Analysis of Impediments to Fair Housing Choice

CDBG FY 2020-2024

CITY OF BOWLING GREEN OHIO

Submission to HUD: October 2019

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EXECUTIVE SUMMARY

The City of Bowling Green, Ohio is an entitlement community under the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," affected communities must conduct a Fair Housing Analysis. Said analysis identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing.

The City of Bowling Green's last Analysis of Impediments to Fair Housing Choice was prepared in 2015. The Analysis coincided with the submission of the CDBG Five-year Consolidated Plan (2015-2019). The next CDBG Five-year Consolidated Plan will cover program years 2020-2024 with submission to HUD in July 2020. In accordance with new HUD guidance, the City of Bowling Green has prepared the 2020-2024 Analysis of Impediments to Fair Housing Choice for submission to HUD in October 2019 (at least 270 days prior to the submission of the next Five-year Consolidated Plan).

This timing is fortuitous. The Analysis of Impediments to Fair Housing Choice uncovers barriers and the City's greatest need areas. It also informs the City's choices in how to plan and allocate CDBG funding priorities in the next five-year period in order to address barriers and better meet local needs.

This Analysis focuses on the status and interaction of six (6) fundamental conditions within Bowling Green:

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

The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse the sale or rental of a property to persons included under the category of a protected class. The Fair Housing Act prohibits discrimination against persons based on their race, color, religion, sex, national origin, disability or familial status in the sale, rental and financing of housing.

The City of Bowling Green's Grants Administrator conducted and prepared the 2020-2024 Analysis of Impediments to Fair Housing Choice. In terms of funding for the Analysis of Impediments to Fair Housing Choice, the City of Bowling Green Grants Administrator (who conducted this study and wrote the Analysis) is paid wages from the City's General Fund. All general administrative costs for preparing the Analysis of Impediments to Fair Housing Choice (e.g. Survey Monkey fees, advertising costs, etc.) were funded using CDBG administrative funds designated as "Fair Housing."

In the development of this Analysis of Impediments to Fair Housing Choice, the City conducted copious research and outreach. The City's methodology included:

Research

- A review of the City's 2015 Analysis of Impediments to Fair Housing Choice, Chapter 150 of the City of Bowling Green's Code of Ordinances (Zoning Code), the City's 2014 Comprehensive Plan, CDBG PY 2015-2019 Five-year Consolidated Plan (including all Annual Action Plans from the five-year period) and all Consolidated Annual Performance Evaluation Reports available (FYs 2015-2018);
- Review of the Consortium of Northwest Ohio's Five Year and Annual PHA Plans (Section 8 HCV Program);
- An analysis of the most recent demographic data for Bowling Green, Ohio from the U.S. Census (includes general, demographic, housing, economic, social and disability characteristics);
- Evaluation of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data;
- Study of the data related to residential segregation;
- Assessment of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database;
- Review of local real estate and mortgage practices; and
- An analysis of home mortgage foreclosure data.

Interviews and Meetings

- Meetings and interviews were conducted with various City of Bowling Green and Wood County department heads, Bowling Green's Fair Housing Officer, the Consortium of Northwest Ohio (administers Section 8, HCV Program), as well as representatives from a wide array of community, social service, development and advocacy agencies (to include a targeted stakeholder surveying) and ongoing reports/updates at the City's Human Relations Committee meetings.
- Public surveying and two public forums were held (added information is found in Appendix A).

Analysis of Data

- Low- and moderate-income area identification and mapping.
- A study into the concentrations of minority populations and mapping.
- The identification of concentrations of owner-occupied and renter-occupied housing units as well as mapping.
- An evaluation of Fair Housing awareness in the community through target stakeholder surveys, public surveys and public forums.
- An analysis of the distribution by location of public and assisted housing units as well as affiliated mapping.
- A review of the location of CDBG expenditures throughout the City.
- The City's Five-year CDBG goals and objectives were reviewed.

Potential Impediments

- The City analyzed various public sector policies that could potentially create impediments.
- Also reviewed were private sector policies with the potential to cause impediments.
- The Grants Administrator evaluated all previously identified impediments to Fair Housing choice in the course of this study.

Citizen Participation

- A public survey was available on the City's website. The City promoted the survey through radio interviews, newspaper articles, and via the City's electronic newsletter.
- Bowling Green held two public forums to gather public feedback during the development of the Analysis of Impediments to Fair Housing Choice. The City promoted these forums via radio interviews, news articles and flyers (sent directly to a number of stakeholder partner agencies/organizations locally).
- The City of Bowling Green advertised notice of a public comment and review period. The City also, during that time, posted a draft of the Analysis of Impediments to Fair Housing Choice on the City's Fair Housing web page along with notice of public comment and review.

Added details about Citizen Participation begin on page 106 of this Analysis with supporting documentation found in Appendix A.

The City of Bowling Green's 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments as well as strategies to address each impediment.

<u>Impediment 1: Fair Housing Education and Outreach Needed</u>

There continues to be a need to educate the public of their rights under the Fair Housing Act and to raise community awareness of affirmatively furthering fair housing choice. This is especially

important for residents at lower income levels, persons with minority status and those with disabilities. The City of Bowling Green conducted a public survey during the development of the Analysis of Impediments to Fair Housing Choice. Close to 16 percent (16%) of survey respondents indicated, they had experienced Fair Housing discrimination. Nearly six percent indicated racial discrimination in rental, real estate and banking practices. Lack of disability accommodations (most often those related to emotional support animals) were the most reported Fair Housing issue, locally, in the last four years. Additionally, nearly eight percent of survey respondents cited this as the form of discrimination experienced. As a result, the City is placing special emphasis in advertisements and presentations to ensure all understand the illegality of such practices. Nearly 16 percent (16%) of survey respondents indicating Fair Housing discrimination did not report it. Through increased education, the City of Bowling Green hopes to minimize instances of discrimination, and where discrimination continues, increase the percentage of individuals that pursue justice.

Goal: Improve the knowledge and awareness of both the public and the local officials of the Fair Housing Act, related laws, regulations and requirements of affirmatively furthering fair housing.

Strategy: The Fair Housing Office will continue to make no less than one Fair Housing presentation to the Wood County Realtor Charter (formerly known as the Wood County Board of Realtors), annually. Said presentation will include added emphasis on the illegality of racial/ethnic steering.

Strategy: The Fair Housing Officer will continue to make no less than one Fair Housing presentation to the Wood County Apartment Owners' Association, annually. Said presentation will include added emphasis on the illegality of racial/ethnic steering and disability accommodation.

Strategy: The Fair Housing Officer will ensure all public presentations include specific information related to the issue of racial/ethnic steering and disability accommodation to include information regarding how the public can report illegal actions.

Strategy: The Fair Housing Office will ensure at least two of the Fair Housing advertisements placed in local newspapers (annually) address the illegality of racial/ethnic steering and at least two of the advertisements will address disability accommodation. All advertisements will convey how the public can report illegal actions.

Strategy: Fair Housing Officer to monitor local newspaper advertising related to rental housing and address any discriminatory issues revealed on weekly basis throughout FYs 2020-2024.

Strategy: Fair Housing Officer to distribute supply of Fair Housing Program brochures to all agencies participating in the "No Wrong Door" program and Bowling Green Housing Agency on or before December 31 each year 2020 through 2024. Make contact with above-noted agencies before April 30 (annually) to assess replenishment needs. Where needed, replenish stock on or before July 31 (annually).

Strategy: Fair Housing Officer to continue to ensure Fair Housing Program brochures are on display in the City Administration Building and Utilities Office throughout FYs 2020-2024.

Strategy: Fair Housing Officer to make no fewer than six Fair Housing training presentations (annually during FYs 2020-2024). Of the six annual presentations, three are for predominantly lower-income audiences. Fair Housing Officer is to provide quarterly status updates to the Grants Administrator to include when, where, how many attended and the training agenda. The Housing Specialist will maintain on file the agenda, sign-in sheet and other relevant data.

Strategy: Fair Housing Officer to provide and distribute approximately **500** brochures describing Fair Housing Program, on or before June 30 (annually) at various locations serving low- and moderate-income persons.

Strategy: Fair Housing Officer to prepare and place public service announcements and advertising which addresses fair housing guidelines on no less than a quarterly basis throughout FYs 2020-2024. Perform no less than a quarterly review of the City's Fair Housing web page to ensure links are working and information on said site is up to date.

Strategy: Fair Housing Officer to communicate no less than annually with representatives from La Conexion and Bowling Green State University International Student Services in an effort to raise awareness of Fair Housing Program's existence/role and gauge ongoing public needs. The Fair Housing Officer is encouraged to expand upon the list of local advocacy organizations and include them in annual outreach efforts. The Fair Housing Officer will also attend all scheduled Human Relations Commission meetings

Strategy: Fair Housing will write and distribute a newsletter (bi-annually) for those in the banking, rental and real estate industries. These newsletters will provide ongoing education related to the Fair Housing Act, provide local Fair Housing contact information and encourage greater compliance.

Impediment 2: Lack of Housing Affordability for Renter Households

Survey respondents, stakeholder consultations and CHAS data overwhelmingly show the greatest barrier to Fair Housing choice is lack of affordable housing. Amongst survey respondents 32 percent (32%) note housing affordability as a barrier to housing choice, locally. In consulting local stakeholders (to include diversity advocates, representatives from agencies serving persons at lower incomes, professionals from the real estate, housing and banking industries), 71 percent cited housing affordability as an impediment to fair housing choice. CHAS data (begins on page 51) overwhelmingly supports this fact. This data indicates 41 percent (41%) of Bowling Green of all households to be cost or severe cost burdened. Most significantly impacted are those at the extremely low-income levels.

Goal: Improve access to affordable rental housing for lower-income rental households.

Strategy: The City of Bowling Green will continue to offer the CDBG-funded Rental Rehabilitation Program. This program improves the decency and affordability of rental housing for persons with low and moderate incomes. Fair Market Rent rates will be the standard applied to provide these already cost-burdened households some reprieve. Annual goals to be set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period (2020-2024).

Strategy: The City of Bowling Green will continue to provide letters of support, proclamations and other assistance to entities seeking funding for publicly supported housing (to include accessible units) and affordable housing programming, annually 2020-2024.

Impediment 3: Lack of Housing Affordability for Owner-Occupied Households

Homeownership in Bowling Green is difficult to obtain for persons at lower income levels. American Community Survey data provides estimated costs for owner households. The median Selected Monthly Owner Costs (SMOC) for Bowling Green households with a mortgage in 2017 was $1,420. For comparison, the median SMOC for Ohio households with a mortgage in 2017 was $1,247—making Bowling Green's median SMOC nearly 13 percent higher than it was for Ohio's median cost. Bowling Green's median SMOC was $1,321 in 2010. This estimated differential in median costs, locally, is more than a seven percent increase within a seven-year timeframe. For those small number of owner-occupied households at or below 80 percent (80%) of the HUD Area Median Family Income level that do achieve homeownership status, 51 percent (51%) suffer cost or severe cost burden (see CHAS tables on pages 51 and 57). Unexpected household issues such as a roof leak or broken furnace can place a lower-income household in jeopardy of becoming cost burdened or crossing from cost-burdened to severe cost-burdened status.

Goal: Improve lower-income households improved access to homeownership and housing affordability.

Strategy: The City of Bowling Green will continue to implement the following Community Development Block Grant (CDBG)-funded housing repair programs for lower-income households: Home Repair, Mobile Home Repair, and Elderly Home Repair. Annual goals (for each program activity) are set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period 2020-2024.

Strategy: The City of Bowling Green will continue to include the Direct Homeownership Assistance Program (makes affordable homeownership possible for lower-income persons) as a written goal in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period 2020-2024.

Strategy: The City of Bowling Green will continue to implement programming through the Housing Revolving Loan Fund (established from prior Community Housing Improvement Program grants). All programs solely benefit persons with low and moderate incomes. Programs include Down-payment assistance/Rehabilitation and Owner-Occupied Rehabilitation.

Program income on this fund is contingent upon recapture of funds from the properties that have been addressed (through said programming) in the past. As a result, the fund balance fluctuates; making it difficult to target how many properties can be addressed within a giving calendar year. The City anticipates that CDBG funds will address no less than two properties annually (if funding levels permit) and more will be if possible.

Impediment 4: High Poverty Rates

ACS 2013-2017 data estimates reveal the median income in Bowling Green is significantly lower than it is statewide. In 2017, Ohio's median income was $52,407. Bowling Green's median income in 2017 was $33,794. Likewise, estimates indicate the median household income increased roughly 3 percent between 2010 and 2017 (from $32,792 in 2010 to $33,794 in 2017). Estimates for the state of Ohio during this same timeframe show a 10 percent increase (from $47,358 in 2010 to $52,407 in 2017). Thus, the local trend of under-employment (discovered at the time Bowling Green's last Analysis of Impediments to Fair Housing Choice was developed) continues.

Goal: Improve access to greater economic opportunities for persons at lower income levels.

Strategy: Utilizing the Business Revolving Loan Fund (RLF), the City of Bowling Green will continue to offer Business Assistance Loans to businesses located in the Special Improvement District, which spans two of the City's low-moderate income census tracts (217.01 and 217.02). Annual goals are set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period 2020-2024. Those goals will be set forth in each year's Fair Housing Action Plan.

Strategy: The City of Bowling Green will utilize the Business Revolving Loan Fund (established through CDBG revenues) as a mechanism to create jobs for persons with lower incomes. Annual goals are set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period 2020-2024. Those goals will be set forth in each year's Fair Housing Action Plan.

I. INTRODUCTION

The City of Bowling Green, Ohio is an entitlement community under the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," affected communities must conduct a Fair Housing Analysis. Said analysis identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing.

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The City of Bowling Green wrote its previous Analysis of Impediments to Fair Housing Choice in 2015. The 2020-2024 Analysis of Impediments to Fair Housing Choice reveals the progress made since 2015, identifies where there is the need to continue current strategies, and set forth new impediments and goals to address those. The writing of this Analysis also brings the City of Bowling Green into sequence with the writing of the 2020-2024 CDBG Five-year Consolidated Plan—with submission of the Analysis no less than 270 days prior to the submission of the Five-year Plan. The Analysis is a living document that is reviewed no less than quarterly with the enactment of annual updates/amendments occurring where warranted.

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- An analysis of the distribution by location of public and assisted housing units as well as affiliated mapping.
- A review of the location of CDBG expenditures throughout the City (and mapping).
- The City's Five-year CDBG goals and objectives were reviewed to assess progress to date.
-

See Appendix E for all aforementioned maps. Refer to Appendix A for documents related to the surveys and public forums.

Potential Impediments

- The City analyzed various public sector policies that could potentially create impediments.
- Also reviewed were private sector policies with the potential to cause impediments.
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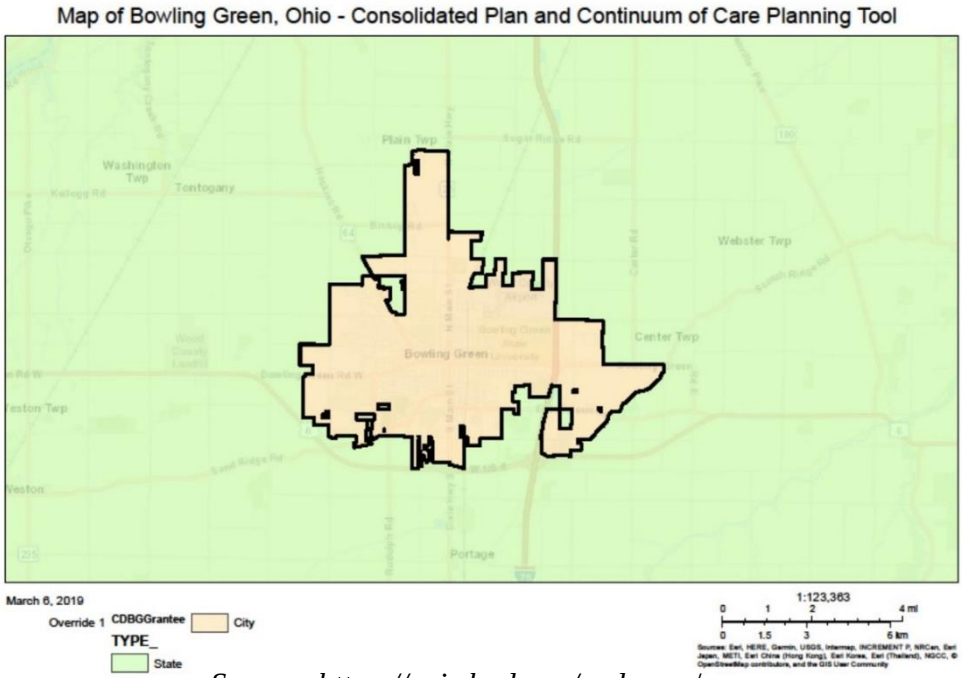
Added details about Citizen Participation begins on page 106 of this Analysis with supporting documentation in Appendix A.

II. DEMOGRAPHIC SUMMARY

Background Data: Bowling Green, Ohio

Situated in northwest Ohio, Bowling Green is the county seat of and most populous city within Wood County. Bowling Green is situated along the I-75 corridor. The major east-west conduit, I-80/90, is only 16 miles to the north and Toledo 20 miles in that same direction. Bowling Green is located less than two hours from Cleveland and Columbus. Detroit, Ann Arbor, and Windsor, Canada provide many cultural opportunities within a short drive.



Source: https://egis.hud.gov/cpdmaps/

Population

Historically, Bowling Green has experienced some level of numerical population growth every ten years. The *level* of growth has narrowed since 1970—most notably between 2000 and 2010. During this period, only a 1 percent (1%) growth rate took place. This marked decline in the percentage rate of growth seemed to indicate a trending toward decreased growth.

Subsequent estimates reveal this latest trend could be shifting. 2009-2013 American Community Survey (ACS) 5-year estimates recorded a population of 31,049; a 3.4 percent (3.4%) increase over the 2010 census population count. The most recent population estimate (2013-2017 ACS) is 31,529--nearly 5 percent (5%) higher than the 2010 census population.

Population Trends

Year	Population	% Increase Over Prior 10 Years
1970	21,552	59%
1980	25,728	19%
1990	28,176	10%
2000	29,636	5%
2010	30,028	1%

Data source: U.S. Census Bureau (DP-1)

Population Change Since 2010

Population Estimate	% Increase Since 2010 Census
31,529	4.9%

Data source: 2013-2017 ACS 5-year Estimates (DP-05)

The trend has been for females to outnumber males in Bowling Green. Since 2000, the number of males has increased and the numerical gap between genders has lessened.

Gender Shares

Census	Total Population	Males	Percent	Females	Percent
2000	29,636	13,865	46.8%	15,771	53.2%
2010	30,028	14,399	48.0%	15,629	52.0%

Data source: U.S. Census Bureau (DP-1)

Current Estimates – Gender Shares

Total Population	Males	Percent	Females	Percent
31,529	14,966	47.5%	16,563	52.5%

Data source: 2013-2017 ACS 5-year Estimates (DP05)

Race

The following table highlights the racial composition of Bowling Green as shown in the 2010 U.S. Census and the 2013-2017 American Community Survey 5-year Estimates.

Race and Hispanic or Latino Population for Bowling Green, Ohio

Race and Hispanic or Latino	2010 U.S. Census		2013-2017 ACS	
	#	%	#	%
Total population	30,028	100.0%	31,529	100.0%
One race	29,375	97.8%	30,557	96.9%
White	26,301	87.6%	27,892	88.5%
Black or African American	1,926	6.4%	1,910	6.1%
American Indian and Alaska Native	64	0.2%	16	0.1%
Asian	640	2.1%	460	1.5%
Native Hawaiian or Other Pacific Islander	9	0.0%	32	0.1%
Some Other Race	435	1.4%	247	0.8%
Hispanic or Latino	1,436	4.8%	1,894	6.0%

2010 (DP-1) and ACS (DP05)

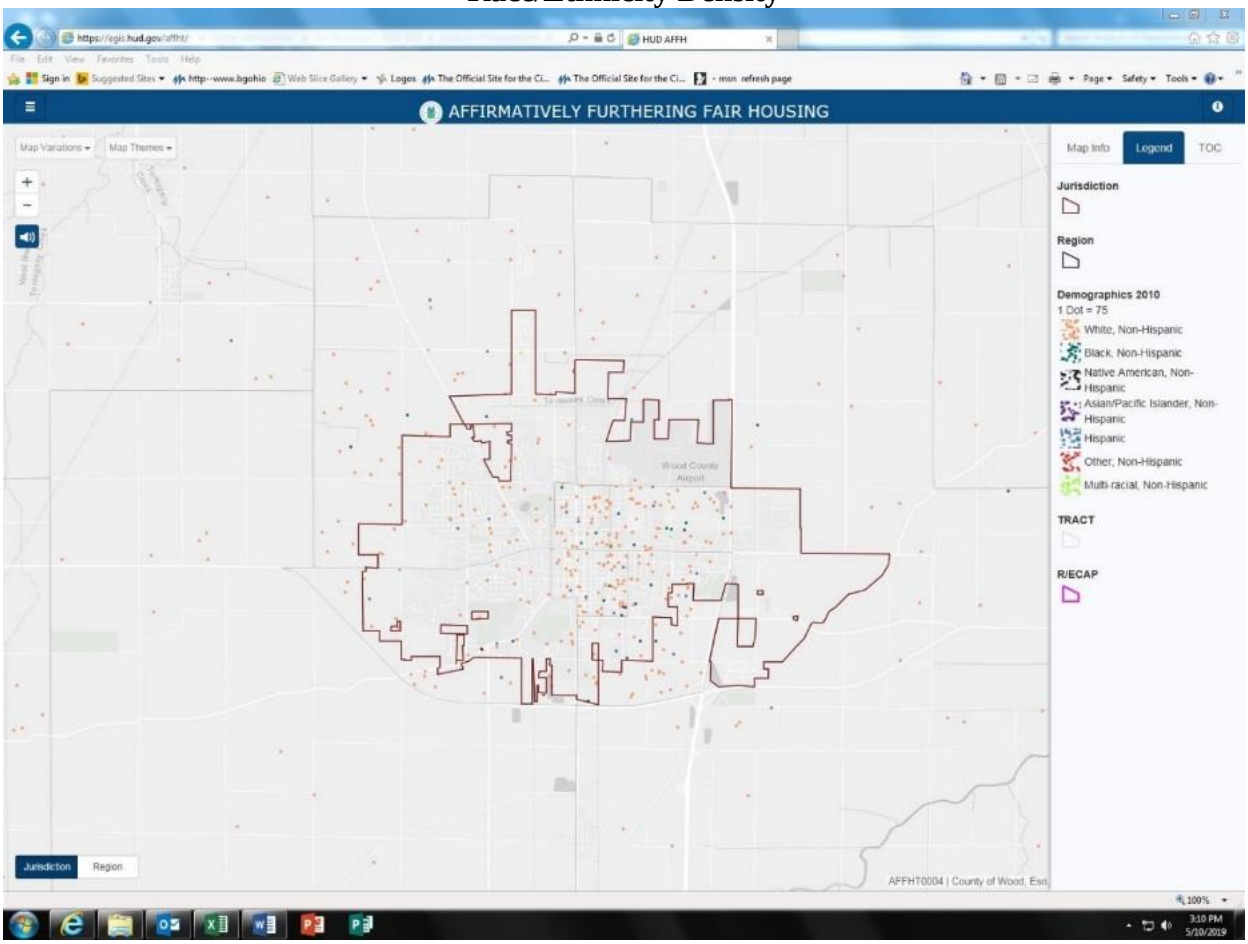
During the two timeframes, Bowling Green experienced an increase in the percentage of people identifying themselves as "White," "Native Hawaiian or Other Pacific Islander," and "Hispanic or Latino." The most notable percentage increase is within those identifying themselves as "Hispanic or Latino," which rose 1.2 percent (1.2%) (458 individuals). The percentage of persons identifying themselves as "Black or African American," American Indian and Alaska Native," "Asian," and "Some Other Race," was estimated between 2010 and 2017. The most notable percentage share decreases are with the persons identifying themselves as "Asian," and "Some Other Race." Both percentages dropped 0.6 percent (0.6%) in 2017 (180 and 188 persons less, respectively).

A review of Ohio data showed somewhat dissimilar results—with two exceptions. Persons identifying as "Some Other Race" also lost percentage shares statewide (0.2 percent (0.2%)). Additionally, the percentage of persons identifying as "Hispanic or Latino" rose by 0.5 percent (0.5%). The percentage of people identifying themselves as "Black" and "Asian" increased

statewide (0.1 percent (0.1%) and 0.3 percent (0.3%), respectively) and the percent of those identifying as "White" decreased (0.8 percent (0.8%)). All other categories remained the same in Ohio.

The following race/ethnicity dot density map (also found in Appendix E) based on 2010 U.2. Census shows the concentration and location of various racial and ethnic cohorts in the City.

Race/Ethnicity Density



Source: HUD https://egis.hud.gov/affht/

The City of Bowling Green Grants Administrator conferred with Kelly Stamper Balistreri, Ph.D., Associate Professor of Sociology of BGSU to determine the status of local racially/ethnically-concentrated areas of poverty (R/ECAP). An analysis of 2013-2017 ACS data shows there are no racially or ethnically concentrated (segregated) areas of poverty in Bowling Green. Balistreri noted that according to HUD's definition of R/ECAP, a census tract must have:

1. A non-white population of 50 percent (50%) or more; and
2. A poverty rate that exceeds 40 percent (40%) or is at least three times the average tract poverty rate for the metropolitan/micropolitan area, whichever is lower.

Bowling Green is a micropolitan statistical area. United States micropolitan statistical areas, as defined by the Office of Management and Budget, are labor market areas in the United States centered on an urban cluster with a population of at least 10,000 but fewer than 50,000 people.

The table below sets forth the relative data aforementioned directly above. Census tract 218 encompasses primarily the Bowling Green State University campus.

Racially and/or Ethnically-Concentrated Areas of Poverty Data		
TRACT	**Share Non-White**	**Share Households Below Poverty Level**
21600	7%	15%
21701	5%	19%
21702	10%	20%
21800	17%	73%
21901	6%	5%
21902	18%	38%
22500	10%	3%

Source: 2013-2017 ACS 5-year Estimates as analyzed by BGSU

For historical context, Balistreri also analyzed census data from 1990, 2000, 2010 and ACS 2013- 2017 estimates (depicted as "current" in the table below) to determine, historically, Bowling Green has no R/ECAP areas. Census tract 218 is the Bowling Green State University campus.

Bowling Green R/ECAP Historical Data				
TRACT	**R/ECAP 1990**	**R/ECAP 2000**	**R/ECAP 2010**	**R/ECAP (Current)**
21600	0	0	0	0
21701	0	0	0	0
21702	0	0	0	0
21800	0	0	0	0
21901	0	0	0	0
21902	0	0	0	0
22500	0	0	0	0

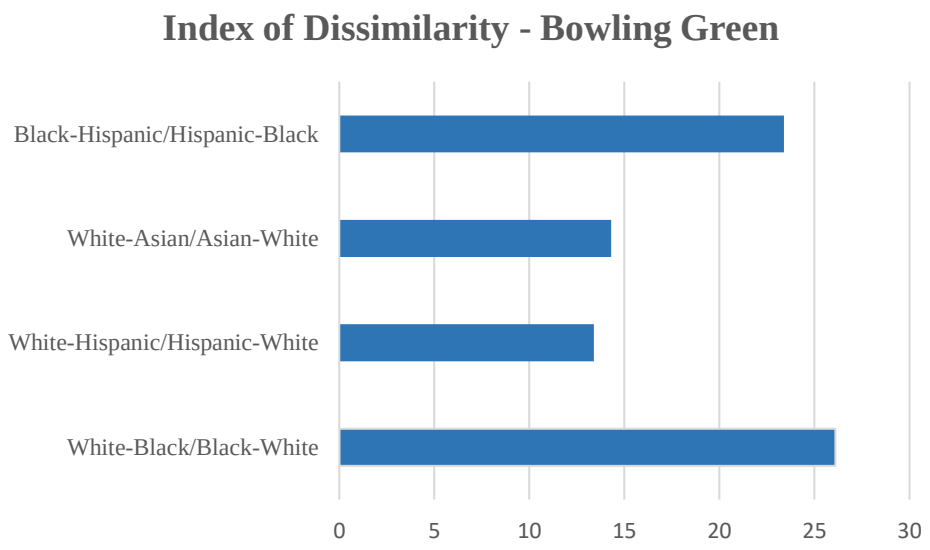
Source: U.S. Census (1990, 2000, 2010 and 2013-2017 ACS 5-year Estimates as analyzed by BGSU

The City Grants Administrator also reviewed data made available through an online source, Diversity and Disparity (). According to their website, Diversity and Disparity "provides independent and peer-reviewed research.

Below is Census 2010 data related to Bowling Green, Ohio.

Index of Dissimilarity - Bowling Green	
Comparison	**Value**
White-Black/Black-White	26.1
White-Hispanic/Hispanic-White	13.4
White-Asian/Asian-White	14.3
Black-Hispanic/Hispanic-Black	23.4

Source: https://s4.ad.brown.edu/projects/diversity/segregation2010/city.aspx?cityid=3907972



Source: https://s4.ad.brown.edu/projects/diversity/segregation2010/city.aspx?cityid=3907972

Given the explanation provided on the website noted above (as "source"), there are no discernable racial concentrations. "The dissimilarity index measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group. A high value indicates that the two groups tend to live in different tracts. D ranges from zero to 100. Brown University considers a value of 60 (or above) very high. What it means is that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low."

Ethnicity and Ancestry

The following table highlights the ancestries of Bowling Green residents via estimates from the 2008-2010 and 2013-2017 American Community Surveys.

Bowling Green Ancestry Estimates

Ancestry	2008-2010 ACS		2013-2017 ACS	
	#	%	#	%
Total population	30,042	x	31,529	x
American	684	2.30%	914	2.90%
Arab	323	1.10%	460	1.50%
Czech	329	1.10%	188	0.60%
Danish	76	0.30%	66	0.20%
Dutch	329	1.10%	329	1.00%
English	3,223	10.70%	2,772	8.80%
French (except Basque)	1,057	3.50%	1,222	3.90%
French Canadian	97	0.30%	115	0.40%
German	11,220	37.30%	11,629	36.90%
Greek	198	0.70%	129	0.40%
Hungarian	662	2.20%	680	2.20%
Irish	5,119	17.00%	4,709	14.90%
Italian	2,211	7.40%	1,935	6.10%
Lithuanian	78	0.30%	90	0.30%
Norwegian	263	0.90%	141	0.40%
Polish	1,643	5.50%	1,977	6.30%
Portuguese	23	0.10%	0	0.00%
Russian	317	1.10%	349	1.10%
Scotch-Irish	231	0.80%	258	0.80%
Scottish	1,060	3.50%	675	2.10%
Slovak	113	0.40%	283	0.90%
Subsaharan African	201	0.70%	216	0.70%
Swedish	96	0.30%	621	2.00%
Swiss	174	0.60%	168	0.50%
Ukrainian	31	0.10%	62	0.20%
Welsh	440	1.50%	376	1.20%
West Indian (excluding Hispanic origin groups)	0	0.00%	147	0.5%

Source: American Community Survey (DP02)

The most represented percentage shares in both timeframes is German and Irish ancestry. In 2010, there was no representation of West Indian ancestry. That rose to 0.5 percent (0.5%) representation in 2017. In 2010, Portuguese ancestry represented a 0.10 percent (0.10%) share of the population. In 2017, the estimated percentage share decreased to zero percent (0%) Portuguese ancestry.

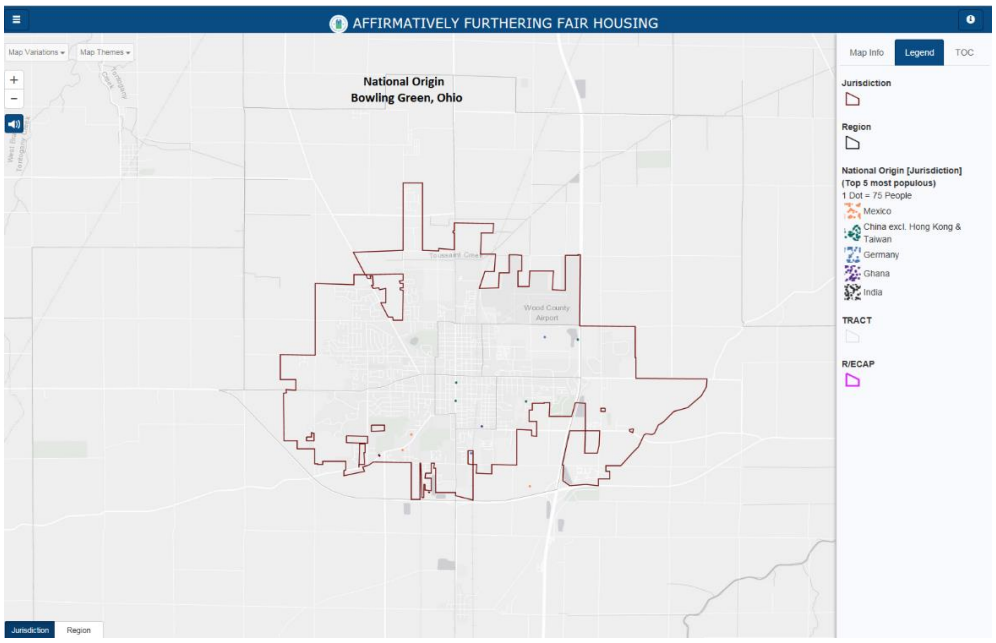
National Origin

Estimates from the 2008-2010 and 2013-2017 American Community Surveys provided insights into Bowling Green's population that is native versus foreign born. Variations between the two timeframes are minimal (in relation to percentage shares). The map below (also found in Appendix E) that indicates no discernable concentrations of persons with similar national origin are present.

Bowling Green Citizenship Status Estimates

	2008-2010 ACS	2013-2017 ACS
Subject	**Estimate**	**Estimate**
Total population (5 years and older)	29,267	30,408
Native	28,009	28,931
Foreign Born	1,258	1,477
Naturalized	380	466
Not a Citizen	878	1,011

Source: American Community Survey (DP02)



Source: HUD https://egis.hud.gov/affht/

Annually, the Grants Administrator conducts a Limited English Proficiency (LEP) Four-Factor Analysis and subsequent LEP Plan in compliance with the City of Bowling Green's federally funded programs. Bowling Green is currently under the Safe Harbor LEP threshold; however, the LEP Plan includes various accommodations to include arranging for volunteer interpreters for programmatic and public hearing assistance, CDBG survey and brochure translations (in Spanish) and free fares for translators assisting B.G. Transit passengers with LEP.

The table below displays 2013-2017 ACS estimates for languages spoken at home. It summarizes numerical estimates for persons who speak English less than "very well" by language categories. The percentage shares are relational to the local population 5 years of age and older. The numbers are well under the 1,000 persons or five percent (5%) per language thresholds established by the federal government.

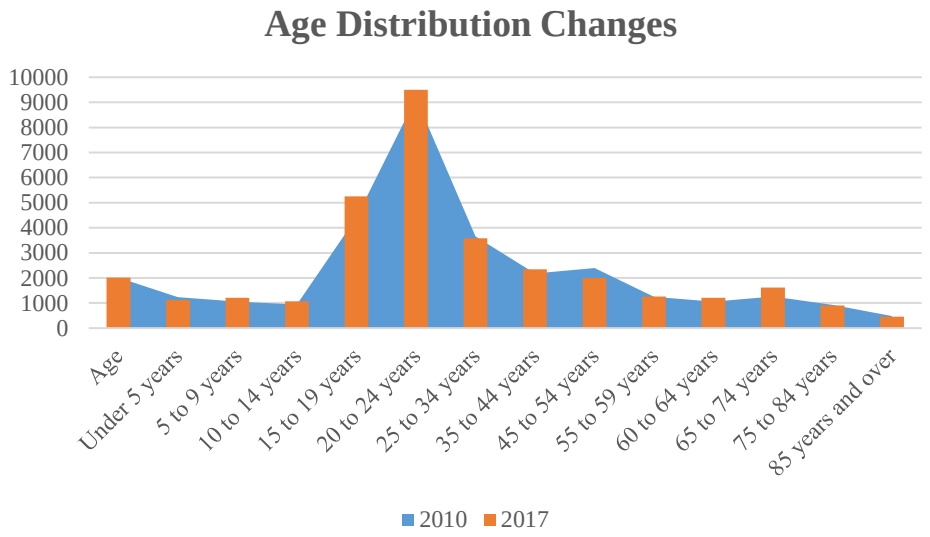
Languages Spoken at Home

Subject	2013-2017 ACS	
	Estimate	Percent
Population 5 years and over	30,042	x
Spanish Languages-Speak English less than "very well"	192	0.63%
Other Indo-European Languages-Speak English less than "very well"	64	0.21%
Asian and Pacific Islander Languages-Speak English less than "very well"	204	0.67%
Other Languages-Speak English less than "very well"	247	0.82%

Source: 2013-2017 ACS (S1601)

Age

The following chart illustrates age distribution in Bowling Green at the time of the 2010 U.S. Census and 2013-2017 ACS. The most represented segment of the population in 2010 is those aged 20 to 24 years. In 2017, this is still accurate, with an estimated increase in the number of persons aged 20 to 24 years. The next most represented age group (both timeframes) is 15 to 19 years. Once again, an estimated increase took place between 2010 and 2017. The larger representations within these age groups can likely attributed to the presence of Bowling Green State University, locally.



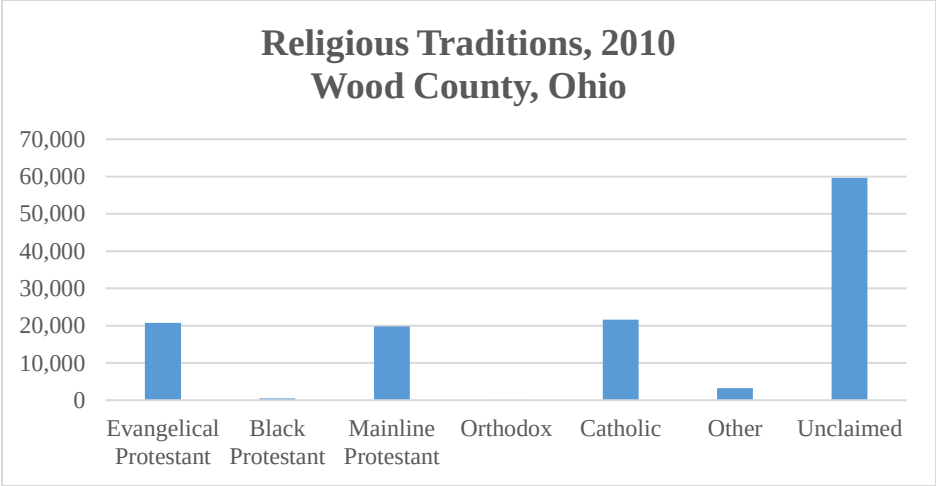
Source: 2010 U.S. Census (DP-1) and 2013-2017 ACS (DP05)

The median age in 2010 and 2017 appears to be relatively stable (23.2 in 2010 and 23.0 in 2017). The least represented segment of the population is those aged 85 years and older. The 2017 ACS estimates (457) show a slight decline in this cohort when compared to 2010 (478).

Religion

The U.S. Census does not collect data on religious affiliations. Since religious affiliation is protected by the Fair Housing Act, it is imperative some understanding of religious affiliation at the local level. The City of Bowling Green viewed data made available by The Association of Religion Data Archives (ARDA). The most recent ARDA data on "religious traditions" is for 2010 and it is only available for the entire county (Wood).

The chart below represents ARDA's County Membership Report of Religious Traditions (2010) for Wood County, Ohio. The congregational adherents include all full members, their children and others who regularly attend services. Per ARDA, the 2010 report contains incomplete counts of congregations and adherents belonging to the eight largest historically African-American denominations. These denominations are not include in the 2000 reports and are largely missing from the 1990 and 1980 reports--according to ARDA.



Source: The Association of Religion Data, County Membership Report 2010

Those claiming no religious affiliation comprise the greatest percentage share (47.5%) within Wood County, Ohio. Of those showing religious adherence, Catholics were most represented (17.2%), with Evangelical Protestants following closely behind (16.5%) and thereafter Mainline Protestant (15.8%).

Disability

American Community Survey estimates (2013-2017) provide insights into the local disability status of the civilian, non-institutionalized population. Within his population, 9.1% has disability status. The greatest segment of Bowling Green's civilian, non-institutionalized population with a disability is found with those aged 65 years or older (nearly one-third). The table below yields added information.

Disability Status of the Civilian Non-institutionalized Population

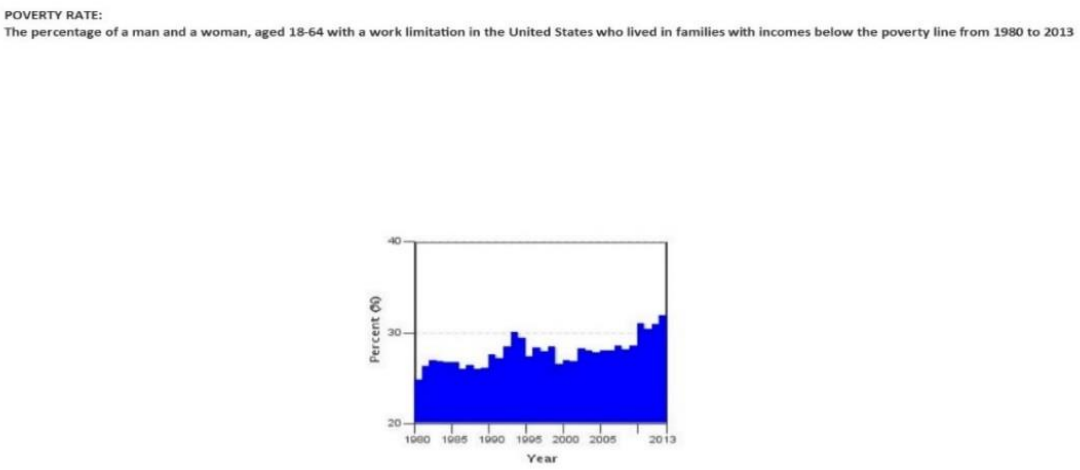
	2013-2017 ACS	
Subject	**Estimate**	**Percentage**
Total Civilian Noninstitutionalized population	30,987	x
With a disability	2,833	9.1%
Under 18 years	3,921	x
With a disability	120	3.1%
18 to 64 years	24,370	x
With a disability	1,900	7.8%
65 years and over	2,696	x
With a disability	813	30.2%

Source: ACS 2013-2017 (DP02)

A review of ACS estimates (2013-2017) also provide data related to employment and disability status. These estimations indicate 1,539 of persons aged 16 years or older have disability status (with any disability). Estimated labor force participation rate is 60.8%, and employment/population ratio estimate is 58.5%. Unemployment during this period for the affected population is 3.6% (ACS S2301).

According to Disability Statistics compiled by Cornell University, in the year **2013**, an estimated 31.9 percent (plus or minus 1.6 percentage points) of civilian non-institutionalized, men and women with a work limitation, aged 18-64 in the United States lived in families with incomes below the poverty line (http://www.disabilitystatistics.org/reports/cps.cfm?statistic=poverty). The chart below (also found in Appendix E) illustrates these data.

Poverty and Disability Correlation Nationally



Source: http://www.disabilitystatistics.org/reports/cps.cfm?statistic=poverty

The table below provides disability estimates from the 2013-2017 ACS. This table displays disability type as a percentage of the entire population for Bowling Green. Individuals with a cognitive difficulty hold both the estimated numerical and percentage share of disability types at 1,295 persons (4.3%).

Disability Type

Disability Type	2013-2017 ACS	
	Estimate	Percentage
With a hearing difficulty	700	2.3%
With a vision difficulty	377	1.2%
With a cognitive difficulty	1,295	4.3%
With an ambulatory difficulty	1,134	3.8%
With a self-care difficulty	378	1.3%
With an independent living difficulty	659	2.4%

Source: 2013-2017 ACS (S1810)

Familial Status of Households

Using Census 2010 and American Community Survey data (2013-2017 ACS), it is estimated the total number of households in 2010 (11,288) has risen slightly (11,291) during the periods. The table below shows an increase in 2017 of married-couple households and family households headed by a male increased. The latter of these was the most marked—with an estimated 18 percent increase since 2010. All other household types marked decreased number estimates between 2010 and 2017.

Households and Families

Household Type	2010 U.S. Census	2013-2017 ACS
Married-couple family household	3,465	3,752
Male householder, no wife present, family household	359	432
Female householder, no husband present, family household	851	776
Nonfamily household	6,613	6,331

Source: U.S. Census (QT-P11) and ACS (S1101)

Household Composition

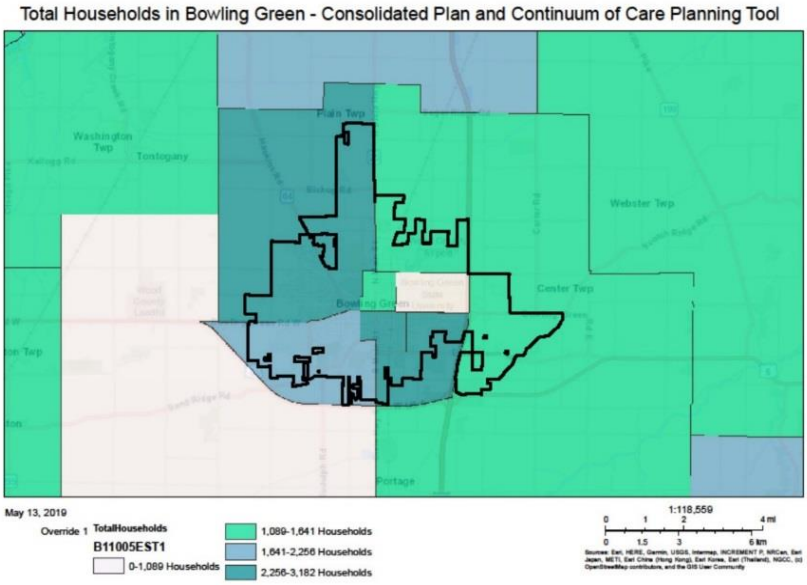
The number of households in Bowling Green has risen since 2000. At the time of the 2010 census, there were 11,288 households—yielding an increase of 9.96 percent within the 10-year span. Using the most recent estimates, the total number of households has risen 9.98 percent since 2000. Vacancy rates have declined since the time of the 2010 U.S. Census. At that time, there were 1,013 vacant housing units (8.2%). Per 2013-2017 ACS estimates, there are 973 vacant housing units (7.9%).

Total Households

Demographic	Base Year: 2000	Most Recent Year: 2017	% Increase
Households	10,266	11,291*	9.98%

*Data Source: 2000 Census (Base Year (DP-1)); *2013-2017 ACS (S1101)*

The CPD Maps map below sets forth the estimated number of households by census tract in Bowling Green. The greatest number of households are currently in census tracts 217.02, 219.02 and 216—all of which have an estimated 2,256 to 3,182 households apiece. The estimated least number of households (0-1,089) is in census tract 218. This census tract primarily encompasses Bowling Green State University, and is not, "primarily residential." As a result, the City of Bowling Green never undertakes CDBG Low-Mod Area activities in census tract 218 (despite the fact most of its residents have lower incomes).



Source: https://egis.hud.gov/cpdmaps/

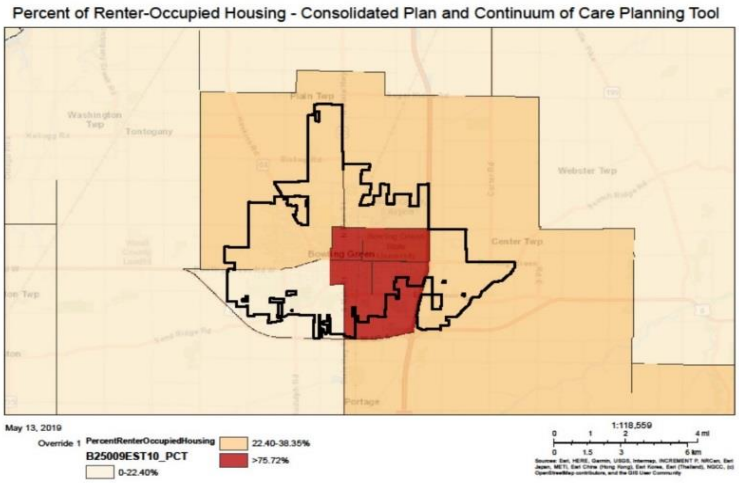
Rental households have outnumbered those with owner occupants in Bowling Green for a number of years. The numerical and percentage shares for rental housing continue to climb. Bowling Green is the site of Bowling Green State University (BGSU). In recent years, BGSU has eliminated a sizable portion of its on-campus housing. This may explain, at least in part, this increase.

Household Types

Household Type	Census 2000	% Share	Census 2010	% Share	2013-2017 ACS	% Share
Renter Occupied	5,932	57.8%	6,788	60.1%	7,026	62.2%
Owner Occupied	4,334	42.2%	4,500	39.9%	4,265	37.8%

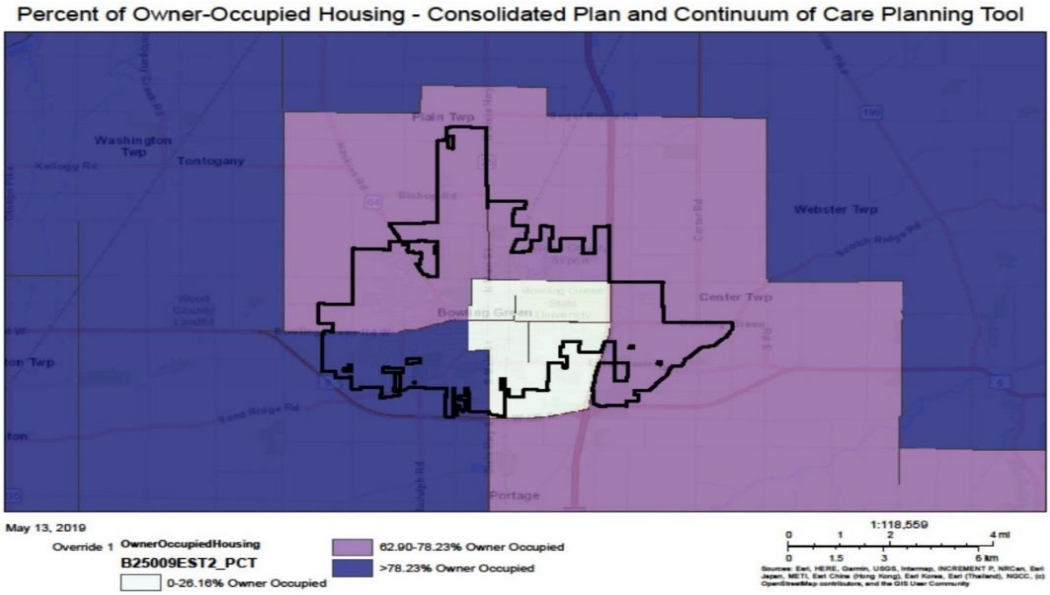
Source: U.S. Census 2000 and 2010 (DP-1) and ACS 2013-2017 (DP04)

The CPD map below provides the estimated percent of renter-occupied housing by census tract. Census tracts 217.01, 217.02, 218 and 219.02 are predominantly renter-occupied (greater than 75.72%). Census tract 218 represents Bowling Green State University. Tracts 217.01, 217.02 and 219.02 all border 218. The census tract with the lowest representation of renter-occupied housing is 219.01 (0-22.40%).



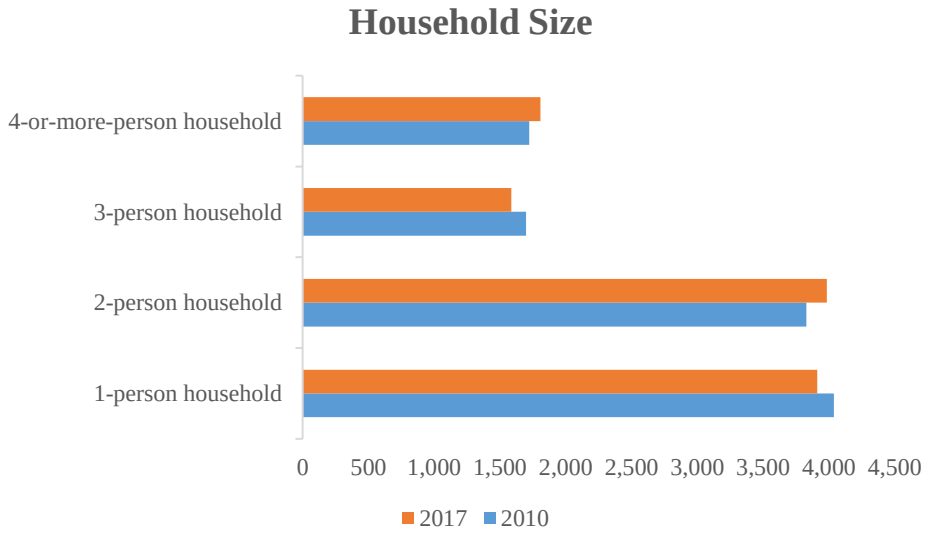
Source: https://egis.hud.gov/cpdmaps/

The following CPD map, displaying the percent of owner-occupied housing in Bowling Green, clearly indicates very little owner-occupied housing is found in census tracts 217.01, 217.02, 218 (BGSU) and 219.02. The greatest percent of owner-occupied housing is in census tract 219.01 (greater than 78.23%). Following closely behind are census tracts 216 and 225 (an estimated .90-78.23% owner-occupied households apiece).



Source: https://egis.hud.gov/cpdmaps/

In 2010 (2010 U.S. Census), the average household size was 2.16 and average family size was 2.16. According to estimates via the 2013-2017 ACS, those numbers have increased (average household size 2.24; average family size 2.18). The following chart illustrates the household sizes in both 2010 and 2017. In 2017, there were fewer one- and three-person households and more households with two and four-plus persons.



Source: 2010 U.S. Census (QT-P11) and 2013-2017 ACS (S2501)

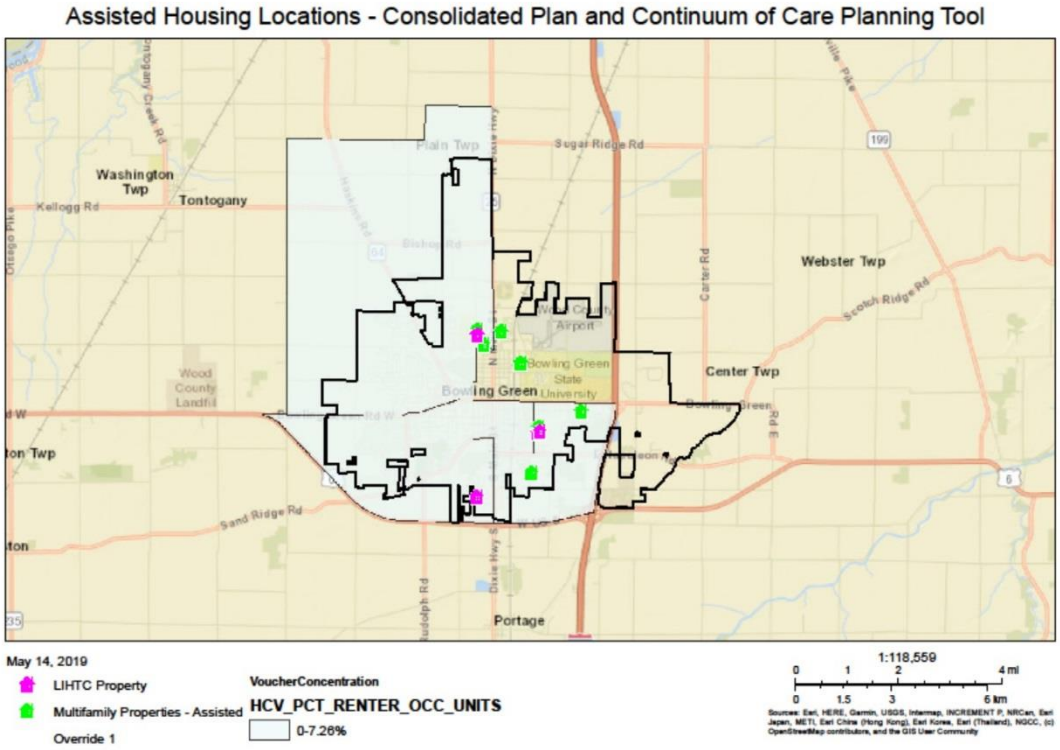
The table below compares estimates of homeowners and renters by race and ethnicity for occupied housing units, locally. Estimates from 2010 are largely comparable to those in 2017. The most notable difference is in householders who are Hispanic or Latino. Both owners and renters within this cohort show increased estimates in 2017. For homeowners, there is a greater-than three percent estimate.

Household Tenure by Race and Ethnicity for Owners and Renters

Cohort	2006-2010 ACS		2013-2017 ACS	
	Owner	Renter	Owner	Renter
Householder who is White alone	96.4%	89.3%	97.0%	89.9%
Householder who is Black or African American alone	0.7%	5.0%	0.8%	5.0%
Householder who is American Indian and Alaska Native alone	0.5%	0.0%	0.0%	0.2%
Householder who is Asian alone	1.6%	2.3%	1.3%	1.4%
Householder who is Native Hawaiian and Other Pacific Islander alone	0.0%	0.0%	0.0%	0.0%
Householder who is some other race alone	0.6%	1.3%	0.0%	0.6%
Householder who is two or more races	0.3%	1.9%	0.8%	2.8%
Householder who is Hispanic or Latino	1.5%	3.7%	4.9%	6.4%

Source: ACS 2006-2010 and 2013-2017 (S2502)

Although there are no public housing developments in Bowling Green, subsidized housing is available throughout the city. In fact, it is present within every census tract except for 218—which encompasses the BGSU campus. A light concentration (0-7.26%) of Section 8 Housing Choice Voucher usage is in census tracts 216, 217.02, 219.01 and 219.02. HUD multifamily properties are in census tracts 216, 217.01, 219.02 and 225. LIHTC properties are in census tracts 216, 219.01 and 225. The CPD map below sets forth the location of Section 8 Housing Choice Voucher usage, HUD multifamily and LIHTC properties within Bowling Green.



Source: https://egis.hud.gov/cpdmaps/

Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

	(Bowling Green, OH CDBG) Jurisdiction							
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	0	0.00%	0	0.00%	0	0.00%	N/a	N/a
Project-Based Section 8	189	58.15%	101	31.08 %	33	10.15%	113	34.77%
Other Multi-family	58	87.88%	0	0.00%	0	0.00%	N/a	N/a
HCV Program	29	23.58%	61	49.59 %	25	20.33%	38	30.89%

Note 1: Data Sources: APSH

Note 2: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

A more detailed discussion about local publicly supported housing and Section 8 Housing Choice Voucher usage is in Section IV of this Analysis.

Income and Poverty

Estimates indicate the median household income increased roughly 3 percent between 2010 and 2017 (from $32,792 in 2010 to $33,794 in 2017). Estimates for the state of Ohio during this same timeframe show a 10 percent increase (from $47,358 in 2010 to $52,407 in 2017). American Community Survey estimates reveal percentage shares of household incomes under the $35,000 mark remained relatively stable between 2010 and 2017. Estimates for 2017 indicate

households at the $50,000 to $74,999 income range hold the greatest percentage share (16.5%) with households at less than $10,000 following closely behind at 15.5%.

Household Income Estimates

Items	2006-2010 ACS Estimate	2013-2017 ACS Estimate
Total Households	10,772	11,291
Less than $10,000	16.7%	15.5%
$10,000 to $14, 999	9.3%	9.3%
$15,000 to 24,999	15.0%	14.0%
$25,000 to 34,999	12.3%	12.5%
$35,000 to 49,999	11.3%	10.7%
$50,000 to 74,999	13.0%	16.5%
$75,000 to $99,999	8.4%	7.8%
$100,000 to $149,999	9.5%	8.0%
$150,000 to $199,999	2.5%	2.7%
$200,000 or more	2.1%	3.1%
Median Household Income	$32,792	$33,794

Source: ACS 2006-2010 and 2013 and 2017 (S1901)

ACS 2013-2017 data estimates reveal the median income in Bowling Green is significantly lower than it is statewide. In 2017, Ohio's median income was $52,407. Bowling Green's median income in 2017 was $33,794. Subsequent research indicates unemployment rates in Bowling Green to be low. Thus, the local trend of under-employment (discovered at the time Bowling Green's last Analysis of Impediments to Fair Housing Choice was developed) continues.

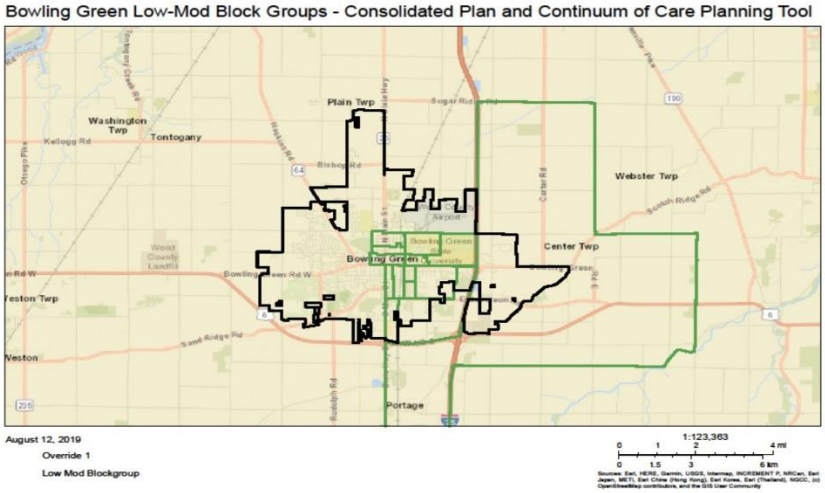
The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for CDBG assistance at or below 80 percent of the HOME Income Limits. Bowling Green is part of the Toledo, Ohio Metropolitan Statistical Area (MSA). The 2019 adjusted HOME income limits for the Toledo, Ohio MSA (effective June 28, 2019) are set forth below:

FY 2019 Income Limits Bowling Green, TOLEDO OH MSA

Income Category	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
Extremely Low (30% Income Limits)	$14,500	$16,550	$18,600	$20,650	$22,350	$24,000	$25,650	$27,300
Very Low (50% Income Limits)	$24,150	$27,600	$31,050	$34,450	$37,250	$40,000	$42,750	$45,500
Low Income (80% Income Limits)	$38,600	$44,100	$49,600	$55,100	$59,550	$63,950	$68,350	$72,750

Source: U.S. Department of Housing and Urban Development

On February 14, 2019, HUD CPD-10-02 Notice that updated the Department's Low- and Moderate-Income Summary Data (LMIDS) based on the American Community Survey 2011-2015 5-year estimates (2015 ACS). These data demonstrate compliance with the CDBG National Objective of providing benefit to lower-income persons on an area basis (LMA).



Source: https://egis.hud.gov/cpdmaps/

The tables below highlights the current lower-income population locally using the data cited in the paragraph above. The block groups (and census tracts) with a population of 51 percent or

greater lower-income are eligible for LMA-based CDBG activities. Bowling Green generally undertakes these types of activities based on the census tract's eligibility versus block group.

Low- and Moderate-Income Residency by Block Group and Census Tract

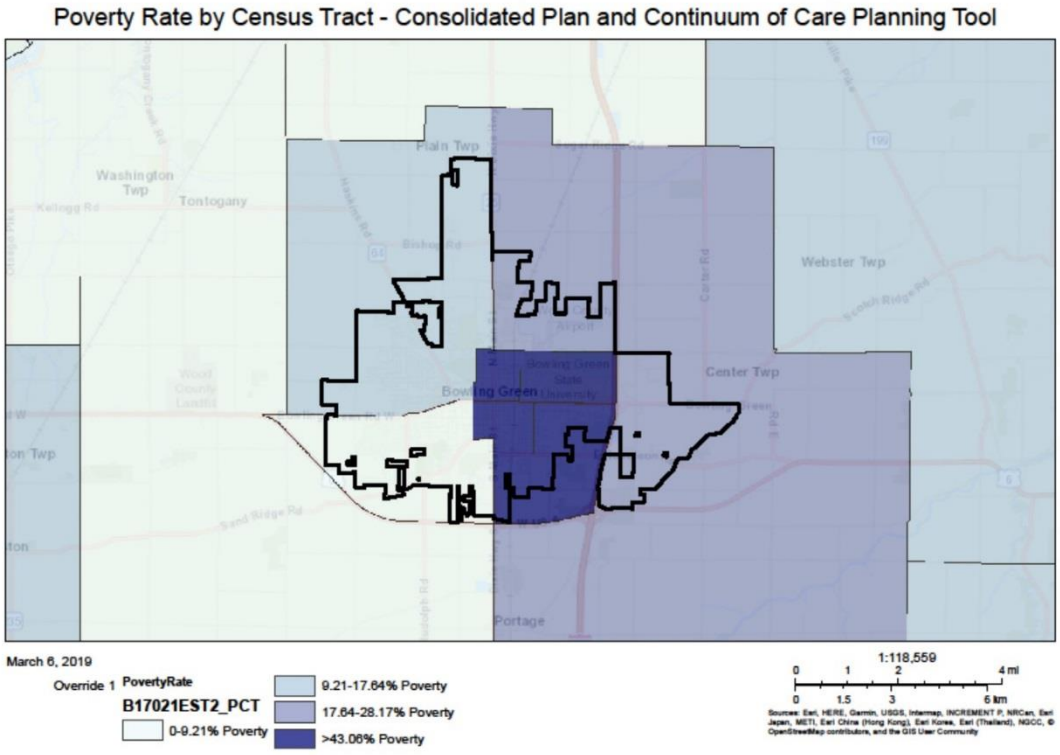
Census Tract	Block Group	Low-Moderate Income Population	Total Population	Low-Moderate Income Percent
021600	1	200	895	22.35%
021600	2	390	2605	14.97%
021600	3	130	1005	12.94%
021600	4	140	1010	13.86%
021600	5	640	1280	50.00%
021701	1	885	1345	65.80%
021701	2	1045	1300	80.38%
021701	3	675	860	78.49%
021702	1	465	1105	42.08%
021702	2	480	760	63.16%
021702	3	745	900	82.78%
021702	4	530	685	77.37%
021702	5	1215	1360	89.34%
021800	1	0	0	0.00%
021800	2	45	50	90.00%
021800	3	85	85	100.00%
021901	1	80	1590	5.03%
021901	2	660	1410	46.81%
021901	3	220	1045	21.05%
021902	1	1635	2485	65.79%
021902	2	1765	2075	85.06%
021902	3	880	1175	74.89%
022500	1	315	760	41.45%
022500	2	1170	2100	55.71%

Source: U.S. Department of Housing and Urban Development

CDBG LMA-eligible Census Tracts (using data above)

Census Tract	Total Percentage of Low-Moderate Income Residency
217.01	74.32%
217.02	71.41%
219.02	74.63%
225	51.92%

The table above uses the HUD data (found in the table above it) to summarize those Census Tracts eligible for CDBG LMA-based activities. Currently (FYs 2015-2019), the City of Bowling Green undertakes only one LMA-based activity (Business Revolving Loan Fund Business Assistance), annually. This activity takes place within Bowling Green's Special Improvement District—located within portions of census tracts 217.01 and 217.02. The affected areas have greater than 51 percent lower-income residency. No LMA-based activities are undertaken in census tract 218 as it is not primarily residential.

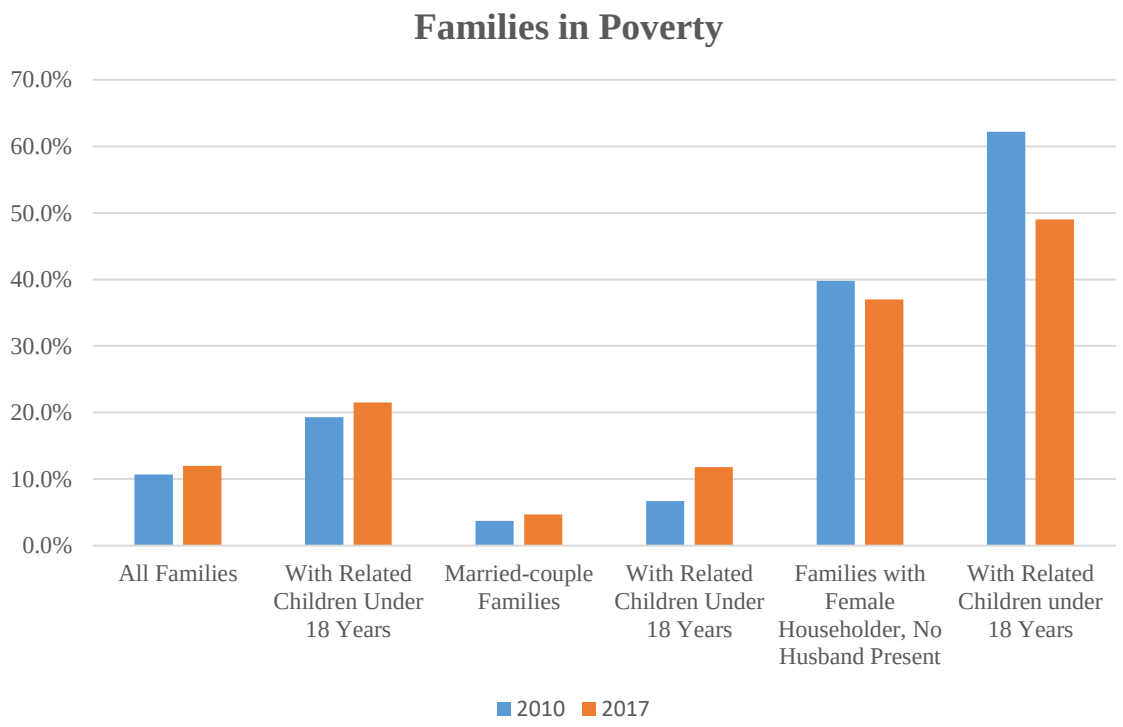


Source: https://egis.hud.gov/cpdmaps/

Lower-income census tracts are primarily located in the eastern portions of Bowling Green. There is brief overlap into the western part of the city for census tracts 217.01 and 217.02. The highest concentration of poverty is in census tract 219.02, located in the southeastern quadrant of Bowling Green.

Estimates indicate poverty has increased, locally, between 2010 and 2017. American Community Survey (ACS) estimates (2008-2010) rose from 33 % to 33.9 % (2013-2017). The number of persons under the age of 18 years also increased during the aforementioned period according to the same (ACS survey estimates). The percentage share between these timeframes dropped, however. In 2010, 528 (17.9%) persons under the age of 18 were living at or below poverty levels (2008-2010 ACS). In 2017, there were 652 (17%) persons under 18 years of age living in poverty (2013-2017 ACS).

ACS estimates indicate an increase in the percentage share of families living under the poverty level between 2010 and 2017. In 2010 (2006-2010 ACS), 10.7% of families in Bowling Green lived under the poverty level. In 2017, 12% of families lived below poverty level. Estimates show decrease in poverty levels for female householders, no husband present between 2010 and 2017. Percentage shares for female heads of households is sizeable, however, at nearly 40 percent for families living under the poverty level. For married-couple families, percentage shares have risen within the same period. The chart, below, highlights local poverty statistics for families with children.



Source: 2006-2010 and 2013-2017 ACS (S1702)

In terms of families, race and poverty status, American Community Survey (ACS) estimates provide insights into families with a householder of a specified race that are below poverty level. The table below compares estimates between 2010 and 2017. The most notable difference is found in fewer families with a householder of "Some other race" that is below the poverty level. This percentage share dropped from 100% in 2010 to 11.1% in 2017. Family households with a

"Black or African American" living below the poverty level holds the highest percentage share in 2017 at 69.3%.

Families with a Householder of a Specific Race or Ethnicity Percent Below Poverty Level

Subject	2006-2010 ACS	2013-2017 ACS
White	9.0%	10.2%
Black or African American	73.2%	69.3%
American Indian and Alaska Native	0.0%	n/a
Asian	0.0%	0.0%
Native Hawaiian and Other Pacific Islander	n/a	n/a
Some other race	1.0%	13.3%
Two or more races	100.0%	11.1%
Hispanic or Latino origin (of any race)	9.2%	15.4%
White alone, not Hispanic or Latino	8.8%	9.8%

Source: ACS 2006-2010 and 2013-2017 (S1702)

Employment

American Community Survey (ACS) estimates (2006-2010 and 2013-2017) provide a glimpse into Bowling Green's employment status during the periods. In 2010, 65.2% of the population 16 years and over was "in labor force." In 2017, the percentage share for the same rose slightly ($67.6%). In 2010, the population 16 years and over "not in labor force" was 34.8%. In 2017, that percentage share (for the same) decreased to 32.4%. The table below sets forth estimates for specifics related to those "in labor force" from both timeframes for the population aged 16 years and over. Amongst those aged 16 years and older in the civilian labor force, the percentage share for "employed" rose and "unemployed" dropped in 2017.

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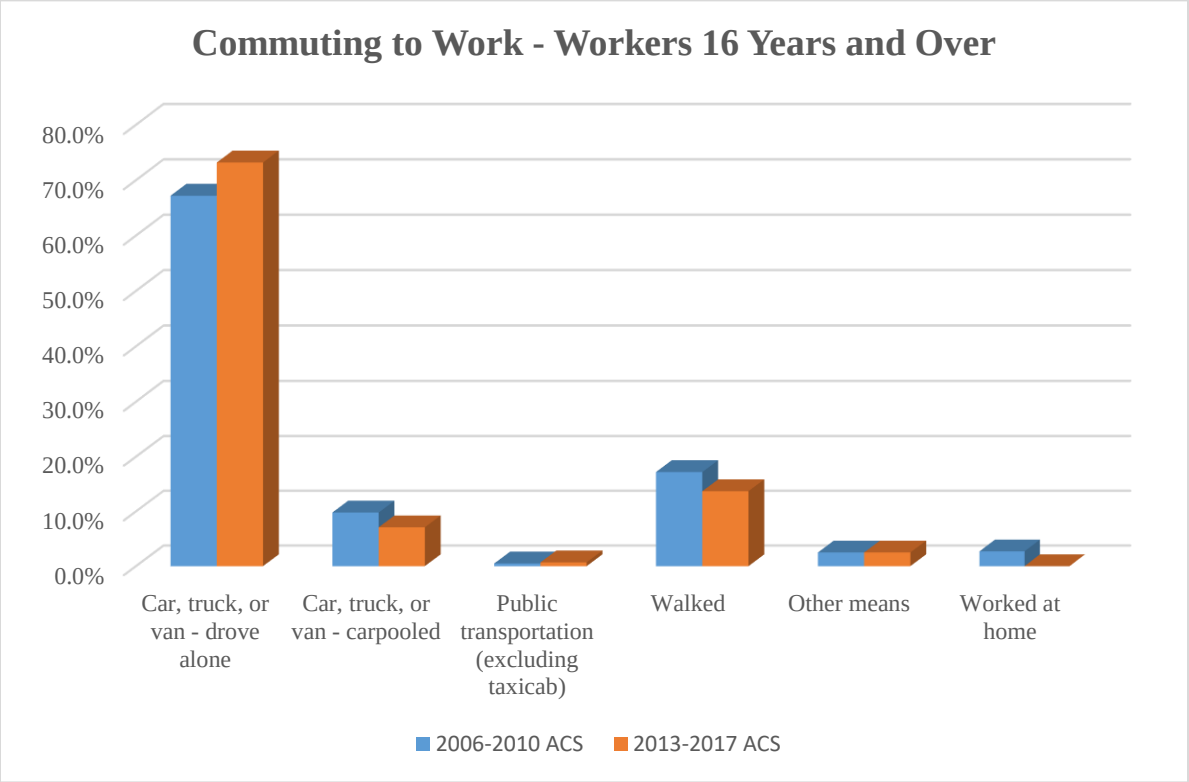
LOAN FUND

Employment Status of Population 16 Years and Over in Labor Force

Subject	2006-2010 ACS	2013-2017 ACS
Civilian labor force	65.1%	67.6%
Employed	54.5%	62.2%
Unemployed	10.7%	5.4%
Armed Forces	0.1%	0.0%

Source: ACS 2006-2010 and 2013-2017 (DP03)

ACS data (2006-2010 and 2013-2017) provides added insights on how the population commuted to work within these periods. Estimates show more workers aged 16 years and over drove alone in 2017. Estimations also indicate fewer people within this population walked or carpooled to work in 2017. Mean travel time to work (in minutes) was 15.2 for both 2010 and 2017.



Source: ACS 2006-2010 and 2013-2017 (DP03)

Some individuals utilize the local public transportation system, the B.G. Transit, to travel to and from work. The B.G. Transit is open to the public, and all of the seven transit vehicles are accessible to persons with disabilities. One of the vehicles has a mechanical lift--whereas

the other six have entry ramps. The transit operates Monday through Saturday. Half-price fares are available to persons who are age 65 or older and to those with a physician-verified disability. In 2018, the B.G. Transit provided 32,342 rides; 81 percent of those were to transport persons that qualified for elderly or disabled fare assistance.

Fares

For persons 4 to 64 years of age: **$4.00 Fare**; **$4.50** rides originating or ending outside of Bowling Green city limits.

For Seniors (65+), Disabled persons & Children ages 4-13: **$2.00 Fare; $2.25** rides originating or ending outside of Bowling Green city limits. *(Transit ID required***)*

Package fare per seat. (When packages/bags take up seat space.)**$2.00 Fare; $2.25** rides originating or ending outside of Bowling Green city limits.

Children under the age of 4, personal care attendants and language interpreters ride free.

***Applications for B.G. Transit ID cards are available at the Grants Administration Office, 304 N. Church St., Bowling Green. Please call (419) 354-6203 to schedule an appointment.

B.G. Transit operates within the city limits and one mile outside the corporation limits of Bowling Green. It's hours of operation are:

Monday through Friday
6:00 a.m. – 8:00 p.m.

Saturday
10:00 a.m. – 4:00 p.m.

No service on Sunday or Holidays

B.G. Transit Mission Statement

The mission of B.G. Transit is to provide safe, affordable, quality public transportation within the city limits of and area immediately surrounding Bowling Green, Ohio.

(Adopted August 2014)

B.G. Transit

"Public transportation for everyone!"

To schedule a ride, please call

1-800-579-4299

Please inform call taker of any assistive devices such as oxygen

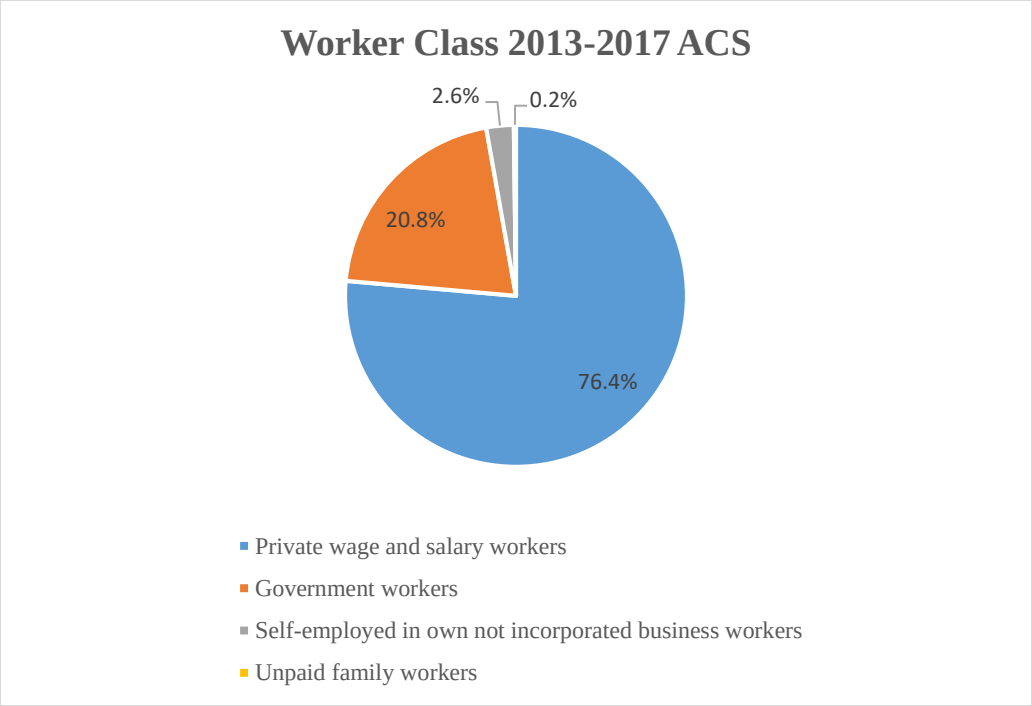
For persons with speech and/or hearing impairments, contact us through the Ohio Relay Network at:

1-800-750-0750 (hearing)
1-877-750-9097 (speech)

Please Call One Hour Before Service is Needed

All B.G. Transit vehicles are accessible to persons with disabilities.

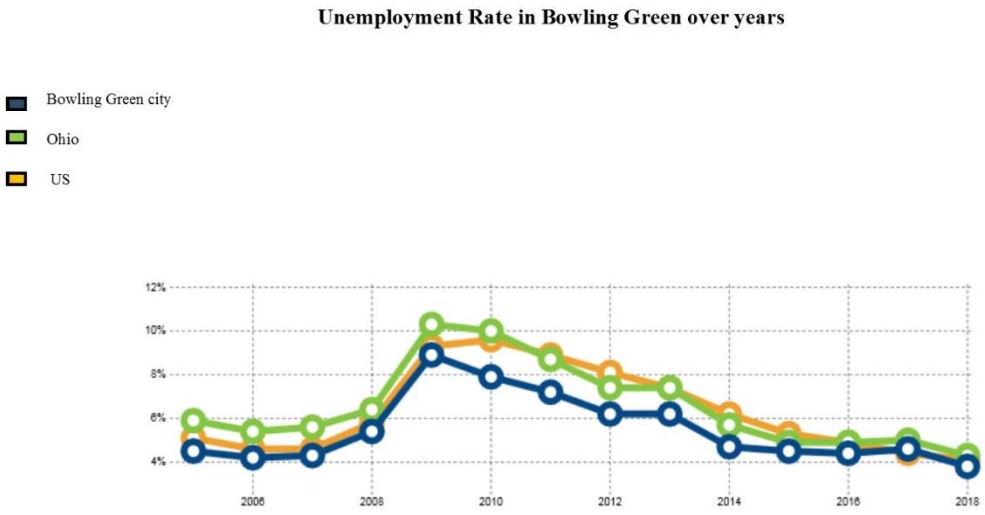
According to the 2013-2017 ACS estimates 17.6% of households receive income from Social Security. The mean Social Security income (in dollars) is $16,676. 2013-2017 ACS data also reveals an estimated 3.8% of households receive Supplemental Security Income (SSI). The mean SSI for 2017 was $7,954. ACS estimates for 2017 also indicate 9.9% of households received Food Stamp/SNAP benefits in the past 12 months.



Source: ACS 2013-2017 (DP03)

In 2017, ACS estimates indicate the presence of 17,411 civilian employed persons 16 years and over in Bowling Green. The vast majority of these individuals are private wage and salary workers. The least represented are within the category of "unpaid family workers."

Data from www.civicdashboards.com indcate the unemployment rate in Bowling Green has steadily declined following its peak in 2009. This same source sets forth an unemployment of 3.8% for the city in March 2018. Comparatively, the Ohio unemployment rate was noted at 4.3% in March 2018. The March 2018 unemployment rate ranked Bowling Green marked it as twelvth lowest unemployment in Ohio at that time. The chart below provides at glance at Bowling Green, Ohio and U.S. unemployment trends 2008-2018.



Source: http://www.civicdashboards.com/city/bowling-green-oh-16000US3907972/unemployment_rate

Housing Profile

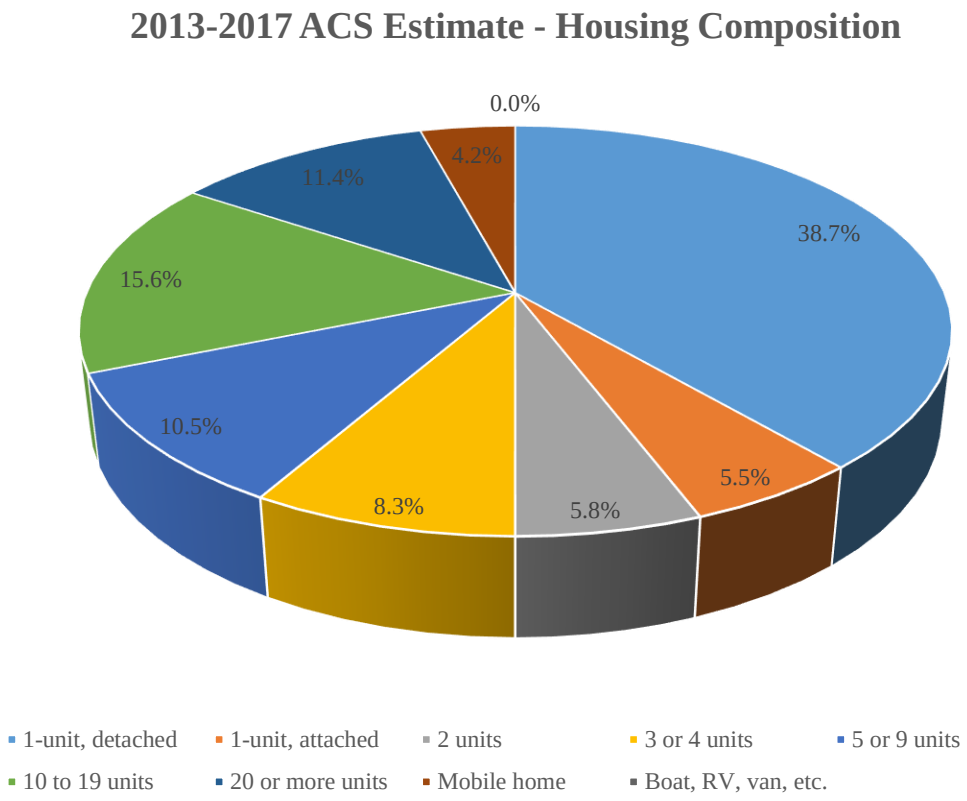
ACS estimates (2013-2017) indicate more than half (52.4%) of Bowling Green's housing stock was built prior to 1980. It is guestimated that there are 12.264 total housing units. The City's most marked period for housing starts was 1970 to 1979. The table below details the year that housing structures were built in Bowling Green as of 2017.

Year Structure Built

Year Structure Built	2013-2017 ACS Estimate	Percent
Built 2014 or later	54	0.4%
Built 2010 to 2013	88	0.7%
Built 2000 to 2009	1,817	14.8%
Built 1990 to 1999	2,064	16.8%
Built 1980 to 1989	1,811	14.8%
Built 1970 to 1979	2,110	17.2%
Built 1960 to 1969	1,353	11.0%
Built 1950 to 1959	923	7.5%
Built 1940 to 1949	323	2.6%
Built 1939 or earlier	1,721	14.0%

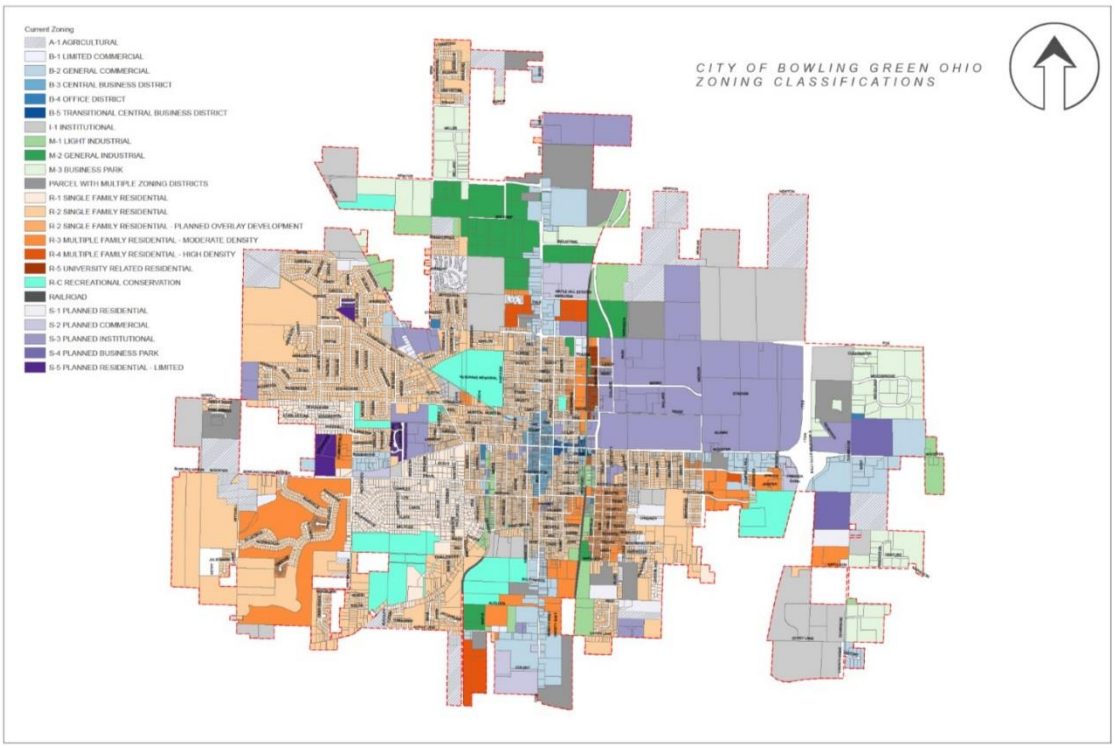
Source: ACS 2013-2017 (DP04)

The following chart lists the composition of Bowling Green's housing stock as of 2017—based on ACS estimates. The greatest representation is in 1-unit detached structures (38.7%). Mobile homes comprise 4.2% of the local housing stock.



Source: ACS 2013-2017 (DP04)

Per ACS estimates (2013-2017), there are 4,265 owner-occupied housing units in Bowling Green. Median value of these units is $164,700. This value is somewhat higher than Ohio's median housing value ($135,100) for owner-occupied units (2013-2017 ACS). Estimates (2017) show there to be 6,933 renter-occupied units in Bowling Green with median rent at $686 (lower than 2017 estimates for Ohio ($764)). The estimated local vacancy rate for 2017 is 973 (7.9%). The City of Bowling Green zoning map below includes areas zoned for housing.



Housing Costs

<u>Owner-Occupied Housing Costs</u>

American Community Survey data provides estimated costs for owner households. The median Selected Monthly Owner Costs (SMOC) for Bowling Green households with a mortgage in 2017 was $1,420. For comparison, the median SMOC for Ohio households with a mortgage in 2017 was $1,247—making Bowling Green's median SMOC nearly 13 percent higher than it was for Ohio's median cost. Bowling Green's median SMOC was $1,321 in 2010. This estimated differential in median costs, locally, is more than a seven percent increase within a seven-year timeframe. The following table illustrates mortgage status and selected monthly owner costs in 2010 and 2017 for Bowling Green.

Mortgage Status and Selected Monthly Owner Costs

Monthly Owner Cost	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Housing units with a mortgage	2,865	67.7%	2,701	63.3%
Less than $300	25	0.9%	NC	NC
$300 to $499	57	2.0%	44*	1.6%
$500 to $699	178	6.2%	NC	NC
$700 to $999	452	15.8%	521*	19.3%
$1,000 to $1,499	1,110	38.7%	961	35.6%
$1,500 to $1,999	600	20.9%	760	28.1%
$2,000 or more	443	15.5%	415	15.4%
Median (dollars)	$1,321	X	$1,420	x
Housing units without a mortgage	1,364	32.3%	1,564	36.7%
Median (dollars)	$448	X	$453	0.0%

Source: ACS 2006-2010 and 2013-2017 (DP04)

**For 2017, the U.S. Census changed the cost ranges for mortgage costs to "Less than $500" and "$500 to $999."*

HUD defines "housing cost burden" as a household that pays over 30% or more of its monthly income on housing costs. The following table illustrates housing costs as a percentage of income for owner households with a mortgage. The data is from ACS 2006-2010 and 2013-2017.

Selected Monthly Owner Costs as a Percentage of Household Income

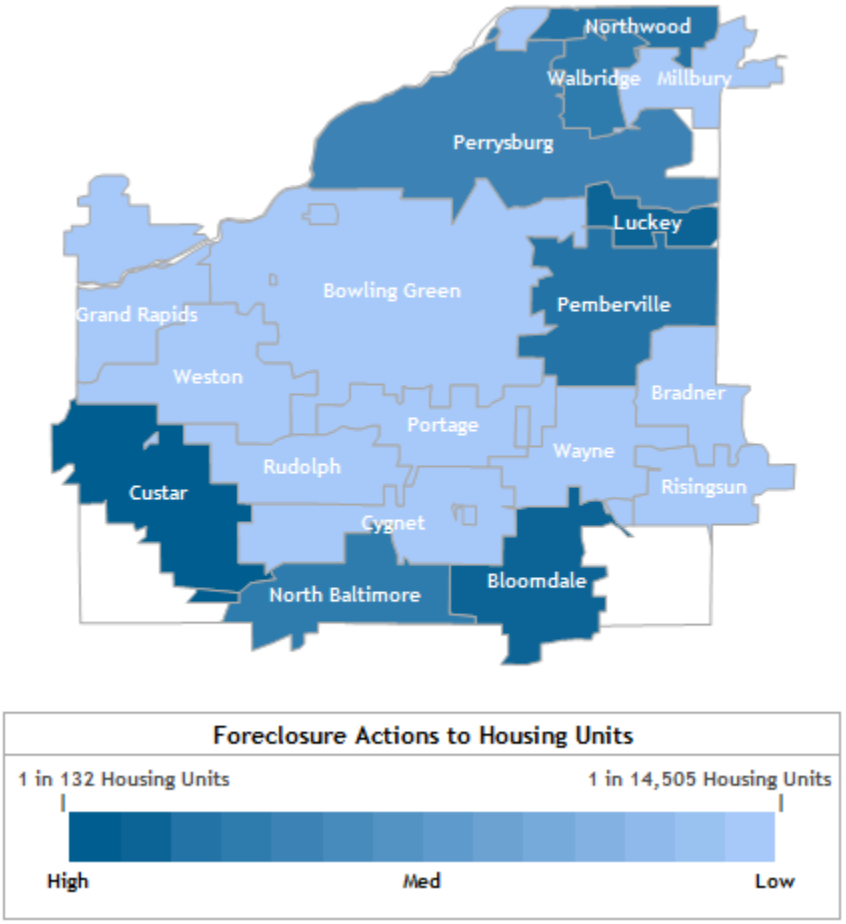
Selected Monthly Owner Costs as a % of household income (SMOCAPI)	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Housing units with a mortgage (excluding units where SMOCAPI cannot be computed)	2,865	67.7%	2,701	63.3%
Less than 20.0 percent	1,530	53.4%	1,246	46.1%
20.0 to 24.9 percent	452	15.8%	560	20.7%
25.0 to 29.9 percent	329	11.5%	288	10.7%
30.0 to 34.9 percent	106	3.7%	211	7.8%
35.0 percent or more	448	15.6%	396	14.7%
Not computed	0	X	0	x
Housing units without a mortgage (excluding units where SMOCAPI cannot be computed)	1,364	46.8%	1,552	53.2%
Less than 10.0 percent	609	44.6%	774	49.9%
10.0 to 14.9 percent	313	22.9%	282	18.2%
15.0 to 19.9 percent	198	14.5%	155	10.0%
20.0 to 24.9 percent	99	7.3%	128	8.2%
25.0 to 29.9 percent	33	2.4%	53	3.4%
30.0 to 34.9 percent	39	2.9%	51	3.3%
35.0 percent or more	73	5.4%	109	7.0%
Not computed	257	X	12	x

Source: ACS 2006-2010 and 2013-2017 (DP04)

In 2010, 19.3% of Bowling Green's owner-occupied units with a mortgage were cost burdened. In 2017, the percentage share rose to 22.5% of owner-occupied units with a mortgage being cost burdened. For owner-occupied housing units without a mortgage, 8.2% were cost burdened in 2010. In 2017, the estimated percentage share for this cohort rose to 10.3%.

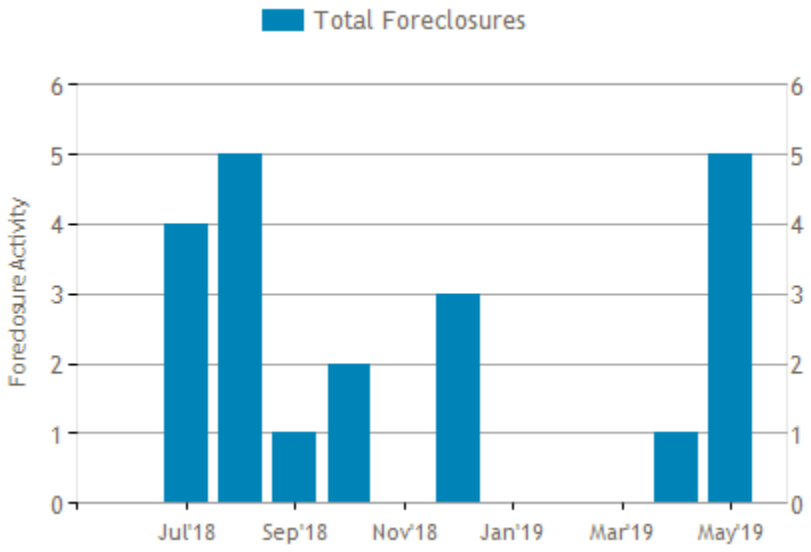
Foreclosures

According to RealtyTrac, Bowling Green (corporation limits) had eight properties in some stage of foreclosure in April 2019. The map below indicates Bowling Green is relatively low in foreclosure actions compared with some other communities within Wood County, Ohio. Wood County has a foreclosure rate of one in every 3,477 housing units. Bowling Green has a foreclosure rate of one in every 14,505.



Source: www.realtytrac.com

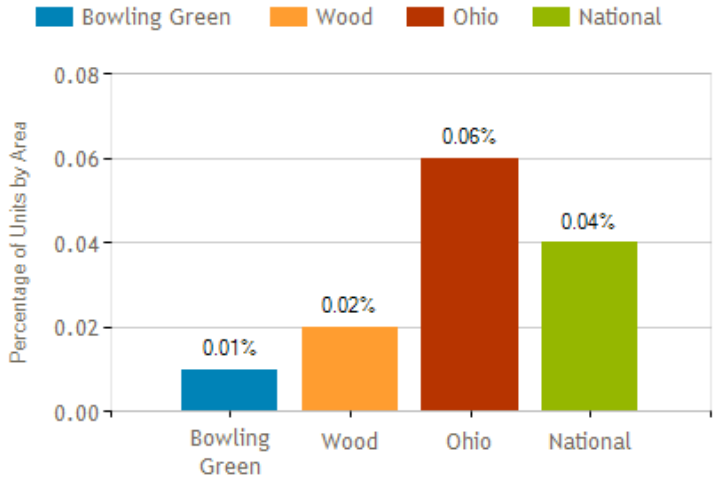
Bowling Green Foreclosure Trends July 2018 to May 2019



Source: www.realtytrac.com

RealtyTrac also provided insights into Bowling Green foreclosure trends within the last year. This data included total foreclosures for May 2019, which appears to be one of the highest months for foreclosures since July 2018. Comparatively, Bowling Green still ranks lower (at 0.01%) than Wood County, Ohio and the nation for foreclosures within the same timeframe.

Foreclosure Trends July 2018 to May 2019



Source: www.realtytrac.com

Renter-Occupied Housing Costs

The supply of occupied rental housing in Bowling Green increased between 2010 and 2017 according to ACS estimates by 537 units. In 2010, there were 6,396 occupied rental units. In 2017, there were 6,933 occupied rental units. Median monthly rental costs increased as well during these two periods. In 2010, the median monthly rent was $598. In 2017, median monthly rent rose to $686 (over 13% increase). The following table estimates rental rates within Bowling Green according to 2006-2010 and 2013-2017 ACS data.

Gross Monthly Rent for Occupied Units

	2006-2010 ACS		2013-2017 ACS	
Subject	**Estimate**	**Percentage**	**Estimate**	**Percentage**
Occupied units paying rent	6,396	X	6,933	x
Less than $200	257	4.0%	NC	NC
$200 to $299	231	3.6%	NC	NC
$300 to $499	1,374	21.5%	1,193*	17.2%
$500 to $749	2,895	45.3%	NC	NC
$750 to $999	941	14.7%	4,323*	62.4%
$1,000 to $1,499	485	7.6%	1,017	14.7%
$1,500 or more	213	3.3%	400*	5.7%
Median (dollars)	$598	X	$686	x
No rent paid	147	X	93	x

Source: ACS 2006-2010 and 2013-2017 (DP04)

**For 2017, the U.S. Census changed the cost ranges for rental rates to "Less than $500" and "$500 to $999."*

The following table illustrates the housing costs for renter-households according to the 2006-2010 and 2013-2017 American Community Survey.

Gross Rent as a Percentage of Household Income (GRAPI)

Subject	2006-2010 ACS		2013-2017 ACS	
	Estimate	Percentage	Estimate	Percentage
Occupied units paying rent (excluding units where GRAPI cannot be computed)	6,286	x	6,720	x
Less than 15.0 percent	641	10.2%	597	8.9%
15.0 to 19.9 percent	646	10.3%	574	8.5%
20.0 to 24.9 percent	798	12.7%	770	11.5%
25.0 to 29.9 percent	619	9.8%	626	9.3%
30.0 to 34.9 percent	374	5.9%	593	8.8%
35.0 percent or more	3,208	51.0%	3,560	53.0%
Not computed	257	x	306	x

Source: ACS 2006-2010 and 2013-2017 (DP04)

HUD defines "housing cost burden" as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 57% of renter households were cost burdened. In 2017, that percentage share rose—with 61.8% of renter households being cost burdened.

The 2018 HUD Fair Market Rents for Bowling Green are shown below.

FY 2019 Fair Market Rents (FMR)

Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
$477	$560	$727	$994	$1,094

Source U.S. Department of Housing and Urban Development

Fair Market Rents (FMRs) primarily determine payment standard amounts for HUD-assisted housing. Wood County, Ohio (and Bowling Green) is part of the Toledo, OH MSA, which consists of the following Ohio counties: Fulton, Lucas, and Wood. The 2017 median rent (per ACS estimates) is $686.

Household Housing Problems

Summary of Housing Needs

Estimates from ACS data indicate from 2010 until 2017 the population of Bowling Green increased by 4.9%, and total households grew by 2.7%. ACS data notes median household income increased from $32,792 in 2010 to $33,794 in 2017—an increase of only 3%. According to the American Institute of Economic Research's Cost of Living Calculator (www.aier.org/cost-living-calculator), this increase falls short 8.68%. The Calculator reveals that $32,792 (in 2010) would need to have risen to $36,861.98 (in 2017) to have increased in harmony with the cost of living.

This mere 3% increase in the median household income is concerning in relation to monthly housing costs—for both owners and renters, locally. ACS estimates between 2010 and 2017 reveal monthly mortgage costs rose 4.02%. Even more shocking, gross monthly median rents increased 13.71% between 2010 and 2017.

The table below summarizes U.S. Department of Housing and Urban Development (HUD) Comprehensive Housing Affordability Strategy (CHAS) data. It is based on 2012-2016 American Community Survey 5-year Estimates. These tables disaggregate households and housing problems based on the HUD area's median household income (HAMFI).

Income Distribution Overview

Income Distribution Overview	Owner	Renter
Household Income less-than or= 30% HAMFI	160	2,860
Household Income>30% to less-than or= 50% HAMFI	285	1,330
Household Income>50% to less-than or= 80% HAMFI	420	1,210
Household Income>80% to less-than or= 100% HAMFI	515	445
Household Income >100% HAMFI	3,050	985

Source: CHAS Summary Level Data, Bowling Green, OH 2012-2016 ACS

Per this data, nearly 20 percent (20%) of housing owners in Bowling Green are at or below 80% of the HUD Area Median Family Income (HAMFI). Renters fared far worse. Estimates show 79 percent (79%) of Bowling Green's renters are at or below poverty level. Renters also comprise a greater share of the population as a whole.

Number of Households Table

Subject	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	2,865	1,435	1,770	930	4,170
Small Family Households	490	345	410	325	1,740
Large Family Households	10	10	50	25	300
Household contains at least one person 62-74 years of age	65	69	240	130	925
Household contains at least one person age 75 or older	90	135	215	110	300
Households with one or more children 6 years old or younger	290	225	193	135	410

Source: 2011-2015 CHAS

CHAS data for 2012-2016 was not available for the number and types of households by income level. As a result, the City referred to 2011-2015 CHAS data. The data above provide estimates on the number of households related to income (HAMFI) and type. As noted above, the majority of households (79.7%) are at lower-income levels. Small family households make up the greatest percentage share (29.6%); whereas large family households are the least represented (3.5%).

On August 5, 2019 HUD released updated CHAS data for the 2012-2016 period. CHAS 2012-2016 data provides insights into Bowling Green's most pressing housing-related matters. These data are in a series of tables, displayed on the new few pages of this Analysis.

According to HUD, "The primary purpose of the CHAS data is to demonstrate the number of households in need of housing assistance. This is estimated by the number of households that have certain housing problems and have income low enough to qualify for HUD's programs (primarily 30, 50, and 80 percent of median income). It is also important to consider the prevalence of housing problems among different types of households, such as the elderly, disabled, minorities, and different household types. The CHAS data provide counts of the numbers of households that fit these HUD-specified characteristics in HUD-specified geographic areas (https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html)."

2012-2016 CHAS Data - Housing Problems Overview			
Issue	**Owner**	**Renter**	**Total**
Household has at least 1 of 4 housing problems	625	4,125	**4,750**
Household has none of 4 housing problems	3,775	2,500	**6,275**
Cost burden not available, no other problems	25	200	**225**
Total	**4,425**	**6,825**	**11,250**

Source: https://www.huduser.gov/portal/datasets/cp.html

The table above demonstrates renters own the greatest share of housing problems, locally. According to CHAS 2012-2016 data, 4,125 renter households (nearly 37% of all households) has at least one of four identified housing problems. The four housing problems are incomplete kitchens, incomplete plumbing facilities, more than one person per room and cost burden greater than 30 percent (30%).

2012-2016 CHAS Data - Severe Housing Problems Overview			
Issue	**Owner**	**Renter**	**Total**
Household has at least 1 of 4 housing problems	150	2,935	**3,085**
Household has none of 4 housing problems	4,250	3,690	**7,940**
Cost burden not available, no other problems	25	200	**225**
Total	**4,425**	**6,825**	**11,250**

Source: https://www.huduser.gov/portal/datasets/cp.html

The data above shows, Once again, renter households are most affected. At least 2,935 renter households (26% of all households) has at least one of four severe housing problems. The four severe housing problems are incomplete kitchens, incomplete plumbing facilities, more than one person per room and cost burden greater than 50 percent (50%).

2012-2016 CHAS Data - Housing Cost Burden Overview			
Issue	**Owner**	**Renter**	**Total**
Cost Burden less-than or equal-to 30%	3,775	2,600	**6,375**
Cost Burden >30% to less-than or equal-to 50%	480	1,320	**1,800**
Cost Burden >50%	138	2,710	**2,848**
Cost Burden not available	25	200	**225**

Source: https://www.huduser.gov/portal/datasets/cp.html

This table conveys renters with severe housing cost burden (cost burden >50%) are most impacted (2,710 households). Second highest affectedness is renters with housing cost burden (1,320 households). Per the website listed above, cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payments, utilities, association fees, insurance and real estate taxes. This data conveys 4,648 of all households (41 percent of all households) experience cost burden or severe cost burden. It also informs that housing affordability—not issues related to housing condition or overcrowding—represent the vast majority of problems represented in the preceding CHAS data.

The table directly below displays CHAS Data sorted by income and by Housing Problems (for renters and owners). The most affected income category is less-than or equal-to 30 percent (30%) of the HUD Area Median Family Income (HAMFI) level (extremely low-income level). These households report at least one of four housing problems. Second most impacted cohort

(has at least one of four housing problems) are households at greater-than 30 percent (30%) and less-than 50 percent (50%) of HAMFI (very-low income level). As noted above, the most represented issue is housing cost burden or severe cost burden.

2012-2016 CHAS Data - Income by Housing Problems (Renters and Owners)			
Cohort	**Household has at least 1 of 4 housing problems**	**Household has none of 4 housing problems**	**Cost Burden not available**
Household Income less-than or equal-to 30% HAMFI	2,630	155	225
Household Income >30% to less-than 50% HAMFI	1,145	465	0
Household Income >50% to less-than 80% HAMFI	495	1,130	0
Household Income >80% to less-than 100% HAMFI	250	710	0
Household Income > 100% HAMFI	230	3,800	0

Source: https://www.huduser.gov/portal/datasets/cp.html

2012-2016 CHAS Data - Income by Housing Problems (Renters Only)			
Cohort	**Household has at least 1 of 4 housing problems**	**Household has none of 4 housing problems**	**Cost Burden not available, no other housing problem**
Household Income less-than or equal-to 30% HAMFI	2,530	125	200
Household Income >30% to less-than 50% HAMFI	1,040	285	0
Household Income >50% to less-than 80% HAMFI	390	820	0
Household Income >80% to less-than 100% HAMFI	55	390	0
Household Income > 100% HAMFI	110	875	0

Source: https://www.huduser.gov/portal/datasets/cp.html

The CHAS data displayed above demonstrates renter households at or less than 30 percent (30%) of the HAMFI represent the highest share of housing problems. The Housing Cost Burden Overview table (above) documents housing affordability to be the most cited housing problem.

2012-2016 CHAS Data - Income by Housing Problems (Owners Only)			
Cohort	**Household has at least 1 of 4 housing problems**	**Household has none of 4 housing problems**	**Cost Burden not available, no other housing problem**
Household Income less-than or equal-to 30% HAMFI	100	30	25
Household Income >30% to less-than 50% HAMFI	105	180	0
Household Income >50% to less-than 80% HAMFI	105	310	0
Household Income >80% to less-than 100% HAMFI	195	320	0
Household Income > 100% HAMFI	120	2,925	0

Source: https://www.huduser.gov/portal/datasets/cp.html

Per the table above, owner households represent only 39 percent of all households in Bowling Green. Of those owner households, seven percent (7%) are at lower incomes and has at least one of the four noted housing problems.

The table below displays CHAS cost burden data by income. The data represents owner and renter households. The most affected income category is households at the extremely low-income level (at or below 30% of the HAMFI). The total impact is 4,920 affected households (44% of total households locally). This number and percentage share includes the data for cost burdened and severe cost burdened households at this income level. The breakdown between cost burdened and severe cost burdened is somewhat comparable, with cost-burdened households slightly higher in number.

Also of marked impact, are cost-burdened households at greater than 30 percent (30%) and less than or equal to 50 percent (50%) of the HAMFI. At 1,145 affected households, 10 percent (10%) of all households are impacted.

2012-2016 CHAS Data - Income by Cost Burden (Owners and Renters)		
Cohort	**Cost burden > 30%**	**Cost burden > 50%**
Household Income less-than or equal-to 30% HAMFI	2,625	2,295
Household Income >30% to less-than 50% HAMFI	1,145	495
Household Income >50% to less-than 80% HAMFI	470	55
Household Income >80% to less-than 100% HAMFI	245	0
Household Income > 100% HAMFI	159	4
Total	4,644	2,849

Source: https://www.huduser.gov/portal/datasets/cp.html

The final two (following) tables display CHAS cost burden data broken out by renter and owner households. Like the table above, these two tables convey the income levels of affected households.

2012-2016 CHAS Data - Income by Cost Burden (Renters Only)		
Cohort	**Cost burden > 30%**	**Cost burden > 50%**
Household Income less-than or equal-to 30% HAMFI	2,525	2,220
Household Income >30% to less-than 50% HAMFI	1,045	440
Household Income >50% to less-than 80% HAMFI	360	50
Household Income >80% to less-than 100% HAMFI	55	0
Household Income > 100% HAMFI	45	0

Source: https://www.huduser.gov/portal/datasets/cp.html

Renter households at or below 30 percent of the HAMFI are most affected by both cost and severe cost burden. Additionally, a significant number of households at the very low-income level are cost burdened.

2012-2016 CHAS Data - Income by Cost Burden (Owners Only)		
Cohort	**Cost burden > 30%**	**Cost burden > 50%**
Household Income less-than or equal-to 30% HAMFI	100	75
Household Income >30% to less-than 50% HAMFI	105	55
Household Income >50% to less-than 80% HAMFI	104	4
Household Income >80% to less-than 100% HAMFI	195	0
Household Income > 100% HAMFI	114	4

Source: https://www.huduser.gov/portal/datasets/cp.html

Owner households affected by cost and severe cost burden are fewer than those that rent. Renter households do outnumber owner households, though. Those at lower-income levels (less than 80% HAMFI) experience cost burden at similar rates to those at higher income levels.

The latest CHAS data did not present data related to crowding. CHAS data 2011-2015 provides some insight into this housing problem.

Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	**>30-50% AMI**	**>50-80% AMI**	**>80-100% AMI**	**Total**	**0-30% AMI**	**>30-50% AMI**	**>50-80% AMI**	**>80-100% AMI**	**Total**
NUMBER OF HOUSEHOLDS										
Single family households	85	0	10	0	**95**	0	0	0	0	**0**
Multiple, unrelated family households	0	0	10	0	**10**	0	0	0	0	**0**
Other, non-family households	10	10	10	0	**30**	0	0	0	0	**0**
Total need by income	95	10	30	0	**135**	0	0	0	0	**0**

Source: 2011-2015 CHAS

Crowding is minimal. This is most notable when comparing the data with the cost burden data noted in the tables above. The CHAS data below shows no crowding noted for housing with children present.

Crowding, Households with Children Present

	Renter				Owner			
	0-30% AMI	**>30-50% AMI**	**>50-80% AMI**	**Total**	**0-30% AMI**	**>30-50% AMI**	**>50-80% AMI**	**Total**
Households with Children Present	0	0	0	**0**	0	0	0	**0**

Source: 2011-2015 CHAS

CHAS data (2011-2015) clearly shows the largest housing problem in Bowling Green is housing affordability. Per the data, nearly 68% of lower-income renter households are cost burdened (greater than 30% cost burden) and almost 46% are severely cost burdened (greater than 50%). Most represented are those at extremely low-income levels (0-30% AMI)--in both instances.

In summary, 2012-2016 CHAS data reveals issues where lower-income owner households are concerned. In viewing owner households, only 19.5 percent (19.5%) are at lower-income levels. This is likely due to lack of affordability. Amongst lower-income owner households, almost 36 percent (36%) are cost burdened and 15 percent (15%) are severely cost burdened. Housing consultations and public surveys also cite "housing affordability" most often as Bowling Green's greatest housing concern. See Appendix A for survey and consultation (stakeholder) results.

Housing Problems – Race and Ethnicity

CHAS 2012-2016 data was not available for housing problems related to race and ethnicity. As a result, the Grants Administrator used CHAS 2011-2015 data to analyze housing needs disaggregated by racial and ethnic cohorts to determine if a racial or ethnic group disproportionately experienced a housing need as compared to Bowling Green's housing needs overall. Bowling Green defines a "disproportionately greater representation" as follows: when the members of a racial or ethnic group experience a housing problem at a greater rate (10% or more) than the jurisdiction as a whole for the income level.
CHAS definitions for housing problems are as follows:

- Housing lacks complete kitchen facilities;
- Housing lacks complete plumbing facilities;
- Housing has more than one person per room; and
- Housing cost burden is over 30%.

The following tables identify the housing problems for Bowling Green. Disproportionate needs display bolded percentage levels.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation
Jurisdiction as a whole	2,440	185	235	92.95%
White	2,100	160	110	92.92%
Black/African American	145	10	65	93.55%
Asian	10	0	50	100.00%
American Indian, Alaska Native	0	10	4	0.00%
Pacific Islander	0	0	0	n/a
Hispanic	125	0	0	100.00%

Source: 2011-2015 CHAS

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation
Jurisdiction as a whole	1,010	420	0	70.63%
White	845	410	0	67.33%
Black/African American	95	0	0	**100.00%**
Asian	10	0	0	**100.00%**
American Indian, Alaska Native	0	0	0	n/a
Pacific Islander	0	0	0	n/a
Hispanic	65	10	0	**86.67%**

Source: 2011-2015 CHAS

EQUAL HOUSING OPPORTUNITY

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation
Jurisdiction as a whole	680	1,090	0	38.42%
White	650	1,015	0	39.04%
Black/African American	10	20	0	33.33%
Asian	0	35	0	0.00%
American Indian, Alaska Native	0	0	0	n/a
Pacific Islander	0	0	0	n/a
Hispanic	0	4	0	0.00%

Source: 2011-2015 CHAS

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation
Jurisdiction as a whole	205	725	0	22.04%
White	185	575	0	24.34%
Black/African American	0	0	0	n/a
Asian	0	25	0	0.00%
American Indian, Alaska Native	0	0	0	n/a
Pacific Islander	0	0	0	n/a
Hispanic	20	60	0	25.00%

Source: 2011-2015 CHAS

0%-30% AMI

Several cohorts (Asian and Hispanic) recorded 100% "disproportionate need calculations for households in this income category. However, since 92.95% of the jurisdiction as a whole for this income level indicated one or more housing problems, there were no households 10% or greater in share. Hence, there were no disproportionate needs calculated for this income level.

30%-50% AMI

Three disproportionate needs are within this income category: Black/African American (100%), Asian (100%) and Hispanic (86.67%). These cohorts record at least one housing problem and are 10% or greater than the jurisdiction as a whole (70.63%).

50%-80% AMI and 80%-100% AMI

There are no disproportionate needs noted at the 50%-80% AMI or 80% to 100% AMI income levels.

Severe Housing Problems – Race and Ethnicity

The Grants Administrator analyzed housing needs disaggregated by racial and ethnic cohorts (using CHAS 2011-2015 data) to determine if a racial or ethnic group disproportionately experienced a severe housing need as compared to Bowling Green's housing needs overall. Bowling Green defines a "disproportionately greater representation" as follows: when the members of a racial or ethnic group experience a housing problem at a greater rate (10% or

more) than the jurisdiction as a whole for the income level. CHAS definitions for housing problems are as follows:

- Housing lacks complete kitchen facilities;
- Housing lacks complete plumbing facilities;
- Housing has more than one person per room; and
- Housing cost burden is over 30%.

The following tables identify the severe housing problems for Bowling Green. Disproportionate needs display bolded percentage levels. A summary of disproportionate needs follows these tables and is broken out by income level.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation
Jurisdiction as a whole	2,320	305	235	88.38%
White	1,995	270	110	88.08%
Black/African American	130	25	65	83.87%
Asian	10	0	50	**100.00%**
American Indian, Alaska Native	0	10	4	0.00%
Pacific Islander	0	0	0	n/a
Hispanic	125	0	0	**100.00%**

Source: 2011-2015 CHAS

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation
Jurisdiction as a whole	420	1,015	0	29.27%
White	380	880	0	30.16%
Black/African American	30	60	0	33.33%
Asian	10	0	0	**100.00%**
American Indian, Alaska Native	0	0	0	n/a
Pacific Islander	0	0	0	n/a
Hispanic	0	75	0	0.00%

Source: 2011-2015 CHAS

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation
Jurisdiction as a whole	120	1,650	0	6.78%
White	120	1,545	0	7.21%
Black/African American	0	30	0	0.00%
Asian	0	35	0	0.00%
American Indian, Alaska Native	0	0	0	n/a
Pacific Islander	0	0	0	n/a
Hispanic	0	4	0	0.00%

Source: 2011-2015 CHAS

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems	Disproportionate need calculation
Jurisdiction as a whole	10	920	0	1.08%
White	10	750	0	1.32%
Black/African American	0	0	0	n/a
Asian	0	25	0	0.00%
American Indian, Alaska Native	0	0	0	n/a
Pacific Islander	0	0	0	n/a
Hispanic	0	80	0	0.00%

Source: 2011-2015 CHAS

0%-30% AMI

Two disproportionate needs are within this income category. The affected cohorts and percentage levels are Asian (100%) and Hispanic (86.67%). These cohorts record at least one housing problem and are 10% or greater than the jurisdiction as a whole (88.38%).

30%-50% AMI

One disproportionate need is within this income category. The affected cohort and percentage level is Asian (100%). The cohort records at least one housing problem and is 10% or greater than the jurisdiction as a whole (29.27%).

50%-80% AMI and 80%-100% AMI

There are no disproportionate needs noted at the 50%-80% AMI or 80% to 100% AMI income levels.

Cost Burden – Race and Ethnicity

CHAS 2012-2016 data was not available for cost burden related to race and ethnicity. CHAS data (2011-2015) provided insights into cost burden status in relation to race and ethnicity. The table below displays the CHAS data as well as calculations related disproportionate need. Bowling Green defines a "disproportionately greater representation" as follows: when the members of a racial or ethnic group experience a housing problem at a greater rate (10% or more) than the jurisdiction as a whole for the income level. Those categories affected by disproportionate housing cost burden are bolded.

Housing Cost Burden

Housing Cost Burden	<=30% (not cost burdened)	30-50% (cost burdened)	>50% (severe cost burdened)	No / negative income (not computed)	% Cost Burdened	% Severely Cost Burdened
Jurisdiction as a whole	6,375	1,815	2,734	235	16.61%	25.03%
White	5,725	1,555	2,430	110	16.01%	25.03%
Black / African American	190	145	105	65	**32.95%**	23.86%
Asian	105	10	14	50	7.75%	10.85%
American Indian, Alaska Native	10	0	0	4	0.00%	0.00%
Pacific Islander	0	0	0	0	n/a	n/a
Hispanic	265	85	125	0	17.89%	26.32%

Source: 2011-2015 CHAS

The data reveals Black/African American households experience disproportionate housing cost burden (30-50%). No other cohorts are affected by housing cost burden or severe housing cost burden (>50%).

III. REVIEW/UPDATE TO ORIGINAL PLAN 2015-2019

Bowling Green's current Analysis of Impediments to Fair Housing Choice was certified in May 2015. The City reviews its progress in addressing the goals of the AI at least quarterly each year. The review periods both coincide with the City's preparation of the Community Development Block Grant (CDBG) Annual Action Plan and the Consolidated Annual Performance Evaluation Report (CAPER). The City of Bowling Green's FY 2015-2019 Analysis of Impediments to Fair Housing Choice identified the following impediments as well as created goals and strategies to address each barrier.

FY 2015-2019 Summary of Impediments, Goals and Strategies

Impediment 1: Fair Housing Education and Outreach

There continues to be a need to educate the public of their rights under the Fair Housing Act and to raise community awareness of affirmatively furthering fair housing choice. This is especially important for residents at lower income levels, persons with minority status and those with disabilities. A few of our survey respondents indicated there are instances of racial steering, so special emphasis will be placed on ensuring all understand the illegality of such practices.

Goal: Improve the knowledge and awareness of both the public and the local officials of the Fair Housing Act, related laws, regulations and requirements of affirmatively furthering fair housing.

Strategy: The Fair Housing Office will continue to make no less than one Fair Housing presentation to the Wood County Realtor Charter (formerly known as the Wood County Board of Realtors), annually. Said presentation will include added emphasis on the illegality of racial/ethnic steering.

Strategy: The Fair Housing Officer will continue to make no less than one Fair Housing presentation to the Wood County Apartment Owners' Association, annually. Said presentation will include added emphasis on the illegality of racial/ethnic steering.

Strategy: The Fair Housing Officer will ensure all public presentations include specific information related to the issue of racial/ethnic steering to include information regarding how the public can report illegal actions.

Strategy: The Fair Housing Office will ensure at least four of the Fair Housing advertisements placed in local newspapers (annually) address the illegality of racial/ethic steering and how the public can report illegal actions.

Strategy: Fair Housing Officer to monitor local newspaper advertising related to rental housing and address any discriminatory issues revealed on weekly basis throughout FYs 2015-2019.

Strategy: Fair Housing Officer to distribute supply of Fair Housing Program brochures to all agencies participating in the "No Wrong Door" program and Bowling Green Housing Agency on or before December 31, 2015. Make contact with above-noted agencies before April 30 (annually) to assess replenishment needs. Where needed, replenish stock on or before July 31 (annually).

Strategy: Fair Housing Officer to continue to ensure Fair Housing Program brochures are on display in the City Administration Building and Utilities Office throughout FYs 2015-2019.

Strategy: Fair Housing Officer to make no fewer than six Fair Housing training presentations (annually during FYs 2015-2019). Of the six annual presentations, three are for predominantly lower-income audiences. Fair Housing Officer is to provide quarterly status updates to the Grants Administrator to include when, where, how many attended and the training agenda. The Housing Specialist will maintain on file the agenda, sign-in sheet and other relevant data.

Strategy: Fair Housing Officer to provide and distribute approximately **500** brochures describing Fair Housing Program, on or before June 30 (annually) at various locations serving low- and moderate-income persons.

Strategy: Fair Housing Officer to prepare and place public service announcements and advertising which addresses fair housing guidelines on no less than a quarterly basis throughout FYs 2015-2019. Perform no less than a quarterly review of the City's Fair Housing web page to ensure links are working and information on said site is up to date.

Strategy: Fair Housing Officer to communicate no less than annually with representatives from La Conexion and Bowling Green State University International Student Services in an effort to raise awareness of Fair Housing Program's existence/role and gauge ongoing public needs. The Fair Housing Officer is encouraged to expand upon the list of local advocacy organizations and include them in annual outreach efforts. The Fair Housing Officer will also attend all scheduled Human Relations Commission meetings.

Impediment 2: Economic Pressures

Housing cost burden amongst both renter and homeowner households (0-80% Area Median Income) is highly present (2007-2011 CHAS data). CHAS data set forth numbers affected by four severe housing problems: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%. Looking more closely at the data broken out, housing cost burden is the most predominant issue. Evidence of disproportionate housing needs is also present. For example, persons that are Hispanic and at the 0-30% Area Median Income (AMI) level have a disproportionately greater need. One hundred percent of persons who are Asian at the 50-80% AMI income level have a disproportionately greater need regarding severe housing problems.

Interestingly, local Gross Median Rent is lower in Bowling Green than it is, on average, statewide. This indicates economic pressures play a role in creating housing cost burden.

Unemployment rates are much higher in Bowling Green than they are (on average) statewide; making unemployment and under-employment a likely suspect for the high number of renter households (most especially at low-moderate income levels) facing cost burden and severe cost burden. Housing cost burden is widespread, locally. Most affected are low-moderate income renter households. The City's high unemployment and poverty rates (both higher than they are (on average) statewide are suspected to be the most contributory as the Median Gross Rent, locally, is lower than it is statewide.

Goal: Provide mechanisms to improve housing affordability for households at lower income levels.

Strategy: Utilizing the Business Revolving Loan Fund (RLF), the City of Bowling Green will continue to offer Business Assistance Loans to businesses located in the Special Improvement District, which spans two of the City's low-moderate income census tracts (217.01 and 217.02). Annual goals are set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period.

Strategy: The City of Bowling Green will continue to offer the CDBG-funded Rental Rehabilitation Program. This program improves the decency and affordability of rental housing for persons with low and moderate incomes. Fair Market Rent rates will be the standard applied to provide these already cost-burdened households some reprieve. Annual goals are set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period.

Strategy: The City of Bowling Green will utilize the Business Revolving Loan Fund (established through CDBG revenues) as a mechanism to create jobs for persons with lower incomes. Annual goals are set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period.

Impediment 3: Lack of Affordable Rental Units for Families and Persons with Disabilities

There is a lack of availability of affordable and publicly supported units with two or more bedrooms. A short of units that are accessible to persons with disabilities also exists.

Consultations with the local Continuum of Care representative, various individuals from agencies serving persons that primarily have lower incomes, and the director of the local Section 8 Housing Choice Voucher (HCV) Program, all reveal there is a lack of affordable housing units; including those with two or more bedrooms. The Section 8 director also indicated 63% of the households participating in the program are those with disabilities, and 50% of the households currently on the HCV program waiting list have disabilities.

Goal: Increase the availability of affordable rental units with two or more units and units accessible to persons with disabilities.

Strategy: The City of Bowling Green will continue to provide letters of support, proclamations and other assistance to entities seeking funding for publicly supported accessible housing, annually.

Strategy: The City of Bowling Green Housing Specialist will encourage property owners participating in the CDBG-funded Rental Rehabilitation Program to include accessibility modifications to addressed units where possible and to foster dialogues between rental property owners and representatives of the Section 8 Housing Choice Voucher Program, annually.

Impediment 4: Housing Stock Deterioration

Both renters and homeowners at every lower-income level (0-80% AMI) have documented housing needs (related to housing decency). Also, at every income category (0-100% Area Median Income (AMI)), there were noted instances of disproportionate housing needs recorded for racial/ethnic minority categories (2007-2011 CHAS Data).

Goal: Improve access to decent housing for persons at lower income levels.

Strategy: The City of Bowling Green will continue to implement the following Community Development Block Grant (CDBG)-funded programs (addressing the housing decency needs of persons with low and moderate incomes): Home Repair, Mobile Home Repair, and Elderly Home Repair. Annual goals (for each program activity) are set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period.

Strategy: The City of Bowling Green will continue to implement programming through the Housing Revolving Loan Fund (established from prior Community Housing Improvement Program grants). All programs solely benefit persons with low and moderate incomes. Programs include Down-payment assistance/Rehabilitation and Owner-Occupied Rehabilitation. Program income on this fund is contingent upon recapture of funds from the properties that have been addressed (through said programming) in the past. As a result, the fund balance fluctuates; making it difficult to target how many properties can be addressed within a giving calendar year. The City anticipates that CDBG funds will address no less than two properties annually (if funding levels permit) and more will be if possible.

Impediment 5: Lack of Access to Public Housing, HCV Program, LIHTC Housing or Supportive, Integrated Housing

Goal: Increase local access to public housing, HCV program, LIHTC housing or supportive, integrated housing.

Strategy: The City of Bowling Green will continue to provide letters of support, proclamations and other assistance to entities seeking funding for publicly-supported accessible housing, annually.

Progress Addressing FY 2015-2019 Impediments

The Fair Housing year-end progress reports for FYs 2015, 2016, 2017 and 2018 are in Appendix B. The City's CDBG FY 2019 began September 1, 2019. The City of Bowling Green will submit those accomplishments with the FY 2019 CAPER (due November 2020).

IV. ANALYZING IMPEDIMENTS TO FAIR HOUSING CHOICE

Fair Housing Complaints

Fair Housing & Equal Opportunity (FHEO-HUD)

The U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. Those wishing to file complaints may do so in English and Spanish online, via email, by phone or by mailing in a completed complaint form. For added information about this process, view details at https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint.

The Bowling Green Fair Housing Officer corresponded with Lisa Enricco of the Cleveland Field Office of HUD in August 2019 to determine if any formal charges or complaints existed for Bowling Green, Ohio. There are no formal charges or complaints with FHEO-HUD for Bowling Green 2015 through August 2019.

Ohio Civil Rights Commission
Our Ohio - Diverse. Strong. Protected.

Ohio Civil Rights Commission

The Ohio Legislature established the Ohio Civil Rights Commission (OCRC) on July 29, 1959. The Ohio Revised Code, Chapter 4112, specifies the powers, duties, jurisdiction, practices and procedures of the Commission. The primary function of The Ohio Civil Rights Commission is to enforce state laws against discrimination. OCRC receives and investigates charges of discrimination in employment, places of public accommodation, housing, credit, and disability in higher education on the bases of race, color, religion, sex, national origin, disability, age,

ancestry, military status or familial status. The Commission has statutory authority to initiate investigations of discriminatory practices.

The City's Fair Housing Officer works closely with the Toledo Regional Office of the Ohio Civil Rights Commission on a consistent basis. Representatives of the OCRC provide City staff guidance, resources, statistical and other types of data and accept local Fair Housing complaints.

Below is a listing of complaints filed with the OCRC from 2015 through 2019 for Bowling Green, Ohio. According to the OCRC, none of the complaints resulted in legal proceedings.

OCRC Complaints Filed for Bowling Green 2015-2019					
Charging Party Address	**Charging Party City**	**Charging Party Zip Code**	**Issue**	**Basis**	**Resolution**
206 West Poe Road	Bowling Green	43402	Intimidation	Handicap (Not ADA)	Ratify Conciliation Agreement and Consent Order Prior to Final Determination – Close
323 South Maple Street	Bowling Green	43402	Terms/Conditions	Handicap (Not ADA)	Withdrawal of Charge with Settlement
1719 Juniper Drive #155	Bowling Green	43402	Terms/Conditions	Handicap (Not ADA)	No Probable Cause – Dismiss
360 Colony Lane #70	Bowling Green	43402	Terms/Conditions	Handicap (Not ADA)	Resolved
737 South College Drive	Bowling Green	43402	Terms/Conditions	Other	Resolved
257 Varsity Square	Bowling Green	43402	Reasonable Accommodation	Handicap (Not ADA)	Ratify Conciliation Agreement and Consent Order Prior to Final Determination – Close
1020 N. Grove St. Apt #206	Bowling Green	43402	Reasonable Accommodation	Handicap (Not ADA)	Resolved

City of Bowling Green Fair Housing Program

The City of Bowling Green's Housing Specialist also serves as the Fair Housing Officer. The Fair Housing Officer provides outreach and education to the public about the existence of Fair Housing laws to assist those experiencing discrimination and prevent such occurrences through work with those in the housing, banking, insurance and real estate industries.

EQUAL HOUSING OPPORTUNITY

Fair Housing

Know your rights!

IF YOU THINK YOUR RIGHTS HAVE BEEN VIOLATED CALL:

419-354-6221

Within the last few years, Bowling Green's Fair Housing Officer has received no complaints related to Fair Housing discrimination. It is the Fair Housing Officer's belief that the ongoing trainings, meetings with those in the housing, banking, insurance and real estate industries—alongside prior intervention through this office—have resulted in greater compliance, locally.

The Fair Housing Officer frequently receives requests for landlord-tenant (non-Fair Housing) resolution. In response, those with such concerns receive various resources related to the resolution of landlord-tenant issues.

Added information on the City's Fair Housing Program is at https://www.bgohio.org/departments/municipal-administrator/grants-administration/fair-housing/. Bowling Green's Fair Housing brochure is contained in Appendix B of this Plan. The FY 2018 (most recent) Fair Housing Action Plan (containing actions taken) is at Appendix B as well.

Below is a listing of the Fair Housing complaints received 2015 through 2019 by Bowling Green's Fair Housing Officer.

Complaints Received by Bowling Green Fair Housing Officer 2015-2019			
Date:	**Protected Class:**	**Fair Housing Complaint:**	**Resolution:**
August 2017	Disability	Complainant stated the landlord was not providing a reasonable accommodation for an emotional support animal.	Resolved through local mediation.
May 2017	Disability	Complainant stated the landlord was not providing a reasonable accommodation for an emotional support animal.	Resolved through local mediation.
November 2016	Disability	Complainant stated the landlord was not providing a reasonable accommodation for an emotional support animal.	Resolved through local mediation.
July 2016	Disability	Complainant stated the landlord was not providing a reasonable accommodation for an emotional support animal.	Resolved through local mediation.
March 2016	Disability	Complainant stated the landlord was not providing a reasonable accommodation for breathing issues.	Resolved through local mediation.
March 2016	Disability	Complainant stated the landlord was not providing a reasonable accommodation to upgrade to a 3 bedroom due to a doctor's recommendation.	Resolved through local mediation.
February 2016	Disability	Complainant stated the landlord was not providing a reasonable accommodation for an emotional support animal.	Resolved through local mediation.
June 2015	Disability	Complainant stated the landlord was not providing a reasonable accommodation for the rent due date (based on timing of SSI issuance).	Resolved through local mediation.
May 2015	Race	Complainant (wished to remain anonymous) felt she was refused an apartment on the basis of race.	Referred to the Ohio Civil Rights Commission and HUD.

The Fair Housing Center (Toledo)

Established in 1975, the Fair Housing Center formed in response to discriminatory housing practices. The Fair Housing Center ensures all people have the same access to opportunities, protecting against discrimination. The Fair Housing Center receives Fair Housing complaints, investigates and pursues enforcement action. They also provide Fair Housing advocacy and education.

Bowling Green's Fair Housing Officer corresponds with the Fair Housing Center as needed. Furthermore, City of Bowling employees have attended various training/forum opportunities offered through the Center during the last few years.

The Fair Housing Officer recently corresponded with the Center's President and Chief Executive Officer. The statistical information below was provided for Bowling Green for the period 2015 through 2019.

All complaints received were resolved prior to legal action.

Complaints Received The Fair Housing Center (Toledo)					
Bowling Green	**2014**	**2015**	**2016**	**2017**	**2018**
New Cases	2	5	2	0	2
Respondents*	1	1	1	1	1
Referrals*	3	23	4	7	9

*Statistical data incomplete/database upgraded 2014-2015

Public Sector

The Analysis of Impediments to Fair Housing Choice examines public policies within the jurisdiction. In return, it analyzes the impact those policies have on fair housing choice. The City of Bowling Green controls land use and development through its comprehensive plan, zoning regulations, subdivision regulations and other laws and ordinances passed by City Council. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses, locally. Local officials and policies determine Bowling Green's commitment to housing goals and objectives.

CDBG Program

The City of Bowling Green receives Community Development Block Grant (CDBG) funds from HUD as an entitlement city under the CDBG Program. In FY 2019, the City will receive $306,283. Although award amounts had been in a period of decline for some years, the allocation levels have risen more recently. The table below sets forth Bowling Green's more recent CDBG award history.

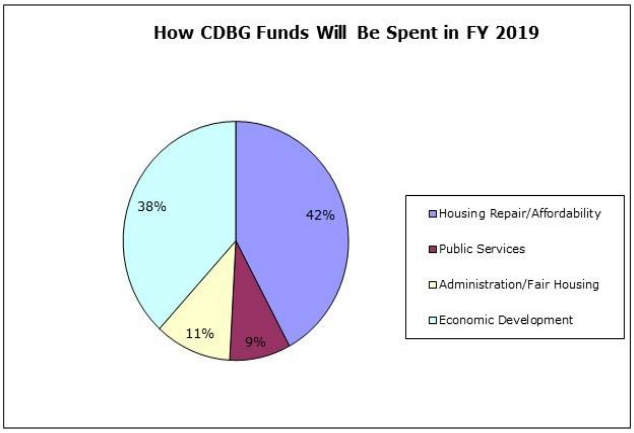
CDBG Recent Award History for Bowling Green, Ohio

Year	Award
2019	$306,283.00
2018	$288,575.00
2017	$256,324.00
2016	$248,954.00
2015	$248,590.00
2014	$247,480.00

Source: https://www.hudexchange.info/grantees/bowling-green-oh/

Annually, the City of Bowling Green allocates its CDBG to eligible projects that address the most critical community needs. The Analysis of Impediments to Fair Housing Choice informs the funding priorities determined within the Five-year Consolidated Plan. The Five-year Plan accordingly plays a critical role in determining the funding priorities within each Annual Action Plan during the planning period.

The chart below is from the City's CDBG FY 2019 Annual Action Plan. It displays the City's CDBG funding priorities for FY 2019.



The chart above represents the planned expenditures of CDBG entitlement and Business Revolving Loan Fund (RLF) funds in FY 2019. All "economic development" activities receive funding from the City's Business RLF. One hundred percent of the beneficiaries will be at lower-income levels—primarily through job creation. The City plans to issue one smaller loan

for business assistance and it will be provided to a business within a census tract with primarily lower income residency (51% lower-income residency or greater). The remaining funding priorities receive funding from CDBG entitlement dollars (FY 2019 and a small portion of rollover from FY 2018). The greatest share of these entitlement dollars are for improving housing decency and affordability through various home repair, rehabilitation and down-payment assistance activities. Both of the planned public service activities address homelessness prevention and assistance. One hundred percent of the planned non-administrative CDBG activities for FY 2019 benefit persons at lower-income levels. Planned administrative activities include the promotion of fair housing choice and assistance to those facing fair housing barriers.

The City of Bowling Green's FY 2015-2019 Five-year Consolidated Plan identified four high priority needs. The City thereafter developed various goals as strategies for addressing said needs for CDBG FYs 2015-2019. The needs and associated goals are set forth in the table below.

CDBG FY 2015-2019 Priority Needs and Associated Goals

Priority Need	Priority Level	Associated Goals
Decent, affordable housing	High	Direct Homeownership Assistance, Elderly Home Repair, Fair Housing, General Administration, Home Repair Housing Rehabilitation Administration, Mobile Home Repair, Rental Rehabilitation
Homeless Prevention and Assistance	High	B.G. Transit (public transportation assistance), General Administration, Transitional Housing for the Homeless
Job Creation	High	General Administration, Job Creation via RLF Business Loans
Business Assistance	High	Businesses Assisted in LMAs via Business RLF Loans, General Administration

STRATEGIC PLAN GOAL PROGRESS

The City of Bowling Green's CDBG FY 2018 (program year 4) ended August 31, 2019. Progress to date in achieving the goals and objectives set forth within the City's CDBG Five-year Consolidated has been excellent. The City anticipates achievement of all proposed goals and objectives by the conclusion of FY 2019 (ends August 31, 2020). The table below provides an accounting of the percentage of goal achievement marked at the close of FY 2018.

CDBG Five-year Strategic Plan Goal Progress (FY 2015-2018)		
Activity	**Plan Yrs. to be Undertaken**	**Percent Outcomes Completed through FY 2018**
Mobile Home Repair	FY 2015-2019	78%
Housing Rehabilitation Administration	FY 2015-2019	80%
Elderly Home Repair	FY 2015-2019	80%
Home Repair	FY 2015-2016, 2018-2019	80%
Public Transportation	FY 2015-2019	85%
Transitional Housing for Homeless	FY 2015-2019	89%
Fair Housing	FY 2015-2019	n/a
General Administration	FY 2015-2019	n/a
RLF General Administration	FY 2015-2019	n/a
RLF Job Creation Loans	FY 2015-2019	84%
RLF Business Assistance Loans (LMA)	FY 2015-2019	80%
Rental Rehabilitation	FY 2016-2019	71%
Direct Homeownership Assistance	FY 2016, 2019	67%

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

- Rental Rehabilitation;
- Direct Homeownership Assistance;
- Mobile Home Repair;
- Home Repair; and
- Elderly Emergency Home Repair.

With the exception of General Administration, all planned goals exclusively benefit persons at lower income levels. There is a need for funding for General Administration as it covers the necessary costs of carrying out all planned strategies.

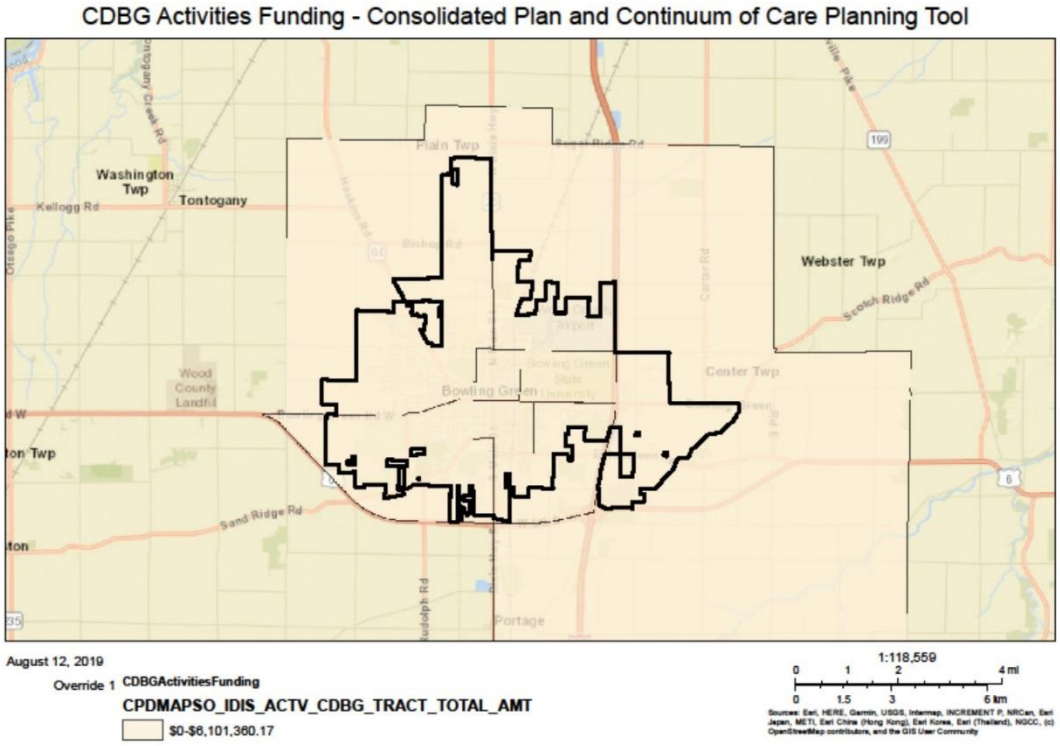
All City of Bowling Green policies and procedures related to Community Development and Housing activities ensure that citizens have access to said programs/activities in an equal manner regardless of whether or not a person is a member of a protected class.
The map below helps support the fact that CDBG expenditures are distributed evenly throughout Bowling Green. The City provides assistance on a first-come, first-serve basis—assuming the applicant meets low-moderate income eligibility requirements.

Per the CDBG Citizen's Participation Plan, the City of Bowling Green sites and facilities are fully accessible. The City advertises public hearings (held for federally funded programs (e.g. the Community Development Block Grant (CDBG))), in accordance with federal guidelines, held in accessible locations, and encourage persons requiring special accommodations to contact the City, so arrangements can be made for them.

The City has adopted a Limited English Proficiency Plan for the CDBG Program, ensuring greater access for all. The City developed its LEP Plan after conducting a thorough Four-factor Analysis as prescribed by Federal standards. Bowling Green is non-threshold community. Additionally, the Fair Housing Officer has observed no evidence (to date) of there being specific groups within Bowling Green that have more severe problems obtaining adequate housing as a result of language barriers, physical or mental disabilities or other conditions that might affect one's ability to secure safe, decent housing.

Nevertheless, the City undertakes every possible means to provide interpretation services where requested. For example, the Fair Housing Program brochure is available in both English and Spanish. The public survey for this Analysis was available in both English and in Spanish. Additionally, any non-English speaker wishing to attend a public hearing may give notice and the City will make every effort to secure interpretation services. Per the CDBG Citizen's Participation Plan, the same efforts are undertaken when a person with a disability needs public hearing assistance or technical assistance.

The map below and the CDBG Activity Count map (Appendix E) demonstrate allocation of CDBG funding occurs in a fair and even manner. Those areas with the highest CDBG activity count are those with Bowling Green's highest poverty concentration.



Source: https://egis.hud.gov/cpdmaps/

The City of Bowling Green adopted an Anti-displacement and Relocation Assistance Plan (adopted September 1992, and revised April 2003). The plan (see Appendix C) requires the City to replace all occupied and vacant housing demolished as a direct result of activities related to or supported by CDBG funding. No housing related to CDBG funds or activities has been demolished in Bowling Green. Furthermore, there is no such demolition planned.

In June 2003, the City adopted a Minority Business Enterprise Plan (Appendix C). The plan provides enhanced opportunities for the participation of businesses owned and operated by minorities, in projects or activities funded (in whole or in part) through the City's Community Development Block Grant (CDBG) program.

The City of Bowling Green is committed to maintaining the principle of equal employment opportunity and achieving affirmative action progress. The City's adoption of the Commitment to Equal Employment Opportunity and Affirmative Action evidences this commitment.

Business Revolving Loan Fund

With HUD approval, the City of Bowling Green's Business Revolving Loan Fund launched in 1988 using proceeds from CDBG-funded economic development activities. The City's Business Revolving Loan Fund (RLF) primarily provides funding for business start-up and expansion in exchange for the creation of jobs for persons with low incomes. Annually, a smaller amount is budgeted for a business assistance loan in a census tract with at least 51 percent (51%) lower-income residency. The following passage if taken from the Revolving Loan Fund Policy and Procedures Manual:

> "The LAB (Loan Approval Board) may adopt policies and procedures to implement the objectives of the fund as long as such actions are in accordance with the general and special terms and conditions of the grant agreement between the City of Bowling Green and the U.S. Department of Housing and Urban Development."

The City of Bowling Green and LAB adhere to the aforementioned regulatory compliance as a measure of preventing unfair impact.

Home Program

The City of Bowling Green is not a HOME entitlement city. The City does have a Housing Revolving Loan Fund (RLF), however. This fund is comprised of revenues from older CHIP grants issued to the City of Bowling Green (the last CHIP grant the City received closed out in 2005). A Housing Revolving Loan Fund Administration Agreement between the City of Bowling Green and the State of Ohio, Development Services Agency, authorizes the use of the Housing RLF for Down-payment Assistance, Down-payment Assistance/Rehabilitation and Private Rehabilitation to households at lower income levels. Wood County is a current CHIP grant recipient. Bowling Green is also included in Wood County's CHIP grant service area. Locally, these dollars fund down-payment assistance and private owner rehabilitation activities for persons at lower income levels.

The City's Housing RLF activities occur under the governance of a City Council approved Housing RLF Program Policy and Procedures Manual. The State of Ohio, Development Services Agency provides approval/amendment of all policies and procedures within the manual; providing added assurance for compliance with all federal regulations and standards.

Accessibility Regulations

The Grants Administrator reviewed federal laws governing accessibility requirements to include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as "Section 504" prohibits discrimination against persons with disabilities in any program receiving Federal funds. Section 504 compliance is included within the City of Bowling Green's CDBG Housing Programs Policy and Procedures Manual.

Adherence to the Architectural Barriers Act is also contained within the City of Bowling Green's CDBG Housing Programs Policy and Procedures Manual. All rehabilitation will take into consideration any special needs of the applicant(s) or a member of the household. All special needs improvements will be completed in compliance with the Architectural Barriers Act.

The Fair Housing Act prohibits discrimination in the sale or rental of housing. It also requires that landlords must make reasonable modifications to accommodate persons who have a disability. The City of Bowling Green's Housing Specialist also serves as the local Fair Housing Officer. Duties include education and outreach.

Other Funds

In the last five years, the City of Bowling Green has received various other forms of federal, state and local funding in order to meet community needs. Included is a 5311 Rural Public Transit Grant from the Ohio Department of Transportation (ODOT) for the operation and capital needs of the local public transit system, the B.G. Transit (2015-2019). The City submitted a funding application for 2020 to ODOT in August 2019. Surface Transportation Funds (STP) ensured the completion of intersection improvements at South Main Street and Gypsy Lane (2016). STP funds also assisted in completing paving projects on the following roadways: South Main Street to South College Avenue (2017), East Wooster Street to Napoleon Road (2018) and State Route 25 (Ordway Avenue to Oak Street (2019)) and State Route 64 (Church Street to Prospect Avenue (2019)). Ohio Public Works Commission grant funds helped to carry out the local water pollution control grit handling improvements project (2017). Grant funding from the Ohio Attorney General's Office provided drug use prevention during the 2015-2019 school years. Department of Justice funding awarded in 2016 and 2018 funded the local Bulletproof Vest Partnership and Bureau of Worker's Compensation (BWC)/Ohio Attorney General's Office awarded grant funding in 2019 (Ohio Law Enforcement Body Armor grant). The Bowling Green Police Department received JAG LE grants from the Office of Criminal Justice Services in 2016 2017 and 2018. The City received a Great Lakes Restoration Initiative grant for planting trees in December 2015 for tree planting in 2016. The City's Fire Department received BWC funding in 2016 (hover materials) and 2019 (hoods). In the last few years, Bowling Green's Parks and Recreation Department has received dollars for existing parks from the Ohio Department of Natural Resources (2016) and the Wood County Park District (2017-2019). The City leveraged local match funding alongside these various dollars.

Research indicates the improvements from these dollars were made equitably amongst all of Bowling Green's census tracts. Furthermore, the City of Bowling Green administered all funds in adherence to local, State and Federal regulations as applicable.

Public Housing

There is not a public housing authority (or units) within Bowling Green's city limits. Various assisted rental units are available and discussed below.

Section 8 Housing Choice Vouchers

The City of Bowling Green, however, contracts with the Consortium of Northwest Ohio to administer the Section 8 Housing Choice Vouchers program, locally. The Consortium of Northwest Ohio implements the Section 8 Housing Choice Vouchers program in Bowling Green as the Bowling Green Housing Agency; which has been approved to provide up to 119 Section 8 vouchers in Bowling Green.

Per consultation with Brian Horst (June 2019) of the Consortium of Northwest Ohio, there are 20 Special Purpose Vouchers issued for Bowling Green. The 20 vouchers are included as part of Bowling Green's 119 vouchers available through the Section 8 Housing Choice Vouchers Program.

Horst, who administers the Section 8 Housing Choice Voucher Program for Bowling Green, indicates, "Current Section 8 Housing Choice Vouchers (HCV) statistics for the City of Bowling Green show that 66% of the households participating in the program are those with disabilities. This number is up slightly from 63% in 2015 (when the last Analysis of Impediments to Fair Housing Choice was developed). In addition, 50% of the households currently on the HCV program waiting list have disabilities, so there is a demand for accessible units."

According to Brian Horst, the Director of the Consortium of Northwest Ohio (also referred to as Bowling Green Housing Agency) who administers the Section 8 voucher program locally, there is no pattern regarding the concentration of tenants participating in the program by race or ethnicity. Regarding the participation of persons with disabilities, there are no program participation limits or exclusions. There are no court lawsuits involving tenant selection and assignment policies and procedures. Voucher holders can use vouchers they receive from this jurisdiction outside of the geographic jurisdiction through the portability process. Also through the portability process, holders who have received their vouchers from other jurisdictions are assisted in residing in Bowling Green. Maps and lists indicating the location of possible rental units are available upon request. Upon request, voucher holders are assisted by the Bowling Green Housing Agency in finding suitable housing (maps and lists are provided). The assistance includes providing up-to-date information to minority home seekers (in particular) about the various facilities and services that are available in all neighborhoods. Assistance also includes providing suitable housing with accessible design features for persons with disabilities. The agency has completed its Section 504 assessment of the need, among households with various types of disabilities, and developed a plan for providing such housing opportunities. Voucher holders are encouraged to look for housing in neighborhoods that are not traditional residential areas for the holder in question (particularly minority voucher holders). Section 8 voucher tenants are able to choose their own unit. The Consortium of Northwest Ohio assists tenants in locating a unit upon request. This helps to promote the availability of accessible existing housing resources that are suitable for the mobility impaired. All participants in the Section 8 voucher program receive clear information concerning their housing rights and the steps they should take in the event of a housing discrimination encounter. The policy/procedure addressing displaced Section 8 tenants is as follows: Consortium employees issue new vouchers to affected tenants so they may relocate. If tenants are able to stay and wish to stay, there are no requirements to re-locate. Again, if relocating, tenants choose their own unit.

There appear to be no impediments to fair housing choice as it relates to the Section 8 voucher program. This determination is made through consultation with Horst and a review of the Consortium of Northwest Ohio's most recent PHA 5-Year and Annual Plan.

Other Federally Assisted Housing Options

In addition to the Section 8 Voucher Program (noted above), Bowling Green includes various units of rental housing assisted with federal, state and local programs. The table below provides added detail.

Assisted Rental Properties in Bowling Green

Property Name	Address	# Units	Assistance Type
Wood Lane Elder Haus I	1086 Fairview Ave.	4	Subsidized/Section 811
Wood Lane Elder Haus II	1084 Fairview Ave.	4	Subsidized/Section 811
Wood Lane Apartments	1088 Fairview Ave.	14	Subsidized/Section 811
Wood County Village II	311 Parkview Dr.	18	Subsidized/Section 811
Wood County Village	804 Thurstin St.	12	Subsidized/Section 811
The Residence Connection	1015 Klotz Rd.	14	Subsidized/Section 811
Fairview Manor	1020 N. Grove St.	92	Subsidized
Amherst Village	1520 Clough St.	100	Subsidized
Cedar Park	1002 3rd St.	150	Subsidized
Bowling Green Manor (Bowling Green Estates)	1078 Fairview Ave.	60	LIHTC
Norwalk Senior Community Bennett Pointe (Chauncey Pointe)	1005 Chauncey Ln.	40	LIHTC
Bowling Green Senior Community (Chauncey Ln.)	1009 Chauncey Ln.	64	LIHTC
Arbors at Bowling Green (The Arbors of Bowling Green)	360 Colony Ln.	12	LIHTC

Source: https://resources.hud.gov/#

The properties discussed below are either subsidized housing units or assisted with a combination of subsidized and Section 811 Supportive Housing for Persons with Disabilities funding.

A subsidized housing unit is one in which a tenant pays approximately 30 percent (30%) of their adjust income on rent and utilities. The management agent calculates the tenant's rent amount HUD then pays the difference between the tenant's rent contribution and the total rent paid to the building owner. The Section 811 Supportive Housing for Persons with Disabilities Program allows persons with disabilities to live as independently as possible in the community by subsidizing rental housing opportunities and providing access to appropriate supportive services.

Amherst Village has 100 units of HUD-subsidized rental housing. These townhouse-style units are available to low-income persons and families, and are available in two-, three- and four-bedroom options.

Fairview Manor offers 42 units of HUD-subsidized rental housing for low-moderate income persons and families. The apartments (32) are available in two- bedroom styles. The townhouses (10) are three-bedroom units. Fairview Manor also offers 50 units of HUD-subsidized rental housing for seniors (age 62 years and older) and persons with disabilities. There are 49 one-bedroom units and one two-bedroom unit available to persons that meet income/age/disability requirements.

Cedar Park Apartments offers 150 units of HUD-subsidized rental housing. These one-bedroom units are available to low-income older adults (aged 62 years or older) and disabled persons.

Behavioral Connections of Wood County (also known as "Harbor Wood County") operates three HUD-funded Section 811 apartment buildings (44, one-bedroom units). Property names are Wood County Village, Wood County Village II and The Residence Connection. Added detail is set forth in the table above. These units house persons with mental disabilities. Behavioral Connections of Wood County also offers seven multi-unit housing sites that are state- and locally-subsidized for persons diagnosed with chronic mental illness. The number of units per facility varies; however, amongst these seven facilities, housing exists for up to 31 persons. For persons with mental disabilities, Behavioral Connections of Wood County operates a 10-week inpatient drug and alcohol treatment facility (12 beds). There are two transitional housing beds available to persons (during a six- to nine-month period) completing the inpatient drug and alcohol treatment program that are without housing.

Wood Lane Residential Properties Inc. owns and operates 20 residential homes located throughout the city's limits. These homes provide safe and affordable housing for individuals with developmental disabilities. There is the capacity to house up to 82 persons amongst these housing sites. In addition to the homes mentioned above, Wood Lane Residential Properties Inc. also owns three HUD subsidized properties, a 14-unit apartment building and two (four-bedroom) homes. Combined, these HUD properties can provide housing to 22 individuals with developmental disabilities.

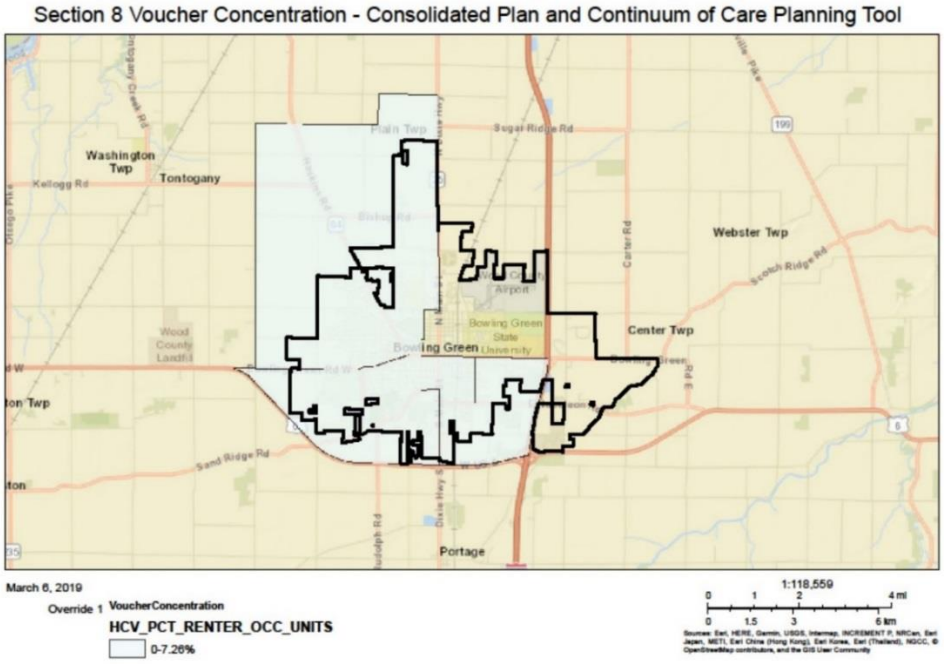
Rental properties receiving Low-income Housing Tax Credits (LIHTC) financing must provide affordable rents to tenants who qualify based on income guidelines. Locally, there are four LIHTC-assisted rental properties (Bowling Green Estates, The Arbors of Bowling Green and

Chauncey Pointe (two locations)). The Chauncey Pointe properties are dedicated senior communities.

No subsidized housing has been demolished in Bowling Green since the time of the last Analysis of Impediments to Fair Housing Choice. Furthermore, no plans to demolish subsidized housing currently exist.

In those instances where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD (regarding assisted housing within a recipient's jurisdiction), CDBG grantees have various obligations. For example, a plan of action by the grantee to help remedy the discriminatory condition (including actions involving the expenditure of funds made available under this part) could ensue. There has been no determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing within Bowling Green. As a result, there is no need for such a plan or actions, currently.

The illustration from CPD Maps (see page 30 and Appendix E) demonstrates that subsidized housing options exist on both the east and west sides of Bowling Green. The majority of this housing, however, is on the city's east side. The map below demonstrates Section 8 housing is more predominant on the City's west side than east. At the local, State and Federal level, there have been no complaints or lawsuits related to any of these properties within the last five years.



Source: https://egis.hud.gov/cpdmaps/

Homeless Facilities

There are no homeless facilities in Bowling Green aside from The Cocoon, a non-profit domestic violence shelter. As a result, the City of Bowling Green designates CDBG funds annually to provide for transitional housing for the homeless, locally. The Salvation Army, a CDBG sub-recipient, undertakes this activity with City oversight. The most recent CDBG Annual Action Plan (FY 2019) includes added detail about this activity. A sub-recipient agreement is signed between the City of Bowling Green and The Salvation Army (CDBG sub-recipient), annually. The sub-recipient agreement stipulates The Salvation Army's adherence to local, State and federal civil rights, non-discrimination, affirmative action, and Section 504 laws is set forth within the agreement. The City monitors compliance of this CDBG-funded activity. Furthermore, governance of this activity is under the City's written policies and procedures that comply with federal laws.

Public Policy Regarding City Services

The Grants Administrator gave full review to the dissemination of City services provided to citizens. The City of Bowling Green provides services (e.g. Police, Fire/Rescue, trash pickup, etc.) equally to all residents. Furthermore, the City of Bowling Green provides services equally throughout every neighborhood within the City of Bowling Green.

The City of Bowling Green's longstanding and varied efforts and actions to welcome and protect inclusiveness for all lend added assurance of this. Bowling Green's stand is achieved through a variety of written policies, laws and participatory practices—all discussed in more detail directly below.

Committed to ensuring that Bowling Green remains a safe and inclusive community, the City of Bowling Green formed the Bowling Green Human Relations Commission. The Commission consists of eleven members meeting no less than 10 times a year. The Human Relations Commission promotes equality for and understanding among all people of the community and provides mediation through conferences and conciliation.

Chapter 153 (Fair Housing) of the Bowling Green, Ohio Code of Ordinances provides protections for persons based on, "race, color, religion, national origin, gender expression, gender identity, sex, pregnancy, age, sexual orientation, creed, ancestry, disability, military status, veteran status, marital status, family status, physical characteristics, HIV-status, or genetic information. This local law first passed in 1979 with the latest amendment to it in 2006. Chapter

153 provides the same range of protections as Federal laws with some expansions upon those to include housing repairs, maintenance, construction, inspection and various other provisions.

With the passage of Chapter 39 (Unlawful Discrimination) of the Bowling Green Code of Ordinances in 2009, discrimination is prohibited, citywide. Prohibitions include those related to employment, business practices and accommodations, education, housing and City of Bowling Green services to include its facilities, transactions and contracts.

Not In Our Town Bowling Green was created to champion diversity and advance the mission of guiding and inspiring people and the community to work together to stop hate and build safe, inclusive environments for all. This movement exists to address acts of intolerance and discrimination. Through this six-year partnership of Bowling Green State University and the City of Bowling Green, Ohio, those involved with Not in Our Town pledge to stop bigotry before it starts and to stand against any, all forms of hate. Several City of Bowling Green employee leaders are appointed and active members of this highly engaged coalition.

In January 2017, City Council adopted Resolution 3655. The Resolution condemns violence, hate speech, discrimination targeting Muslim people and expressing solidarity with the Muslim community and all those targeted for their ethnicity, race or religion.

In April 2017, City Council adopted Resolution 3662. Resolution 3662 proclaims Bowling Green as a welcoming community for immigrants and condemns discrimination, harassment, or unjustified deportation of immigrant residents of Bowling Green. This resolution is available in a wide number of languages and posted prominently on the City's website (as is Resolution 3655).

Following the adoption of Resolution 3662, the City of Bowling Green formed a "Welcome BG Task Force." In June 2018, the Welcome BG Task Force published its first Report and Recommendations. The City of Bowling Green's Human Relations Commission works cooperatively with City officials to address these recommendations. Chapter 39 and Resolutions 3665 and 3662 are in Appendix C of this Plan.

In 2019, the City of Bowling Green Police Division began offering training to assist late-shift employees (working within Bowling Green's corporation limits) in how to deal with acts of discrimination and/or hate crimes they may witness. The training focuses on prevention and mitigation of violence and discriminatory conduct.

Comprehensive Plan

The City of Bowling Green's Comprehensive includes a Housing Section adopted by the City Council. This plan includes various estimates to include anticipated growth and various other components to include recommendations intended to direct the present and future physical, social and economic development within Bowling Green. The City Council adopted the last update to the Comprehensive Plan October 2014 (Future Land Use Update). The City of Bowling Green's Plan received the 2015 APA Ohio Planning Award under the category "Comprehensive Planning – Small Jurisdiction."

Planning, Zoning and Building Codes

The City of Bowling Green's policies, procedures and practices affecting the approval of sites and other building requirements used the approval process for the construction of publicly-assisted housing are not restrictive; nor do they negatively impact persons who are protected under Fair Housing laws. The zoning ordinance does not set minimum building size requirements that exceed the local housing and health code standards. There are no established impact fees.

Per the City's legal counsel, all local zoning laws, policies, and practices are in compliance with the federal fair housing laws and up-to-date with legal decisions. Regarding criteria for placement of group homes, review shows there are no restrictions in conflict with the Fair Housing Act and judicial decisions. There are no local occupancy ordinances restricting the number of people in a family when buying a home. The City's definition of a "family" does not conflict with the definition set forth within the Fair Housing Act.

The City's zoning ordinance and map, development and subdivision regulations and other land use controls conform to the Master Plan, providing sufficient land use and density categories and sufficient land zoned/mapped to permit the building of affordable housing. The City has no ordinances that criminalize homeless persons (which would thereby make it difficult for said persons to qualify for subsidized or other types of housing). The City of Bowling Green does not require affordable housing projects to undergo public review or special hearings when the project is otherwise in full compliance with the zoning ordinance and other development regulations. Local zoning ordinances and building codes have no impact on lower income housing (e.g. no lot size requirements). There are no court decisions or settlements affecting the City's zoning ordinances, building codes or other policies and regulations relating to the provision of housing for lower income households and persons with disabilities. The City of Bowling Green fully welcomes the placement of supportive housing locally. There are no concentrations of lower-income housing in any areas within the corporation limits of Bowling Green.

The City of Bowling Green is currently in the process of procuring a contractor to examine and update its Zoning Codes. The City Planning Director anticipates the work on this project will begin later this year.

Building Codes for Bowling Green are through Wood County. The Wood County Building Code encourages language regarding housing rehabilitation through gradated regulatory requirements applicable as different levels of work in existing buildings. The Wood County Building Code utilizes/adopted a recent (published within last five years) version of a nationally recognized model building code.

Community Reinvestment Area

The City has a Community Reinvestment Area (CRA) program. Bowling Green Community Development Foundation administers the local CRA. CRA's are specific areas of land in which property owners can receive tax abatement for investing in real property improvements. The

CRA program is a direct incentive tax exemption benefiting property owners to renovate existing or construct new buildings. The CRA has resulted in enhanced economic development locally.

Home Investment Trust Fund

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

Taxes

Wood County establishes property tax rates (rather than the City of Bowling Green). Property tax increases for Bowling Green were minimal between 2017 and 2018. While real estate tax rates may not be an impediment to fair housing choice, the amount and method of tax calculation both affect the affordability of housing.

Private Sector

The private sector has traditionally generated the most easily recognized impediments to fair housing choice in regard to discrimination in the sale, rental or advertising of dwellings, the provision of brokerage services or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibit such practices as the failure to give the same terms, privileges, or information, charging different fees, steering prospective buyers or renters toward a certain area/neighborhood or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, and national origin.

Real Estate Practices

The Toledo Regional Association of Realtors is the local organization of real estate brokers operating within the greater Toledo area to include Lucas, Wood, and Fulton Counties. Also included are parts of Hancock, Seneca, Sandusky and Ottawa Counties. The Toledo Regional Association of Realtors has an open membership policy and does not discriminate. Members adhere to the Code of Ethics of the National Association of Realtors (NAR). This Code of Ethics obligates its members to maintain professional standards including efforts to affirmatively furthering fair housing. Realtors are required to complete annual continuing education on topics that focus on protecting the rights of persons covered under the Fair Housing Act, the Civil Rights Act, and ADA laws.

At least annually, the Fair Housing Officer provides a Fair Housing presentation to the Wood County Realtor Charter (formerly known as the Wood County Board of Realtors). These presentations include added emphasis on the illegality of racial/ethnic steering. To date, the Fair Housing Officer has observed no discriminatory real estate practices. Additionally, the Fair Housing Officer has not received any complaints regarding real estate practices.

Real Estate Advertising

Federal law indicates no advertisement, with respect to the sale or rental of a dwelling unit, may give any preference, limitation or discrimination as related to race, color, religion, sex, handicap, familial status or national origin.

The City of Bowling Green Fair Housing Officer reviews (in an ongoing manner) both electronic and hard copy print real estate advertisements to monitor compliance. Some of these sites/publications included a disclaimer indicating that each advertisement is subject to the Federal Fair Housing Act and that all dwellings advertised are available on an equal opportunity basis. Most of the sources included the Fair Housing logo. None of the publications appeared to contain discriminatory language nor prohibited occupancy by any protected class.

Private Financing

The Financial Institutions Reform, Recovery and Enforcement Act of 1989 (F.I.R.R.E.A) requires any commercial institution that makes five or more home mortgage loans to report said activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data is online at **www.ffiec.gov/hmda/**. The City analyzed the most recent (2017) data. The following tables provide an analysis of the HMDA data in the Toledo, OH Metropolitan Statistical Area (MSA). The MSA includes Fulton, Wood, and Lucas Counties. City census tracts 216, 217.01, 217.02, 219.01, 219.02 and 225 are located in Bowling Green's corporation limits and those amounts were totaled to get Bowling Green calculations. The home loans included in this report present loans on 1- to 4-family and manufactured homes from the following loan types 1) FHA, FSA/RHS and VA; 2) Conventional; 3) Refinanced Loans; and 4) Home Improvement.

Area	Home Loans Purchased by Location of Property and Type of Loan							
	FHA, FSA/RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	Amount	#	Amount	#	Amount	#	Amount
City of Bowling Green	21	$2,884	26	$3,866	20	$2,439	1	$81
Wood County	224	$31,102	166	$39,228	113	$16,548	8	$585
MSA	1,196	$142,440	811	$127,597	580	$75,311	37	$3,162
Bowling Green loans as a % of County Loans	9%	9%	16%	10%	18%	15%	13%	14%
Bowling Green loans as a % of MSA Loans	2%	2%	3%	3%	3%	3%	3%	3%

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/2

The table above lists the home loans purchased in Bowling Green, Wood County and the MSA during 2017. As expected, Bowling Green represents a low percentage share, comparatively.

The table below lists the disposition of home loan applications during 2017 for the area. Of loan applications originated in 2017, Bowling Green represented five percent (5%) of conventional and refinanced loans in the MSA and a lower share for the other types of loans. Compared to Wood County loans, Bowling Green comprised a 19 percent (19%) share of conventional and refinanced loans. Again, comparisons were lower for other types of loans.

Disposition of Home Loan Applications by Location of Property and Type of Loan						
Loan and Location		**Loans Originated**	**Approved, Not Accepted**	**Applications Denied**	**Applications Withdrawn**	**File Closed for Incompleteness**
FHA, FSA/RHS & VA	**Bowling Green**	58	0	6	5	0
	Wood County	443	8	58	54	8
	MSA	2,195	66	328	267	40
Conventional	**Bowling Green**	244	6	23	18	2
	Wood County	1,255	54	184	113	23
	MSA	4,836	218	634	477	104
Refinanced	**Bowling Green**	154	11	46	30	15
	Wood County	817	74	298	210	111
	MSA	3,216	286	1,620	1,017	576
Home Improvement	**Bowling Green**	24	0	15	2	3
	Wood County	219	4	143	23	16
	MSA	853	41	845	100	55

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/1

The table below sets forth the disposition of applications for FHA, FSA/RHS, and VA home-purchase loans, 1- to 4- family and manufactured home dwellings by income of applicant for the MSA in 2017. Denial rates between applicants at levels 70% of the MSA/MD median income level and below (13% denial rate) were comparable to those at 80% of the MSA/MD median income level and above (10%).

Income of Applicants, 2017, FHA, FSA/RHS and VA Loans						
Income	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Less than 50% of MSA/MD median	345	233	7	61	37	7
50-79% of MSA/MD median	905	691	22	103	75	14
80-99% of MSA/MD median	506	396	15	50	38	7
100-119% of MSA/MD median	368	287	3	39	35	4
120% or more of MSA/MD median	745	570	19	70	79	7
Income Not Available	0	0	0	0	0	0
Total	**2,869**	**2,177**	**66**	**323**	**264**	**39**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-1

The table below sets forth the disposition of applications for FHA, FSA/RHS, and VA home-purchase loans, 1- to 4- family and manufactured home dwellings by race of applicant(s) for the MSA in 2017. White applicants had a 10 percent loan denial rate. These applicants had higher denial rates: Asian (23%), Black or African American (15%) and applicants noting two or more races (25%).

Race of Applicants, 2017, FHA, FSA/RHS and VA Loans						
Race	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
American Indian/Alaska Native	14	8	0	0	4	2
Asian	13	10	0	3	0	0
Black or African American	245	177	7	36	23	2
Native Hawaiian or Other Pacific Islander	1	1	0	0	0	0
White	2,314	1,791	56	240	198	29
2 or more minority races	4	2	1	1	0	0
Joint (White/Minority Race)	28	24	0	1	3	0
Race Not Available	250	164	2	42	36	6
Total	**2,869**	**2,177**	**66**	**323**	**264**	**39**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-1

The table below sets forth the disposition of applications for FHA, FSA/RHS, and VA home-purchase loans, 1- to 4- family and manufactured home dwellings by ethnicity (Hispanic or Latino) of applicant(s) for the MSA in 2017. The disparity between Hispanic or Latino applicants (14% denied) and applicants that are not Hispanic or Latino (11% denied) are minor, comparatively.

Ethnicity of Applicants, 2017, FHA, FSA/RHS and VA Loans						
Ethnicity Status	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Hispanic or Latino	127	85	5	18	16	3
Not Hispanic or Latino	2,474	1,910	58	261	214	31
Joint (Hispanic or Latino/Not Hispanic or Latino)	45	35	1	8	1	0
Ethnicity Not Available	223	147	2	36	33	5
Total	**2,869**	**2,177**	**66**	**323**	**264**	**39**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-1

The table below sets forth the disposition of applications for FHA, FSA/RHS, and VA home-purchase loans, 1- to 4- family and manufactured home dwellings by gender of applicant(s) for the MSA in 2017. Loans originated for 74 percent (74%) of female applicants. The percentage share for male applicants is comparable (76%). Loan denial rates for male and female applicants were comparable (10% and 13%, respectively).

Gender of Applicants, 2017, FHA, FSA/RHS and VA Loans						
Applicant Gender	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Male	1,238	947	34	127	108	22
Female	757	561	16	96	76	8
Joint (Male/Female)	741	583	14	74	63	7
Data Not Available	133	86	2	26	17	2
Total	**2,869**	**2,177**	**66**	**323**	**264**	**39**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-1

The table below sets forth the disposition of applications for Conventional home-purchase loans, 1- to 4- family and manufactured home dwellings by income of applicant for the MSA in 2017. Seventeen percent (17%) of applications at 79 percent (79%) or below of the MSA/MD median

income level were denied compared to seven percent denied at those income levels at and above 80% of the MSA/MD median income level.

Income of Applicants, 2017, Conventional Loans						
	Applications Received	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Less than 50% of MSA/MD median	425	248	12	130	30	5
50-79% of MSA/MD median	1,224	903	48	149	95	29
80-99% of MSA/MD median	825	630	31	84	59	21
100-119% of MSA/MD median	642	495	29	53	52	13
120% or more of MSA/MD median	2,960	2,414	90	193	227	36
Income Not Available	0	0	0	0	0	0
Total	**6,076**	**4,690**	**210**	**609**	**463**	**104**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-2

The table below sets forth the disposition of applications for conventional home-purchase loans, 1- to 4- family and manufactured home dwellings by race of applicant(s) for the MSA in 2017. Nine percent of White applicants' conventional home loan applications resulted in denials in 2017. The denial rate was at least double that amount for these applicants: American Indian/Alaska Native (20%), Black or African American (21%), and Native Hawaiian or Other Pacific Islander (50%). The denial rate for Asian applicants (13%) was a bit higher than that of White applicants.

Race of Applicants, 2017, Conventional Loans						
Race	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
American Indian/Alaska Native	15	8	2	3	2	0
Asian	87	60	4	11	8	4
Black or African American	220	140	10	46	22	2
Native Hawaiian or Other Pacific Islander	4	2	0	2	0	0
White	5,207	4,088	184	489	358	88
2 or more minority races	1	0	1	0	0	0
Joint (White/Minority Race)	56	44	3	4	4	1
Race Not Available	486	348	6	54	69	9
Total	**6,076**	**4,690**	**210**	**609**	**463**	**104**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-2

The table below sets forth the disposition of applications for conventional home-purchase loans, 1- to 4- family and manufactured home dwellings by ethnicity of applicant(s) for the MSA in 2017. The denial rate was double for persons of Hispanic or Latino ethnicity (18%) versus applicants that were not Hispanic or Latino (9%).

Ethnicity of Applicants, 2017, Conventional Loans						
Ethnicity Status	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Hispanic or Latino	148	102	3	27	10	6
Not Hispanic or Latino	5,347	4,182	197	505	382	81
Joint (Hispanic or Latino/Not Hispanic or Latino)	81	67	2	6	4	2
Ethnicity Not Available	500	339	8	71	67	15
Total	**6,076**	**4,690**	**210**	**609**	**463**	**104**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-2

The table below sets forth the disposition of applications for conventional home-purchase loans, 1- to 4- family and manufactured home dwellings by gender of applicant(s) for the MSA in 2017. No notable discrepancies noted in reviewing the denial rates of male versus female applicants. The denial rate for males (10%) was slightly lower than the rate for females (13%).

Gender of Applicants, 2017, Conventional Loans						
Applicant Gender	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Male	2,123	1,630	87	207	163	36
Female	1,384	1,024	46	183	109	22
Joint (Male/Female)	2,315	1,853	74	187	162	39
Data Not Available	254	183	3	32	29	7
Total	**6,076**	**4,690**	**210**	**609**	**463**	**104**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-2

The table below sets forth the disposition of applications for refinanced home-purchase loans, 1- to 4- family and manufactured home dwellings by income of applicant for the MSA in 2017. Thirty-two percent (32%) of applications at 79 percent (79%) or below of the MSA/MD median income level were denied compared to 21 percent (21%) denied at those income levels at and above 80% of the MSA/MD median income level.

Income of Applicants, 2017, Refinanced Home Loans						
	Applications Received	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Less than 50% of MSA/MD median	596	204	30	214	85	63
50-79% of MSA/MD median	1,130	481	45	345	177	82
80-99% of MSA/MD median	848	378	45	219	138	68
100-119% of MSA/MD median	684	367	33	149	89	46
120% or more of MSA/MD median	2,691	1,467	107	516	380	221
Income Not Available	0	0	0	0	0	0
Total	**5,949**	**2,897**	**260**	**1,443**	**869**	**480**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-3

The table below sets forth the disposition of applications for refinanced home-purchase loans, 1- to 4- family and manufactured home dwellings by race of applicant(s) for the MSA in 2017. Twenty-two percent (22%) of White applicants' refinanced home loan applications resulted in denials in 2017. The denial rates were a bit higher these applicants: American Indian/Alaska Native (33%), Asian (27%), and Black or African American (37%).

Race of Applicants, 2017, Refinanced Loans						
Race	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
American Indian/Alaska Native	30	9	2	10	5	4
Asian	33	16	3	9	3	2
Black or African American	371	102	22	138	62	47
Native Hawaiian or Other Pacific Islander	5	1	0	0	2	2
White	4,618	2,403	197	1,006	656	356
2 or more minority races	4	2	0	0	1	1
Joint (White/Minority Race)	45	20	4	10	8	3
Race Not Available	843	344	32	270	132	65
Total	**5,949**	**2,897**	**260**	**1,443**	**869**	**480**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-3

The table below sets forth the disposition of applications for refinanced home-purchase loans, 1- to 4- family and manufactured home dwellings by ethnicity of applicant(s) for the MSA in 2017. The denial rate was higher for persons of Hispanic or Latino ethnicity (34%) versus applicants that were not Hispanic or Latino (22%).

Ethnicity of Applicants, 2017, Refinanced Loans						
Ethnicity Status	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Hispanic or Latino	135	53	8	46	15	13
Not Hispanic or Latino	4,948	2,475	220	1,134	722	397
Joint (Hispanic or Latino/Not Hispanic or Latino)	78	41	4	14	13	6
Ethnicity Not Available	788	328	28	249	119	64
Total	**5,949**	**2,897**	**260**	**1,443**	**869**	**480**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-3

The table below sets forth the disposition of applications for refinanced home-purchase loans, 1- to 4- family and manufactured home dwellings by gender of applicant(s) for the MSA in 2017. The denial rate for males (26%) and females (25%) is quite close.

Gender of Applicants, 2017, Refinanced Loans						
Applicant Gender	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Male	1,962	879	85	516	289	193
Female	1,204	564	65	301	179	95
Joint (Male/Female)	2,231	1,221	86	438	330	156
Data Not Available	552	233	24	188	71	36
Total	**5,949**	**2,897**	**260**	**1,443**	**869**	**480**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-3

The table below sets forth the disposition of applications for home improvement loans, 1- to 4-family and manufactured home dwellings by income of applicant for the MSA in 2017. The disparity for those at lower income levels is notable. Fifty-seven percent (57%) of applications at 79 percent (79%) or below of the MSA/MD median income level were denied compared to 35 percent (35%) denied at those income levels at and above 80% of the MSA/MD median income level.

Income of Applicants, 2017, Home Improvement Loans						
	Applications Received	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Less than 50% of MSA/MD median	331	85	10	218	10	8
50-79% of MSA/MD median	445	181	11	223	21	9
80-99% of MSA/MD median	249	121	4	106	12	6
100-119% of MSA/MD median	197	102	3	76	10	6
120% or more of MSA/MD median	620	349	12	186	47	26
Income Not Available	0	0	0	0	0	0
Total	**1,842**	**838**	**40**	**809**	**100**	**55**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-4

The table below sets forth the disposition of applications for home improvement loans, 1- to 4-family and manufactured home dwellings by race of applicant(s) for the MSA in 2017. Forty-four percent (44%) of all refinanced home loan applications resulted in denials in 2017. The denial rates were somewhat higher these applicants: American Indian/Alaska Native (73%),

Black or African American (58%), Native Hawaiian or Other Pacific Islander (67%), two or more minority races (80%) and joint (white/minority race) (55%).

Race of Applicants, 2017, Home Improvement Loans						
Race	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
American Indian/Alaska Native	11	3	0	8	0	0
Asian	9	5	1	0	1	2
Black or African American	224	76	7	130	7	4
Native Hawaiian or Other Pacific Islander	3	0	0	2	1	0
White	1,348	667	28	534	79	40
2 or more minority races	5	0	0	4	0	1
Joint (White/Minority Race)	9	4	0	5	0	0
Race Not Available	233	83	4	126	12	8
Total	**1,842**	**838**	**40**	**809**	**100**	**55**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-4

The table below sets forth the disposition of applications for home improvement loans, 1- to 4-family and manufactured home dwellings by ethnicity of applicant(s) for the MSA in 2017. The denial rate was higher for persons of Hispanic or Latino ethnicity (51%) versus applicants that were not Hispanic or Latino (42%).

Ethnicity of Applicants, 2017, Home Improvement Loans						
Ethnicity Status	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Hispanic or Latino	88	39	2	45	2	0
Not Hispanic or Latino	1,510	708	34	639	84	45
Joint (Hispanic or Latino/Not Hispanic or Latino)	20	12	0	6	1	1
Ethnicity Not Available	224	79	4	119	13	9
Total	**1,842**	**838**	**40**	**809**	**100**	**55**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-4

The table below sets forth the disposition of applications for home improvement loans, 1- to 4-family and manufactured home dwellings by gender of applicant(s) for the MSA in 2017. The loan denial rate for males (45%) is slightly lower than that of females (51%).

Gender of Applicants, 2017, Home Improvement Loans						
Applicant Gender	**Applications Received**	**Loans Originated**	**Applications Approved, but not Accepted**	**Applications Denied**	**Applications Withdrawn**	**Files Closed for Incompleteness**
Male	648	278	18	292	36	24
Female	516	208	11	265	22	10
Joint (Male/Female)	496	280	9	158	34	15
Data Not Available	182	72	2	94	8	6
Total	**1,842**	**838**	**40**	**809**	**100**	**55**

Source: https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/OH/45780/4-4

Fair Housing laws provide protections against discriminatory lending practices. In mortgage lending, no one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap.

The Fair Housing Officer provides Fair Housing presentations to local lending institutions as the ability to do so arises. These presentations include added emphasis on the illegality of discriminatory lending practices to include:

- Refusal to make a mortgage loan, purchase a loan or provide related information based on discrimination/bias;
- Imposing different terms or conditions on a loan, such as different interest rates, points or fees;
- Discriminatory practices related to property appraisals;
- Setting different terms or conditions for purchasing a loan for persons in protected categories.

More recently (2019), the Fair Housing Officer conducted a targeting mailing campaign to promote the CDBG-funded Direct Homeownership Assistance Program to local lending institutions. He provided Fair Housing information with these packets. He also encouraged questions and offered to provide educational presentations.

According to Margaret Wright (https://www.claconnect.com/resources/articles/2019/using-hmda-lar-data-to-uncover-your-institutions-fair-lending-story), "Historically, regulators have acknowledged HMDA data analysis alone is not enough to establish a pattern or practice of disparate treatment under fair lending standards." This necessitates a review of other sources; namely, complaints related to local lending practices. To date, the Fair Housing Officer has observed no discriminatory real estate practices. Additionally, the Fair Housing Officer has not received any complaints regarding real estate practices. Likewise, there is no record of complaints with the OCRC, either.

Insurance Practices

The Fair Housing Act protects homeowners against unfair treatment by insurance companies in the sale or terms of homeowners insurance. Below is a list of insurance practices that may constitute discrimination under the Fair Housing Act:

- Insurance companies may not charge higher rates based on the homeowner's race, color, national origin, religion, sex, familial status and handicap (disability).
- Insurance companies may not offer different terms or conditions based on race, color, national origin, religion, sex, familial status and handicap (disability).
- Insurance companies may not refuse or deny coverage based on race, color, national origin, religion, sex, familial status and handicap (disability).
- Insurance companies may not treat homeowners differently because of the composition of the area when the home is located.

The City's CDBG and Revolving Loan-funded housing programs require applicants to provide proof of homeowner's insurance coverage for every property purchased and/or rehabilitated. As a result, the City's Fair Housing Officer/Housing Specialist is in a position to be aware of any concerns regarding homeowner insurance issues as related to households with lower incomes. To date, he has not evidenced any of the noted concerns above. Additionally, any homeowner policy preventing the replacement or guaranteed replacement cost policies for older homes is discriminatory. The City's Fair Housing Officer has evidenced no cases where an insurance company prevented the writing of replacement or guaranteed replacement cost policies for older homes. The Fair Housing Officer also has noted no evidence of another discriminatory practice; that being insurance companies having marketing programs that exclude writing multi-line coverage for the city or certain neighborhoods within the city. Furthermore, the Fair Housing Officer has not witnessed or received complaints about any policies that prohibit the writing of replacement or guaranteed replacement cost coverage with homes with market values that fall significantly below the estimated cost to replace the home.

Citizen Participation

Meetings/Human Relations Commission (HRC) Involvement

The City of Bowling Green Human Relations Commission (HRC) consists of eleven local members each serving three-year terms. The City of Bowling Green and the HRC are committed to ensuring that Bowling Green remains a safe and inclusive community. As part of these efforts, Bowling Green has taken a proactive stance on enacting laws that protect against discrimination (Chapter 39 of the Bowling Green Codified Ordinances) as well as passing resolutions condemning violence, hate speech and proclaiming our community as safe and welcoming for all. The Fair Housing Officer attends the monthly HRC meetings, providing a report related to local Fair Housing matters. Notice of HRC meetings notes these meetings are open to the public.

During the development of this latest Analysis of Impediments to Fair Housing Choice, the Fair Housing Officer apprised the Commission (at these public meetings) of progress related to the Analysis's timelines, reported on any known developments related to the Analysis and sought input on various mechanisms related to its writing. The HRC helped to promote the public surveys, community forums and public comment/review period.

Consultations

On February 15, 2019, 62 local stakeholders were invited to participate in a consultation survey related to Fair Housing matters in Bowling Green. Stakeholders included Human Relations Commission members, leaders within the banking and housing industries, and a variety of representatives from organizations serving diverse, lower-income and/or at-risk populations. Response rate was 11 percent (11%). The stakeholder list and survey results are in Appendix A of this Analysis.

Additional face-to-face, email and telephone consultations took place in an ongoing fashion between January and August 2019. Some of the stakeholders noted in the preceding paragraph provided needed information, as did a variety of others to include representatives from the Fair Housing Center (Toledo), the Cleveland Field Office of HUD, the Toledo Regional Office of the OCRC, City of Bowling Green executive staff and a host of others. Mention of those providing information is throughout this Analysis.

Surveys

Those living in Bowling Green were invited to participate in a survey related to Fair Housing. The survey ran from April 10 through April 24, 2019, and was available in both paper and electronic (Survey Monkey) formats as well as in English and Spanish languages. The City received 118 responses to this survey. The survey was widely promoted through a press release/news articles, flyers posted at various points locally and via the City website (information and a link provided) and Bowling Green's electronic newsletter (information and a link provided). The survey, promotional documentation and results are in Appendix A of this Analysis.

Public Forums

The City of Bowling Green conducted two public forums during the development of the Analysis of Impediments to Fair Housing Choice (2019-2023). The first took place April 16 and the second happened on April 24. The public forums were widely publicized. The City provided a number of community stakeholders with flyers to display at their facilities. These flyers provided the purpose, dates and locations of the public forums (each held at different dates/times) and at central, accessible locations. The promotional documentation and sign-in sheets are in Appendix A of this Analysis. Many of those attending wished only to complete a Fair Housing survey. The agendas were open to those in attendance to set. No true Fair Housing issues came forward during these forums. The Fair Housing Officer was able to answer questions related to City of Bowling Green services and provide landlord-tenant dispute resources where requested.

Public Comment and Review

In adherence with the City's CDBG Citizen Participation Plan, the 2019-2023 Analysis of Impediments to Fair Housing Choice was available for public comment and review September 27 through October 11, 2019. Also in accordance with the Citizen Participation Plan, public notice for this period appeared in the local newspaper, the Sentinel Tribune on September 11. The City received no comments during the aforementioned timeframe. The City's Fair Housing web page also displayed a draft Analysis and notice of the public comment and review period. The Fair Housing Officer announced the public comment and review period at the October 4, 2019 Human Relations Commission and encouraged their review and comments. The public notice certification is in Appendix A.

V. IDENTIFIED IMPEDIMENTS, GOALS AND STRATEGIES 2020-2024

The following identified impediments to fair housing choice as well as affiliated goals and strategies serve to assist the City of Bowling Green in affirmatively furthering fair housing for our community.

A discussion of the previously identified impediments to fair housing choice is located in Section III of this Analysis of Impediments to Fair Housing Choice. The City has marked progress for each 2015-2019 impediment. Refer to Appendix B of this Analysis for added specifics.

The City of Bowling Green's PY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments, as well as defined specific goals and strategies to address each impediment. Most all strategies from the 2015-2019 have been carried forward—with new ones added alongside them. These identified impediments, goals and strategies serve to inform the Grants Administrator in the writing (January 2020) of the 2020-2024 CDBG Five-year Consolidated Plan.

Impediment 1: Fair Housing Education and Outreach Needed

There continues to be a need to educate the public of their rights under the Fair Housing Act and to raise community awareness of affirmatively furthering fair housing choice. This is especially important for residents at lower income levels, persons with minority status and those with disabilities. The City of Bowling Green conducted a public survey during the development of the Analysis of Impediments to Fair Housing Choice. Close to 16 percent (16%) of survey respondents indicated, they had experienced Fair Housing discrimination. Nearly six percent indicated racial discrimination in rental, real estate and banking practices. Lack of disability accommodations (most often those related to emotional support animals) were the most reported Fair Housing issue, locally, in the last four years. Additionally, nearly eight percent of survey respondents cited this as the form of discrimination experienced. As a result, the City is placing special emphasis in advertisements and presentations to ensure all understand the illegality of such practices. Nearly 16 percent (16%) of survey respondents indicating Fair Housing discrimination did not report it. Through increased education, the City of Bowling Green hopes to minimize instances of discrimination, and where discrimination continues, increase the percentage of individuals that pursue justice.

Goal: Improve the knowledge and awareness of both the public and the local officials of the Fair Housing Act, related laws, regulations and requirements of affirmatively furthering fair housing.

Strategy: The Fair Housing Office will continue to make no less than one Fair Housing presentation to the Wood County Realtor Charter (formerly known as the Wood County Board of Realtors), annually. Said presentation will include added emphasis on the illegality of racial/ethnic steering.

Strategy: The Fair Housing Officer will continue to make no less than one Fair Housing presentation to the Wood County Apartment Owners' Association, annually. Said presentation

will include added emphasis on the illegality of racial/ethnic steering and disability accommodation.

Strategy: The Fair Housing Officer will ensure all public presentations include specific information related to the issue of racial/ethnic steering and disability accommodation to include information regarding how the public can report illegal actions.

Strategy: The Fair Housing Office will ensure at least two of the Fair Housing advertisements placed in local newspapers (annually) address the illegality of racial/ethnic steering and at least two of the advertisements will address disability accommodation. All advertisements will convey how the public can report illegal actions.

Strategy: Fair Housing Officer to monitor local newspaper advertising related to rental housing and address any discriminatory issues revealed on weekly basis throughout FYs 2020-2024.

Strategy: Fair Housing Officer to distribute supply of Fair Housing Program brochures to all agencies participating in the "No Wrong Door" program and Bowling Green Housing Agency on or before December 31 each year 2020 through 2024. Make contact with above-noted agencies before April 30 (annually) to assess replenishment needs. Where needed, replenish stock on or before July 31 (annually).

Strategy: Fair Housing Officer to continue to ensure Fair Housing Program brochures are on display in the City Administration Building and Utilities Office throughout FYs 2020-2024.

Strategy: Fair Housing Officer to make no fewer than six Fair Housing training presentations (annually during FYs 2020-2024). Of the six annual presentations, three are for predominantly lower-income audiences. Fair Housing Officer is to provide quarterly status updates to the Grants Administrator to include when, where, how many attended and the training agenda. The Housing Specialist will maintain on file the agenda, sign-in sheet and other relevant data.

Strategy: Fair Housing Officer to provide and distribute approximately **500** brochures describing Fair Housing Program, on or before June 30 (annually) at various locations serving low- and moderate-income persons.

Strategy: Fair Housing Officer to prepare and place public service announcements and advertising which addresses fair housing guidelines on no less than a quarterly basis throughout FYs 2020-2024. Perform no less than a quarterly review of the City's Fair Housing web page to ensure links are working and information on said site is up to date.

Strategy: Fair Housing Officer to communicate no less than annually with representatives from La Conexion and Bowling Green State University International Student Services in an effort to raise awareness of Fair Housing Program's existence/role and gauge ongoing public needs. The Fair Housing Officer is encouraged to expand upon the list of local advocacy organizations and include them in annual outreach efforts. The Fair Housing Officer will also attend all scheduled Human Relations Commission meetings

Strategy: Fair Housing will write and distribute a newsletter (bi-annually) for those in the banking, rental and real estate industries. These newsletters will provide ongoing education related to the Fair Housing Act, provide local Fair Housing contact information and encourage greater compliance.

Impediment 2: Lack of Housing Affordability for Renter Households

Survey respondents, stakeholder consultations and CHAS data overwhelmingly show the greatest barrier to Fair Housing choice is lack of affordable housing. Amongst survey respondents 32 percent (32%) note housing affordability as a barrier to housing choice, locally. In consulting local stakeholders (to include diversity advocates, representatives from agencies serving persons at lower incomes, professionals from the real estate, housing and banking industries), 71 percent cited housing affordability as an impediment to fair housing choice. CHAS data (begins on page 51) overwhelmingly supports this fact. This data indicates 41 percent (41%) of Bowling Green of all households to be cost or severe cost burdened. Most significantly impacted are those at the extremely low-income levels.

Goal: Improve access to affordable rental housing for lower-income rental households.

Strategy: The City of Bowling Green will continue to offer the CDBG-funded Rental Rehabilitation Program. This program improves the decency and affordability of rental housing for persons with low and moderate incomes. Fair Market Rent rates will be the standard applied to provide these already cost-burdened households some reprieve. Annual goals to be set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period (2020-2024).

Strategy: The City of Bowling Green will continue to provide letters of support, proclamations and other assistance to entities seeking funding for publicly supported housing (to include accessible units) and affordable housing programming, annually 2020-2024.

Impediment 3: Lack of Housing Affordability for Owner-Occupied Households

Homeownership in Bowling Green is difficult to obtain for persons at lower income levels. American Community Survey data provides estimated costs for owner households. The median Selected Monthly Owner Costs (SMOC) for Bowling Green households with a mortgage in 2017 was $1,420. For comparison, the median SMOC for Ohio households with a mortgage in 2017 was $1,247—making Bowling Green's median SMOC nearly 13 percent higher than it was for Ohio's median cost. Bowling Green's median SMOC was $1,321 in 2010. This estimated differential in median costs, locally, is more than a seven percent increase within a seven-year timeframe. For those small number of owner-occupied households at or below 80 percent (80%) of the HUD Area Median Family Income level that do achieve homeownership status, 51 percent (51%) suffer cost or severe cost burden (see CHAS tables on pages 51 and 57). Unexpected household issues such as a roof leak or broken furnace can place a lower-income household in

jeopardy of becoming cost burdened or crossing from cost-burdened to severe cost-burdened status.

Goal: Improve lower-income households improved access to homeownership and housing affordability.

Strategy: The City of Bowling Green will continue to implement the following Community Development Block Grant (CDBG)-funded housing repair programs for lower-income households: Home Repair, Mobile Home Repair, and Elderly Home Repair. Annual goals (for each program activity) are set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period 2020-2024.

Strategy: The City of Bowling Green will continue to include the Direct Homeownership Assistance Program (makes affordable homeownership possible for lower-income persons) as a written goal in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period 2020-2024.

Strategy: The City of Bowling Green will continue to implement programming through the Housing Revolving Loan Fund (established from prior Community Housing Improvement Program grants). All programs solely benefit persons with low and moderate incomes. Programs include Down-payment assistance/Rehabilitation and Owner-Occupied Rehabilitation. Program income on this fund is contingent upon recapture of funds from the properties that have been addressed (through said programming) in the past. As a result, the fund balance fluctuates; making it difficult to target how many properties can be addressed within a giving calendar year. The City anticipates that CDBG funds will address no less than two properties annually (if funding levels permit) and more will be if possible.

Impediment 4: High Poverty Rates

ACS 2013-2017 data estimates reveal the median income in Bowling Green is significantly lower than it is statewide. In 2017, Ohio's median income was $52,407. Bowling Green's median income in 2017 was $33,794. Likewise, estimates indicate the median household income increased roughly 3 percent between 2010 and 2017 (from $32,792 in 2010 to $33,794 in 2017). Estimates for the state of Ohio during this same timeframe show a 10 percent increase (from $47,358 in 2010 to $52,407 in 2017). Thus, the local trend of under-employment (discovered at the time Bowling Green's last Analysis of Impediments to Fair Housing Choice was developed) continues.

Goal: Improve access to greater economic opportunities for persons at lower income levels.

Strategy: Utilizing the Business Revolving Loan Fund (RLF), the City of Bowling Green will continue to offer Business Assistance Loans to businesses located in the Special Improvement District, which spans two of the City's low-moderate income census tracts (217.01 and 217.02). Annual goals are set forth in the City of Bowling Green's CDBG Annual Plan for each of the

five given years within the planning period 2020-2024. Those goals will be set forth in each year's Fair Housing Action Plan.

Strategy: The City of Bowling Green will utilize the Business Revolving Loan Fund (established through CDBG revenues) as a mechanism to create jobs for persons with lower incomes. Annual goals are set forth in the City of Bowling Green's CDBG Annual Plan for each of the five given years within the planning period 2020-2024. Those goals will be set forth in each year's Fair Housing Action Plan.

Certification

By my signature, I certify that the Analysis of Impediments to Fair Housing Choice for the City of Bowling Green, Ohio complies with the intent and directives of the regulations of the Community Development Block Grant Program regulations.

Richard A. Edwards, Mayor

ATTEST:

Tina Bradley, M.P.A.
Grants Administrator

Date 9/27/19