity to perform. The County's and the Lake MHA's financial and staffing resources were considered when defining the goals for this AFH as well as the resources available to FHRC.

Within the January 2017 submission the following historical perspective was provided. The experience of the LCUC through the Planning and Community Development office noted more efforts were needed to addressing the issues identified above. The largest change the County implemented was by creating an alternative avenue through which complainants can have issues of housing discrimination addressed, as identified in Impediment #5 above. This office was responsible for creating the local fair housing office now known as the Fair Housing Resource Center, Inc. The

Fair Housing Resource Center evolved out of the working relationship between the 12-year old non-profit organization known as the Lake County Community Housing Resource Board and the Lake County Planning and Community Development office. The former administered a HUD grant for education and outreach programs. The Board of Lake County Commissioners, through administrative funds provided by the Community Development Block Grant program, funded the latter. The two groups merged as a recommendation by the County believing that a central, coordinating center to serve all fair housing complaints, intake, and investigative services would be more effective in meeting the community's fair housing needs. The merger resulted in a name change to the Fair Housing Resource Center, Inc. which has continued the work of both organizations since 1999. Since that time, FHRC established an impressive record of accomplishments and assumed a prominent leadership role to create and maintain racially and economically integrated housing patterns. The collaborative effort of the Planning and Community Development office and the Fair Housing Resource Center, helped carve the selection of the detailed and comprehensive current goals identified in the 2011 Fair Housing Action Plan.

## V. Fair Housing Analysis

### A. Demographic Summary

V.A.1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

Lake County is a small county located on Lake Erie in Northeast Ohio, was created in 1840 from portions of Cuyahoga and Geauga counties. Although it is geographical the smallest county in Ohio, at 228 square miles, its population ranks eleventh highest in the state, with approximately 229,245 residents [1] and approximately 994 residents per square mile.

Historical data demonstrates that after its founding in 1840, the population of the County grew relatively slowly through 1910, by which time it had reached 22,297 residents. The population doubled over the next two decades and continued to rapidly grow. By 1950, the county population reached 75,000 residents and then double in size again in 1960 to reach 150,000 residents. Population growth eventually started to taper off by 1980 when it reached 212,801 residents.

After 1980, the County population grew at a smaller pace as **AFH Tool Table 2** demonstrates:

<b>Jurisdiction Table 3:</b> Total Population 1990 - 2010: Lake County, Ohio, Lake County Urban County (LCUC, HUD Jurisdiction), City of Mentor (HUD Jurisdiction) and Village of Waite Hill				
Year	LCUC	City of Mentor	Waite Hill	Lake County
1990	167,058	55,629	454	215,499
2000	176,417	50,278	446	233,120
2010	179,775	47,159	471	230,041

The data above indicates the slow growth between 2000 and 2010 for the LCUC, however there is a decrease in population for the total County population in 2010. The statistics are similar for the City of Mentor, yet Waite hill shows a slight growth from 2000 to 2010.

The City of Mentor has a total area of 28.00 square miles as compared to the County which has 227 square miles of land and Waite Hill that has a total area of 4.25 square miles.

Lake County is small in comparison to the adjoining county of Cuyahoga County, Ohio, home of the City of Cleveland, where the total population is listed nearly 5 times that of Lake County as a whole at 1,249,352 persons according to population estimates of 2015. Out of the 88 counties in Ohio, Cuyahoga County is the second most populous. Yet it is interesting to note that the population for that county peaked in 1970 and then decreased for four consecutive decades by 25%. Between the

2000 and 2010 censuses, the greatest population loss occurred in the east-side neighborhoods of the City of Cleveland and in the inner-ring, east-side suburbs. Interestingly all R/ECAP areas that border the western boundary of Lake County. It appears as though there is a slow movement of urban sprawl into Lake County as the total population of Cuyahoga County is decreasing whereas the total population of Lake County is increasing.

**RACIAL DIVERSITY** - Lake County has not historically had a large minority population. As **AFH Tool Table 2** demonstrates, in 1990, the LCUC had only 3.3% total minority population. The total minority population had doubled in size over the next decade to 6% in 2000. In 2010, population subset grew over the next decade but at a slower rate than the preceding decade to 9% total minority population. However, compared with the Cleveland-Elyria CBSA Region at nearly 29% total minority population, it is evident that level of diversity within the County remains extremely low.

Lake County has not historically had a large racial minority population. As **AFH Tool Table 2** demonstrates, in 1990, the LCUC only had 1.96% total Black population that nearly doubled in size in 2000. The detailed data demonstrates there has been a consistent slow growth in Black population in the county. In 1990, the LCUC had only 1.96% Black residents that grew to 3.68 total minority population in 2010. However there is still too little growth when compared to the 19.72% total minority population for the Cleveland-Elyria MSA Region that consists of the following 5 counties: Lake Cuyahoga, Geauga, Lorain and Medina.

The City of Mentor is a separate CDBG entitlement jurisdiction and had a 2010 Census population of 47,159 of whom only 3.7% were minority. Both Mentor and Waite Hill's minority population is extremely low as compared to the county as a whole. Even though the City of Mentor's total minority population is lower than that of the rest of the county, the minority distribution patterns between Mentor and Lake County are similar.

The Village of Waite Hill does not participate as a part of the LCUC and is a unique place with a population per the 2010 Census of 471 persons. Of those residents 456 are White, 2 are Black, 6 are Asian and 5 are some other race and two are two or more races, with one person listed as Hispanic. This community sits in the southwestern part of the County and is distinct from Lake County in the following measures: \$129,668 median household income compared to \$56,018; 98.27% single family homes vs. 77.5%; and 4.5 square miles of Lake County's total 228.2 square miles. Waite Hill has a population density of 104.7 compared to the county's 1004.6 per square miles. An aerial image of this community is included in the uploaded supporting documents to depict the physical features and land use present.

These racial demographics for the County depart significantly from the region and particularly with the adjacent Cuyahoga County. In Cuyahoga County, Ohio, Whites made up 61.4% of the total population, African Americans 29.3%, and Hispanics/Latinos at 4.8%. Mapping data demonstrates a clear line of racial demarcation of Black and White at the western boundary of Lake County. While there are newer clusters of Black population within Lake County cities of Willoughby, Wickliffe, and

Willowick, the line of demarcation along the Cuyahoga and Lake County boundary still significant. The reason for this line of demarcation is still unclear and is an area worthy of detailed study in the future.

**ETHNIC & FOREIGN BORN POPULATION** - The largest minority growth patterns occur within the Hispanic residents of the LCUC area. In 1990, data demonstrated only .69% Hispanic residents in the County. By 2010, that number grew substantially to nearly 4%, showing the highest minority growth pattern over the 20 year window currently analyzed. Hispanic residents nearly make up half of the total minority population in the County. Contrary, Native American, Non-Hispanic resident's population grew from 0.1% - 0.3% between 1990 and 2000, yet decreased equal to its growth in 2010 back to 0.1%. Asian or Pacific Islander, Non-Hispanic residents have grown steadily but modestly over the last 20 years from 0.57 to 1.08.

Data for the City of Mentor shows interesting growth for the Hispanic population. In 1990, Mentor has a trace of Hispanic residents at 0 .1% that remained relatively unchanged in 2000. However, there was a larger growth in population over the course of the following 10 years where the Hispanic population rose to 1.32% in 2010. Asian American population were nearly nonexistent in 1990 and grew to 1.2% in 2000 and then doubled in 2010. While Asian American population in 2010 is still relatively small in the City of Mentor, the population growth has demonstrated significant changes over the last 20 years.

On the other hand, the Cleveland area has shown continuous growth over the last 20 years of Hispanic residents where the area's Hispanic population has increased approximately 1% each decade. The Native American population in Cleveland has an interesting change in population over this same time period. In 1990, the Native American population was 1.5% in 1990 and increased to 3.9% in 2000. Yet between 2000 and 2010, the population decreased almost identically to the back down to 1.5%. Asian or Pacific Islander population in Cleveland showed slow steady growth over the last 20 years as well.

Foreign Born Population has seen a steady growth in Lake County since 1990. Nearly 4% of the LCUC population are from the following counties listed in order of largest population to smallest: Mexico, Bosnia & Herzegovina, Croatia, India, Other Eastern Europe, Italy, Germany, Canada, Ukraine, and England. Interestingly, as AFH Tool Table 2 demonstrates, the percentage ratios of population of foreign born individuals in LCUC is higher than those residing in the Cleveland-Elyria CBSA Region.

There are significant gaps in foreign born population of Mexico within Lake County. There is a heavy concentration of persons born in Mexico within the City of Painesville. There are a few individuals within the City of Mentor as well, however in between those two locations, there are little to no representation of foreign born residents of Mexico. Conversely, when total foreign born populations are combined together, the data indicates these residents are more equally disbursed in the urban areas of the county as opposed to the more rural and agricultural areas.

**LIMITED ENGLISH PROFICIENCY** - While the LCUC area has seen an increase in ethnic diversity and foreign born individuals residing in the County, the data demonstrates that the numbers of individuals with Limited English Proficiency did not increase at the same levels as those identified in the previous section. **AFH Tool Table 1** states there has only been a slight increase in residents identified with LEP from 1.89% to 2.96%, slightly smaller percentage than the region 3.25%.

**FAMILIES WITH CHILDREN** - Interestingly, population data of families with children has remained relatively similar throughout the years analyzed at a steady 43% with a slight decline to 41% in 2010. Similarly, the Cleveland-Elyria CBSA Region shows the same pattern for residents of the region.

**AGE & SEX** - The data in **AFH Tool Table 1** reflects steady trends of age data. There has been relatively no change in the percentage of LCUC residents under the age of 18 between 1990 and 2000. There is a slight decrease in persons in that age group between 2000 and 2010 from 24.32% to 22.44% respectively. The pattern of growth was reversed for persons in the 18-64 age group whereas the population was higher in 1990 at 62.92% of the residents and lowered to 61.64% of residents in 2010. The age group of 65+ has seen a steady increase over the last twenty years and has shown continuous growth from 12.73% to 15.92% over time. The LCUC's Age data is nearly identical to that of the region.

There has been no change in the Male/Female proportions in the LCUC area as the numbers have consistently remained at 51% female to 48% male in the community. The region demonstrates similar proportions at 52% to 48% respectively.

## **PEOPLE WITH DISABILITIES**

**AFH Tool Table 1** indicates that 21% of the LCUC population is a person with a disability. The disability type classifications demonstrate there is a higher percentage of persons (27%) with an Ambulatory difficulty than all of the other types listed. The next highest disability type listed is that of persons with Independent Living Difficulty at 19%. The data above includes the City of Mentor. These statistics are similar to those of the Cleveland-Elyria CBSA Region. However, the Cleveland region demonstrates a higher percentage of persons with a Cognitive Difficulty than LCUC's Independent Living Difficulty.

Over time, the disability statistics have staggered throughout the years in review. In 1990, LCUC had 18,853 which grew significantly and nearly doubled in 2000 to 33,599. The rate of growth in population of persons with disabilities slowed substantially between 2000 and 2010. In 2010, 38,656 LCUC residents are a person with a disability

V.A.2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

Following the patterns of the broader community given the economic situation, Lake County has seen an increased vacancy rate and an increase in the percentage of occupied housing units that are occupied by renters. Per the 2000 census, the rate of owner-occupied housing was at 77.5%, and that dropped to 74.9% in the 2010 census. More detail is found at the community level in the table below that uses current 2014 5-year estimate ACS data has been compiled to display in detail the median number of rooms and median house value for each community in the county for both homeowners and renters. Also in the uploaded documents is an Excel file that shows tenure and race/ethnicity from 1990 to 2010 by all Lake County census tracts.

The **AFFH Tool Map # 16** has two variations: one that depicts the percentage of renter households and the other depicts the percentage owner households. In LCUC the more rural areas in the southeastern corners of the jurisdiction have fewer than 16% renter households. Most of this area is south of Interstate 90, lacks sewers and has other physical/geographical challenges to development. The low renter percentage in that area is longstanding. The next category of 16-32% rental is widely scattered by and comprises roughly a third of the LCUC census tracts. The three highest categories of percentage of renters on this map includes those tracts having more than 32% renters. These areas are also widely scattered but the highest concentrations are noted in Painesville City, Willoughby Hills adjacent to Cuyahoga County, and Willoughby in the Route 2 and Lost Nation Road interchange area.

Mentor has lower concentrations of renter households north of Route 2 with the exception of the area along Lake Erie known as the Headlands where 18% of the households are renters. South of Route 2 along a commercial corridor is where the highest concentrations of renter households are found.

HUD's CPDMaps tool provides an up to date visual representation of the data noted below on percent renter and homeowner but to the census tract level. Visit website <http://egis.hud.gov/cpdmaps/> and select Ohio and then Lake County to view an array of data and maps similar to the AFFH tool.

In the Region it appears that the central cities, for each county (Cleveland, Lorain, Elyria, and Medina) are those that have the highest concentrations of renters. Homeownership is higher in the communities outside the central cities.

**Jurisdiction Table 4:** Housing Characteristics (size, value, tenure) by Community

Locality	Median Rooms	Median Value	% Owner	% Renter
Concord Township	7.4	226,500.00	92.9	7.1
Eastlake City	5.8	120,000.00	74.6	25.4
Fairport Harbor Village	5.5	96,800.00	69.5	30.5
Grand River Village	6	140,000.00	64.2	35.8
Kirtland City	7.6	267,000.00	85	15
Kirtland Hills Village	9+	567,300.00	93.2	6.8
Lakeline	6.3	157,500.00	91.4	8.6
Leroy Township	7.5	228,900.00	93.5	6.5
Madison Village	6.2	138,600.00	78.6	21.4
Madison Township	6.1	124,900.00	75.4	24.6
Mentor City	6.6	166,900.00	85.1	14.9
Mentor on the Lake City	5.8	132,700.00	61.4	38.6
North Perry Village	7.1	165,500.00	80.1	19.9
Painesville City	5.2	107,500.00	47.4	52.6
Painesville Township	6.1	141,500.00	76.7	23.3
Perry Township	6.6	163,600.00	88.2	11.8
Perry Village	6.6	164,800.00	90.8	9.2
Timberlake	6.6	153,600.00	91	9
Waite Hill	9+	611,100.00	85.4	14.6
Wickliffe City	5.9	122,700.00	81.1	18.9
Willoughby City	5.4	145,700.00	60	40
Willoughby Hills City	5.2	237,100.00	48.2	51.8
Willowick City	5.8	119,200.00	80.8	19.2

V. Fair Housing Analysis > B. [General Issues](#)

V. Fair Housing Analysis > B. General Issues > i. Segregation/Integration > 1. Analysis

*V.B.i.1.a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.*

As noted previously in [V. A. 1. Demographic Summary](#) Lake County as a whole and the portion that makes up the jurisdiction (LCUC) is not as diverse as the region nor as diverse as the largest county in the region, Cuyahoga County, home to the principal city of the region, Cleveland. Similar to the region and to Cuyahoga County there are areas of LCUC, whether at the community, neighborhood or census tract level that have concentrations of minority populations far above the average percentage for that population in the jurisdiction as a whole. Those areas are considered segregated. The table below shows by census tract and community the areas that have minority populations more than 5% above the average jurisdiction level of Black 3.98 or Hispanic 4.15.

**Jurisdiction Table 5:** Identified Areas of Concentration 5% exceeding Jurisdiction Average for Minority Populations (Black or Hispanic) by Census Tract and Community – Census 2010 / American Community Survey (ACS)

<b>% Black alone (not Hispanic)</b>	<b>% Persons of Hispanic origin</b>	<b>Census Tract</b>	<b>Community</b>
10.45	28.77	2045.00	Painesville City
9.26		2040.00	Fairport Harbor, Grand River, Painesville Twp (Part)
11.65		2011.00	Willoughby Hills
10.07		2001.00	Willowick
25.99		2010.00	Willoughby Hills
15.55		2043.02	Painesville City
15.02	29.22	2042.00	Painesville City
	17.17	2057.01	Madison Twp.
	31.00	2044.00	Painesville City

Conversely there are areas of the LCUC and of the region that continue to a nearly exclusively White population have in 2010. Those areas in LCUC with a 98% or more White population are shown below.

**Jurisdiction Table 6:** Area of White Population exceeding 98% by Census Tract & Community  
Census 2010 / ACS

<b>% White alone (not Hispanic)</b>	<b>Tract</b>	<b>Community</b>
98.19	2014.00	Willoughby
98.58	2018.00	Eastlake
98.24	2037.00	Kirtland Hills & Kirtland (part)
99.14	2037.00	Kirtland Hills & Kirtland (part)
100	2047.00	Painesville Twp
98.43	2052.00	Leroy Twp
99.14	2059.00	Madison Twp
99.04	2060.00	Madison Twp
100	2062.00	Fairport, Grand River & Painesville Twp
99.88	2063.00	N. Perry Village & Perry Twp (part)
99.04	2064.00	Waite Hill & Kirtland (partial)
98.82	2066.00	Eastlake (part), Lakeline, Timberline

The **AFH Tool Table 3** shown in the index - **Racial/Ethnic Dissimilarity Trends** describes levels of segregation over time from 1990 to current projections. The index values range from 0-100, with higher numbers indicating a higher degree of segregation among the two groups; thus 0-39=low segregation; 40-54=moderate segregation; 55-100=high segregation. In LCUC the highest level of segregation as measured by the Dissimilarity index provided is experienced by Blacks followed closely by Hispanics with current estimates at 59.76 and 57.52, both levels indicating high segregation.

In the Region, the Black population is most segregated since the White/Black index remains above 70, indicating the highest level of segregation.

In the LCUC the dissimilarity index for nonwhite/ white remains moderate throughout the time period 1990 to 2010 and for the current population projection. In the LCUC the dissimilarity index for Black/White was at high levels of segregation from 1990 to 2000 at 65.23 to 59.32 but dropped to moderate in 2010 at 50.27. The current projection shows the index increasing again to high levels

at 59.76 while **AFH Tool Table 2** shows a curious Black population loss of nearly 1,500 in the current estimate.

The index for Hispanic/White reflected low levels of segregation in 1990 increasing to high segregation from 2000 to current estimates. However the low dissimilarity index in 1990 could be a misrepresentation due to low levels of participation in the 1990 Census by Hispanics.

Asian or Pacific Islander/White index levels indicate a low level of segregation but low population levels (less than a thousand in 1990 to roughly 2,500 in 2010) may also contribute to this seemingly low index data. In the Region only the Asian Pacific Islander index falls within the low segregation levels, and does so throughout the time frame analyzed.

In the Region there has been a decrease in the Hispanic/White levels of segregation from a high at 58.32 in 1990 to 52.26 in 2010. Other indexes, the Black/White and nonWhite/White show continued high levels of segregation but the index has dropped at least ten points in the 1990 to 2010 period

As the instructions note for this section low population levels below one thousand may cause questionable results. Also noted is that the index views each area as a whole and does not provide any information or insight into any areas of concentration within the region or the jurisdiction; however the maps in the AFFH Tool as well as the tables generated above do provide that insight.

*V.B.i.1.b. Explain how these segregation levels have changed over time (since 1990).*

The discussion above in V.B.i.1.a also addresses the changes in segregation levels over time for the jurisdiction and for the region. A more detailed Census Tract analysis view of the changes in the number of persons, and the percentages of each racial group and Hispanic origin is found in the uploaded attachment / supporting documentation. It shows parts of Lake County that have had a consistent minority population, others that have a growing minority population and areas that at one time had an entirely White population base. An overview of the changes in racial and ethnic composition of Lake County as a whole change over the 1960 to 2015 time period is shown below. Data is drawn from US Census for the decennial years and from the 2015 American Community Survey.

**Jurisdiction Table 7:** Lake County Population by Race & Hispanic: Census 1960 - 2010 and ACS 2015, Number & Percentage

		1960	1970	1980	1990	2000	2010	2015 ACS
<b>White</b>	#	146,470	193,754	208,311	209,879	217,041	212,713	212,349
	%	98.50%	98.25%	97.9%	97.39%	95.40%	92.47%	92.55%
<b>Black</b>	#		2,697	2,851	3,528	4,527	7,306	8,494
	%	1.5%	1.37%	1.34%	1.64%	1.99%	3.18%	3.70%
<b>Asian &amp; Pacific Isl</b>	#	non white		1,213	1,447	2,089	2,646	2,918
	%			0.57%	0.67%	0.92%	1.15%	1.27%
<b>Native Am</b>	#			255	250	251	273	242
	%			0.12%	0.12%	0.11%	0.12%	0.11%
<b>Other</b>	#	2,230				1,505	3,577	1,229
	%					0.66%	1.55%	0.54%
<b>2 or more</b>	#					2,098	3,309	4,205
	%					0.92%	1.44%	1.83%
<b>Hispanic</b>	#			1,043	1,469	3,879	7,825	8,805
	%			0.49%	0.68%	1.70%	3.40%	3.84%
<b>Total</b>		148,700	197,200	212,801	215,499	227,511	230,041	229,437

*V.B.i.1.c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.*

**Minority Racial and Ethnicity**

Using **AFFH Tool Map 1** analysis was performed by increasing the dot density to 10 and examining one racial and or ethnic minority group at a time. The dot color representing White persons was deactivated to allow the other racial groups to be visible.

In LCUC the main area of racial concentration is the City of Painesville with considerable representation of persons that are either Black, Other race and multi-racial depicted on **AFFH Tool Map 1** as dark green, light green and orange. Additional areas of Black racial concentration are seen

on the border with Cuyahoga County south of Rt 90 in Willoughby Hills and again in Willoughby near to Interstate 90 & State route 91 interchange and by State route 2 and the Lost Nation Blvd. exit.

The Region covers a large area of five counties with Cuyahoga located adjacent to Lake County to the west. Since it is the most populated county and the center of the region with Cleveland at its heart it is logical to focus the analysis there rather than the other smaller counties that are less diverse and have a lesser impact on the Lake County housing and job markets. While Cuyahoga is more diverse than Lake County overall, it too has areas that appear on **AFFH Tool Map 1** as having primarily Black racial minority residents located to the east and south of Cleveland's central city. Asian or Pacific Islander populations appear largely dispersed but a few census tracts in the region have concentrations in excess of 25%.

Concentrations of persons of Hispanic origin are noted in Lake County primarily in the City of Painesville. There is a scattered but steady presence of Hispanic persons in LCUC with the exception of the most rural areas to the southeast corners. Interestingly in the Region the scattered pattern of residency continues through the suburbs of Cleveland with heavy Hispanic concentrations appearing on Cleveland's west side and further west in Lorain County/city.

### **National Origin**

The five most prevalent countries of National Origin for LCUC in descending order are Mexico, Bosnia Herzegovina, Croatia, India, and other Eastern European countries. In addition to the concentration of persons from Mexico in Painesville City there are concentrations of persons from Bosnia Herzegovina and Croatia in Eastlake and in Wickliffe. Concentration of Indian and other Eastern European countries are difficult to discern but appear to be concentrated in Willoughby Hills at the south west corner of the LCUC.

In the region National Origin ranks the following top five by the corresponding percent of population: India (.53%, China excl. Hong Kong & Taiwan (.34%), Mexico (.33%), Ukraine (.32%) and Germany (.24%) with Romania (.23%) and Italy (.22%) following closely.

### **Limited English Proficiency (LEP)**

The **AFFH Tool Table 1** showing LEP data provides a listing of the ten most populous limited English proficient groups in the jurisdiction and region. For LCUC the greatest number of persons having limited English proficiency speak either Spanish (2,776 - 1.61%) and Serbo-Croatian (771 - 0.45%) followed by nearly equal numbers of those that primarily speak Italian, Russian or Other Indo-European language. While LEP is a concern it is interesting to note that of the 7,200 persons of Hispanic origin, less than half, only 2,776 indicate language difficulty. Again as in National Origin the residents with Spanish as their primary language reside in the Painesville area and those with Serbo-Croatian and other European languages are clustered in the western part of the LCUC.

**LEP in the Region** by the **AFH Tool Table 1** also note Spanish as the number one language (22,120) with a smaller percentage (1.13%) of the region having language challenges. In the region Chinese is the next most prevalent language for which persons have limited English proficiency, followed by similar European languages as LCUC. Analyzing the maps for the region is challenging due to the size and color selection of the dot density even when the represented number of persons per dot is adjusted to lower than 75. Also adjacent jurisdictions, Cuyahoga county and City of Euclid have different top ten National Origin and LEP selections.

*V.B.i.1.d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.*

Census data reveals that LCUC's housing stock is predominantly owner occupied. Looking at the percentages in each city, and comparing them to the **AFH Tool Map 2**, there appears to be a correlation between a highly white population and a high percentage of owner occupied housing. Note the following percentages of owner occupied housing by community: Eastlake 74.6%, Kirtland 85.0%, Mentor on the Lake 61.4%, Mentor 85.1% (other CDBG jurisdiction), Painesville City 47.4%, Wickliffe 81.1%, Willoughby 60.0%, Willoughby Hills 48.2%, and Willowick 80.8%.

As noted in V. A. 2 the location of occupied units by tenure was provided. A more detailed analysis of tenure by race and ethnicity over the period 1990 to 2010 is included in the uploaded supporting documents and will be made available in the appendix. Referring to the uploaded Excel file that shows tenure and race/ethnicity from 1990 to 2010 by all Lake County census tracts provides the necessary factual reference materials to show that the higher concentration of renter occupied census tracts coincide with the higher concentration of Black and Hispanic concentrated census tracts. These areas are notably Painesville City, Willoughby Hills, and Willoughby. That analysis notes expanded minority presence throughout the LCUC in both rental and owner properties but also supports the high prevalence of owner occupied housing by White households.

*V.B.i.1.e. Discuss how patterns of segregation have changed over time (since 1990).*

As noted in the introduction LCUC and Lake County as a whole has not historically had a large racial or ethnic minority population. The City of Painesville has long been and continues to be where the majority of the Black population has resided. A small two block area in the western part of the county has been and continues to be an area of higher concentration, but still low numbers, of Black owner occupied housing units. The timing of the growth of LCUC in the post WWII era was still a time when discriminatory practices and policies were the norm. While LCUC is adjacent to Cuyahoga County migration of Blacks to Lake County did not occur, a pattern similar to other city and suburban areas. The influx of Black population concentration noted in the Census 2000 and 2010 influx in the western part of the county is an emerging trend as is a greater dispersion and at least minimal presence of all minority groups in the LCUC.

The emergence of Hispanic population in the Painesville area has been developing since at least the 1980 Census. Local knowledge reveals that participation in the 1990 Census by Hispanics was poor, causing an undercount. As first primarily men came to the areas of LCUC to find work (the local Nursery industry is a historically major employer) and returned to Mexico in the winter. Gradually families came, stayed and grew. There is a smaller but steady Puerto Rican population presence in the Painesville area as well.

Still when compared to the 19.72% total minority population for the Cleveland-Elyria MSA Region that consists of the following 5 counties: Lake Cuyahoga, Geauga, Lorain and Medina, the minority presence in LCUC is minor. The regional population as a whole has decreased 1.2% but the White Non-Hispanic population decreased 9.8%. Using the 2010 Census figures from **AFH Tool Table 1**, all other racial groups and Hispanics increased their proportional share of the population during the time frame shown.

*V.B.i.1.f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.*

The main noticeable demographic trend is that of increased number and percent of Hispanic households in the City of Painesville. Outreach to Hispanic residents to provide information about fair housing, as well as business and housing opportunities throughout the area is in place and being expanded. Additional outreach and education to the entire LCUC is specified in the goals of this assessment, in part due to readily expressed immigration status concerns by some members of the community.

#### V.B.i.2. Additional Information

*V.B.i.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.*

While some categories of persons with disability are concentrated in Painesville other categories are dispersed in the LCUC. Families with children have limited opportunities to obtain affordable housing and senior citizens, a rapidly growing population segment similarly must compete for the few affordable accessible units despite the addition of over a hundred units in the past few years.

*V.B.i.2.b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.*

Programs funded by LCUC have taken both approaches including: residential rehabilitation for single family owner occupied housing based on the current owner's income level and need, placement (security deposit assistance to allow persons to move anywhere within the LCUC. Designation of target areas with CDBG funds is challenging due to the requirement that an area be sufficiently populated by persons having low income; noticeably and frequently not in areas of opportunity.

### V.B.i.3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

Community Opposition

Lack of private investments in specific neighborhoods

Lack of public investments in specific neighborhoods, including services or amenities

Location and type of affordable housing

Private discrimination

No additional unique local contributing factors were identified by the Program Participants.

Descriptions of local experience with specified contributing factors is found within supporting documents.

## V. Fair Housing Analysis B. General Issues ii. R/ECAPs

### V.B.ii.1. Analysis

#### *V.B.ii.1.a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.*

The data and mapping indicates that there are no areas within Lake County that have been designated as a Racially Ethnically Concentrated Area of Poverty (R/ECAP). There are multiple R/ECAP areas in Cuyahoga County, specifically in the Cities of Cleveland and East Cleveland near Lake County's western boundary. The majority of these R/ECAP areas are predominately Black and grouped in three large clusters in the northeast region of the County. The County has even noted that there is "segregation of African Americans from whites and of African-Americans from Hispanics exceeds the averages for many large cities. Cleveland's African-American population is concentrated on the east side of the city and in the near eastern suburbs. Hispanics are concentrated in the city's west side neighborhoods. The greatest concentration of poverty is found on the city's east and near west sides, where many of the city's Hispanic and African-American residents live." City of Cleveland Planning Commission, Population Trend. There are no R/ECAPs in the jurisdiction. Within the Segregation/Integration section there is a discussion of the LCUC's areas that simulate such areas but to a much lesser extent. Affecting change in areas of concentrated poverty coupled with minority concentrations is challenging.

#### *V.B.ii.1.b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region? V.B.ii.1.c. Describe how R/ECAPs have changed over time (since 1990).*

While there are no R/ECAPs in the LCUC jurisdiction, there are several areas in the Region as described above in the information released by the City of Cleveland's Planning Commission.

In 1990 the R/ECAPs were only seen in Cleveland's eastern neighborhoods. By 2000 these areas had increased in number and dispersed to the south, east and west. In 2010 the areas expanded further to the west into the main cities of Lorain County.

V.B.ii.2. Additional Information V.B.ii.2.a & b. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics. V.B.ii.2.b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

The LCUC jurisdiction participated in a HUD Sustainable Communities Fair Housing Equity Assessment a few years ago that covered a multi-county area even beyond this five county region. Some useful data and perspectives may be available from that endeavor to inform the process of the larger communities when they undertake their Assessment of Fair Housing. One factor that impacted the Region severely was the widespread foreclosure crisis.

The LCUC has no additional information to add at this time but plans to continue and possibly expand involvement with agencies and groups serving the Region to develop expertise and influence.

### V.B.ii.3. Contributing Factors of R/ECAPs

The jurisdiction does not have any R/ECAPs.

## V. Fair Housing Analysis B. General Issues

### iii. Disparities in Access to Opportunity - V.B.iii.1. Analysis

*V.B.iii.1.a. Educational Opportunities - V.B.iii.1.a.i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.*

As stated in the instructions, the School Proficiency Index measures the proficiency of elementary schools in the attendance area of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams and are percentile ranked and range from 0 to 100. The higher the school score the higher the school system quality is in a neighborhood.

Analysis of **AFFH Tool Table 12** School Proficiency Index clearly shows disparities in percentiles amongst the protected classes. Asian or Pacific Islander, Non-Hispanic students display the highest level of proficiency at 76.85% with White students following closely at 74.41%. However, there is a large disparity for Black Non-Hispanic students at 56.98% and Hispanic Students at a low level of 42.08 which is nearly half of the Asian/White counterparts.

According to **AFFH Tool Map 9** – Demographics and School Proficiency, Race/Ethnicity, the schools with the highest proficiency rating are located primarily in Western Lake County and Southeast Lake County. The spatial distribution indicates there is a high concentration of Black, Non-Hispanic and Hispanic populations located in areas with the lowest school proficiency ratings. The data indicates this concentrated area in Central Lake County to include Painesville.

Utilizing the same **AFFH Tool Map 9** – National Origin there is a clear indication that residents from Mexico are concentrated in the area with the lowest School Proficiency rating in Painesville. Similarly, this same area of the County has the highest concentration of household families with children at 80 – 100%. There are indications of high numbers of household families with children residing in Eastern Lake County with high index ratings, but there is less concentration of those households compared to Western Lake County.

*V.B.iii.1.a.ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.*

There are eight public school districts located in the Lake County Urban County:

Kirtland, Fairport Harbor Exempted, Madison, Painesville, Perry, Riverside, Wickliffe, and Willoughby-Eastlake. There are 57 public schools in Lake County serving 32,228 students. Local data indicates that the public schools have a diversity score of .22 which is lower than the State average. Minority enrollment is 17% which is primarily Hispanic and the student teacher ratio is 18:1.

Local data differs from that of **AFFH Tool Map 9** in that it clearly indicates that the Painesville City Local School District not only displayed a low proficiency school rating; this district also has the highest enrollment of Hispanic (49.9%) and Black (16.4) students, coupled with nearly 98% of the students are classified as Economically Disadvantaged. Also, this school district indicates the highest level of Mobility for all protected classes. Mobility data indicates students that did not spend a majority of the school year within the district. The 2015-2016 school report cards were recently published for the State of Ohio and graded the district as an “F” for Achievement, Gap Closing, K-3 Literacy, Graduation Rate, and Prepared for Success.

Performance of a school district is a function of several factors. The School Proficiency index provided in the AFG tool is but one measure that is in use by systems in Ohio and nationwide. Schools throughout Ohio are working to respond to the evolving multiple measurements applied in the school report cards. **AFFH Tool Map 9** is focused on the fourth grade performance and attendance within 1.5 mile radius which results in differing and somewhat confusing variances in performance index measurement within one district. Throughout Lake County districts work to provide education programming using funds that are generated largely from real estate taxes from commercial, industrial and residential uses. Districts that are strong in one use and or have a balance mix are more able to provide adequate resources.

Residency patterns are influenced by historic settlement patterns, the housing stock’s characteristics (age, decency, affordability), availability of employment opportunities, and proportions of households at differing life stages.

From the west, central and eastern districts differing characteristics contribute to the differing results. Aging housing stock and aging population are challenges to levying additional taxes to support education. Collecting those taxes levied, especially during an economic downturn presents additional challenges.

In western districts, the single family housing stock is vintage 1950 to 1979. The small bungalow style lack appeal to those that desire larger homes. Aging homeowners make way for younger households that desire housing that is affordable. Passing levies to support schools has been a struggle. The mix of Commercial and industrial uses helps to offset the demands on the residential tax base.

In central Lake County the differences between Mentor Exempted, Fairport Harbor, Painesville City and Riverside (Painesville Township) districts couldn’t be more distinct. Mentor enjoys the tax benefits of considerable industrial and commercial uses. Mentor has a much newer housing stock with 35% of their 20,472 units being built since 1980, compared with Painesville City and Fairport Harbor at 28% and 26%. The housing value of and the resultant taxes collected perpetuate the financial challenges. Painesville City’s fleet of newly constructed schools may contribute to improvements.

To the east, Perry and Madison demonstrate considerable differences as well with Perry having more, higher value, post 1990 single family housing starts and the tax benefit of the Parry Nuclear Power Plant contributing to the development of a new campus style school system in the 1990s. While Madison covers a large geographic area, the population is concentrated in the norther corridor between Lake Erie and US Route 20. Some new housing has been added to the existing older stock and school plans recently implemented included building reuse, new construction, demolition and consolidation.

*V.B.iii.1.a.iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school Which protected class groups are least successful in accessing proficient schools?*

The chart below lists the enrollment options for the 8 school districts in the County. The data indicates that the schools listed with the highest proficiency ratings are located in Districts that do not allow open enrollment. Conversely, the schools that allow open enrollment to any district are ones with the lowest performing schools according to the recently published Ohio School Report Cards.

Local knowledge of school enrollment policies in the County includes the fact that there is a mandate that students attend their neighborhood school, thus neighborhood segregation affects access to proficient schools. The racial/ethnic demographics of the schools mirror the demographics of the surrounding neighborhoods. The City of Painesville District is located in the most segregated communities in the County clearly establishing the premise that neighborhood segregation affects access to proficient schools.

**Jurisdiction Table 8:** Open Enrollment Report for the 2016-2017 School Year effective 05.03.16 Last Updated / Prepared by the Office of Quality School Choice and Funding

<b>State Totals</b>						
			Total Districts	No Open Enrolment	Open to Adjacent Districts	Open to Any District
			10	5	1	4
				50.0%	10.0%	40.0%
<b>IRN</b>	<b>School District</b>	<b>County</b>	<b>Area</b>	<b>No Open Enrollment</b>	<b>Open to Adjacent Districts</b>	<b>Open to Any District</b>
051169	Auburn Career Center	Lake	8		X	
045369	Fairport Harbor Exempted Village	Lake	8			X
047878	Kirtland Local	Lake	8	X		
047886	Madison Local	Lake	8			X
045492	Mentor Ex. Village	Lake	8	X		
044628	Painesville City Local	Lake	8			X
047902	Perry Local	Lake	8	X		
047894	Riverside Local	Lake	8			X
045088	Wickliffe City	Lake	8	X		
045104	Willoughby-Eastlake City	Lake	8	X		

## V. Fair Housing Analysis > B. General Issues

### iii. Disparities in Access to Opportunity 1. Analysis b. Employment Opportunities Employment

#### *V.B.iii.1.b.i. Describe any disparities in access to jobs and labor markets by protected class groups.*

The Jobs Proximity Index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a statistical area, with larger employment centers weighted more heavily. The values are percentiles ranked with values ranging from 0 – 100; the higher the index value, the better access to employment opportunities for resident in a neighborhood.

**AFFH Tool Table 12** data displays overall County data and indicates a total range of 43.48% to 53.49% for all of the protected classes. The neighborhoods with the best access to employment opportunities in the County are the Hispanic neighborhoods at 53% with White neighborhoods a close second at 50%. Native American, Non-Hispanic areas are the lowest at 43%. Generally, according to the Job Proximity Index there is only marginal differences between accesses to employment opportunities.

According to **AFFH Tool Map 10**– Demographics and Job Proximity (Job Proximity and Race/Ethnicity), the County data indicates the areas with the highest Job Proximity data are located in primarily in Madison, North Perry and the City of Mentor and Wickliffe in direct correlation with areas zoned for commercial and industrial activities. The data on the Job Proximity and National Origin indicates the data is relatively dispersed, with the exception of the City of Painesville where the map is picking a Brownfield site near a residential area where jobs are scarce. However three miles in any direction they are in a census tract with job proximity rating of 75% and above. This data is similar to the other **AFFH Tool Map 10** variations where there is little to no disparities within the County.

**AFFH Tool Table 12** also discerns the Labor Market Engagement Index for the County. The Labor Market Engagement Index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This data is based upon the unemployment rate, labor-force participation rate, and percent of population ages 25 and above with a bachelor's degree or higher. Values are percentile ranked and range from 0 to 100; the higher the score, the higher the labor force participation and human capital in a neighborhood.

**AFFH Tool Table 12** data in this category shows disparities amongst the protected classes with an overall range of 40.76 to 68.32. Here, the highest labor force participation is amongst the Asian or Pacific Islander, Non-Hispanic class, with White participation second at 60.89. The lower end of this chart indicates Hispanic neighborhoods has a lower Labor Market Engagement Index with Black neighborhoods in the middle at 54.71%. **AFFH Tool Map 11**– Demographics and Labor Market Race/Ethnicity displays City of Painesville in it's entirely and northern City of Painesville has a higher level concentrations of Hispanic and Black minorities. The patterns of where people live have

remained static throughout the community with the layer provided in this map. Specifically, other factors within Northeast Ohio impact the labor market index measures. At first glance, this map does indicate that the area with the lowest Labor Market Index in the County correlates with a high level racial concentration in the Painesville area. This same premise holds true with persons with a National Origin of Mexico living in Painesville. Interestingly, persons with a National Origin of India ancestry are concentrated in Willoughby Hills, an area with higher concentrations of Labor Market. Lastly, consistent with Job Proximity data, the same Painesville area displays the highest concentration of households that are families with children.

*V.B.iii.1.b.ii. How does a person's place of residence affect their ability to obtain a job?*

The evaluation of the Job Proximity Index values by neighborhoods does expose slight differences between the census tracts. The higher scoring areas are those that run through the center of the County largely in industrial and manufacturing areas that are not heavily populated. The data is similar when comparing the Labor Market Index scores. As a result, the proximity of access to employment opportunities does not appear to be a significant impediment in the area.

*V.B.iii.1.b.iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?*

As stated above, **AFH Tool Table 12** Labor Market Index data shows disparities amongst the protected classes with an overall range of 40.76 to 68.32. The data demonstrates Hispanic residents have the most difficulty in obtaining and maintaining employment at 40.76% or opportunity, with Black residents at 54.71%.

## V. Fair Housing Analysis B. General Issues

### iii. Disparities in Access to Opportunity V.B.iii.1.c. Transportation Opportunities

*V.B.iii.1.c.i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.*

The Low Transportation Cost Index is based on estimates of transportation costs for a family that meets the following description: A 3-person single parent family with income at 50% of the median income for renters for the region. The values for this data and percentiles are ranked nationally with values from 0 to 100. The higher the transportation cost index, the **lower** the cost of transportation in that neighborhood. According to **AFH Tool Table 12 – Low Transportation Cost Index**, Lake County ranges between 38.96 to 51.80%. Since the data in this table is inverted a low cost index rating indicates a higher cost of transportation. According to **AFH Tool Table 12**, White families have a highest cost index in the area at 38.96% whereas Black residents have the lowest cost index at 51.80%. Yet, for resident populations below federal poverty line, Asian or Pacific Islanders have a high cost index at 28.50% while Black residents in this subclass remains the same. Costs for transportation in the County is also markedly higher than those in the Cleveland-Elyria CBSA Region.

The Transit Trips Index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region. Values are percentile ranked nationally, with values ranging from 0 to 100. The higher the transit trips index, the more likely residents in that neighborhood utilize public transit. Evaluation of **AFH Tool Table 12** indicates a range of 48.75% to 60.36% of trips taken in our area. **AFH Tool Table 12** indicates Black residents utilize public transportation more frequently than White residents. Yet the data changes for persons below federal poverty level in the County. Here, Black residents still utilize public transportation more frequently, but Asian or Pacific Islander residents use public transportation the least. Lastly, the Transit Index ratings for the County are markedly lower than those in the Cleveland-Elyria CBSA Region. Local knowledge indicates that public transportation in the Greater Cleveland area is more accessible than in our local County.

Local analysis of Lake County's transportation related factors includes the following: Lake County is the second most densely populated county in the Cleveland-Elyria-Mentor metropolitan statistical area with 1,008 residents per square mile. A review of Lake County's low transportation cost index figures and map shows correlation between higher density areas with public transit coverage and lower costs of transportation. Areas within the county with lower transportation costs are generally near fixed public transit routes provided by Laketran. Additionally, higher concentrations of minority populations (Black non-Hispanic, Native American non-Hispanic, Asian/Pacific Islander non-Hispanic, and Hispanic) are living in census tracts with lower transportation costs and a higher transit trip index.

While fixed transit routes are located in higher density areas by design, the demographic data in Lake County shows that individuals living there are likely to utilize this public transportation and have lower transportation costs. Populations living in lower density portions of Lake County have proportionately higher transportation cost indices which may be attributed to lack of public transit and need for personal vehicles.

*V.B.iii.1.c.ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?*

The data in **AFH Tool Map 13** – Demographics and Low Transportation Cost Race/Ethnicity depicts a county with slight marginal differences between protected classes. As stated above, White families have the highest cost index in the area when compared to other racial classes. Utilizing **AFH Tool Map 13**, it is easy to discern that this fact is mainly due to the limited transportation lines that run throughout the county. The county's regional transit authority primarily operates throughout a center line in the county.

The higher costs of transportation in areas of Lake County not served by public transit can put jobs and housing in those areas out of reach. A majority of protected class groups, namely minority race/ethnicity and families with children, are clustered in portions of Lake County that have the

highest transit index and low transportation costs. Lack of jobs and sufficient, affordable housing near public transit will negatively affect portions of Lake County’s population.

*V.B.iii.1.c.iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.*

Areas with access to public transit routes and those with higher transit trip indices, are related to lower transportation cost indices in Lake County. Areas of Lake County not served by transit, or areas with limited transit service, show higher costs of transportation. Population clusters of protected classes (race/ethnicity, national origin, and family status) are concentrated in areas with low transportation cost indices. If lower density development, including homes and jobs, moves outward from higher populated portions of the county and existing transit systems, this can cause economic hardships for people relying on public transportation.

In a 2013 report “Regional Analysis of Impediments to Fair Housing Choices,” from the Northeast Ohio Sustainable Communities Consortium, land use and planning were identified as impediments to fair housing and public services like transportation. The report notes that “classes most frequently affected are disability, familial status, race, and national origin” and suggests to “enhance the reach and access of the public transportation system so that persons belonging to protected classes have improved access to transportation service.”

Additionally, according to the Northeast Ohio Area-wide Coordinating Agency’s Coordinated Public Transit-Human Services Transportation Plan for Northeast Ohio, 5% (4,738) of Lake County’s 94,347 households do not have access to a personal vehicle. Though a small percentage of the overall population, these households represent residents who are reliant upon public transit and unable to readily access areas of the county not served by Laketrans.

## V. Fair Housing Analysis B. General Issues

### iii. Disparities in Access to Opportunity d. Low Poverty Exposure Opportunities V.B.iii.1.d.

*V.B.iii.1.d.i. Describe any disparities in exposure to poverty by protected class groups.*

The Low Poverty Index captures the depth and intensity of poverty in a given neighborhood. This index uses both the family poverty rates and public assistance receipt, for of cash-welfares, such as Temporary Assistance for Needy Families (TANF). The values of the Poverty Index range from 0 1-100 and the higher the score, the less exposure to poverty in a neighborhood.

**AFH Tool Table 12**– Low Poverty Index indicates a large disparity of poverty status among the protected classes. The index ranges from 37.93% to 73.24 % in the County. A low score in this index indicates more exposure to poverty at a neighborhood level. Here, Hispanic residents show the greatest exposure to poverty with a 37.93% index value. Next, Black residents have a 54.96% index value and Asian or Pacific Islanders have the least exposure to poverty at 73.24%. The disparities in

values among the racial classes are substantial. Additionally, the data changes substantially among those listed as populations below federal poverty line. Here, Hispanic residents remain with the lowest range of index value at 28.46%, where Black residents don't fare much better at 35.08%. White and Asian or Pacific Islanders are similarly situated at 53% equally.

*V.B.iii.1.d.ii. What role does a person's place of residence play in their exposure to poverty?*

**AFFH Tool Map 14**– Demographics and Poverty with Race/Ethnicity, national origin, and familial status shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that depicts poverty levels for the jurisdiction and the region. The areas that displays the lowest poverty ratings are similar to the same areas identified in the School Proficiency rating. The City of Painesville depicts the lowest poverty rating of 0 – 10% with the outer City boarders displaying a 10.1 – 20% poverty index rating. Similarly, North Madison and South Mentor also have a poverty index of 10.1 – 20%. Concord, Leroy, Painesville Township, Willoughby Hills and a select potion of Mentor depict high percentages 80. – 90.1 on the Low Poverty Index map.

**AFFH Tool Map 14** Poverty and National Origin depicts an equal sampling of protected classes spread throughout the entire county with the exception of a large concentration of persons whose national origin is Mexico concentrated within the City of Painesville's two low tracts.

**AFFH Tool Map 14**- Poverty and Family Status displays a large concentration of families with children 80.1% - 100% centrally located in the area with the highest exposure to poverty, the City of Painesville. There is also a large concentration of households that are families with children in the South Mentor high poverty area as well.

*V.B.iii.1.d.iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?*

The mapping data demonstrates pockets of severe segregation of Hispanic individuals and Families with children in the County. The concentration of these groups in areas of high exposure to poverty, underperforming schools indicates an area of low opportunity.

*V.B.iii.1.d.iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas*

The affordability of housing is key to providing the protected classes access to low poverty areas. Traditionally, like in most other American cities, subsidized affordable housing was built predominantly in neighborhoods where there is a concentration of low-income residents. Studies have shown that these neighborhoods have deteriorated and have gotten poorer and the

percentage of residents with college degrees, the homeownership rates and median housing values all have declined.

In Lake County, the building and development of affordable housing was heavily concentrated within the City of Painesville. These affordable housing developments contributed greatly to creating areas of high poverty. The cost of land, and exclusionary zoning practices throughout the remaining areas of the County helped create this environment. Public housing authorities, tax credit properties, and other affordable housing opportunities were drawn to the Painesville area due to the affordability of the land where the land costs alone were too burdensome for the projects to be built elsewhere. Tax credit policies favored development in low-income areas by creating an incentive to achieve higher points for projects in those areas. Additionally, there was a requirement for letters of support from the community in which the project was to be developed which created a burden for those interesting in building in a community of opposition.

Many local zoning ordinances include great impediments to fair housing for families with children. Many localities offer no multi-family housing, have very high minimum local acreage build requirements and restrictive definitions of “family.” The cumulative effect of these ordinances severely limited fair housing choice.

#### V. Fair Housing Analysis B. General Issues iii. Disparities in Access to Opportunity e & f.

##### *V.B.iii.1.e.i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.*

The Environmental Health Hazard Exposure Index summarizes potential exposure to harmful toxins at a neighborhood level. Potential health hazards exposure is a linear combination of standardized EPA estimates of air quality carcinogenic, respiratory and neurological hazards with indexing census tracts. Values are inverted and then percentile ranked nationally. Values range from 0 to 100. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.

The data in **AFH Tool Table 12** – Environmental Health Index displays a consistent range of data with a change of .10 across all protected classes. Generally, the County’s Environmental index ranges from 58.10% to 68.29%, indicating better environmental qualities countywide. Race/Ethnicity indicators show Whites reside in the best environmental neighborhoods at 68.29%, Hispanics at 67.11% and Blacks residing in the lowest environmental quality neighborhood at 58.10%. The data also remains high for populations below federal property line, however displays a shift where low-income Asian or pacific Islanders, Non-Hispanics reside in neighborhoods with 77.95% environmental quality. The County also substantially excels in this area as compared to the Cleveland-Elyria CBSA Region where the highest environmental quality of the region scales at 53% compared to Lake County’s 68.29%.

*V.B.iii.1.e.ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?*

According to **AFFH Tool Map 15** – Demographics and Environmental Health, Race/Ethnicity shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading showing the level of exposure to environmental health hazards for the jurisdiction and the region. Here, the communities in Western Lake County show the lowest environmental quality neighborhoods at levels of 20.1 – 30%. According to the Racial/Ethnicity **AFFH Tool Map 14**, Whites predominately populate this environmentally unhealthy communities. This area is also boundaries the Cleveland area; an area ripe very low environmental quality neighborhoods. The only other area noted on **AFFH Tool Map 15** is the Fairport Harbor/North Painesville Township area which surrounds Diamond Shamrock. It is important to note that the Diamond Shamrock Corp. (Painesville Works) site is a 1,100-acre former chemical manufacturing facility in Lake County, Ohio. The Diamond Shamrock Painesville Works facility operated from 1912 through 1977. It made a variety of products, including soda ash, baking soda, chromium compounds, carbon tetrachloride, hydrochloric and sulfuric acids, chlorinated wax and coke. Facility operations contaminated soil, sediment and surface water with hazardous chemicals. Site cleanup is ongoing through the U.S. EPA Superfund Program.

Yet overall, according to variations of **AFFH Tool Map 14** there is relatively no disproportionate impact on minorities; specifically race/ethnicity, national origin and family households of children under the age of 18. As stated above, the County Environmental Health Index between 58.10% to 68.29%, indicating better neighborhood environmental qualities countywide

Storm runoff has created environmental issues for the Communities of Wickliffe, Willowick, Eastlake, Mentor, Mentor-on-the-Lake, Grand River, Fairport Harbor and Painesville City. Some of the infrastructure in Lake County was built at the turn of the 20th Century when it was common practice to build combined sanitary and storm water systems. These storm water these non-combined systems are over 100 years old. The age of the systems coupled with upstream development and the lack of storm water detention and retention facilities, have led to sanitary sewer backups into various homes in these communities. Whites are predominately the racial class effected by this issues in Wickliffe, Willowick, Eastlake, Mentor, Mentor-on-the-Lake, Grand River and Fairport Harbor. African Americans and Hispanic Populations are affected by this issue in Painesville City.

Additionally, 72.7% of all dwelling units in Lake County were built before 1979. The largest concentration of housing built during that time can be found in the communities of Fairport Harbor (86.0%), Eastlake (83.5%), Madison Township (80.1%) Painesville (79.3), Willowick (95.2) and Wickliffe (94.9%). Painesville City and Fairport Harbor have between 40% and 64% of their homes built before 1950. There is notable existence of lead paint and other hazardous materials such as asbestos and lead solder in homes built prior to 1979. Also, while many homeowner maintain their

property, many plumbing systems remain as the original systems installed at the time the homes were originally build.

#### V.B.iii.1.f. Patterns in Disparities in Access to Opportunity

*V.B.iii.1.f.i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.*

The data clearly indicates that the City of Painesville area experiences an aggregate of poor access to opportunity and high exposure to adverse factors and this data correlates directly with that of the patterns of segregation within the county. There is a clear indication that residents from Mexico are concentrated in the area with the lowest School Proficiency rating in Painesville. Similarly, this same area of the LCUC has a high concentration of families with children households as shown on the AFFH Tool map for school proficiency with the activation of the variation “% of households that are families with children.” This shows that at the tract level at least 60% of the households in that area are families with children. Local data differs from that of **AFFH Tool Map 9** in that it clearly indicates that the Painesville City Local School District not only displayed a low proficiency school rating; this district also has the highest enrollment of Hispanic (49.9%) and Black (16.4) students, coupled with nearly 98% of the students are classified as Economically Disadvantaged. However, the transportation data demonstrates that this community relies on public transportation the most out of all residents in the county and has a lower transportation cost index. Yet, conversely this lower transportation cost index only pertains to persons without disabilities who can utilize local standard routes as compared to mobility impaired individuals who must rely on specific transportation.

The areas that display the lowest poverty ratings are similar to the same areas identified in the School Proficiency rating. The City of Painesville depicts the lowest poverty rating of 0 – 10% with the outer City borders displaying a 10.1 – 20% poverty index rating. Poverty and Family Status displays a large concentration of families with children centrally located in the area with the highest exposure to poverty, the City of Painesville. There is also a large concentration of households that are families with children in the South Mentor high poverty area as well. Affordable housing issues also play a role in creating an area that experiences an aggregate of poor access to opportunity and high exposure to adverse factors. In Lake County, the building and development of affordable housing was historically heavily concentrated within the City of Painesville. These affordable housing developments contributed greatly to creating areas of high poverty. The cost of land, and exclusionary zoning practices throughout the remaining areas of the County helped create this environment. Public housing authorities, tax credit properties, and other affordable housing opportunities were drawn to the Painesville area due to the affordability of the land and LIHTC selection criteria that focused development in areas of need. It is interesting to note that the AFFH Tool Maps show the area as having lower environmental concerns than the western boundary of

the county. Understanding that the AFFH Tool environmental maps is only focus is air quality; whereas local knowledge recognizes the vacant land north and east of this area to be a former industrial settling basin, now remediated as shown in V.B.iii.1.e.ii. In sum, the data demonstrates pockets of severe segregation of Black and Hispanic individuals and families with children in the County. The concentration of these groups in the City of Painesville, and area of high exposure to poverty, under performing schools indicates an area of low opportunity. This pattern of high poverty, minority concentration, low school proficiency and predominance of families with children fully correlates with the patterns of racial and ethnic segregation described in V.B.i.1. While LCUC has this one concentrated, multi-layered, challenged area the jurisdiction recognizes that there are other areas and R/ECAPs within the region that face problems similar to or worse than this. While the Labor engagement index in this area of Painesville City is the lowest for the LCUC, the job proximity index is good to average throughout LCUC. In the Region many of the same areas that show on the maps as R/ECAPs or areas of racial and ethnic concentration are in areas that have varying job proximity indices.

*V.B.iii.2. Additional Information V.B.iii.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.*

Access to opportunity is still a barrier that many protected classes face within Lake County, Ohio. One report published by The Housing Research and Advocacy Center called “The state of Fair Housing in Northeast Ohio: 2016” shows that Lake County has the second highest incidence of fair housing complaints with 5.63 complaints for 100,000 people. (Page 32). The report also shows that since 1990 over 337 complaints of discrimination have been filled. While this number seems small over the 16 year time frame, however, take into consideration that amount of individuals who are unaware of their housing rights and the knowledge that they legally can file a complaint to rectify the overall discrimination issues. Of the 337 complaints 142 complaints were on disability, 80 were familial status and 69 were race. This data shows that disability and familial status are the top two protected classes within Lake County to receive unfair treatment when it comes to housing. In regards to racial discrimination, the issues surrounding our community were apparent and in the news on June 26, 2015. A black family recently purchased a home in Painesville. One evening when they arrived to unpack, they found that a racial slur was written across the front of the garage. The individuals responsible were never found. Yet, this goes to show the prevalence of discrimination within our community.

Another study that was recently published on December 8, 2016 by Fair Housing Resource Center Inc. FHRC conducted this systemic testing program to help eliminate the strong evidence of housing segregation apparent within the tri-county area and to provide an enforcement mechanism to serve as a deterrent to housing providers, lending institutions, developers, Realtors, and builders who

engage in illegal practices encouraging such segregation. FHRC found direct evidence that persons with disabilities encounter significant levels of adverse treatment when they search for rental housing within the tri-county area compared to nondisabled home seekers. FHRC also noted direct evidence that families with children, persons with disabilities and minorities are encountering adverse treatment when home seeking compared to similarly-situated non-minority individuals and individuals without children. FHRC noted direct evidence that REO properties in both communities of color and rural communities were in much poorer condition compared to the properties in predominantly white neighborhoods. Furthermore, FHRC found direct evidence that lending discrimination occurs for minority borrowers when minorities seeking home loans, compared to similarly situated white borrowers.

*V.B.iii.2.b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).*

The County's local fair housing office, FHRC, has an extensive plan for 2017 to provide Lake County with an aggressive agenda to provide education and outreach opportunities with a focus on fair housing, fair lending and information on affirmatively furthering fair housing. These opportunities will provide much needed information to individuals informing them of their fair housing rights and provide access to opportunities to those in need.

Some of the education and outreach events that will be in place for 2017 include: the presentation of two (2) Fair Housing seminars, with courses aimed at intermediate and advance fair housing; an assistance animal awareness event hosted to provide education and bring awareness to the struggle that individuals with disabilities have in relation to seeking housing; hosting a 1 day motorcycle run to highlight and emphasize the communities need to understand Veterans and to prevent discrimination against individuals with disabilities; and hosting a one (1) day multi track conference.

The education that FHRC will provide to residents throughout Lake County will shed light on the ongoing issues that our community faces in lieu of discrimination and provide the necessary tools and information to the individuals and organizations to create preventative measures to ensure that discrimination is not prevalent within Lake County.

#### *V.B.iii.3. Contributing Factors of Disparities in Access to Opportunity*

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

Access to financial services

The availability, type, frequency, and reliability of public transportation

Lack of regional cooperation

Land use and zoning laws

Lending Discrimination

Location of employers

Location of environmental health hazards

Location of proficient schools and school assignment policies

Location and type of affordable housing

Private discrimination

No additional local Contributing Factors identified. Descriptions of local experience with specified contributing factors is found within supporting documents.

## V. Fair Housing Analysis B. General Issues

### iv. Disproportionate Housing Needs

*V.B.iv.1. Analysis V.B.iv.1.a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?*

Disproportionate housing needs is a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of members of any other relevant groups or the total population experiencing that category of housing need in the applicable geographic area.[1]

To better understand this section, a discussion on the data being measured is important. HUD has provided data to assist in the analysis of housing need as measured by several types of housing problems: Cost Burden and Severe Cost Burden is calculated by the fraction of a household's total gross income spent on housing costs. There are two levels of cost burden: (1) Cost Burden counts the households for which housing costs is greater than 30% of their income; and (2) Severe Cost Burden counts the number of households paying 50% or more of their income for housing. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include mortgage payments, taxes, insurance and utilities. Overcrowding is determined by measuring the number of persons per room. Households having more than 1.01 to 1.5 persons per room are considered overcrowded and those having more than 1.51 persons per room are considered severely overcrowded. The person per room analysis excludes bathrooms, porches, foyers, halls, or half-rooms. Lastly, there are two types of substandard housing problems considered as well: 1. Households without hot and cold piped water, a flush toilet and a bathtub or shower; and 2. Households with kitchen facilities that lack a sink with piped water, a range or stove, or a refrigerator.

**AFH Tool Table 9** shows the percentage of race/ethnicity groups and families with children experiencing two potential categories of housing need. The first category is households experiencing one of four housing problems: housing cost burden (defined as paying more than 30% of income for monthly housing costs including utilities), overcrowding, lacking a complete kitchen, or lacking plumbing. The second category is households experiencing "one of four severe housing problems" which are: severe housing cost burden (defined as paying more than half of one's income for monthly housing costs including utilities), overcrowding, and lacking a complete kitchen, or lacking plumbing.

In Lake County Ohio, there are a total of 75,225 households in the area. Of those total households, nearly 31% demonstrate as one that experiences one of the four housing problems outlined above. This is a slightly smaller percentage than the Cleveland-Elyria, OH CBSA Region which demonstrates 34% of total household experiencing housing problems. There is a great significance between White households and households of other protected classes. Here, **AFH Tool Table 9** indicates that only

29% of White families in Lake County experience housing needs as compared to 47% of Hispanic households, 46% of Black households, 46% of Native American, Non-Hispanic households and 45% others.

The data takes an even greater shift when comparing Households experiencing any of the 4 severe housing problems and a cost burden greater than 50%. For this category of housing problems, other, non-Hispanic households declined sharply from 45% to 5%; White households make up only 12% of the severe cost burdened households, whereas Native American, Non-Hispanic households constitute 46%. Black and Hispanic households are equal at 21%.

Severe housing cost burden represents by far the most significant type of housing issue at the national level as identified in HUD's Worst Case Needs for affordable housing measure. **AFH Tool Table 10** shows the number of persons by race/ethnicity and family size experience severe housing cost burden, whereas the cost burden is defined as greater than 50% of income. Similar to the above, the data demonstrates that 46% of Native-American, Non-Hispanic families have the higher percentage of cost burden as compare to other members of protected classes. Blacks at 21% are the next protected class with the highest percentages, followed by Asian or Pacific Islanders 14%, Hispanics 13%, Whites at 12% and Others at 6%. This proportional data is very similar to that of the Cleveland-Elyria, OH CSBA Region.

In sum **AFH Tool Tables 9 & 10** indicate there is great indication of disproportionate housing needs in Lake County. Members of protected classes are more likely to reside in cost burdened, severely cost burdened, overcrowded and substandard housing than White households. Not to understate the overall need, the participants as a part of the Consolidated Plan process will provide tables that show the actual numbers of households experiencing housing problems such as cost burden and severe cost burden in decreasing order by race and ethnicity / owner and renter / household type. This will further demonstrate the magnitude of the need and issue of lack of affordable housing for all.

[1] 24 C.F.R. § 5.152

*V.B.iv.1.b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?*

**AFH Tool Map 7** – Housing Burden and Race/Ethnicity plots the households experiencing one of more housing burdens in the area. This dot density map displays a different picture. First, the area within the county that is shaded as having the most households with a burden at 43.27 – 53.70% is located in the City of Painesville, area which is the County's most integrated community. In Painesville, Whites, Blacks and Hispanics occupied this area of a high level of housing burden. There is another area in the County showing the same level of housing burden that displays primarily White residents. The next shaded area listing a percentage of 34.20 – 43.26% are scattered in mainly 4

areas within the county. The first area is in Central Lake County specifically the Painesville Township and Fairport Harbor area display areas with a high level of Hispanic and Black populations, but also show may White populations with housing burdens as well. The other areas shown with this level of housing burden are displayed in the Southwest corner of the County in the Willoughby, Willoughby Hills area that is home of the largest apartment complex in the County, Pine Ridge Apartments. Lastly, the Southeast corner of the County in Madison is occupied primarily by White households in this high cost burdened area as well.

**AFH Tool Map 8** – Housing Burden and National Origin plots the same information as indicated above. This map indicates that nearly 100% of the population from Mexico are residing in the areas with the greatest housing burden. Residents of other origins such as Bosnia & Herzegovina, Croatia, India, and Other Eastern Europe origins reside primarily in the Western end of Lake County and are evenly dispersed throughout all levels of housing burdens.

*V.B.iv.1.c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.*

Taking a closer look back at **AFH Tool Table 9** – Demographics of Households with Disproportionate Housing Needs it was interesting to note that there is a higher percentage of the population living with housing burdens for Non-family households 42% compared to family households. In households with 5 or more individuals, they are likely to reside in burdened housing 32% of the time in comparison to only 23% of families with less than 5 individuals. **AFH Tool Table 11** provides data on Publically Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children. This data indicates there is no greater level of need for households with children. In each of the four program categories: Public Housing, Project-Based Section 8, Other Multifamily and the HCV Program there appears to be a greater need for housing without children rather than housing with children. Here, out of the combined program categories, HCV Program has the highest percentage of households with Children at 46.75%, compared with 42% in Project-Based Section 8, and 27% in Public Housing.

*V.B.iv.1.d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.*

In the LCUC area, there are a total 94,089 housing units in the community.[1] Of those housing units, 90,488 or 75% are owner occupied housing and 23,623 units or 25% are renter occupied housing. There is significant disparities in homeownership amongst members of protected classes.

As the following table demonstrates, Native American, White and Asian county residents are more likely to own their own home in Lake County. The data indicates that 86% of Native Americans, 72.56% of Whites, and 64% of Asian Americans are homeowners. However, there is a startling

disparity for Black residents in Lake County. Here, the data is actually the complete opposite for Blackcounty residents. Only 28% of Blackcounty residents own their own home while 71% of those residents reside in rental properties.

[1] Census.gov - American Factfinder – 2014 ACS 5 year estimates for geographies Lake County and Mentor City, with tables identified in attached scan. B25003A through B25003H.

**Jurisdiction Table 9:** Lake County Urban County Jurisdiction - Number of Occupied Housing Units by Tenure and Race

<b>LCUC Area</b>	<b>Total Housing Units</b>	<b>Owner Occupied Units</b>	<b>Renter Occupied Units</b>	<b>Percentage Owner Occupied</b>	<b>Percentage Renter Occupied</b>
<b>Combined</b>	94,089	70,466	26,623	74.89%	25.11%
<b>White</b>	88,730	68,271	20,459	72.56%	23%
<b>Black</b>	3,213	925	2,288	28%	71.2%
<b>Native American</b>	53	46	7	86%	13%
<b>Asian</b>	1,106	708	398	64%	36%
<b>Other</b>	482	240	242	.05%	.09%

V.B.iv.2. Additional Information

*V.B.iv.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.*

As a part of the Consolidated Plan process these needs will be more fully explored at the county, local and census tract level looking for areas of concentrated need as well as areas of opportunity to provide programming to meet overall needs.

*V.B.iv.2.b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.*

Lake MHA, as a part of their five year planning process will more fully explore and report on their housing needs analysis. Data gleaned from the surveys of public housing residents and HCV holders will contribute to that analysis.

#### V.B.iv.3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

The availability of affordable units in a range of sizes

Displacement of residents due to economic pressures

Lack of private investments in specific neighborhoods

Lack of public investments in specific neighborhoods, including services or amenities

Land use and zoning laws

Lending Discrimination

No other additional local Contributing Factors were identified. Descriptions of local experience with specified contributing factors is found within supporting documents.

## V. Fair Housing Analysis > C. Publicly Supported Housing Analysis

### V. Fair Housing Analysis > C. Publicly Supported Housing Analysis > 1. Analysis > a. Publicly Supported Housing Demographics

*V.C.1.a.i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?*

Based on an analysis of **AFH Tool Table 6 and 7**:

#### **Jurisdictionally:**

- White families are most represented in the Multifamily category (81.67%) and are least represented in HCV category (62.21%).
- Black families are most represented in the HCV category (34.14%) and are least represented in the Project Based Section 8 category (17.10%)
- Hispanic families are most represented in the Projected Based Section 8 category (9.74%) and are least represented in the Other Multifamily Category (0.0%)
- Asian or Pacific Islander families are most represented in the Public Housing category (.78%) and are not represented in either Other Multifamily or the Project Based Section 8 category (0%)

In review of the data, Black households in Lake County are most likely to reside in HCV. Despite being 3.97% of the jurisdiction's total households, 34.14% of HCV households are Black. Lake County is adjacent to Cuyahoga County, which we know through regional analysis, to be much larger and more racially diverse. As the HCV program allows families choice and mobility, the disproportionate number of Black households in HCV may, in part, be attributed to minority families from Cuyahoga County accessing voucher assistance through Lake MHA's program. Currently, there are 585 families on the HCV waiting list. 361 of those families are from Cuyahoga County. 70.26% of families on the waitlist are Black, while 27.18% are White. At 1,344 vouchers Lake MHA's HCV program is modest in size compared to that of Cuyahoga MHA which controls 15,270 of the regions 20,934 total HCV. Program size combined with the timing and frequency of open application cycles may indicate that families may be served more quickly in Lake. Families ultimately have two goals: (1) to obtain voucher assistance, and (2) to have the choice to reside where they feel comfortable and supported.

Conversely, Black households are least represented in Project-Based Section 8 housing (17.10%). Black households account for 20% of Public Housing and 18.33% of Other Multifamily housing. Across the board, data reflects an over-representation of Black households in Publicly Supported Housing in comparison to their population as a whole.

Hispanics are 2.48% of total households in Lake County, but they are significantly over-represented in Project-Based Section 8, at 9.74%. This higher percentage at 9.74% is the result of the larger

complex Seneca Grove having the high 30% concentration 40 of 132 units, while Andrews Place a senior complex in Mentor on the Lake has 3 of 78 (4%) units and 1 of the 12 units at McNaughton. This particular concentration of Hispanics at Seneca Grove Apartments in Painesville City is consistent with census data for Hispanics in that tract. In review of **AFFH Tool Map 5**, 26% of Seneca Grove Apartments is Hispanic and 30% of the population within that census tract is Hispanic. HUD's **AFFH Tool Table 6** shows Hispanics have no representation in Other Multifamily housing in the county.

Asians or Pacific Islanders make up 1.03% of total households in the jurisdiction. They are slightly under-represented in Publicly Supported Housing, being most located in Public Housing (0.78%); while only 0.25% of HCV are Asian or Pacific Islander households. The data shows no representation of this population in Project-Based Section 8 or Other Multifamily housing. This data, as reviewed, does not seem to negatively affect fair housing choice.

Lake County is a predominantly White jurisdiction. 92.05% of total households are White. As such, Whites are predominant in each category of Publicly Supported Housing. Whites are found most in the Other Multifamily category (81.67%) and are least represented in HCV (62.21%). White households are 75.29% of Public Housing and 72.92% of Project-Based Section 8. In each category of publicly-supported housing, there is an under-representation of White households when compared to the total jurisdiction population.

### **Regionally:**

**AFFH Tool Table 6** reflects some differences between the jurisdiction and region. Black households, at 19.63% of the region are dramatically over-represented in each category of Publicly Supported Housing. Hispanics, at 3.64% of the households in the region are over-represented in Public Housing (7.74%), Project-Based Section 8 (6.66%), and HCV (6.58%) but proportionately represented in Other Multifamily (3.32%). However in the region, Blacks are predominant in all Publicly Supported Housing. In contrast to our jurisdiction, Public Housing in the region is overwhelmingly (81.04%) utilized by the Black population. **AFFH Tool Map 5** shows a concentration of Publicly Supported Housing sites within identified R/ECAPS in the region. Additionally, 76.16% of the population utilizing HCV is Black. Although somewhat disbursed throughout the region, the voucher concentrations do appear to be east/southeast of Cleveland, in areas of high minority concentration and poverty. There are concentrations of Hispanics in neighborhoods west of Cleveland in areas with moderate voucher utilization and near publicly supported housing. The Asian or Pacific Islander population is under-represented in all categories except Other Multifamily. Although they are 1.71% of the total regional households, they are slightly over-represented at 3.02% in this category. A Multifamily site, Asian Evergreen Apartments, has 42 units and shows as 100% of those served are Asian. This area's overall Asian population is high with census tracts showing 39%-47% as being Asian. Locally, this area is known as a niche neighborhood, with a strong Asian cultural influence.

**Jurisdiction Table 10:** Project Based Section 8 Complexes by Protected Classes (Race, Ethnicity, Family Status)

Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
<b>Mc Naughton Apartments (AKA- Extended Housing)</b>	12	89%	11%	0%	0%	0%
<b>Andrews Place</b>	78	91%	3%	3%	4%	31%
<b>Seneca Grove</b>	132	32%	41%	26%	0%	80%
<b>Lithuanian Center</b>	82	100%	0%	0%	0%	0%

*V.C.1.a.ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.*

The HCV Program, Public Housing and other subsidized housing types are in demand. Due to the fact that there are more people seeking subsidized housing than there are available units, it can take months, even years to obtain a Housing Choice Voucher or to become a public housing resident in Lake County. **View V. C. 1b** for number of income eligible households in county.

**Public Housing and Housing Choice Voucher** are both operated by Lake Metropolitan Housing Authority (LakeMHA). The Housing Choice Voucher Program allocation is 1,457 vouchers and the number of Public Housing units are 265 within four complexes. Lake MHA also has 14 market rate units co-located with Parkview.

While **AFH Tool Table 6** depicts that of the 181 Public Housing units approximately 76% are occupied by White households with nearly 19% and 5% by Black households and Hispanic households respectively **AFH Tool Table 6** fails to depict data for 84 of the public housing units and 231 of the HCV. Examination of LakeMHA data for the 265 public housing units reflects a higher 21% Black and 7% Hispanic occupancy.

In the two elderly and disabled Public Housing complexes the proportion of minorities is considerably less. Washington Square and Jackson Towers both have a 12% Black population while these complexes have a 1% and 3% Hispanic population. Conversely at the family complexes the percentage of Black population is 30% at the smaller (23 unit) Parkview complex in Willoughby and 40% in the larger (68 unit) Woodlawn Homes complex in Painesville. The Parkview complex is

comprised of two and three bedroom units, thus an elderly household would generally not be eligible for those larger unit sizes.

**Jurisdiction Table 11:** Public Housing Complexes by Type, # Units, Protected Classes (Race, Ethnicity, Disability & Family Status)

Public Housing Complex	Location	Type	# Units	% Black	% Hispanic	% Disabled	% Families with Children
Washington Square	111E.Washington Painesville City	Elderly /Disabled	69	12	1	76.8%	0
Jackson Towers	200W. Jackson Painesville City	Elderly /Disabled	95	12	3	90.5	0
Woodlawn/Sanders	Multi address Painesville City	Family	68	39.7%	19	8.8	
Parkview Place	38185/38153 Erie Rd. Willoughby	Family	25 PH 15 mkt	30.4	0	21.7 % ph	

While **AFH Tool Table 6** depicts a total of 1,226 HCV with approximate percentages of households at White 67%, Black 29%, Hispanic 3% and Asian 0.4%, the Lake MHA data for the 1,457 vouchers again reveals similar but higher minority proportions than Lake County at White 64.5%, Black 35.2%, Asian 0.08% and Native American 0.23% and Hispanic at 3.6%. Lake MHA reports that outreach efforts to the local Hispanic community for both public housing and HCV has yielded few applications.

The majority of families participating in the Housing Choice Voucher program have a female head of household. Of the current household count of 1336, 1,106 are led by females. Of the 1,106, 46% are between the ages of 25-44. In comparison, only 230 of these families are led by males. Of the 230, 41% are between the ages of 45-59.

### Low Income Housing Tax Credit

**AFH Tool Table 6** does not address Low Income Housing Tax Credit units but the table below was generated with the **AFH Tool Map 5** Query function. It reveals an actual 581 units in the six complexes below, disregarding Seneca Grove which was listed and discussed with Project-Based Section 8 units. The demographic composition of the developments will be discussed upon the provision of those statistics from the respective complex. The demographics at the tract level demonstrates the tendency for the highly competitive LIHTC properties, over time, to have been constructed within areas of Minority and low income concentrations.

## Project based Section 8

**AFH Tool Table 6** indicates that Project-Based Section 8 Units number 204 while the **AFH Tool Map 5** Query function reveals an actual 304 units in the four complexes below. Of these four only Seneca Grove (formerly Argonne Arms) was originally designed as family housing; thus the 80% of households with children is to be expected. The concentration of Hispanic households in the complex is consistent with the concentration in the tract while the concentration of Black households is double that of the tract, three times that of the City and roughly ten times that of the county as a whole.

**Jurisdiction Table 12:** Comparison of the Percentage of Units Occupied by Protected Classes (Race, Ethnicity, Disability & Family Status) in Named Project Based Section 8 Complexes to the Census Tracts Where Located

Project Section 8 Development Name	Bases in Proj	Prop White (%)	Prop Black (%)	Prop Hispanic (%)	Prop Asian (%)	Households with children in the development	Census Tract Number	Tract White (%)	Tract Black (%)	Tract Hispanic (%)	Tract Asian (%)	Census Tract Poverty Rate
Mcnaughton Apartments Aka Extended Housing	12	89%	11%	0%	0%	0%	39085 204400	61%	9%	28%	0%	27%
Andrews Place Apartments	78	91%	3%	3%	4%	31%	39085 202500	93%	3%	2%	2%	13%
Seneca Grove Apartments	132	32%	41%	26%	0%	80%	39085 204200	47%	18%	30%	0%	34%
Lithuanian Center	82	100%	0%	0%	0%	0%	39085 201200	92%	4%	1%	2%	7%
Total	304											

## Low Income Housing Tax Credits

Neither **AFH Tool Table 6** nor **AFH Tool Table 8** fully address Low Income Housing Tax Credit units but the table below was generated with the **AFH Tool Map 5** Query function. It reveals an actual 581 units in the six complexes below, disregarding Seneca Grove which was listed and discussed with Project-Based Section 8 units. The demographic makeup of the developments will be discussed upon the provision of those statistics from the respective complexes. The demographics at the tract level demonstrates the tendency for the highly competitive LIHTC properties, over time to have

been constructed within areas of Minority and low income concentrations. Wesley Village I & II, a senior/disabled complex, also reported that none of their 104 units had children and that 90 (86.6%) were female head of household, 8 (7.7%) male and 6 (5.7%) joint head of household.

**Jurisdiction Table 13: Comparison of the Percentage of Units Occupied by Protected Classes (Race, Ethnicity, Disability & Family Status) in Named Low Income Housing Tax Credit Complexes to the Census Tracts Where Located**

Low Income Housing Tax Credit Development Name	Units in Project	White (%)	Black (%)	Hispanic (%)	Asian (%) *	Households with children in the development	Census Tract Number	Tract White (%)	Tract Black (%)	Tract Hispanic (%)	Census Tract Poverty Rate
BRENTWOOD APARTMENTS PHASE I & II	256	50%	42%	7%	0%	52	204302	68%	13%	14%	17%
WESLEY VILLAGE I & II I=42 II=62	104	65%	24%	0***	0	0%	204500	53%	13%	29%	38%
SENECA GROVE APARTMENTS	132	32%	41%	26%	0%	80%	204200	47%	18%	30%	34%
OAK HILL VILLAGE	181	58%	41%	0%	0%	74%	201600	91%	3%	1%	7%
MADISON WOODS **	40	100%	0%	0%	0%	0%	2061	96%	1%	1%	1%

\* Asian population at the tract level ranges from 1 % to 3 % \*\* Property history includes 3 Federal housing programs LIHTC, Sect 515, USDA to make rent affordable to lower income tenants. \*\*\* No persons identified as Hispanic yet 9 identified as "Other" and one as American Indian.

An alternate data source Ohio Preservation Network was used to identify other publically supported housing types namely USDA and other PBS8.

<http://ohiopreservationcompact.org/housingdatabase.aspx> That data source identified Madison Place’s 73 units for elderly of which 38 are USDA funded and Breckenridge Village in Willoughby that has 125 PBS8 units.

## V.C.1.b. Publicly Supported Housing Location and Occupancy

*V.C.1.b.i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPS.*

While Lake County has no R/ECAPS there are identifiable areas where poverty rates are higher than the jurisdictional average of 9.85% and there are areas where there are higher concentrations of Black and Hispanic households than the jurisdictional average of 3.98% and 4.15%. The table in the Segregation/Integration section and the RECAPS section depicts the census tracts (communities) where both the poverty % and the percent minority are more than 5% than the jurisdictional average. In keeping with the discussion in section **V.B.b.i.** on Segregation/Integration these areas are considered diverse and integrated by some persons while others view the areas of concentration as examples of segregation caused by discriminatory practices both past and present. These areas will be referred to as segregated for purposes of this analysis regardless of the multiple causes that created these areas of stark concentration. There is a concentration of the Black and Hispanic populations in the city of Painesville, where the majority of Public Housing is situated. Three of the four Public Housing sites are in Painesville. Two of these sites: Jackson Towers and Washington Square Apartments serve the elderly/disabled population; and the third, Woodlawn Homes, are family units. A description of the fourth Public Housing site located in Willoughby follows. The highest minority representation is seen in Painesville's Woodlawn Homes as nearly 40% of those family units are occupied by Black households and 19% are occupied by Hispanic households. In 2014, Public Housing was expanded to the central portion of the city of Willoughby through a large renovation of a blighted apartment complex. The renovation was in keeping with the overall revitalization of the downtown Willoughby area, which is a highly sought-after part of town. Park View Place provided an additional 25 units of Public Housing for western Lake County and it includes 14 market rate units. This expansion included six fully-accessible ADA units (4 for public housing and 2 for market rate). Racial composition of the Park View Place units is 18 White and 6 Black of the 25 public housing units and 8 White and 5 Black of the 15 market rate units. A LIHTC apartment (Oak Hill Village) of 181 units is about a mile northeast of Park View Place.

Lake MHA operates the HCV program and is allocated 1,457 vouchers. Similarly, voucher utilization is highest in the cities of Painesville and Willoughby. There are several apartment complexes located along Lost Nation Road in northern Willoughby that serve a high number of families on HCV. Along the lake there is a moderate concentration of vouchers that consist of small, single family cottage-style homes used as rental properties. Northern Willoughby offers a variety of housing choice for families. Outside of these two areas, voucher concentration is reduced but present in parts of the cities of Eastlake, Wickliffe and Painesville Township then the vouchers appear to be somewhat dispersed throughout the county. There is little to no representation in the high-opportunity areas such as Kirtland, Kirtland Hills, portions of Concord and Waite Hill.

Data **AFFH Tool Map 5** shows five Project-Based Section 8 developments in the jurisdiction: McNaughton Apartments in Painesville (12 units), which serves the severely mentally disabled

population; Seneca Grove Apartments in Painesville (132 units) which are family units; Andrews Place Apartments in Mentor-on-the-Lake (78 units); Breckenridge Village (125 units) and Lithuanian Center/Abbott's Manor in Willoughby (82 units) all appear to serve the elderly population. Of those five developments, Black households are disproportionately found in Seneca Grove Apartments (41%) located in Painesville.

A review of the maps and tables generated by HUDS's AFH tool show that there are two Other Multifamily developments, both found in low minority, low poverty census tracts. Lake Vistas/Maximum Accessible Living (22 units) located in Mentor-on-the-Lake was built to accommodate those with physical disabilities. Mary Rose Estates (40 units) located in Willoughby Hills is housing for low-income seniors.

Lake County has LIHTC developments located in Painesville, Willoughby, and Madison. The table below was generated with the **AFH Tool Map 5** Query function and supplemented with local knowledge. It reveals 581 units in the complexes below, disregarding Seneca Grove which was listed and discussed with Project-Based Section 8 units. Brentwood Apartments and Wesley Village are located in the city of Painesville. Oak Hill Village Apartments is in the northern portion of Willoughby and Madison Woods is a small senior complex, found in Madison Village, which is the eastern Lake County and somewhat rural. The demographics at the tract level demonstrate the tendency for the highly competitive LIHTC properties, over time to have been constructed within areas of minority and low income concentrations.

*V.C.1.b.ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?*

Publicly supported housing built for families with children is concentrated in the cities of Painesville and Willoughby. As stated previously Painesville City has a higher concentration of racial and Hispanic households.

Housing for persons with disabilities is somewhat concentrated in the City of Painesville but there are units in other parts of the county as well. Again there is separation of complexes by funding source and then also by the type of disability that exists in the household. Persons with mental illness are served primarily by Extended Housing that operates McNaughton, several local and state vouchers, McKinley Grove PSH, group homes in Willoughby, and Madison. Persons with developmental disabilities are served by a number of housing providers including North Coast Community Homes.

Housing built for elderly is found in several locations throughout the county with two newer LIHTC. Using another HUD data source CPDMaps the following information about concentration of subsidized units is provided.

<b>Jurisdiction Table 14: Percentage of Subsidized Rental Units by Census Tract</b>		
<b>% Subsidized Rental</b>	<b>Tract</b>	<b>Community</b>
14	39085204400	Painesville City
13	39085202500	Mentor on the Lake
12	39085201700	Willoughby City
11	39085201200	Willoughby City
14	39085204400	Painesville City
31	39085204302	Painesville City
46	39085204200	Painesville City
16	39085201900	Eastlake City
53	39085201600	Willoughby City
31	39085204302	Painesville City
19	39085204500	Painesville City
19	39085201300	Willoughby City

*V.C.1.b.iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPS?*  
 With no R/ECAPS identified in the jurisdiction the requested comparisons could not be performed.

*V.C.1.b.iv.(A). Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.*

Most developments were built with a particular funding source which influenced if not dictated the age and or disability of the population that would be served. Examples of Sec 811, 202 for elderly and disabled while Section 236 and LIHTC for households with children. LIHTC was frequently built for specific populations based on the priorities established in the state’s QAP year by year. With the QAP frequently focused on elderly and complete points given for building in areas where low income persons were already concentrated the concentration was perpetuated. Similarly HUD entitlement awards such as CDBG and HOME have stressed the importance of geographically

targeting resources to areas of concentrated need. The intention of such targeted investment is to address the most severe need and to help an area reach a tipping point toward success and sustainability. Sadly need is greater than the resources available to invest.

Continuing on the inadequate resources discussion, while Lake MHA was approved for conversion to RAD for 265 units none have been converted to RAD as yet. These 265 are just some of the 3,644 units in Ohio that are classified as Active RAD Transactions. Per the HUD Press Release No. 16-141 the RAD conversion will allow “public housing authorities to safely leverage other sources of private capital, typically debt and equity, in order to finance rehabilitation or in some cases completely replace distressed public housing. To ensure that the housing remains permanently affordable, owners must agree to long-term rental assistance contracts and use restrictions that automatically renew as they expire. Combined with the physical improvements, these requirements ensure that the housing remains affordable and in good condition for decades to come.”

Footnote - HUD Press Release - HUD No. 16-141 From this link [http://portal.hud.gov/hudportal/documents/huddoc?id=RAD\\_PHA\\_Data\\_20160916.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=RAD_PHA_Data_20160916.pdf)

The needs of and population served by McNaughton Apartments managed by Extended Housing, Inc. is described in Section V. D. and through information in the Attached documents. Again the lack of resources is threatening the continued availability of affordable units for low income tenants with severe mental illness diagnoses.

**AFH Tool Table 8**, identifies 241 units at Jackson Towers. As noted previously in section V. C. 1.a.ii. the actual public housing demographic is as shown below. All of these complexes are relatively small and a change of five households can alter the demographic composition.

*V.C.1.b.iv.(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.*

The prompt for this section suggests that information from the public participation process be shared in this section. Within the shorter survey form a question was included that asked “Where would you support additional income based housing?” Responses were varied and included some blatant negativity, some expressions that people should not be dependent on assistance, but the majority called for increased availability of affordable housing throughout the county. At the second public participation meeting there was a high level of negativity by some attendees. One attendee suggested that the jurisdiction not accept HUD funding. Since this assessment is to be a balance between the available data, local perspectives and local knowledge it is anticipated that the local knowledge of the areas unmet need will prevail and fund will continue to be sought and expended with diligence and fairness.

Six pages of additional Tabular data from Lake MHA is provided within the attachments in a scanned format. Additional examination may be performed as time allows to identify differences in the public

housing demographics as a whole compared to that of individual complexes. Similarly additional sorting of the HCV data by race and address may reveal patterns not readily apparent. Additional relevant information about occupancy by protected class in publicly supported has been discussed in previous sections. Additional prompts may be needed to generate examples.

*V.C.1.b.v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.*

That racial minorities are more prevalent than their proportional representation in the community (Painesville City and Willoughby) and in the county has been established in prior sections. The racial composition of the elderly/disabled complexes of public housing are equal to the City of Painesville but greater than the county as a whole. The racial composition of the family housing whether public housing or LIHTC tends to be a higher share of minorities than the community in which it is located as well as the whole county. The elderly and or disabled complexes for housing types other than public housing and the one MIL complex have little to no minority occupants.

The jurisdiction looks forward to added functionality of the Data and Mapping Tool. Data has been gathered by calling complexes believed or known to be publicly supported. As one of the first program participants required to submit the AFH the **AFFH Tool Map 5** data was provided that showed the demographics of developments and Census tracts in which they are located. That original table was available for download at the link below and completed table below will be updated. Additional data from Census and ACS at the tract level has been obtained from the AmericanFactFinder feature of [www.Census.gov](http://www.Census.gov) and is depicted in several parts of the assessment.

<https://www.hudexchange.info/resource/4845/affh-map-5-data/>

#### V.C.1.c. Disparities in Access to Opportunity

*V.C.1.c.i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.*

**AFFH Tool Map 9** and **AFFH Tool Map 14** show the school and poverty indices. Disparities in access to opportunity is primarily a factor for children being exposed to high poverty rates and poor school performance indices at the family complexes in Painesville City.

Also persons with disabilities that are or want to be in the labor force experience difficulty locating housing that is both accessible and has access to job opportunities. The jurisdiction has historically been reliant on private transportation. The expansion of additional public transportation is limited

by funding and sufficient numbers of riders to expand in a given area/route. Alternative transportation arrangements are to be explored and examined. In the county south of the jurisdiction a local ethnic and religious population relies on carpooling and drivers from outside their community to transport workers.

#### V.C.2. Additional Information

*V.C.2.a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.*

The HUD provided data only partially captured the data related to persons of Hispanic origin. The prevalence of the number of persons of Hispanic origin in the City of Painesville is apparent. The increase between 1990 and 2000 may be overstated in that the number of Hispanic persons did not actually double, rather there was a lack of outreach by the Census in 199 coupled with a lack of participation. The growth of the Hispanic population and the relative youth of that ethnic minority is shown in the school statistics discussed previously and in the difference in the median age for the City of Painesville (32.0 years) compared to Lake County (42.9 years) for all population groups and the same measure for persons of Hispanic origin - City of Painesville (21.9 years) compared to Lake County (22.2 years)

The analysis of the disability data is best addressed in Section V (D).

*V.C.2.b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.*

Lake MHA offers a self-sufficiency program to their eligible tenants. Success in that program is linked to the tenant being connected with resources in the community, increasing income and saving toward a goal. Funds saved have been used toward education, vehicle purchase, and home purchase. Each of these actions helps the tenant become more in control of accessing opportunity.

Housing rehabilitation programs operated with CDBG funding work to reduce all of the identified housing problems of cost burden, overcrowding and substandard conditions. HOME funded Tenant Based Rental Assistance addresses several needs as well to create or preserve opportunity. Funds are provided for placement (security deposit and first month rent) providing the tenant with the opportunity to make that initial move. The increased use of these funds throughout the county rather than just in Painesville is documented in the past few CAPERs. Other programs of TBRA provide rental subsidy to persons with mental illness, especially veterans or households with children allowing them stability until another source of subsidy is identified. Similarly another subsidy is provided to persons completing their education; and yet another allows the tenant to remain stable in the home after experiencing and recovering from a crisis. Partial funds are used to keep the household in the same place and avoid disruption.

The jurisdiction has provided assistance to Lake MHA in the preparation of required annual environmental paperwork, capital improvements to existing public housing properties and with costs to acquire/rehabilitate the Park View apartments in Willoughby and thus can exhibit some influence. Other types of publically supported housing, with the exception of LIHTC, either have not been building, or do not have requirements that the local jurisdiction support their efforts.

### V.C.3. Contributing Factors of Publicly Supported Housing Location and Occupancy

**Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.**

Admissions and occupancy policies and procedures, including preferences in publicly supported housing

Land use and zoning laws

Community opposition

Impediments to mobility

Lack of regional cooperation

Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

Source of income discrimination

No additional local Contributing Factors identified.

Descriptions of local experience with specified contributing factors is found within supporting documents.

## V. Fair Housing Analysis > D. Disability and Access Analysis

### V.D.1. Population Profile

*V.D.1.a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?*

**AFH Tool Table 13** data outlines Lake County, Ohio residents with a disability by type of disability. Specifically, this table delineates persons with vision, hearing, cognitive, ambulatory, self-care, and independent living disabilities for the jurisdiction. According to this data, there are 38,656 individuals (21%) residing in the county with one of the disabilities mentioned above out of the 179,775 total County population. Of those individuals with a disability, 6,291 (3.68%) have a hearing difficulty; 3,450 (2.02%) have a Vision difficulty, 6,998 (4.10 %) have a Cognitive difficulty; 10,610 (6.21%) have an Ambulatory difficulty; 3,918 (2.79%) have a Self-care difficulty; and 7,389 (4.33%) have an Independent Living difficulty.

**AFFH Tool Map 16** – provides dot density data on the population of persons with disabilities by persons with Hearing, Vision and Cognitive disability and where they reside throughout the County. This data shows persons with disabilities evenly dispersed throughout the county with no apparent neighborhood concentrations.

*V.D.1.b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.*

The data is **AFH Tool Table 14** – only provides detailed information on a portion of persons with disabilities inconsistent with the numbers of Lake County residents with a disability listed in **AFH Tool Table 13**. **AFH Tool Table 13** listed 38,656 residents with a disability whereas **AFH Tool Table 14** provided age related detail on only 20,686 residents. In any event, **AFH Tool Table 14** indicates residents with disabilities aged 18 – 64 are the largest represented age group (9,839 or 47%) with residents ages 65 and over second (9,420 or 45%). The lowest represented age group are persons with disabilities ages 5 – 17 at 1,427 or 6%.

**AFFH Tool Map 17** – Disability by Age Group displays a dot density map for the three age groups mention above. This data indicates that persons with disability regardless of age are generally spread throughout the entire county. There is a small indication of the heaviest concentration of persons throughout the Northwestern section of the County. However, that data correlates to the heavy residential area throughout that region of the County. The data is similar to the data displayed in **AFFH Tool Map 16** as there were no apparent neighborhood concentrations of persons based on disability type either.

V.D.2. Housing Accessibility

*V.D.2.a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.*

With the high rates of cost burden, coupled with long waiting lists throughout Lake County, it is clear that the supply of affordable housing does not currently meet the demand. Furthermore, many single-family homes in the County are old and generally not accessible to persons with physical disabilities. This statement also holds true for the public housing stock in the County built in the early 1970’s. The Fair Housing Act requires that most multi-family properties built after 1991 meet federal accessibility standards, but the vast majority of the County’s housing stock was built before this time. In reference to the Year Unit Built chart below for the PHAs Section 8 participating homes, only 27.55% were built after 1991. The housing authority was fortunate to be able to rehab its Willoughby site to include 6 fully-accessible ADA units. Specific data on privately-owned affordable, accessible housing is not available.

While homes participating in the PHA Section 8 program offer a variety of unit sizes (see chart below), this does not necessarily correlate to the County or the region having an adequate supply of affordable, accessible housing in a range of unit sizes. Due to the aging population of Lake County, this lack of affordable, accessible housing will become increasingly important in the near future. This conclusion was supported by a recent study conducted by Lake County in 2015 to identify and address the needs of its growing senior population. Lake County is currently home to more than 51,400 residents 60 years and older. By 2030, it is estimated 1 in 3 residents will be 60+.

Of the 265 public housing units owned and operated by the Authority, only 17 are accessible. In the majority of cases, retrofitting existing units to become accessible would be either cost-prohibitive or result in a loss of units.

<b>Measure</b>	<b>Description</b>	<b>Source</b>	<b>Year(s)</b>	<b>Lake County</b>	<b>N.E. Ohio</b>
Housing Affordability - Renters	Percent of renter households paying 30%+ of monthly household income for housing costs, including rent or mortgage, utilities and property taxes	American Community Survey, three year sample	2010-2012	49.6%	51.4%

**Jurisdiction Table 16: Age of Housing Stock for Housing Choice Voucher (Section 8)**  
(Section 8 Only)

Year Built	Total Units	%
Before 1960	366	26.33%
1960 - 1978	641	46.12%
1979 - 1996	202	14.53%
After 1996	181	13.02%
<b>Total Units:</b>	<b>1390</b>	

**Jurisdiction Table 17: Housing Choice Voucher (Section 8) in Use by Bedroom Size**  
Voucher/Bedroom Size

Size	Total Families	%
1	550	39.57%
2	418	30.07%
3	339	24.39%
4	70	5.04%
5	8	0.58%
6	2	0.14%
7	3	0.22%
<b>Total Families:</b>	<b>1390</b>	

*V.D.2.b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?*

For question (2)(b) HUD is unable to provide data at this time. Single-family housing is generally not accessible to persons with disabilities unless state or local law requires it to be accessible or the housing is part of a HUD-funded program or other program providing for accessibility features. The Fair Housing Act requires that most multifamily properties built after 1991 meet federal accessibility standards. As a result, multifamily housing built after this date, if built in compliance with federal law would meet this minimum level of accessibility, while buildings built before this date generally

would not be accessible. The difficulty with the accessible housing stock is that the newer multifamily complexes built within the county after 1991 are generally ones with the highest rent costs. There have been a few new multifamily developments built within the last 20 years, but most of them are private condominium complexes with requirements for ownership only, as opposed to rentals. Thus, the new accessible housing is available to those individuals who can purchase their home or can afford the high cost rents to reside there. The County does have a presence of assessable housing, but the majority of that housing is not affordable.

In addition, affordable housing subject to Section 504 of the Rehabilitation Act must include a percentage of units accessible for individuals with mobility impairments and units accessible for individuals with hearing or vision impairments. **AFFH Tool Map 5** displays Public Housing, Project-Based Section 8, Other Multifamily and LIHTC locations mapped with race/ethnicity dot density map that distinguishes categories of publically supported housing by color. **AFFH Tool Map 5** demonstrates that the City of Painesville is heavily concentrated with publically supported housing as compared to other localities within the county.

*V.D.2.c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?*

Countywide, 37.89% of public housing residents, 10.98% of Project-Based Section 8 residents, 25.81% of Housing Choice Voucher holders and 37.70% Other Multifamily residents have a disability. Regionally, these figures are 26.79%, 29.79%, 23.64% and 9.63%, respectively. Data is not available for type of disability.

The available figures indicate that at least some of the affordable housing stock is accessible, even if only a small percentage of it is designated as such. However, the number of units is insufficient to meet the demand and individuals with disabilities may have to wait a long time to be able to move into these units or receive a voucher. Other policies and practices that impact ability of individuals with disabilities to access publicly supported housing include:

- Website accessibility: while the Housing Authority lists its TDD/TTY phone number on its website, and individuals are able to change the size of text, it is not fully accessible to individuals with hearing or visual impairments per W3C Web Accessibility guidelines.
- The Housing Authority gives waiting list preferences to disabled applicants for both its Housing Choice Voucher and Public Housing programs. The Authority also maintains a reasonable accommodation policy, including making accommodations to apply for housing. Furthermore, when opening the HCV waiting list, the housing authority designates and publishes a phone number for individuals who are mobility-challenged to call and request a reasonable accommodation.

- Outreach to Improve Disabled Accessibility – The Housing Authority initially reaches out to landlords participating in the Section 8 program with information on disability, reasonable accommodation, and other fair housing material. However, there is no regular or routine effort to reach out to participating and non-participating property owners on the need for accessible units. Doing so may encourage more landlords with accessible units to make them available under the program.

**Jurisdiction Table 18: Disability by Publicly Supported Housing Program Category / AFH Tool**

**Table # 15**

	People with a Disability*	
	#	%
<b>(Lake County, OH CDBG, HOME) Jurisdiction</b>		
	97	37.89
Public Housing	47	10.98
Project-Based Section 8	23	37.70
Other Multifamily HCV Program	320	25.81
<b>(Cleveland-Elyria, OH) Region</b>		
	2,713	26.79
Public Housing	4,880	29.79
Project-Based Section 8	179	9.63
Other Multifamily HCV Program	5,052	23.64

**Note 1:** The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD Programs. **Note 2:** Data Sources: ACS **Note 3:** Refer to the Data Documentation for details ([www.hudexchange.info](http://www.hudexchange.info)).

The greatest barrier to access housing accessible to persons with a disability lies in the fact that the demand for such housing greatly outweighs the supply publically supported housing or affordable housing. Many individuals in the area know there has been a great change in the housing market over the last handful of years. Housing rental prices have escalated to an all-time high, leaving many individuals unable to afford their monthly rent. Housing subsidy programs are the “Holy Grail” for individuals, persons with disabilities and families desperately needing affordable housing. The Lake Metropolitan Housing Authority (LMHA) has a budget of 1,457 vouchers for Lake County residents

to use for their Voucher program. In July, LMHA opened their waiting list for three days and accepted new applications for the Housing Choice Voucher program waiting list. The organization could only accept 750 applications. In three days, LMHA received over 4,000 applications for assistance.

The outpouring response from the community needing affordable housing was staggering. LMHA received the allotted 750 applications on the first day. The community's need for limited program funds was alarming as 81% of the individuals who applied were not accepted on the wait list and must wait a full-year before the list will reopen. There are many factors to blame for the rise in rental costs. However, in 2016 there were 3,250 LMHA applicants who are cost burdened and have to wait another year for an opportunity to apply while they wait for another year.

As stated in the Lake County 2014 Community Plan, it was noted that several local, state and national changes have impacted the social and demographic make-up of individuals utilizing our system and services offered. Extended housing, a Transitional Housing and Shelter Plus Care provider was quoted as stating, "we continue to see a significant increase in individuals coming into our system as a result of loss of employment and/or loss of insurance. The poor and slowly rebounding economy has been the driver of this trend. While several years ago our primary consumers were individuals with an ongoing history of severe and persistent mental illness, today we have more people coming to us seeking assistance for the first time from a "safety net" behavioral health provider; addressing behavioral health crises as a result of environmental factors. Additionally, that same In the past 12 months our system has been able keep waiting list short while demand for services have increased for outpatient services for both adults and youth. Our residential treatment and housing programs continue to have long waiting lists."

The local ADAMHS Board, the Alcohol, Drug Addiction, and Mental Health Services Board assists residents in Lake County who are dealing with a mental illness and/or an addiction issues. In a report they provided in 2014 analyzing treatment program trends, they had indicated: "We contract with Extended Housing, Inc. to provide housing and housing vouchers for adults with severe mental disabilities and children and youths with serious emotional disturbances. The applications for these programs increased by 27% from FY11 to FY13 (359 applications/455 applications). Currently, there are 408 applications on the waitlist. Our homeless outreach program had a 25% increase in outreaches from FY11 to FY13 (140 outreaches/175 outreaches). The number of individuals without income in these programs increased by 17% from FY11 to FY13 (176 people/206 people). We contract with Beacon Health, Inc. for residential treatment; there is currently no wait list for general admission. Individuals in the hospital are always prioritized. We contract with Northcoast Community Services Network for our group homes; the wait time went from 6 to 7 months in FY10 to 4.8 months in FY11, and 2.1 months in FY12. Wait List time has reduced due to better collaboration with agencies within the county. The residential treatment consumer satisfaction surveys demonstrated high levels of satisfaction with services provided."

### V.D.3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

*V.D.3.a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?*

*V.D.3.b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.*

V. D. 3. A. & b. Answered together

Despite our concentrated efforts to provide a detailed response to this question in the form of data, we are only able to provide limited data as follows: According to various data sources available, in 2010, Lake County had 1,566 residents living in skilled nursing facilities; 163 residents residing in group homes intended for adults; 83 residents reside in residential treatment centers for adults; 53 residents reside in other non-institutional facilities; and 9 individuals reside in treatment centers for juveniles (non-correctional).

The State of Ohio does have an Olmstead Plan titled “Ohio’s Strategic Plan to Improve Long-Term Services and Supports for People with Disabilities”[1] states they are committed to advancing the principle that people with disabilities and the aging population are served in the most appropriate integrated settings. The state claims they have made significant progress toward this goal. The Lake County Board of Developmental Disabilities 2014-2016 Strategic Plan[2] incorporated the State’s plan as a strategic goal for this period. Specifically, the Lake County Board of Developmental Disabilities is working towards “integrating individuals they serve within the community while collaborating with outside organization to maximize current service offerings and explore new opportunities.”

However despite the State’s efforts, many persons with disabilities and their families complained to Disabilities Rights Ohio (DRO), claiming that Ohio’s system does not give them the opportunities to live, work and spend time in their communities. The Disability Rights Ohio group investigated the State of Ohio’s system and found the people’s complaints to be true and feel despite Ohio’s list of strategic goals, as of 2016 the Ohio had not changed its service model to comply with the law, leaving thousands of people in facilities when they would like to live in work in their own community. The issues the DRO identified were the following:

1. Long waiting lists for waiver programs requiring people to wait over 13 Years for services they would need to reside within the community;
2. The wages for well-trained staff are so low that direct care staff who support people with developmental disabilities in the community are below poverty levels resulting in excessive turnover.
3. More individuals resided in large facilities and sheltered workshops than any other state.

In March of this year, the DRO filed a class action lawsuit on behalf of Ohioans with Developmental Disabilities.

As taken from their press release, “Today, Disability Rights Ohio (DRO), the law firm of Sidley Austin, the Center for Public Representation (CPR), and attorney Sam Bagenstos against the state of Ohio, including the Ohio Department of Developmental Disabilities, the Ohio Department of Medicaid, and Opportunities for Ohioans with Disabilities. The suit, filed in the United States District Court for the Southern District of Ohio and initiated on behalf of individuals with developmental disabilities who are trapped in institutions or are at risk of institutionalization because of Ohio's illegal service system, asserts that the state is in violation of the Americans with Disabilities Act and the Supreme Court ruling in *Olmstead v. L.C.* Six named plaintiffs, as well as The Ability Center of Greater Toledo, will represent the class in the suit.”[3] [4]

The DRO states that for years, Ohio has relied too much on institutions to provide services to individuals with intellectual and developmental disabilities. Indeed, state officials acknowledge that Ohio's Intermediate Care Facility "footprint is one of the largest in the United States. More than 6,000 individuals with intellectual and developmental disabilities are institutionalized in facilities with eight or more beds across the state. Similarly, the state has channeled people with disabilities into segregated facilities, such as sheltered workshops, for employment and equally segregated facilities for day programs. This has resulted in a lack of opportunity for thousands of individuals who want to live, work or spend their days in integrated, community settings, but need home and community-based supports to do so.” The above litigation surrounding this issue will heighten the public's knowledge and awareness on this issue while providing deeper insight into the State of Ohio's actions regarding their *Olmstead* Plan.

[1] <http://www.ohioaccess.ohio.gov/pdf/ohioaccessrpt2004.pdf>

[2] <http://lakebdd.org/news-forms/documents/LCBDDThreeYearOperatingPlanRevised617Usethisversion.pdf>

[3] <http://www.disabilityrightsohio.org/dd-class-action-lawsuit>

[4] This case is active at the time of the writing of this report.

#### V.D.4. Disparities in Access to Opportunity

##### *V.D.4.a. To what extent are persons with disabilities able to access the following?*

County staff sought additional local knowledge by posing this question prompt (and V.D.4.b. & V.D.5a) to all of the local communities (23 cities, towns and villages) and to the agencies that routinely seek CDBG and or HOME funding. Input was also solicited from agencies that provide services or advocacy for specific persons or groups of persons with disabilities. As of this writing no response has been received from the major regional agency serving persons with physical disabilities (Services for Independent Living) but outreach will continue.

In the survey for the FY17-21 Consolidated Plan survey 43% of the respondents to the special needs question ranked meeting the needs of persons with developmental disabilities among the top three priorities while only 24% selected meeting the needs of persons with physical disabilities in the top three. The results of this survey reflect the community's perception of need in their area of the County.

##### Identify major barriers faced concerning:

###### *i. Government services and facilities:*

The local communities in Lake County provided local knowledge of accessibility of government facilities. Seven (7) of the twenty-three (23) communities responded, and they indicated which public buildings have accessible bathrooms, entryways, and parking areas. One community (Willoughby Hills) indicated that a barrier is retrofitting old buildings. The County has used CDBG funds in the past to make ADA improvements on public buildings or public infrastructure for the following communities: Willoughby Hills, Madison Township, Painesville City, Fairport Harbor Village, and Eastlake City. CDBG has also been used by the County in the past to make ADA improvements on neighborhood facilities, such as the YMCA, the Lake County Historical Society building, Lake-Geauga Recovery Center, and others. While community responses indicated that they have a good understanding of access need related to physical barriers (mobility issues), the County noted that other barriers were not discussed within the responses (such as barriers for those with hearing or sight limitations). We may draw a conclusion that outreach and education is needed to increase awareness on this issue within the County.

Project Hope for the Homeless indicated that the shelter has accessible entry doors and showers. Shelter guests with acute mental health issues are coordinated with Extended Housing and Beacon Health to meet their needs. There are no reports from shelter guests of difficulty accessing government structures for food stamps, disability income, etc. The wait time for disability approval is a barrier and has a destabilizing effect due to shelter stay limits of 45 days.

A study was performed by The Center for Community Solutions, prepared with support from the Cleveland Foundation in March 2015. The study is titled "Ohio at a Crossroads: The Developmental Disabilities System." According to the study, "Ohio's funding structure is unique in that a large portion of its funding for services for persons with developmental disabilities comes from local

revenue streams, primarily property tax levies. Due to this reliance on local money, discrepancies in funding across the state are vast. In some cases, this means that Ohioans with developmental disabilities can't access equitable services.

#### ii. Public infrastructure

Lake County has funded ADA improvements to infrastructure in the following communities: Fairport Harbor Village, City of Painesville and City of Wickliffe. The City of Painesville and the Village of Timberlake both contributed to local knowledge by indicating that sidewalk improvements, ramps and roadways are maintained. The number of applications from communities seeking CDBG assistance with sidewalk type improvements has increased over the period of the FY12-16 Consolidated Plan. In the survey for the FY17-21 Consolidated Plan survey 43% of the 270 respondents to the infrastructure question ranked sidewalk improvements within the top three priorities. The Lake County Board of Developmental Disability did not identify any major barriers related to public infrastructure.

#### iii. Transportation:

Outreach efforts were made by Lake County to collect local knowledge from each community within the county regarding access to transportation. It was found that local communities rely on Laketran to provide transportation. The Laketran fixed bus routes extend east/west in the County, but are not very accessible to communities in the rural southeast area of the County. This affects the disabled population in that area of the county, although there are minimal disabled persons living in that area of the county possibly due to the lack of transportation and the higher cost of housing. Willoughby Hills indicated that the senior housing is not on the bus line. They have a senior service program called WHISPER that will help seniors with the cost of a bus pass. There also exists a senior rental buddy system. Other difficulties noted include that there is a limited time schedule of buses (no rides after 6:00 PM) which in turn limits access to jobs and medical care.

Laketran is the public transit agency that serves Lake County, Ohio, offering a family of services consisting of fixed route, commuter express, and Dial-a-Ride (paratransit) service throughout the County. Demand for paratransit service is high among the general public, especially among senior citizens and residents with disabilities. Laketran receives sales tax money that ensures that Dial-a-Ride can continue to grow and meet the demand. Laketran has 16 vehicles dedicated to fixed routes, all of which have low-floor access for easy passenger boarding and alighting. According to Laketran's most recent 10-year plan (2014 – 2024), due to Lake County's projected demographic shift to an older, more disabled population in the not-too-distant future, Laketran will experience greater demand to provide expanded service to help mitigate the physical and economic challenges to seniors. Laketran's Dial a Ride offers "door-through-door" service, assisting disabled passengers into and out of their locations at both origin and destination ends of their trips, going above and beyond the level provided by most other transit systems throughout the country. Laketran's study includes survey data – riders were surveyed about their disability status and whether their disability prevents them from driving. Of the 750 surveys collected, 644 riders answered this question with

only 7.6 percent (49) of the riders responding that they have a driving-impairing disability. Dividing the results between local fixed route bus and commuter express, the survey found that 12 percent of local fixed route bus users indicated that they have a disability that prevents them from driving, while less than 2 percent of commuter express users indicated disability. This indicates that a significant number of Laketrans' disabled population is using the local fixed route bus service at least some of the time.

#### iv. Proficient schools and educational programs

Regarding local knowledge, Project Home for the Homeless indicated that schools under McKinney Vento must continue to provide for transportation and schools of homeless shelter guests. This provision assists some of the County's most vulnerable children achieve some stability in education. Extended Housing, Inc. indicated that school liaisons are often not readily available. Further communication and partnership between the school districts and agencies assisting persons with mental illnesses is necessary to ensure full access to education.

Local officials did not comment on the prompt related to education, which may indicate that communities are not familiar with the topic of disability and access as it relates to education. We may draw the conclusion that outreach and education on this topic is needed throughout the county, involving local officials as well as the general public.

#### v. Jobs:

Regarding local knowledge, Beacon Health provides a supported employment program for persons with mental health disabilities to seek and retain private sector jobs. Barriers to certain employment locations exist because the locations are not served by the bus route and 2nd and 3rd shift jobs are also affected by limits to public transportation in Lake County. The Project Hope Homeless Shelter indicated that shelter guests have barriers to employment due to criminal history and disability. The shelter also indicated that increased partnerships among the non-profits and private sector companies would help to increase opportunities. It was noted by Extended Housing, Inc. that the local Lake County employment programs (Beacon Health and Catholic Charities) seem to be more successful than the programs offered out of Cleveland. However, the disabled population would benefit from more local resources for employment.

In 2012, Ohio's Employment First Initiative began to be implemented state-wide. The program was developed so that working-age adults with disabilities would have the same opportunities and expectations as working-age adults without disabilities, and the philosophy behind the new policy is the presumption of employability for all. The State's 2014-2015 budget allowed for \$2 million to launch the program, and an additional \$2.8 million for implementation. The program is operated by the Opportunities for Ohioans with Disabilities Agency (OOD). While specific data for Lake County are not available, the program has not lead to significant change in employment throughout the state. Ohio's rates remain higher than the national average for integrated employment. Additional program changes that are planned include a new employment data collection system, enhanced

training and technical assistance, and an online portal with resources and easy-to-understand system.

A research team from The Ohio State University and Cincinnati Children's Hospital Medical Center received a grant from Ohio Developmental Disabilities Council to create the health care policy white paper "Caring for Children with Disabilities in Ohio: The Impact on Families." Higher levels of family stress, curtailed employment opportunities, and diminished rates of well-being occur in families caring for children with disabilities. The financial impact of raising children with disabilities varies across states, Ohio is ranked in the middle. While specific findings about Lake County are not included in the paper, employment proximity is one problem identified in the study: parents take lower paying jobs closer to home, limiting employment opportunities, to be able to help with care giving needs. Another employment-related problem is "job lock" when parents take lower paying jobs, limiting employment opportunities, because health insurance benefits are better for their children.

*V.D.4.b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.*

Lake County has 23 communities, each of which makes independent decisions related to reasonable accommodations and accessibility modifications. In the interests of collecting local knowledge, the County asked the local communities to share their processes. Some of the communities responded. Madison Township handles requests on a case-by-case basis through the Township office. Painesville City handles requests through the City Manager's office, and concerns are addressed through the proper department unless the property is under private ownership. The City of Willoughby Hills does assist elderly homeowners that request ramps under the WHISPER program.

Regarding the County's process, Commissioners meetings are conveniently timed and located so as to ensure the maximum participation by residents who might or will benefit from the information provided, including residents with disabilities. When non-English speaking residents or vision/hearing impaired residents are expected to participate, an interpreter or interpreters will be available. Hearing impaired residents are also able to submit written comments and review written agendas and meeting minutes.

All Commissioners meetings are held in locations that are physically accessible. The Commissioners' staff take reasonable and necessary steps, prior to any meeting; to ensure that public buildings and/or other proposed meeting sites comply with the ADA Standards for Accessible Design. In some instances, it may be necessary to make an on-site visit to evaluate the accessibility of the physical environment. Community meeting sites that are often accessible include: libraries, senior centers, community colleges, universities, and newer buildings.

The Project Hope Homeless Shelter indicated that they utilize the Fair Housing Resource Center to assist them with requests for reasonable accommodations. However, specific examples were not provided by the agency. Beacon Health assists its clients of the Supported Employment Program with their requests to employers. Beacon Health seeks accommodations from Laketran and it is normally provided, although they have limited hours/days of transport.

The Lake County Board of DD stated that there is no standard process in place to overcome the limits of time and schedules for transportation for those with no access to natural supports or other funding to take place of Medicaid.

The local communities did not comment on the processes for reasonable accommodations/accessibility modifications for education and jobs. We may draw the conclusion that the local communities do not have this knowledge and should increase their awareness of these issues within their local community. We may draw the conclusion that education and outreach is needed on these topics within communities across the county, involving both local officials and the general public. Public infrastructure was not identified as a major barrier by any of the communities. Therefore, it is not discussed in this section.

Regarding housing specifically for the developmentally disabled population, a waiver process has been available in the past to help pay for home modifications as someone transitions from an intermediate care facility to a less concentrated group setting. The Board of DD is currently waiting for the State of Ohio to pass its budget, and they are counting on the funding from the waivers to help with the housing transitions. North Coast Community Homes is an agency that works regionally to develop rental properties for individuals who are ambulatory, or those who have more significant disabilities and generally use wheelchairs. This agency uses State funding from the Lake County Board of DD to develop the housing and matching some of it with county HOME funds. They are currently planning four homes in Lake County.

It was identified that in Cleveland, each family has their own team of people to assist with housing transitions, thus there is a more “community based” effort. Lake County may benefit by identifying successful regional efforts and using similar strategies within the County.

*V.D.4.c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.*

Persons with physical mobility limitations face a limited accessible ownership market due to either age of housing stock that has not been upgraded or modified to suit the buyer. Newly constructed accessible housing stock is not generally affordable to persons at lower income levels designated by HUD programming.

#### V.D.5. Disproportionate Housing Needs

##### *V.D.5.a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.*

Regarding local knowledge, some of the communities within Lake County provided responses to this prompt. The City of Painesville stated that there is a concentration of housing for persons with mental health disabilities in the City. There is good coordination with the staff of Extended Housing for persons with other disability noted through Lake MHA. The City of Willoughby Hills noted that there is insufficient affordable accessible housing in the City. There are long waiting lists for senior housing. More affordable and accessible housing is needed in the City and throughout the County. Madison Township noted that there is insufficient tracking of housing needs including housing needs of the disabled population in the County. The City of Willoughby declined to provide information. The City of Kirtland stated that there is no known disproportionate housing needs experienced by persons with disabilities. Grand River Village indicated that discrimination would be most likely experienced by those with disabilities, although in their opinion it has improved over time.

While some local communities provided their opinions, the knowledge and acceptance of actual need of the community and the perceived need may be somewhat disconnected. To this end, further local knowledge was gathered from Extended Housing, Inc. (serving persons with mental illness), the Board of Developmental Disabilities/Deepwood, and the ADAMHS Board (entity charged with planning, funding and evaluating programs and agencies serving persons with mental health and or addition). These agencies indicated that there are long waiting lists for housing for persons with disabilities. Additionally, there is a gap in service for those who do not meet the guidelines for nursing home care, and those who cannot be successful in the Section 8/ Housing Choice Voucher program. The Board of DD indicated that they have been able to construct housing in Lake County without interference from local communities. However, County staff has identified NIMBY behavior and negative resident comments at public hearings. This is an indicator that more fair housing education and outreach is necessary throughout the County.

These agencies assist clients with reasonable accommodations/modifications requests. They did not indicate any major issues when communicating with landlords.

A closer partnership between Lake MHA and the Board of DD was discussed during the information gathering stage of the AFH. Lake MHA has difficulty filling their 4-bedroom units. There is the possibility of retrofitting these units to serve the disabled population. Further discussion will take place between these agencies, in hopes of increasing housing options for disabled persons in Lake County.

It was identified by the ADAMHS Board that the rental housing for persons with disabilities is well spread out in Lake County, although there are some areas of density. It is more difficult to find housing in the rural areas because of the limits of transportation and the properties are more expensive.

More landlords are needed, specifically more stand-alone houses. Staff and leadership from agencies serving both persons with developmental disabilities and persons with mental health disabilities indicate that some clients would be more successful in single family homes versus apartments, depending on the nature of disability. Additionally, a single-family home may be a personal preference. However, because Lake County has older housing stock much of the rental housing is not in good condition and or does not meet the need of persons with limited mobility. This is an identified barrier related to housing for the disabled population.

#### V.D.6. Additional Information

*V.D.6.a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.*

To the extent possible and appropriated additional pertinent data and commentary will be drawn from local studies of the Senior population, Health District and Alcohol Drug and Mental Health Services Board(ADAMHS) to be used in the implementation of Lake County and Lake MHA programming.

Lake County recently issued a report regarding the growing senior citizen population. <http://www.lakecountyohio.gov/Portals/4/SeniorReport/Lake%20County%20Report%20-%20FINAL%2010-16-2015.pdf> . Additionally a staff person has been added to the County to coordinate all the senior activities, centers and funding streams.

The Lake County ADAMHS Board has issued an updated strategic plan and has expanded efforts to respond to the deadly escalation of opiate abuse and become more engaged in providing housing opportunities. View their Annual Report that references these activities. <http://www.helphatworks.us/wp-content/uploads/2017/03/ADAMHS-FY2016-Annual-Final-Proof-copy.pdf>

Similarly the Lake County General Health District has completed necessary planning and reporting to maintain a more stringent certification process adopted through the State of Ohio. View some of their publications including Annual Report 2014 & 2015 at: [https://www.lcghd.org/?page\\_id=4694](https://www.lcghd.org/?page_id=4694)

*V.D.6.b. The program participant may also describe other information relevant to its assessment of disability and access issues.*

The County's Housing Rehabilitation program provides for Mobility and Accessibility modifications to single family owner occupied housing units.

The County will continue to use available CDBG/HOME funding to address mobility and accessibility issues and barriers.

#### V.D.7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

Lack of affordable, accessible housing in range of unit sizes

Land use and zoning laws

State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings

No other local Contributing Factors were identified.

Descriptions of local experience with specified contributing factors is found within supporting documents.

## V.E. Fair Housing Analysis E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

V.E.1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

At the time of writing this report, data confirmed from the Ohio Civil Rights Commission and with HUD, there are no open charges pending in which the County is a Respondent.

At the time of the original filing of this AFH in January 2017, Lake MHA did not have any outstanding fair housing claims. However, a new claim was filed naming the housing authority as a Respondent on March 20, 2017. There have been no charges or findings from HUD, as it is still in the information collection stage.

V.E.2. Describe any state or local fair housing laws. What characteristics are protected under each law?

Fair housing laws exist in each level of government. Federally, the Fair Housing Act outlaws refusal to sell or rent to a person based on race, color, religion, national origin, sex, familial status, and disability. The State of Ohio also prohibits discrimination based on ancestry and military status.

Our local Fair Housing Center contacted each city and village in the County to determine if they had a local fair housing ordinance. In the County, the Cities of Mentor-on-the-Lake, Painesville, and Wickliffe have all passed local fair housing ordinances. Of these local ordinances, the city of Painesville provides the least protection, prohibiting discrimination based on race, color, religion, national origin, and sex, but not providing protection for either familial status or disability (both protected by federal law) or ancestry or military status (both protected by Ohio law). Mentor-on-the-Lake's ordinance includes all of the protected classes covered by Painesville, as well as disability, creed, and marital status. While the latter two grounds are not protected by federal or state law, Mentor-on-the-Lake's ordinance does not provide protection for three protected classes covered in federal and/or state law (familial status, ancestry, and military status). In contrast to these statutes, the City of Wickliffe has a comprehensive fair housing ordinance, covering all grounds protected by federal law and in addition prohibiting discrimination based on age, marital status, parental status, gender identity, military discharge status, and source of income. Wickliffe is the first city in Northeast Ohio to protect against discrimination based on source of income and the first city in Lake County that provides protections for gender identity.

While the mere enactment of a local fair housing ordinance by a city or village does not in itself increase fair housing choice, particularly if the ordinance does not expand upon the protected classes in federal or state law, such ordinances do serve as a signal to local residents that the

jurisdiction is concerned about housing discrimination. Moreover, when the local ordinance is broader than federal or state law, such as Wickliffe's law, it can serve a mechanism to provide greater housing choice to individuals in the community, contributing to an atmosphere of inclusiveness. Interesting to note, that only a handful of the counties in Lake County were mentioned above.

V.E.3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

The Lake County Board of Commissioners is fortunate to have a local fair housing organization that provides valuable tools and resources to the County and its residents. The Fair Housing Resource Center Inc. (FHRC), is our local and regional non-profit organization that provides residents of Lake, Geauga and Ashtabula County education and outreach, fair housing enforcement and many other valuable resources.

The U.S. Department of Housing and Urban Development has awarded the FHRC a three-year grant in the amount of \$325,000 per year under the FHIP-PEI initiative. This private enforcement grant allows FHRC to conduct an aggressive regional comprehensive systemic testing program to measure discrimination against families with children, African-Americans, Latinos, and persons with disabilities in Lake, Geauga and Ashtabula county rental, lending and REO sales markets. Also, the testing program sought to determine potential violations of FHA discrimination by reviewing Lake, Geauga and Ashtabula County condominium and homeowner association rules, and monitor all new multi-family construction projects for the purpose of determining compliance with the Fair Housing Act Accessibility Guidelines (FHAAG) and the Americans with Disabilities Act (ADA) for the tri-county Area. The programs are sought to identify and change a major social and economic problem in the tri-county area- severe housing segregation and the discriminatory behavior of professionals in housing that sustains segregation.

FHRC also receives additional grant funding specifically Education and Outreach to provide the tri-county with viable access to trainings, conferences, educational materials, webinars, billboards, bus advertisements and community events to help educate and provide awareness to residents on their fair housing rights. Overall, our local/regional fair housing organization provides our community with valuable tools and resources to ensure that our residents have access to educational tools that provide information regarding our local, state and federal fair housing laws.

V.E.4. Additional Information

*V.E.4.a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region. See below*

*V.E.4.b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.*

The collaborative effort of the Planning and Community Development office and the Fair Housing Resource Center, helped carve the selection of the detailed and comprehensive goals identified in the 2011 Fair Housing Action Plan. As previously stated, the County contracts with the Fair Housing Resource Center, Inc. (FHRC) to conduct educational and enforcement services that include conducting thorough investigations of allegations of discrimination within the Urban County. FHRC conducts fair housing/fair lending education and outreach events with a focus on the distribution of Spanish language materials. FHRC assists the County in promoting fair housing and diversity to help eliminate the presence of segregation within County. FHRC assists the County in its efforts to affirmatively further fair housing and provide consultation services to the County with working with AFFH activities including affirmative fair housing marketing plans. FHRC works to encourage cities and villages to adopt fair housing ordinances and to provide sample ordinances to work from. FHRC conducts fair housing monitoring of all activities within the county and conducts systemic testing of all the protected classes. FHRC assists the County with their efforts towards eliminating racial disparities in mortgage lending present within the county. FHRC also conducts a wide range of education and outreach opportunities that provide county residents with information about mortgage lending options and access to homebuyer counseling. Lastly, FHRC monitors progress towards eliminating identified impediments and provides suggestions to future changes and or progress to the impediments to fair housing.

The office of FHRC has compiled many reports of their investigative work within the County.[1] Additionally, FHRC creates a quarterly newsletter that discusses several fair housing related matters that is distributed locally to assist the community in learning about fair housing matters.[2]

Additionally, since 2013 the County has created a mandatory requirement for CDBG & HOME funds eligibility for all applicants to "plan, undertake and document the manner in which their proposed activities, if funded, will affirmatively further fair housing." All applicants are required to prepare and submit a narrative that describes the activities to be undertaken during the contract year to meet the obligation to affirmatively further fair housing. Additionally, the County require all applicants to detail their marketing strategy to reach the underserved populations, declare what protected classes the proposed project will benefit and how the classes will benefit, and how the applicant will document and report on Affirmatively Furthering Fair Housing Activities. All eligible applicants must attend fair housing training and have a Resolution adopted supporting fair housing.

These additional eligibility requirements assists the County to recommend funding for applications that will benefit the county and provides a message to the applicants of their responsibility towards AFFH efforts. This requirement directly addresses several of the Impediments listed above

[1] Several of the Reports are available at <http://www.fhrc.org/Articles.html>

[2] The latest edition of the Fall 2016 newsletter is available at [http://www.fhrc.org/Fall\\_newsletter.pdf](http://www.fhrc.org/Fall_newsletter.pdf)

V.E.5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Lack of local public fair housing enforcement

Lack of resources for fair housing agencies and organizations

Lack of state or local fair housing laws

Other - Lack of Recording and reporting of Hate Crimes was identified locally as a High Priority

Descriptions of local experience with specified contributing factors is found within supporting documents.

## VI. Fair Housing Goals and Priorities

### 1. Prioritization of Contributing Factors

For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice of access to opportunity, or negatively impact fair housing or civil rights compliance.

For each fair housing issue the analysis aided in the identification of the Contributing Factors. In some instances the local labeling of Contributing Factors differed from the HUD terminology. In those instances some locally identified Contributing Factors were collapsed into one that was consistent with the HUD terminology. The Contributing Factor Table shown in the Executive Summary identifies by Fair Housing Issue the Contributing Factor and the priority level selected. Each fair housing issue, and example provided in the list of significant contributing factors provided by HUD resonated with the persons drafting the AFH as well as with the agencies, governmental entities and residents that contributed their time, effort, thoughts and opinions. While there was agreement that each of those contributing factors had a part in forming the housing climate there was a variety of opinion on the weight and impact of certain significant contributing factors. The analysis of the data identified in this report coupled with the application of local knowledge of policies, practices, and data assisted the County and the Housing Authority identify significant contributing factors that impact fair housing choice in the area. The January 2017 submission included detailed and exhaustive discussions of Contributing Factors using local rather than HUD terminology. As mentioned previously when the Contributing Factors were prioritized for the June 2017 submission it was realized that much of that local terminology for some contributing factors could be and was combined into one of the HUD provided Contributing Factor terms. Since considerable work went into the preparation of those earlier discussions and there is value in capturing the story told therein those discussions have been added to the supporting documents.

The contributing factors were assigned three (3) priority levels as follows:

- High – factors that limit or deny fair housing choice, factors that limit or deny access to opportunity, or negatively impact fair housing or civil rights compliance;
- Moderate – moderately urgent or building on prior actions;
- Low – limited direct impact on fair housing issues

V. Fair Housing Analysis > B. General Issues > i. Segregation/Integration > 3. Contributing Factors of Segregation

Community Opposition

Lack of private investments in specific neighborhoods

Lack of public investments in specific neighborhoods, including services or amenities

Location and type of affordable housing

Private discrimination

No additional unique local contributing factors were identified by the Program Participants.

Descriptions of local experience with specified contributing factors is found within supporting documents.

V. Fair Housing Analysis > B. General Issues > ii. R/ECAPs > 3. Contributing Factors of R/ECAPs

The jurisdiction does not have any R/ECAPs

V. Fair Housing Analysis > B. General Issues > iii. Disparities in Access to Opportunity > 3. Contributing Factors of Disparities in Access to Opportunity

Access to financial services

The availability, type, frequency, and reliability of public transportation

Lack of regional cooperation

Land use and zoning laws

Lending Discrimination

Location of employers

Location of environmental health hazards

Location of proficient schools and school assignment policies

Location and type of affordable housing

Private discrimination

No additional local Contributing Factors identified. Descriptions of local experience with specified contributing factors is found within supporting documents.

V. Fair Housing Analysis > B. General Issues > iv. Disproportionate Housing Needs > 3. Contributing Factors of Disproportionate Housing Needs

The availability of affordable units in a range of sizes

Displacement of residents due to economic pressures

Lack of private investments in specific neighborhoods

Lack of public investments in specific neighborhoods, including services or amenities

Land use and zoning laws

Lending Discrimination

No other additional local Contributing Factors were identified. Descriptions of local experience with specified contributing factors is found within supporting documents.

V. Fair Housing Analysis > C. Publicly Supported Housing Analysis > 3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Admissions and occupancy policies and procedures, including preferences in publicly supported housing

Land use and zoning laws

Community opposition

Impediments to mobility

Lack of regional cooperation

Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

Source of income discrimination

No additional local Contributing Factors identified.

Descriptions of local experience with specified contributing factors is found within supporting documents.

V. Fair Housing Analysis > D. Disability and Access Analysis > 7. Disability and Access Issues  
Contributing Factors

Lack of affordable, accessible housing in range of unit sizes

Land use and zoning laws

State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings

No other local Contributing Factors were identified.

Descriptions of local experience with specified contributing factors is found within supporting documents.

V. Fair Housing Analysis > E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis >  
5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Lack of local public fair housing enforcement

Lack of resources for fair housing agencies and organizations

Lack of state or local fair housing laws

Other - Lack of Recording and reporting of Hate Crimes was identified locally as a High Priority

Descriptions of local experience with specified contributing factors is found within supporting documents.

VI. Fair Housing Goals and Priorities > 2. Fair Housing Goals

**VI.2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.**

Jurisdiction Table 19: Assessment of Fair Housing Goals (same as Jurisdiction Table 2)

Goal #1	Contributing Factors	Fair Housing Issue	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Strengthen fair housing education, investigation, enforcement, and administration</b></p>	<p>Lack of resources for fair housing agencies and organizations</p> <p>Private discrimination</p> <p>Source of income</p>	<p>Fair Housing Enforcement</p> <p>Segregation /Integration</p> <p>Publicly supported housing</p>	<p>Annually contract for professional fair housing services related to education, outreach, and enforcement</p> <p>Annually train County and PHA staff in fair housing practices, including training staff on identifying discriminatory practices and also techniques to communicate with individuals with language and/or cultural barriers.</p> <p>Within 1 year, the County develop and implement an LEP plan</p> <p>Within 1 year review the current scoring criteria requirements of CDBG/HOME applications to evaluate and possibly make changes to improve effectiveness &amp; responsiveness of the applicants' compliance regarding AFFH</p> <p>The County will obtain annual reporting of source of income discrimination through its contract for professional fair housing services: to include quantitative and qualitative data as available.</p>	<p>Lake MHA</p> <p>Lake County</p>

**DISCUSSION:** This goal's purpose is to address the fair housing issues of Fair Housing Enforcement, Segregation/Integration, and Publicly supported housing. There is a chronic underfunding of enforcement, investigation, and outreach in Lake County. Without sufficient financial resources, progress in affirmatively furthering fair housing will not occur. In order to overcome the listed contributing factors, a multi-pronged approach will be taken to increase the level of education, investigation, and enforcement related to fair housing. In order to mitigate these contributing factors dedicated education, outreach and enforcement efforts are noted in the metrics above.

Goal #2	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Increase the level of fair housing knowledge and understanding among housing developers, real estate professionals, lenders, safety forces, elected/appointed officials, and the general public</b></p>	<p>Community opposition</p> <p>Lack of local fair housing laws, local public enforcement of fair housing laws and support of fair housing</p> <p>Admissions &amp; occupancy policies and procedures, including preferences in publicly supported housing</p> <p>Lending discrimination</p> <p>Lack of private investment in specific neighborhoods</p> <p>Private discrimination</p> <p>State or local laws, policies or practices that discourage individuals with disabilities from being place in or living in apartments, family homes, and other integrated living settings</p> <p>Source of income</p>	<p>Fair Housing Enforcement</p> <p>Disparities in Access to Opportunity</p> <p>Publicly Supported Housing</p> <p>Disproportionate Housing Needs</p> <p>Disability and access</p> <p>Segregation/Integration</p>	<p>Within 1 year, create a page on Lake MHA’s website for fair housing information, including information on reasonable accommodation and modification requests, as well as resources for how to report suspected discrimination.</p> <p>Annually review the HMDA data analyzed by fair housing agencies in the region and disseminate fair housing lending reports via email link to area lenders and public officials serving Lake County and the region.</p> <p>Annually will participate in one of the following: Lake Geauga Area Assn REALTORS NE Ohio Planning and Zoning Workshop, Lake County Chamber event, to distribute fair housing information.</p> <p>Establish contact and develop rapport with leadership of safety forces and school superintendents during year 1 &amp; 2 to increase the knowledge and awareness of fair housing of these groups.</p> <p>Annually during fair housing month April distribute fair housing information related to disability and access and other contributing factors pertinent to the specific entities named in the goal by email.</p> <p>Make the entities named in this goal aware of local and regional fair housing trainings at least annually via email, social media, County/LMHA websites and other means.</p>	<p>Lake MHA</p> <p>Lake County</p>

**DISCUSSION:** It is clear that fair housing education and outreach are continued needs in Lake County. As such, the County and PHA will work to improve the level of fair housing knowledge and understanding among local housing developers, real estate professionals, lenders, safety forces, elected/appointed officials, and the general public. A multi-pronged approach will be taken to address the noted contributing factors through increased distribution of fair housing material and consistent participation with local partners.

Goal #3	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Continually monitor local zoning codes for discriminatory elements</b></p>	<p>Land use and zoning laws</p> <p>Location and type of affordable housing</p> <p>Availability of affordable units in a range of sizes</p> <p>Community Opposition</p> <p>Lack of affordable, accessible housing in a range of unit sizes</p> <p>State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings</p>	<p>Disparities in Access to Opportunity</p> <p>Segregation/Integration</p> <p>Disproportionate Housing Needs</p> <p>Publicly Supported Housing</p> <p>Disability and Access</p>	<p>In year 1 Obtain from HUD or funded FHIP agency the complete application and reporting documentation related to Zoning Analysis of Lake County performed in 2012-15. Review report findings to identify communities that have zoning issues that may contribute to discriminatory practices or inhibit AFFH.</p> <p>In year 2 Explore and share grant opportunities provided through American Planning Association (APA) to develop best practices for those communities with identified AFFH issues</p> <p>Within 3 to 5 years propose to Board of Lake County Commissioners that they adopt a policy to deny CDBG/HOME funding to those communities whose zoning ordinances are identified as having regulations or definitions that contribute to discriminatory practices, and have not modified to remove those identified practices</p> <p>By year 2 and on an as needed basis in response to emerging issues share Olmstead information by email with all communities in Lake County.</p>	<p>Lake County</p> <p>Lake MHA</p>

**DISCUSSION:**

Older zoning ordinances and other regulations that may not be in line with the AFFH rule can hinder housing choice, both explicitly and implicitly. As a result, municipalities that discriminate and/or do not affirmatively further fair housing choice in their zoning ordinances may be funded. This emphasizes the need for the County to review existing report findings to identify communities with such zoning and propose changes in order to alleviate the contributing factors. There is resistance in the community and within certain municipalities as it relates to housing for the disabled population.

Goal #4	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Provide greater access to all types of transportation for all persons in the community to access areas of opportunity by advocating for and supplementing the services provided through the public transportation providers.</b></p>	<p>The availability, type, frequency, and reliability of public transportation</p> <p>Lack of regional cooperation</p>	<p>Disparities in Access to Opportunity</p>	<p>Within 1 year, use and expand existing networks (Coalition for Housing &amp; Support Services ...) to promote and support LakeTran’s education and technology efforts</p> <p>Within 1 year use existing seats at the table to advocate for expanded service to reach underserved areas and time periods beyond Route 20 corridor and first shift work hours. Lake County elected officials are board members of the Northeast Ohio Area-wide Coordinating Agency (NOACA).</p> <p>Within 2 years, explore feasibility of partnership with alternative transportation providers i.e. Uber, to serve those persons/areas/times outside of LakeTran’s existing system</p> <p>Maintain involvement with NOACA’s planning processes and stay abreast of planning, funding and participation opportunities through periodic review of the NOACA Facebook page and through attendance or participation in public meetings.</p>	<p>Lake County</p> <p>Lake MHA</p>

**DISCUSSION:**

Transportation is an important factor in relation to housing choice, as its availability can often determine where an individual or family can live and/or work. Although Lake County has its own public transportation system to assist those who do not have access to a private vehicle, its routes are limited. Expanded service, via alternative public and private means, is needed to reach underserved areas beyond Route 20 and first shift work hours.

Goal #5	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Increase the amount of affordable housing in areas with greater access to opportunity through: expanded landlord participation in HCV Program, increased QAP equity, and increased acceptance of other subsidized programming</b></p>	<p>Location and type of affordable housing</p> <p>Lack of private investments in specific neighborhoods</p> <p>Location of proficient schools and school assignment policies</p> <p>Siting selection policies, practices and decisions for publicly supported housing, including discretionally aspects of Qualified Allocation Plans and other programs.</p> <p>Impediments to mobility</p>	<p>Segregation/Integration</p> <p>Disparities in Access to Opportunity</p> <p>Publicly Supported Housing</p>	<p>Within 6 months, the Lake MHA will survey all current participating HCV landlords to examine the factors that influence their participation and solicit feedback for program improvement</p> <p>Within 1-2 years the Lake MHA will initiate targeted outreach to increase participation of private landlords, particularly those in higher opportunity neighborhoods</p> <p>By year 3 PHA will incorporate an evaluation process for HCV portability households to examine all factors related to mobility choice: site selection, length of stay, relocation reasons, and destination.</p> <p>By year 2, and as updates are available, provide demographic data coupled with fair housing information to the 8 local school districts to aid in the schools' planning process and to assist them in being inclusive and responsive to the community they serve.</p>	<p>Lake MHA</p> <p>Lake County</p>

**DISCUSSION:**

There is not enough affordable housing in Lake County to satisfy need. In addition to the quantity of affordable housing, the location of affordable housing is a major influence on segregation and integration. Lake County and the PHA will work with private landlords, schools, public, private, and non-profit sectors on specific initiatives designed to expand opportunity for members of protected classes throughout the County. Surveying participating PHA landlords and voucher holders will be primary tools for achieving this goal.

Goal #6	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Evaluate the prevalence of hate crimes that occur in the county and the extent to which such crimes are formally reported in national databases to establish and document that such crimes limit a person’s fair housing choices.</b></p>	<p>Lack of reporting and or recording of Hate Crimes</p>	<p>Fair Housing Enforcement</p>	<p>During year one establish contact and develop rapport with leadership of safety forces and school superintendents during year 1.</p> <p>The county will collect data on hate crimes through its contract for professional fair housing services and share with safety forces and school superintendents by year three.</p>	<p>Lake County</p>

**DISCUSSION:**

Most jurisdictions in Lake County do not report hate crimes to the FBI. Additionally, some local police departments do not keep statistics on hate crimes. Although hate crime reporting is not mandated by the FBI, jurisdictions that do so raise awareness of discrimination occurring in their own communities. In a partnership with civic leaders, law enforcement officials have found they can advance community relations by demonstrating a commitment to be both tough on hate crime perpetrators and sensitive to the needs of hate crime victims. Increased education and focus needs to be placed on local safety forces to help these agencies understand the importance of reporting hate crimes and the connection to community fair housing issues.

Goal #7	Contributing Factors	Fair Housing Issues	Metrics, Milestones, Timelines and Measures	Responsible Participant
<p><b>Provide increased fair housing information to the general public with particular attention to persons in protected classes.</b></p>	<p>Community Opposition Access to financial services and lending discrimination</p>	<p>Segregation Publicly supported housing Disparities in access to opportunity</p>	<p>Annually continue to support education and outreach efforts funded through the professional fair housing services contract: including quarterly newsletter and one education/outreach event with alternating focus on populations of the various protected classes, and the general public.</p> <p>Establish contact and develop rapport with financial institutions / lenders during year 1 &amp; 2 to aid them in planning for and meeting CRA obligations by sharing identified fair housing community needs.</p> <p>By year three coordinate and host a “Bankers’ Breakfast” to promote existing and new programs: IDA, low interest loans, down payment and financial literacy. In years 3-5 both county and MHA to refer consumer base.</p>	<p>Lake County Lake MHA</p>

**DISCUSSION:**

Racial disparities in mortgage loan application denial rates were found throughout the county. High-cost lending revealed similar racial and ethnic disparities. There are a high number of financial institutions with physical locations throughout the area. However, there is direct evidence of inequitable treatment in receiving mortgage financing, equal access to financing information and equal access to mortgage modifications.

This goal is intended to focus on informing members of protected classes about their respective fair housing rights while educating area financial institutions and becoming a part of the planning process for carrying out its CRA obligations.

Lake County and the Lake Metropolitan Housing Authority first submitted an AFH to HUD on January 11, 2017. That AFH was not accepted for reasons detailed in a March 10, 2017 letter from HUD's Fair Housing and Equal Opportunity Office. To address the deficiencies initially identified by HUD, the County and LakeMHA accepted technical assistance from Abt Associates, who provided two days of onsite assistance as well as performing review of proposed subsequent revisions made to the AFH. Any and all changes are reflected in this version of the AFH.

[1] Discrimination in the Tri-County Housing Market, Final Report 2011-2014 was authored by The Fair housing Resource Center, Inc., and submitted to HUD FHEO office.

[2] <http://www.ohioaccess.ohio.gov/pdf/ohioaccessrpt2004.pdf>

[3] <http://lakebdd.org/newsforms/documents/LCBDDThreeYearOperatingPlanRevised617Usethisversion.pdf>

## JURISDICTION GENERATED TABLES

**Jurisdiction Table 1:** Prioritization of Contributing Factors by AFH Designated Fair Housing Issue

**Jurisdiction Table 2:** Assessment of Fair Housing Goals

**Jurisdiction Table 3:** Total Population 1990 - 2010: Lake County, Ohio, Lake County Urban County (LCUC, HUD Jurisdiction), City of Mentor (HUD Jurisdiction) and Village of Waite Hill

**Jurisdiction Table 4:** Housing Characteristics (size, value, tenure) by Community

**Jurisdiction Table 5:** Identified Areas of Concentration 5% exceeding Jurisdiction Average for Minority Populations (Black or Hispanic) by Census Tract and Community – Census 2010 / American Community Survey (ACS)

**Jurisdiction Table 6:** Area of White Population exceeding 98% by Census Tract and Community - Census 2010 / ACS

**Jurisdiction Table 7:** Lake County Population by Race & Hispanic: Census 1960 - 2010 and ACS 2015, Number & Percentage

**Jurisdiction Table 8:** Open Enrollment Report for the 2016-2017 School Year effective 05.03.16

**Jurisdiction Table 9:** Lake County Urban County Jurisdiction - Number of Occupied Housing Units by Tenure and Race

**Jurisdiction Table 10:** Project Based Section 8 Complexes by Protected Classes (Race, Ethnicity, Family Status)

**Jurisdiction Table 11:** Public Housing Complexes by Type, # Units, Protected Classes (Race, Ethnicity, Disability & Family Status)

**Jurisdiction Table 12:** Comparison of the Percentage of Units Occupied by Protected Classes (Race, Ethnicity, Disability & Family Status) in Named Project Based Section 8 Complexes to the Census Tracts Where Located

**Jurisdiction Table 13:** Comparison of the Percentage of Units Occupied by Protected Classes (Race, Ethnicity, Disability & Family Status) in Named Low Income Housing Tax Credit Complexes to the Census Tracts Where Located

**Jurisdiction Table 14:** Percentage of Subsidized Rental Units by Census Tract

**Jurisdiction Table 15:** Renter Housing Affordability for Lake County and Northeast Ohio

**Jurisdiction Table 16:** Age of Housing Stock for Housing Choice Voucher (Section 8)

**Jurisdiction Table 17:** Housing Choice Voucher (Section 8) in Use by Bedroom Size

**Jurisdiction Table 18:** Disability by Publicly Supported Housing Program Category - AFH Tool Table # 15

**Jurisdiction Table 19:** Assessment of Fair Housing Goals

## SUPPORTING DOCUMENTS

<u>File</u>	<u>Description</u>	<u>Uploaded</u>
<a href="#"><u>Cover Sheet Signed - Lead - County.pdf</u></a>	<u>Signed Cover Sheet</u>	<u>3/10/2017 6:59:13 PM</u>
<a href="#"><u>Press release 20160825.pdf</u></a>	<u>Press Release 1</u>	<u>3/10/2017 6:59:13 PM</u>
<a href="#"><u>Press release 20161014.pdf</u></a>	<u>Press Release 2</u>	<u>3/10/2017 6:59:13 PM</u>
<a href="#"><u>Stakeholder long Survey Data All 161115.pdf</u></a>	<u>Stakeholder long survey results</u>	<u>3/10/2017 6:59:13 PM</u>
<a href="#"><u>Export Excel Long.xls</u></a>	<u>Stakeholder survey excel results</u>	<u>3/10/2017 6:59:13 PM</u>
<a href="#"><u>Short Survey Data All 161115.pdf</u></a>	<u>Public survey results</u>	<u>3/10/2017 6:59:14 PM</u>
<a href="#"><u>Export excel.xls</u></a>	<u>Public survey results excel format</u>	<u>3/10/2017 6:59:14 PM</u>
<a href="#"><u>McNAUGHTON 202.docx</u></a>	<u>Extended Housing - McNaughton units</u>	<u>3/10/2017 6:59:14 PM</u>
<a href="#"><u>Agreement Collaboration Lake County Lake MHA.pdf</u></a>	<u>Collaboration agreement - Jurisdiction &amp; PHA</u>	<u>3/10/2017 6:59:14 PM</u>
<a href="#"><u>AFFH flyer final.pdf</u></a>	<u>Promotional outreach materials Sept</u>	<u>3/10/2017 6:59:14 PM</u>
<a href="#"><u>Public hearing #1 09.22.16.pdf</u></a>	<u>First public hearing materials - Sept</u>	<u>3/10/2017 6:59:14 PM</u>
<a href="#"><u>AFFH flyer final10262016.pdf</u></a>	<u>Promotional outreach materials Oct</u>	<u>3/10/2017 6:59:14 PM</u>
<a href="#"><u>AFH card with 20161026 big 2.pdf</u></a>	<u>Outreach - tabletop</u>	<u>3/10/2017 6:59:14 PM</u>
<a href="#"><u>Comment period notice 1.pdf</u></a>	<u>Public notice Comment period 1</u>	<u>3/10/2017 6:59:15 PM</u>

<u>File</u>	<u>Description</u>	<u>Uploaded</u>
<a href="#"><u>Comment period notice 2.pdf</u></a>	<a href="#"><u>Comment period Public notice 2</u></a>	<a href="#"><u>3/10/2017 6:59:15 PM</u></a>
<a href="#"><u>Community Meeting agenda20161026.docx</u></a>	<a href="#"><u>Public hearing 2 Agenda 20161026</u></a>	<a href="#"><u>3/10/2017 6:59:15 PM</u></a>
<a href="#"><u>Facilitator Guide (002).docx</u></a>	<a href="#"><u>Facilitator Guide for Public Hearing/Meeting</u></a>	<a href="#"><u>3/10/2017 6:59:15 PM</u></a>
<a href="#"><u>Resident Meeting Agenda.pdf</u></a>	<a href="#"><u>Lake MHA - Resident meeting agenda</u></a>	<a href="#"><u>3/10/2017 6:59:15 PM</u></a>
<a href="#"><u>Survey supplemental Dec2016.docx</u></a>	<a href="#"><u>Lake MHA survey supplemental</u></a>	<a href="#"><u>3/10/2017 6:59:15 PM</u></a>
<a href="#"><u>Cover Sheet Signed.pdf</u></a>	<a href="#"><u>Cover sheet signed - Lake MHA</u></a>	<a href="#"><u>3/10/2017 6:59:15 PM</u></a>
<a href="#"><u>Lake-County-Lending-Factbook1.pdf</u></a>	<a href="#"><u>Lake County Lending Factbook 2009</u></a>	<a href="#"><u>3/10/2017 6:59:16 PM</u></a>
<a href="#"><u>Waite Hill aerial.pdf</u></a>	<a href="#"><u>Waite Hill Aerial photo</u></a>	<a href="#"><u>6/13/2017 11:01:25 AM</u></a>
<a href="#"><u>tract race90 00 10.xls</u></a>	<a href="#"><u>Race &amp; Ethnicity 1990- 2010 by Census Tract</u></a>	<a href="#"><u>6/13/2017 11:08:23 AM</u></a>
<a href="#"><u>Tenure by tracts 2000 &amp; 2010.xlsx</u></a>	<a href="#"><u>Tenure by Race &amp; Ethnicity 1990 - 2010</u></a>	<a href="#"><u>6/13/2017 11:10:31 AM</u></a>
<a href="#"><u>Contributing factors supporting document 1.docx</u></a>	<a href="#"><u>CF discussion 2017 01 01</u></a>	<a href="#"><u>6/13/2017 11:40:31 AM</u></a>
<a href="#"><u>Contributing Factors supporting document 2.docx</u></a>	<a href="#"><u>CF discussion 2017 01 02</u></a>	<a href="#"><u>6/13/2017 11:41:17 AM</u></a>

## [AFFH TOOL MAPS](#)

**Please note there are multiple versions of data available in the AFFH Data and Mapping Tool (AFFH-T). By default, program participants using this version of the assessment tool, OMB Control #2529-0054, are provided with data version AFFHT0001 in the AFFH User Interface (AFFH-UI).**

Please note that maps are available at the Lake County, Ohio jurisdiction level and the Cleveland – Elyria Metropolitan Statistical Area or Region. Maps are best viewed through the use of the AFFH tool at the following site. Persons desiring instruction in this GIS mapping system should contact the Lake County Planning and Community Development Office at 440-350-2740.

**Map 1 - Race/Ethnicity (Race/Ethnicity)**

**Map 2 - Race/Ethnicity Trends (Race/Ethnicity Trends, 1990 and Race/Ethnicity Trends, 2000)**

**Map 3 - National Origin (National Origin)**

**Map 4 - LEP (Limited English Proficiency)**

**Map 5 - Publicly Supported Housing and Race/Ethnicity**

**Map 6 - Housing Choice Vouchers and Race/Ethnicity**

**Map 7 - Housing Burden and Race/Ethnicity**

**Map 8 - Housing Burden and National Origin**

- Demographics = Race and Ethnicity, National Origin and Family Status

**Map 9 - Demographics and School Proficiency**

**Map 10 - Demographics and Job Proximity**

**Map 11 - Demographics and Labor Market Engagement**

**Map 12 - Demographics and Transit**

**Map 13 - Demographics and Low Transportation Cost**

**Map 14 – Demographics and Poverty**

**Map 15 - Demographics and Environmental Health**

**Map 16 - Disability by Type (Hearing, Vision, Cognitive Disability) or (Ambulatory, Self-Care and Independent Living Disability)**

**Map 17 - Disability by Age Group**

## AFFH TOOL TABLES

Please note there are multiple versions of data available in the AFFH Data and Mapping Tool (AFFH-T) due to the release and incorporation of updates from the United States Census – American Community Survey. By default, program participants using this version of the assessment tool, OMB Control #2529-0054, are provided with data version AFFHT0001 in the AFFH User Interface (AFFH-UI).

**Table 1 - Demographics** - Tabular demographic data for Jurisdiction and Region (including total population, the number and percentage of persons by race/ethnicity, national origin (10 most populous), LEP (10 most populous), disability (by disability type), sex, age range (under 18, 18-64, 65+), and households with children)

**Table 2 - Demographic Trends** - Tabular demographic trend data for Jurisdiction and Region (including the number and percentage of persons by race/ethnicity, total national origin (foreign born), total LEP, sex, age range (under 18, 18-64, 65+), and households with children)

**Table 3 - Racial/Ethnic Dissimilarity Trends** - Tabular race/ethnicity dissimilarity index for Jurisdiction and Region

**Table 4 - R/ECAP Demographics** - Tabular data for the percentage of racial/ethnic groups, families with children, and national origin groups (10 most populous) for the Jurisdiction and Region who reside in R/ECAPs

**Table 5 - Publicly Supported Housing Units by Program Category** - Tabular data for total units by 4 categories of publicly supported housing in the Jurisdiction (Public Housing, Project-Based Section 8, Other Multifamily, Housing Choice Voucher (HCV) Program)

**Table 6 - Publicly Supported Housing Residents by Race/Ethnicity** - Tabular race/ethnicity data for 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) in the Jurisdiction compared to the population as a whole, and to persons earning 30% AMI, in the Jurisdiction

**Table 7 - R/ECAP & Non-R/ECAP Demographics by Publicly Supported Housing Program Category** - Tabular data on publicly supported housing units and R/ECAPs for the Jurisdiction

**Table 8 - Demographics of Publicly Supported Housing Developments by Program Category** - Development level demographics by Public Housing, Project-Based Section 8, and Other Multifamily, for the Jurisdiction

**Table 9 - Demographics of Households with Disproportionate Housing Needs** - Tabular data of total households in the Jurisdiction and Region and the total number and percentage of households experiencing one or more housing burdens by race/ethnicity and family size in the Jurisdiction and Region

**Table 10 - Demographics of Households with Severe Housing Cost Burden** - Tabular data of the total number of households in the Jurisdiction and Region and the number and percentage of households experiencing severe housing burdens by race/ethnicity for the Jurisdiction and Region

**Table 11 - Publicly Supported Housing by Program Category**: Units by Number of Bedrooms and Number of Children - Tabular data on the number of bedrooms for units of 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) for the Jurisdiction

**Table 12 - Opportunity Indicators, by Race/Ethnicity** - Tabular data of opportunity indices for school proficiency, jobs proximity, labor-market engagement, transit trips, low transportation costs, low poverty, and environmental health for the Jurisdiction and Region by race/ethnicity and among households below the Federal poverty line.

**Table 13 - Disability by Type** - Tabular data of persons with vision, hearing, cognitive, ambulatory, self-care, and independent living disabilities for the Jurisdiction and Region

**Table 14 - Disability by Age Group** - Tabular data of persons with disabilities by age range (5-17, 18-64, and 65+) for the Jurisdiction and Region

**Table 15 - Disability by Publicly Supported Housing Program Category** - Tabular data on disability and publicly supported housing for the Jurisdiction and Region