AN ANALYSIS OF IMPEDIMENTS: AFFIRMATIVELY FURTHERING FAIR HOUSING CHOICE

Substantial Re-Evaluation & Update

June 2019

Submitted For: City of Delphos, Ohio City of Lima, Ohio Allen County, Ohio

By:
Lima-Allen County Regional Planning Commission

With the Support of:
Allen County Housing Consortium
Allen County Metropolitan Housing Authority
City of Lima Department of Community Development
West Ohio Community Action Partnership

TABLE OF CONTENTS

	TION	<u>PAGE</u>
TAB	BLE OF CONTENTS	i
ITC	T OF TABLES MADS & TILLISTDATTONS	iv
LIJ	TOT TABLES, MARS & ILLUSTRATIONS	ıv
1	INTRODUCTION	1 - 1
	Status of the Analysis of Impediments	1 - 2
	Challenges	1 - 2
	Recommendations	1 - 3
	Housing Vision	1 - 3
	Public Participation	1 - 4
2	POPULATION & SOCIOECONOMIC DEMOGRAPHICS	2 - 1
	Population & Area	2 - 1
	Population & Population Change	
	Households & Household Size	
	Age & Age Cohorts	2 - 8
	Race & Ethnic Diversity	
	· · · · · · · · · · · · · · · · · · ·	
	· · · · · · · · · · · · · · · · · · ·	
	Summary	2 - 26
3	COMMUNITY HOUSING STOCK	3 - 1
	Historical Overview	3 - 1
	Housing Stock	3 - 1
	Housing Units	3 - 2
	Tenure	3 - 2
	Vacancy Rate	
	Size of Housing Units	3 - 5
	Age of Housing Stock	
	Residential Housing Quality	3 - 5
	Housing Value	
	·	
	•	
	Lead-Based Paint	
	Affordable Housing	
2	Overcrowding	
	Housing Costs	
	Status of the Analysis of Impediments Challenges Recommendations Housing Vision Public Participation POPULATION & SOCIOECONOMIC DEMOGRAPHICS Population & Area Population & Population Change Households & Household Size Age & Age Cohorts Race & Ethnic Diversity The Disabled Population Educational Attainment Income: Household, Family & Per Capita Poverty Status: Persons & Families Below Poverty Level Labor Force Profile HUDs Protected Classes Summary. COMMUNITY HOUSING STOCK Historical Overview Housing Stock Housing Units Tenure Vacancy Rate Size of Housing Units Age of Housing Stock Residential Housing Quality Housing Value Manufactured/Mobile Homes Manufactured/Mobile Homes Manufactured/Mobile Home Parks Group Quarters Housing Rehabilitation Needs Essential Amenities Lead-Based Paint Affordable Housing Overcrowding	3 - 25

TABLE OF CONTENTS (Continued)

SEC	<u>CTION</u>	<u>PAGE</u>
4	ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE	4 - 1
	Regulatory Barriers	4 - 1
	Zoning Regulations	4 - 2
	Subdivision Regulations	4 - 3
	Building Codes	4 - 4
	Impact of Such Regulations	
	Lending Institutions	4 - 7
	Fair Housing Implications	4 - 9
	Lending Practices	4 - 9
	Lending Patterns	
	Predatory Lending & Real Estate Foreclosures	4 - 14
	Tax Policy	
	Local Taxes	4 - 18
	Taxation Policies & Housing Tools	4 - 19
	Impact of Local Tax Policies on Fair Housing	
	Equity in the Real Estate Industry	
	Fair Housing Administration & Enforcement	
	Summation	
5	5-YEAR ASSESSMENT	5 - 1
	Status of Action Items	5 - 1
	Local CDBG Program Overview	
	Allen County HUD Programming	
	Allen County Community Allocation Program	
	Lafayette Waste Water Treatment Project	
	Bath Street Improvement Project	
	Bath Road Reconstruction	
	Lafayette Village Street Reconstruction	
	Bath Township Shearin Street Drainage	
	Allen County CDBG Water & Sewer Programming	
	Allen County Revolving Loan Fund Programming	
	Eagle Rail Project	
	Lima Rail Project	
	Allen County HOME Programming	
	City of Lima HUD Programming	
	City of Lima 2014 CDBG Program	
	Decent Affordable Housing	
	Suitable Living Environment	
	Economic Opportunities	
	City of Lima 2015 CDBG Program	
	Decent Affordable Housing	
	Suitable Living Environment	
	Economic Opportunities	
	City of Lima 2016 CDBG Program	
	Decent Affordable Housing	
	Decem Affordable Floating	5 - 20

TABLE OF CONTENTS (Continued)

SEC	TION	<u>PAGE</u>
5	5-YEAR ASSESSMENT (Continued)	
	Suitable Living Environment	5 - 20
	Economic Opportunities	5 - 21
	City of Lima 2017 CDBG Program	
	Decent Affordable Housing	5 - 22
	Suitable Living Environment	5 - 23
	Economic Opportunities	5 - 24
	City of Lima 2018 CDBG Program	5 - 24
	Decent Affordable Housing	
	Suitable Living Environment	
	Economic Opportunities	
	Summation	5 - 27
APPI	ENDICES	
Α	Public Planning Process	A - 1
В	Public Transportation	
С	Tax Rate	
D	Limited English Proficiency	
Ε	Zoning	
F	Lending Institutions & Realtors	
G	Demographics & Housing	G - 1
Н	Adoptive Procedures	
I	Signature Page	

LIST OF TABLES, MAPS & ILLUSTRATIONS

TABLES		PAGE
Table 1-1	Public Participation Calendar	1 - 5
Table 2-1	Population 1960-2017	2 - 3
Table 2-2	Total Households & Average Household Size	
	by Political Subdivision 2010-2017	2 - 5
Table 2-3	Households by Political Subdivision, Married &	
	Single Householder with the Presence of Children	2 - 6
Table 2-4	Large Household Size by Political Subdivision	2 - 7
Table 2-5	Single Female Head of Household	
	in Allen County by Political Subdivision	2 - 7
Table 2-6	Allen County Population by Age Cohorts & Gender	2 - 8
Table 2-7	Age of Residents by Political Subdivision	2 - 9
Table 2-8	Total Minority Population by Race by Political Subdivision 2010-2017	2 - 11
Table 2-9	Minority Race/Ethnicity in Allen County by Political Subdivision	2 - 12
Table 2-10	Population Change by Race/Ethnicity in Allen County	2 - 12
Table 2-11	Age & Disability Status Residents of Allen County 2017	2 - 14
Table 2-12	Educational Attainment for the Population 25 Years & Over 2017	2 - 17
Table 2-13	Comparative Income Measures by Decennial Census &	
	American Community Survey	2 - 18
Table 2-14	Income in 2017 by Allen County Household Type	2 - 18
Table 2-15	Low Median Income by Political Subdivision	2 - 20
Table 2-16	Ratio of Income to Poverty Level among Individuals	2 - 20
Table 2-17	Poverty Status by Family Status	2 - 20
Table 2-18	2017 Allen County Employment by Sector	2 - 23
Table 2-19	Demographic Summary by Political Subdivision 2017	2 - 27
Table 3-1	Total Housing Units by Political Subdivision 2010-2017	3 - 2
Table 3-2	Owner Occupied Housing Units Change 2010-2017	3 - 4
Table 3-3	Renter Occupied Housing Units Change 2010-2017	3 - 4
Table 3-4	Vacancy Status by Political Subdivision	3 - 6
Table 3-5	Percentage Housing Units by Number of Rooms & Bedrooms	
	by Political Subdivision	
Table 3-6	Housing Units by Age & Value by Political Subdivision	3 - 8
Table 3-7	Assessed Quality of Residential Properties by Political Subdivision 2017	3 - 8
Table 3-8	Median Value Owner Occupied Units	3 - 10
Table 3-9	2017 Housing Sales in Allen County by Census Tract	
Table 3-10	Mobile Home Occupancy by Political Subdivision	
Table 3-11	Mobile Home Parks in Allen County 2018	3 - 14
Table 3-12	Housing Stock Presumed to Need Rehabilitated in 2017	
Table 3-13	Presence of Lead Based Paint by Year of Housing Construction 2017	3 - 18
Table 3-14	Estimated Exposure to Lead Hazard by Year of Housing Construction 2017	
Table 3-15	Estimated Lead Hazard Affected Households in Allen County 2014	3 - 19
Table 3-16	Occupants per Room in Renter Occupied Households by Political Subdivision	3 - 21
Table 3-17	Occupants per Room in Owner Occupied Households by Political Subdivision	3 - 21
Table 3-18	Median Gross Rent by Political Subdivision	
Table 3-19	Owner/Renter Occupied Housing Units Costs Greater than 30% Income	3 - 23
Table 3-20	Available Rental Stock at 30% or Less of Median Income	
	by Political Subdivision 2017	3 - 24

LIST OF TABLES, MAPS & ILLUSTRATIONS (Continued)

<u>TABLES</u>		<u>PAGE</u>
Table 3-21	Available Housing Stock at 30% or Less of Median Income	
	by Political Subdivision 2017	3 - 24
Table 4-1	Zoning Regulation Residential Attributes by Political Subdivision	4 - 3
Table 4-2	Subdivision Regulation Attributes by Political Subdivision	4 - 4
Table 4-3	2017 Home Loan Activity by Tract & Loan Type	4 - 10
Table 4-4	2017 Mortgage Denial Activity by Tract & Loan Type	4 - 11
Table 4-5	Percentage Home Loan Denials by Reason for Denial by Type of Loan in 2017	4 - 12
Table 4-6	2017 Loan Approval Rates by Type, Race & Ethnicity	4 - 12
Table 4-7	2017 Loan Application Denial Rates by Race & Income	4 - 13
Table 4-8	Approval Rates of Conventional Home Purchase Loan Applications	
	by Race & Income (2012-2017)	4 - 13
Table 4-9	Percentage Home Loan Denials by Reason for Denial in 2017:	
	Government Loan	4 - 13
Table 4-10	Percentage Home Loan Denials by Reason for Denial in 2017:	
	Conventional Loan	4 - 14
Table 4-11	Percentage Home Loan Denials by Reason for Denial in 2017:	
	Refinance Loan	4 - 14
Table 4-12	Percentage Home Loan Denials by Reason for Denial in 2017:	
	Home Improvement Loan	4 - 14
Table 4-13	Percent of Foreclosures by Census Tract 2012-2017	4 - 17
Table 4-14	Complaint Referrals Received by WOCAP in CY 2017	
Table 4-15	Disposal of Referrals in CY 2017	
Table 4-16	Fair Housing Testing 2017	
Table 5-1	Goal: Advance Public Awareness, Understanding & Support for the	
	Development of Safe, Clean, Healthy & Affordable Housing in Allen County	5 - 2
Table 5-2	Goal: Expand the Range of Available, Accessible & Appropriate	
	Housing Opportunities to Meet the Needs of the Disabled	5 - 3
Table 5-3	Goal: Expand Available Housing Opportunities to Meet the	
	Needs of All Allen County Residents	5 - 4
Table 5-4	Goal: Develop Neighborhood & Corridor Plans to Ensure Supportive	
	Environments for Redevelopment	5 - 5
Table 5-5	Goal: Provide Housing Options in Neighborhoods that Respect	
	Architectural Character while Maximizing Housing Choice	5 - 6
Table 5-6	Goal: Eliminate Homelessness in Allen County	5 - 7
Table 5-7	Identify, Assemble & Develop Underutilized Land	
	for Future Redevelopment Opportunities	5 - 8
Table 5-8	Goal: Safe, Accessible, Appropriate & Affordable	
	Housing in our Neighborhoods	5 - 9
Table 5-9	Goal: An Enhanced Quality of Life in Area Neighborhoods	5 - 10
Table 5-10	Allen County Community Allocation Program	5 - 12
Table 5-11	Allen County HOME Program	
Table 5-12	City of Lima 2014 HOME Program	
Table 5-13	City of Lima 2014 CDBG Program	
Table 5-14	City of Lima 2015 HOME Program	
Table 5-15	City of Lima 2015 CDBG Program	

LIST OF TABLES, MAPS & ILLUSTRATIONS (Continued)

TABLES		<u>PAGE</u>
Table 5-16	City of Lima 2016 HOME Program	5 - 22
Table 5-17	City of Lima 2016 CDBG Program	5 - 22
Table 5-18	City of Lima 2017 HOME Program	5 - 24
Table 5-19	City of Lima 2017 CDBG Program	5 - 24
Table 5-20	City of Lima 2018 HOME Program	5 - 26
Table 5-21	City of Lima 2018 CDBG Program	5 - 26
<u>MAPS</u>		
Map 2-1	Allen County	2 - 2
Map 2-2	Racial Minority Population Redistribution by Census Tract 2010-2017	2 - 13
Map 2-3	Age 18+ Disabled Population by Political Subdivision	2 - 15
Map 2-4	Percent of Population with Mobility Limitation by Census Tract 2017	2 - 16
Map 2-5	Households in Poverty by Subdivision	2 - 21
Map 2-6	Elderly in Poverty by Subdivision	2 - 22
Map 3-1	2017 Demolitions by Census Tract	3 - 3
Map 3-2	2017 Vacant Housing Units by Block-Group	3 - 7
Map 3-3	Allen County 2017 Property Grades	3 - 11
Map 3-4	Allen County Home Sales in 2017 by Census Tract	3 - 12
Map 3-5	Manufactured Home Parks	3 - 15
Map 3-6	Group Quarter Locations in Allen County	3 - 16
Map 4-1	Available Land for High Density Residential Development	4 - 8
Map 4-2	Foreclosure Location 2012-2017	4 - 16
Map 5-1	Community Housing Improvement Program	5 - 15
<u>ILLUSTRATION</u>		
Illustration 2-1	Allen County Population Trend	2 - 1
Illustration 2-2		
Illustration 2-3	2010 Average Household Size by Race	
Illustration 2-4	2017 Allen County/Ohio Population by Age Cohort	2 - 9
Illustration 2-5	2017 Racial Comparisons of Allen County/Ohio	2 - 10
Illustration 2-6		
Illustration 2-7	Unemployment Rates 2000-2017	2 - 24
Illustration 3-1	Group Quarter Population	3 - 13
Illustration 3-2	Affordability Gap	3 - 26
Illustration 4-1	Foreclosures in Allen County	4 - 15

SECTION 1 INTRODUCTION

An Analysis of Impediments: Affirmatively Furthering Fair Housing Choice (AI) was adopted in December 2013 by the City of Lima and the Allen County Commissioners. The report was designed to reflect the planning requirements identified by HUD for small urban and rural communities. The AI document opened with reference to the Civil Rights Act of 1968 and an overview of the Federal Fair Housing Act (Title VIII) with select references to the Community Development Act of 1974 which stipulated the national objectives (Title I) of the Community Development Block Grant Program. An extensive analysis of the housing stock followed a detailed overview of the community's demographics and socio-economic status. An analysis of impediments to fair housing choice focused on regulatory barriers, lending institutions, tax policies, equity in the real estate industry and administration and enforcement of fair housing followed by report summations and recommendations including an action plan.

The 2013 AI offered a clear analysis of the information collected. It worked to identify challenges and offered strategies to effect change. The AI document included a vision for housing and a plan complete with policies, strategies and objectives with timelines and specific partners to support such actions.

The AI document was heavily laden with primary and secondary datum compiled from: the American Community Survey, County Auditor's land records, Clerk of Courts - foreclosure records, County Health Department, County Sheriff's Office, Lima Police Department, Lima Building & Zoning Department, Lima Department of Community Development, Federal Financial Institutions Examination Council - Home Mortgage Disclosure Act (HMDA) data, Lima Allen Council on Community Affairs (LACCA - now the Western Ohio Community Action Partnership (WOCAP)), Lima -Allen County Housing Consortium - "Blueprint to End Homelessness Report", Lima-Allen County Regional Planning Commission (LACRPC) platting and zoning files, National Low Income Housing Coalition, Ohio Department of Commerce, Ohio Department of Education, Ohio Department of Health, Ohio Department of Natural Resources, and the US Bureau of Labor Statistics. Such data was analyzed using GIS based mapping at the address, census tract and political subdivision levels. Historical data points were used to establish trend lines when available. The report was supported with maps, tables, charts and illustrations to facilitate Fair Housing Planning (FHP) efforts. The report remains available on the Agency website at: http://www.lacrpc.com/pdfs/2013%20Analysis%20of%20 Impediments%20to% 20Fair%20Housing--COMPLETE.pdf.

The 2013 AI was developed in large measure due to the efforts of LACCA, the City of Lima and authored by the LACRPC. However, the AI was supported by a broader based - "Community Assessment" prepared for LACCA by the LACRPC and finalized only months after AI submission. The "Assessment" supported many of the same housing and population conclusions identified within the AI but examined in greater detail educational attainment levels and environmental determinants of poverty across the community in both the natural and man-made environments. The "Assessment" examined air and water quality, drinking water quality, transportation services, motor vehicle crashes, potential hazards of industrial lands and pipeline locations and other health and safety effects of the built environment. The report mapped crime rates and criminal incidents and the extent of alcohol permits. The report also addressed food outlets, food deserts and the access households had to healthy foods. The "Assessment" also looked at the location and proliferation of convenience stores and fast food restaurants and access to recreational facilities. The "Assessment" concluded with a series of actionable recommendations many of which were also

identified in the AI. The LACRPC and WOCAP are currently working thru the DRAFT of an update to that report.

Status of the Analysis of Impediments

The May 23, 2018 Notice in the Federal Register - posted by the Assistant Secretary for Fair Housing & Equal Opportunity at HUD^1 - governing the submission of the AI and use of the "Local Government Assessment Tool", communiques between ODSA and the LACRPC indicated that local parties should move forward to provide an Updated AI with enhanced demographic and housing profile necessary to assess fair housing issues as part of planning for use of CDBG & HOME programmatic grants.

In compliance with such direction, the LACRPC and local stakeholders worked to provide: a comprehensive overview of the population and socioeconomic characteristics of the region by community/neighborhood; a substantial overview of the housing stock across the region using various geographies including political subdivision levels, census tract, census block group and street address; and, an analysis of impediments typically used to establish action items in Fair Housing Planning. These 3 sections follow this Introduction. The report concludes with an assessment of the last 5-years of Fair Housing Planning efforts and the basis from which a new Analysis of Impediments to Fair Housing Choice will be developed.

This submission is intended to provide programmatic feedback as to the status of those actions taken to address the housing challenges being faced across the region and to recommend action items to be considered in the pending AI. More specifically this update addresses how CDBG Program funding was used and how such programmatic funding targeted specific actionable items identified in the 2013 AI.

Challenges

The AI submitted to ODSA is a shared commitment of some 20 different agencies working to advance housing interests across the 20 different political subdivisions within Allen County. Section 5 of the AI summarized the recommendations and Action Plan of the AI. The challenges identified in the AI summation highlighted: (1) a declining household size, increasing single parent households and increasing single person households; (2) an aging housing stock, in deteriorating conditions, and increasing maintenance costs; (3) the blighting influence of vacant and abandoned or boarded-up housing units; (4) the presence of asbestos, lead-based paint and mold; (5) a lack of code enforcement due to the lack of codes, lack of funding to enforce such codes, or the dismissal of any such regulations; (6) a large supply of inadequate housing conditions as established under MOU defining "clean and healthy" conditions; (7) increasing proportion of households facing housing cost burdens in excess of 30% of income; (8) declining housing values and diminished stability within neighborhoods; (9) addressing crime and criminality's impacts and the reintegration of those previously incarcerated; (10) providing transitional housing and group homes for special needs populations against local resistance; and, (11) the assembly of land for large scale housing development/re-development projects.

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¹ https://www.federalregister.gov/documents/2018/05/23/2018-11145/affirmatively-furthering-fair-housing-affh-responsibility-to-conduct-analysis-of-impediments

Recommendations

Recommendations identified in the AI are broad and comprehensive attempts to address and stabilize a distressed housing market while creating safe, clean, healthy and affordable housing to support housing options and choice for the entire populace. Recommendations contained in the AI are largely focused on "regulatory controls" and remediation efforts to support fair housing choice. Such changes take time.

Recommendations targeting local governments identified planning and regulatory controls; and, focused on an examination of local zoning regulations, subdivision regulations, building codes, and exterior maintenance codes to improve neighborhoods and housing affordability. Related planning recommendations looked to develop neighborhood and comprehensive plans using innovative tools including land banks, land trusts, opportunities for tax increment financing (TIF), the use of federal and state funds (CDBG, OHFA, etc.) to promote physical preservation or rehab; as well as, regional cooperation to achieve economies of scale in program management.

Several fair housing choice issues were also identified and recommended for action by local housing activists and stakeholders. Specific targets include: (1) Coordination & Implementation of a Fair Housing Plan using a broad based forum to support regional coordination - this has been done but requires significant resources to maintain; (2) Fair Housing education, training, monitoring and enforcement - this has been done but with such limited funding it is difficult to retain qualified personnel and continue such efforts to the extent necessary; (3) Coordinated educational efforts to understand and overcome community opposition to affordable housing - a strategic marketing campaign remains to be developed to clear this hurdle; (4) Examine possible changes in Section 8 programming to achieve greater landlord participation outside of the central city and retain existing landlords in the program - this is; (5) Real Estate & Insurance Industries should reassess their commitment to FHC principles and educational training to better reflect inclusivity; (8) Rental Housing and landlords should be targeted for fair housing education, information and technical assistance; and, (8) A reassessment and commitment to identifying the economic and social impact of poor quality housing and the lack of building codes and rental registries remains warratned.

Housing Vision

The AI identified a specific vision and certain goals for addressing housing within Allen County. The Plan defined neighborhoods as geographic areas wherein residents held both personal and psychological ownership; areas where residents shared common values built on strong relationships. The Housing Vision established "Clean, safe, vibrant, neighborhoods that offered affordable housing to all socioeconomic groups with accessibility to necessary services and increasing property valuations" by 2020.

The following goal statements were identified in the AI to highlight the community's approach to the realization of the identified vision:

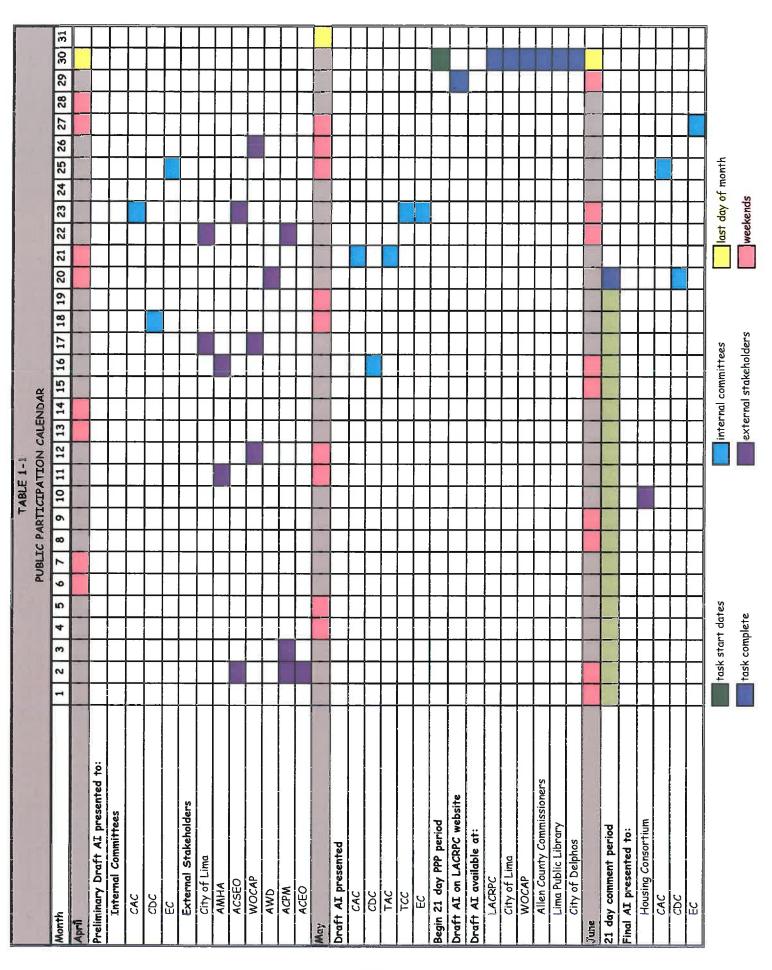
- Support the development of clean, safe, affordable housing in neighborhoods.
- Develop county-wide residential housing and maintenance codes to ensure resident safety and protect property valuations.
- Expand the range of residential opportunities for persons with special housing needs.
- Develop appropriate housing for senior citizens in proximity to shopping, medical facilities, social services, and public transportation to support their ability to remain independent.
- Develop alternative housing types including apartments, townhouses, condominiums, and converted commercial, industrial and institutional buildings to support live-work spaces and a wide variety of housing choice.

- Provide a variety of housing types in neighborhoods throughout the community that
 respects its architectural character while maximizing housing choice for residents of all
 incomes, ages, ability levels and social circumstances.
- Support housing rehabilitation programming as a most effective means of making affordable housing available to the greatest number of residents.
- Develop neighborhood plans to ensure a supportive environment for continued residential development while allowing for appropriate housing infill and renovation.
- Promote community and housing development through strategic, proactive land assembly.
- Address homelessness through a multi-faceted strategy that includes emergency shelters, permanent supportive housing, medical and social services, and job training.

Public Participation

The AI was completed on behalf of the City of Delphos, City of Lima, and Allen County over a 6-month period. The completion of this assessment was made possible only with the support and cooperation of multiple agencies and offices including: Allen Metropolitan Housing Authority, Coleman Professional Services, West Ohio Community Action Partnership, Family Promise, Allen County Housing Consortium, Allen County Commissioners, Allen County Auditor's Office, Allen County Building Department, Allen County Engineer's Office, Allen County Sanitary Engineer's Office, Allen County Tax Map Office, Allen Water District, City of Lima Public Works Department, City of Lima Building & Zoning Office, City of Lima Community Development Office, City of Lima Police Department, and the City of Delphos Safety Services Office - including the Delphos Fire Department.

Early drafts of the AI evolved and were refined based on various data items identified as necessary; this refined data was provided by the aforementioned offices/agencies. The early drafts were submitted through the internal committee structure of the Regional Planning Commission, which is comprised of delegates of all 20 political subdivisions in Allen County. The Final Draft was formerly introduced across the political spectrum after its adoption by the Regional Planning Commission. Immediately after the Final Draft was adopted by the Regional Planning Commission the document was distributed to local governments and stakeholders. In late May, a press release was issued announcing a 21-day public involvement period for the AI. Electronic copies were also made available to area governments for use on their websites, including the cities of Lima and Delphos as well as the Allen County Commissioners. Copies of the Report were made available to the public, including options to request large print and electronic versions. Document was also made available to the public at key public institutions, including: the Allen County Commissioners' Office, City of Lima Administrative Offices, City of Delphos Administration Building and the Lima Public Library as well as the Regional Planning Commission. Public meetings were held at the Regional Planning Commission and the Allen County Court House - both sites met ADA accessibility standards and served by the Regional Transit Authority. Written comments and associated responses were solicited and contained in the Final Document submitted to ODSA (Appendix A). Table 1-1 depicts the public participation calendar.



SECTION 2 POPULATION & SOCIOECONOMIC CHARACTERISTICS

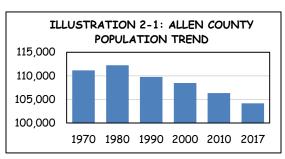
In order to address this community's access to fair housing, a better understanding of the local population is warranted. Assessing a community's population and its respective demographic measures is important to understanding the related demand and consumption of housing. Recognizing and understanding how economic factors impact population furthers the discussion and assessment of housing, its conditions and affordability while affording the community an opportunity to develop sound housing policies and support the wise expenditures of public funds.

Population & Area

The Lima-Allen County Regional Planning Commission's planning area spans all of Allen County and its cities and villages inclusive of those areas in Hancock and Van Wert counties. The study area encompasses the Cities of Delphos and Lima, the incorporated villages of Bluffton, Cairo, Elida, Harrod, Lafayette, and Spencerville and 12 townships including: Amanda, American, Auglaize, Bath, Jackson, Marion, Monroe, Perry, Richland, Shawnee, Spencer and Sugar Creek. Major roadways include Interstate Highway 75, and State Routes 65, 115 and 696 which run north and south. U. S. Route 30 and State Routes 81, 117 and 309 cross the county east to west. The Auglaize and Ottawa Rivers flow through Allen County. The total study area reflects some 409 square miles. Map 2-1 provides a representative base map for reference. The population of Allen County in 2017 according to the American Community Survey (ACS) was 104,157 persons, with the total population of the study area reaching 112,352, inclusive of the non-Allen County parts of Bluffton and Delphos. This population however, is not uniform in its demographics, distribution or density. The remainder of this section attempts to highlight specific characteristics of the community's population and provide broad generalizations that will further the planning process.

Population & Population Change

In the context of this report, the term population refers to the number of inhabitants in a given place and time. Herein, unless otherwise noted, population data reflects the total number of residents in a specific political subdivision as prescribed by the U.S. Census Bureau for that ACS 5 Year Estimate. Table 2-1 provides population data for Allen County and its political subdivisions by decennial census



period. The population of Allen County has changed over time with an extended period of relatively slow growth followed by decline. As identified in Table 2-1 and demonstrated in Illustration 2-1, the County's population reached a plateau of 112,241 persons in 1980, since then it has decreased by 8,084 persons, or 7.2 percent. For purposes of comparison the State of Ohio experienced a population growth rate of 7.5 percent over the same 37-year period.

Since 2000, a 4% population loss is due largely to out-migration.

Such population change is the net result of the relationship between the number of births and the number of deaths in a population (sometimes referred to as natural change) coupled with the gross migration rate within the community. Comparing

2017 data against 2000 Census tabulations Allen County lost 4,316 residents, a loss in population of 4.0 percent. Data indicates that out migration is the principal component of population decline as people leave the community to fulfill opportunities elsewhere. Illustration 2-2 provides additional insights into the components of population change over the 2005 thru 2015 period.

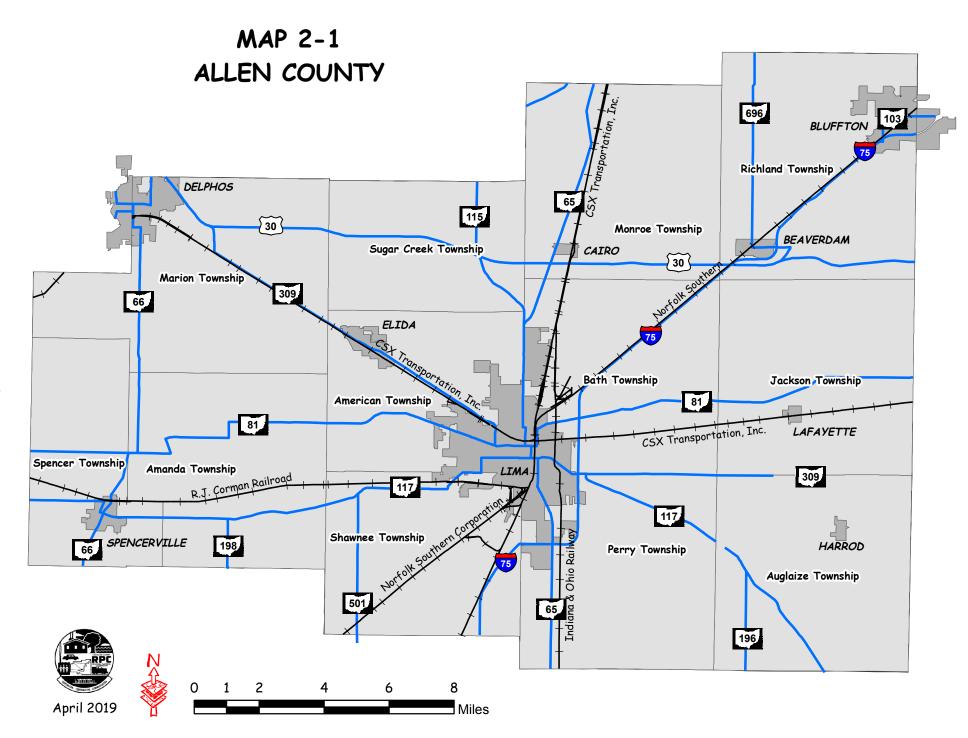
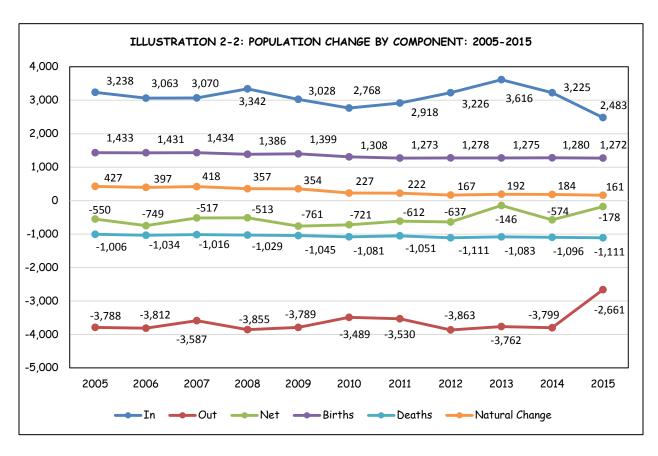


TABLE 2-1 POPULATION 1960-2017								
Political Subdivision	1960	1970	1980	1990	2000	2010	2017	Percent Change
Allen County	103,691	111,144	112,241	109,755	108,473	106,331	104,157	0.4%
Beaverdam	514	525	492	467	356	382	469	-8.8%
Bluffton	2,591	2,935	3,310	3,367	3,896	4,125	4,383	69.2%
Cairo	566	587	596	473	499	524	534	-5.7%
Delphos	6,961	7,608	7,314	7,093	6,944	7,101	7,123	2.3%
Elida	1,215	1,211	1,349	1,486	1,917	1,905	1,910	57.2%
Harrod	563	533	506	537	491	417	399	-29.1%
Lafayette	476	486	488	449	304	445	402	-15.5%
Lima	51,037	53,734	47,817	45,549	41,578	38,771	37,592	-26.3%
Spencerville	2,061	2,241	2,184	2,288	2,235	2,223	2,240	8.7%
Amanda Township	1,217	1,498	1,769	1,773	1,913	2,071	1,861	53.0%
American Township	9,184	8,766	11,476	10,921	13,599	12,476	12,182	32.6%
Auglaize Township	1,740	2,245	2,042	1,936	2,359	2,366	2,314	33.0%
Bath Township	8,307	9,323	9,997	10,105	9,819	9,725	9,590	15.4%
Jackson Township	1,523	1,761	2,214	2,288	2,632	2,611	2,565	68.4%
Marion Township	2,222	2,644	2,734	2,775	2,872	2,777	2,864	28.9%
Monroe Township	1,386	1,490	1,621	1,622	1,720	1,702	1,827	31.8%
Perry Township	5,045	3,751	3,586	3,577	3,620	3,531	3,464	-31.3%
Richland Township	1,530	1,515	1,628	1,821	2,015	1,955	1,527	-0.2%
Shawnee Township	9,658	9,734	12,344	12,133	12,220	12,433	12,176	26.1%
Spencer Township	863	960	925	832	871	844	798	-7.5%
Sugar Creek Township	1,166	1,209	1,242	1,311	1,330	1,283	1,248	7.0%
B01003 Total Populatio	n <i>ACS-</i> 2013-	-2017						



Population change, whether related to growth or decline is not static nor is it uniform. For example, with the population decline since 1980 noted, the County has actually experienced an overall population increase of 0.45 percent when examining the full period spanning the 1960 to 2017 period. In fact, as depicted in Table 2-1, many political subdivisions within Allen County have experienced an extended period of continued growth while others have experienced overall growth in cyclical spurts since 1960.

Data suggests that the older urban centers of Allen County witnessed a general decline of population since 1970.

Data suggests that the older urban centers of Allen County witnessed a general decline of population since 1960, while younger suburban and exurban townships have increased in overall population. For example, Lima, the county seat, witnessed a 5.3 percent increase in population between 1960 and 1970 before dropping 27.8 percent in size by 2017. However, Amanda Township, a township without an incorporated area,

experienced sizeable percentage growth over the 57-year period witnessing population growth of 24.2 percent respectively. Of some concern is the effect of annexation on the unincorporated areas over the 57-year period. However, the actual annexation of population is considered negligible as most annexation initiatives targeted undeveloped/unpopulated land.

Households & Household Size

Another population related factor to recognize is change in the number and size of local households. This measure is important since each household requires a dwelling unit, and in most cases the size of the household will determine specific housing components such as number of bedrooms, bathrooms, square footage, play area, etc. Therefore, as

From a public policy perspective, it is important to balance the available housing supply with the housing demand.

households change in number or character, housing consumption changes. As the characteristics of the household change, new residency patterns are established. From a public policy perspective, it is important to balance the available housing supply with the housing demand, otherwise voids develop whereby housing remains unoccupied/vacant and housing needs go unmet.

Census data reveals the total number of households and the rate of change in total households reported between 2010 and 2017. Table 2-2 indicates the total number of Allen County households in 2017 was 40,319, staying relatively stable since 2010 with less than a one percent change (-0.9)

Household size is an interesting factor. Table 2-2 presents information relative to the changing size of households. The average household size in Allen County has increased slightly at 2.48 persons per household between 2010 and 2017, an increase of .4 percent. In comparison, the State average size of 2.44 persons per household was a decline of 0.8 percent from seven years ago. Notice also that household size varies by political subdivision across Allen County with 12 of the 21 jurisdictions experiencing a decline in average household size.

Table 2-3 examines household composition. In 2017, just under half of households (12,548) or 31.1 percent of all households were identified with the presence of children. This data may very well

The implications of smaller size households should be monitored by local policy experts and reflected in local housing policies, building codes and zoning regulations.

indicate that a historical trend of families with children is changing to more 2.0 person households, single-parent households with children under the age of 18 years, and households comprised of retirees. The implications of smaller sized households should be monitored by local policy experts and reflected in local housing policies, building codes and zoning regulations.

TABLE 2-2
TOTAL HOUSEHOLDS & AVERAGE HOUSEHOLD SIZE BY POLITICAL SUBDIVISION
2010-2017

Political Subdivision 2017 Total Household		2017 Average Household Size	2010 Total Households	2010 Average Household Size	Total Households % Change	Household Size % Change
Allen County	40,319	2.48	40,691	2.47	-0.9%	0.4%
Beaverdam	194	2.42	144	2.6	34.7%	-6.9%
Bluffton	1719	2.31	1,428	2.57	20.4%	-10.1%
Cairo	183	2.92	198	2.70	-7.6%	8.1%
Delphos	2,890	2.42	2,893	2.38	0.0%	1.7%
Elida	699	2.73	708	2.67	-1.3%	2.2%
Harrod	145	2.75	143	2.87	1.4%	-4.2%
Lafayette	153	2.63	161	2.72	-5.0%	-3.3%
Lima	14,312	2.42	14,221	2.39	0.6%	1.3%
Spencerville	851	2.57	817	2.62	4.2%	-1.9%
Amanda Township	700	2.66	759	2.72	-7.8%	-2.2%
American Township	5,190	2.38	5,344	2.46	-2.9%	-3.3%
Auglaize Township	810	2.85	893	2.69	-9.3%	5.9%
Bath Township	3,751	2.5	3,827	2.52	-2.0%	-0.8%
Jackson Township	933	2.74	1,003	2.61	-7.0%	5.0%
Marion Township	1,068	2.46	1,016	2.6	5.1%	-5.4%
Monroe Township	1,068	2.46	1,016	2.6	5.1%	-5.4%
Perry Township	1,350	2.52	1,453	2.49	-7.1%	1.2%
Richland Township	711	2.26	604	2.64	17.7%	-14.4%
Shawnee Township	4,767	2.54	4,833	2.5	-1.4%	0.0%
Spencer Township	391	2.58	326	2.61	19.9%	-1.1%
Sugar Creek Township	452	2.76	495	2.54	-8.7%	8.7%
Census 2010 ACS 2017						

Large households (6 or more persons) usually have more difficulty finding housing particularly affordable rental housing due to a lack of supply. Such households are also at greater risk of experiencing housing discrimination based on familial status. Table 2-4 suggests that 29.4 percent of large households in Allen County reside in the

Large households (6 or more persons) usually have more difficulty finding housing particularly affordable rental housing due to a lack of supply.

City of Lima. Illustration 2-3 reveals that in 2010 households with a Hispanic householder tended to be larger than households with Asian (2.77), African American (2.47) or White (2.46) householders. As of the date of this report no ore current data is available.

Single parent households, especially female head of households are also at risk of experiencing fair housing discrimination based on familial status. Table 2-5 reveals the distribution of female-headed households with children across the study area. Data suggests the highest percentage of female head of households in Allen County is located in the City of Lima (22.8%) followed by the Village of Spencerville (20.8%). However, Spencer Township had the lowest percentage of female head of households with zero identified in 2017.

TABLE 2-3 HOUSEHOLDS BY POLITICAL SUBDIVISION, MARRIED & SINGLE HOUSEHOLDER WITH THE PRESENCE OF CHILDREN Married Single Single Total Political Subdivision % Woman w/ % Man w/ % Households w/ Households w/ Children Children w/ Children Children Children 58.5% 30.4% 1,300 10.4% 31.1% 7,341 3,811 12,548 Allen County Beaverdam 37 60.7% 22 36.1% 0 0.0% 61 31.4% 78.3% 7.0% 13.3% 497 28.9% Bluffton 389 35 66 37 61.7% 9 15.0% 7 11.7% 60 32.8% Cairo Delphos 594 59.3% 67 6.7% 229 22.9% 1,001 34.6% 170 70.8% 15.4% 13.8% 240 34.3% Elida 37 33 40.0% 24.1% 13.8% 58 Harrod 36 62.1% 14 Lafayette 31 63.3% 11 22.4% 5 10.2% 49 32.0% 1,766 37.6% 50.9% 501 4,699 32.8% Lima 2,391 10.7% Spencerville 188 52.5% 37.2% 37 10.3% 42.1% 133 358 Amanda Township 188 81.0% 44 19.0% 0 0.0% 232 33.1% American Township 948 68.6% 268 19.4% 12.0% 1,382 166 26.6% 208 Auglaize Township 61.9% 36 10.7% 81 24.1% 336 41.5% Bath Township 746 67.7% 316 28.7% 33 3.0% 1,102 29.4% 223 81.4% 5.5% 274 29.4% Jackson Township 19 6.9% 15 Marion Township 210 12.7% 28.7% 68.6% 39 57 18.6% 306 Monroe Township 180 73.2% 58 23.6% 8 3.3% 246 39.6% 2.3% Perry Township 177 81.2% 36 16.5% 5 218 16.1% Richland Township 133 77.3% 13 7.6% 17 9.9% 172 30.7% Shawnee Township 1,080 77.8% 241 17.4% 68 4.9% 1,389 29.1% 100.0% 0.0% 0.0% 34.0% Spencer Township 133 0 0 133 Sugar Creek Township 104 74.3% 0 0.0% 25.7% 140 31.0% 36 *ACS B11005 2013-2017

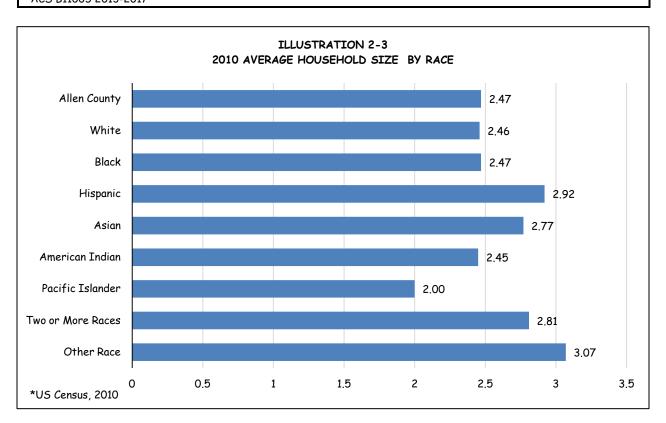


TABLE 2-4 LARGE HOUSEHOLD SIZE BY POLITICAL SUBDIVISION								
Political Subdivision Household Size Large Households 6 7+ 6+ PCT Large Households								
Allen County	762	349	1,111	2.8%				
Beaverdam	13	0	13	6.7%				
Bluffton	0	17	17	1.0%				
Cairo	2	12	14	7.7%				
Delphos	52	0	52	1.8%				
Elida	16	2	18	2.6%				
Harrod	4	0	4	2.8%				
Lafayette	4	1	5	3.3%				
Lima	188	139	327	2.3%				
Spencerville	0	0	0	0.0%				
Amanda Township	17	4	21	3.0%				
American Township	132	4	136	2.6%				
Auglaize Township	35	18	53	6.5%				
Bath Township	124	20	144	3.8%				
Jackson Township	16	11	27	2.9%				
Marion Township	20	5	25	2.3%				
Monroe Township	0	7	7	0.7%				
Perry Township	32	35	67	5.0%				
Richland Township	20	0	20	2.8%				
Shawnee Township	108	54	162	3.4%				
Spencer Township	0	0	0	0.0%				
Sugar Creek Township	16	20	36	8.0%				
*ACS B11016 2013-2017			<u> </u>					

TABLE 2-5 SINGLE FEMALE HEAD OF HOUSEHOLD IN ALLEN COUNTY BY POLITICAL SUBDIVISION							
Subdivision	Households	Female Head of Household	Percent				
Allen County	40,319	5,559	13.8%				
Beaverdam	194	27	13.9%				
Bluffton	1,719	129	7.5%				
Cairo	183	25	13.7%				
Delphos	2,890	306	10.6%				
Elida	699	75	10.7%				
Harrod	145	16	11.0%				
Lafayette	153	18	11.8%				
Lima	14,312	3,262	22.8%				
Spencerville	851	177	20.8%				
Amanda Township	700	79	11.3%				
American Township	5,190	455	8.8%				
Auglaize Township	810	36	4.4%				
Bath Township	3,751	448	11.9%				
Jackson Township	933	56	6.0%				
Marion Township	1,068	48	4.5%				
Monroe Township	621	58	5.4%				
Perry Township	1,350	123	9.1%				
Richland Township	711	24	3.4%				
Shawnee Township	4,767	348	7.3%				
Spencer Township	391	0	0.0%				
Sugar Creek Township	452	11	2.4%				
ACS B11001 2013-2017							

Age & Age Cohorts

Age is a critical characteristic of a community's population. Age reflects certain attitudes and beliefs. Age also reflects demands for education, employment, housing, and related services. Age cohorts

Age reflects the degree to which specific services will be required.

attempt to identify a specific population within a certain particular age grouping and are important in attempts to identify specific needs or the degree to which specific services will be required by that particular population segment.

The construction of a population pyramid furthers an analysis of age and age cohorts by gender differences. As sex is a protected class under the Fair Housing Act this construct provides valuable insights not only into fertility and morbidity issues but also workforce availability and housing consumption by age and gender. Table 2-6 provides a breakdown of the County's population by age cohorts and gender.

TABLE 2-6 ALLEN COUNTY POPULATION BY AGE COHORTS & GENDER								
Age Cohort	Male	Percent	Female	Percent	Total	% Total		
> 5	3,351	6.4%	3,106	6.0%	6,457	6.20%		
5-9	3,507	6.7%	3,278	6.4%	6,785	6.51%		
10-14	3,429	6.5%	3,433	6.7%	6,862	6.59%		
15-19	3,947	7.5%	3,278	6.4%	7,225	6.94%		
20-24	4,308	8.2%	3,294	6.4%	7,602	7.30%		
25-29	3,521	6.7%	3,032	5.9%	6,553	6.29%		
30-34	3,156	6.0%	3,020	5.9%	6,176	5.93%		
35-39	3,146	6.0%	3,163	6.1%	6,309	6.06%		
40-44	3,029	5.8%	2,771	5.4%	5,800	5.57%		
45-49	3,144	6.0%	2,908	5.6%	6,052	5.81%		
50-54	3,519	6.7%	3,528	6.8%	7,047	6.77%		
55-59	3,560	6.8%	3,649	7.1%	7,209	6.92%		
60-+64	3,553	6.8%	3,539	6.9%	7,092	6.81%		
65-69	2,911	5.5%	2,595	5.0%	5,506	5.29%		
70-74	1,554	3.0%	2,337	4.5%	2,337	2.24%		
75-79	1,323	2.5%	1,461	2.8%	2,784	2.67%		
80-84	785	1.5%	1,524	3.0%	2,309	2.22%		
85+	871	1.7%	1,627	3.2%	2,498	2.40%		
Allen County Total	52,6	14	51,5	543	104,	157		
*ACS B01001 2013-2017								

The following construct, Illustration 2-4, depicts an age/gender profile of Allen County's population as documented in the 2017 ACS against the State of Ohio for the same period. When compared to the State of Ohio, the population pyramid suggests Allen County is slightly higher in the number of both males and females less than 5 years of age and also slightly higher than the State in the 5 to 9 years of age cohort.

Consistent with national trends, the County's population is aging.

Consistent with national trends, the County's population is aging. The median age of the County population is 38.6 years. That compares with a median of 39.3 and 37.8 years with the State of

Ohio and the United States respectively. Table 2-7 indicates the variance in median age between the various political subdivisions. For example, The Village of Spencerville had a median age of 30.5 years, compared to Amanda Township with a median age of 47.3 years, nearly 9 years older than the median of Allen County.

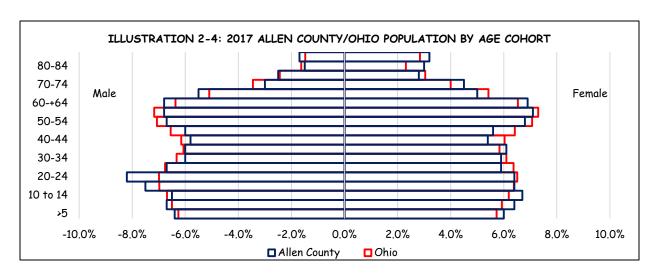


TABLE 2-7 AGE OF RESIDENTS BY POLITICAL SUBDIVISION						
Subdivision	Subdivision Median Age % Under 18					
Allen County	38.6	23.3%	16.3%			
Beaverdam	32.8	26.0%	13.0%			
Bluffton	40.2	20.5%	21.6%			
Cairo	38.5	31.5%	16.1%			
Delphos	38.8	22.4%	17.7%			
Elida	41.8	25.9%	14.5%			
Harrod	35.4	27.8%	12.3%			
Lafayette	35.9	24.9%	15.7%			
Lima	32.9	24.7%	12.0%			
Spencerville	32.0	29.6%	15.1%			
Amanda Township	47.3	23.2%	12.8%			
American Township	42.4	21.9%	22.2%			
Auglaize Township	36.3	29.3%	9.0%			
Bath Township	39.7	21.1%	18.2%			
Jackson Township	44.5	25.5%	18.6%			
Marion Township	42.0	18.2%	19.6%			
Monroe Lownship	33.8	31.9%	13.0%			
Perry Township	45.5	16.0%	21.2%			
Richland Township	41.8	22.2%	18.1%			
Shawnee Township	45.5	21.7%	20.0%			
Spencer Township	33.1	29.3%	16.8%			
Sugar Creek Township	33.0	24.9%	16.2%			
ACS B01003,B01002,B09001 &	B09020 2013-2017					

Age data reveals that 6.2 percent of the County's population is less than 5 years of age and nearly a quarter (23.3%) is below the age of 18. Data suggests that simply due to age of the population, more than a third of the population is not able to fully contribute to the economic growth and earning power of the community. Data shows

Data suggests that simply due to age a third of the population is not able to fully contribute to the economic growth of the community.

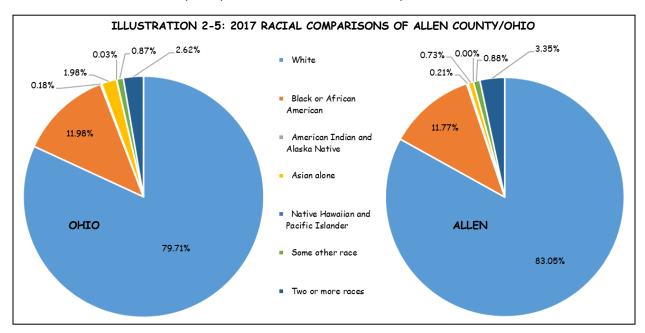
that an additional 20 percent of the population is categorized in the pre-retirement age group (50-64) and may be readying for retirement. An examination of the community's population reveals an increasing senior population. Concerns center on the availability of a younger work force and the need for appropriate senior housing services and public transportation to accommodate pre-retirement and post-retirement households.

Race & Ethnic Diversity

One of the key components of the assessment is an examination of the community's racial and ethnic make-up and its associated concentration. Federal policies have defined minority populations in a number of ways. Included are persons of all non-white races, Hispanics of any race, and persons of multiple races. The Census identifies seven major minority

The community has followed national trends and grown more racially diverse between 2010 and 2017.

racial/ethnic classifications, including: American Indian and Alaska Natives; Black or African-American; Asian; Native Hawaiian and Other Pacific Islanders; persons of other races; persons of two or more races; and, persons of Hispanic or Latino origin. ACS 2017 data revealed that representatives of all minority classifications lived within Allen County, except for Pacific Islander. Ethnicity is a term somewhat harder to identify when considering race and/or minority relationships. Ethnicity typically refers to a person's country of origin and his or her cultural ties. It should be understood that this demographic measure is distinctly different from one's racial stock. The Census indicates ethnicity in terms of Hispanic Origin. Illustration 2-5 reveals the extent to which Allen County compares to the State of Ohio by racial breakdown.



Following the national trend, Allen County's population has grown more racially and ethnically diverse during the past decade. Racially, the white population comprises the largest percentage of the population with all racial minorities only accounting for 16.9 percent (see Table 2-8). However this is a 2.4 percent increase in the minority population since 2010. The largest minority group within Allen County is African American, which comprises 11.8 percent of the total population. All other minority groups together comprise approximately 5.1 percent of the total County population. Although dispersed across the County, the County's largest minority group, African-Americans are primarily concentrated in the City of Lima where it constitutes 25.6 percent of the City's population. Table 2-8 reveals the extent of racial diversity across the local political subdivisions of Allen County and the pace of the changing composition in each.

When consideration is given to Hispanic ethnicity, which can include persons of any race including White, the number of minority residents within Allen County climbed to 19,539 persons, or 18.7 percent of the total Allen County population. The largest minority population was the Black or African-American population which totals some 12,260 persons, and accounts for approximately

62.7 percent of the total minority population (see Table 2-9). Hispanics, the second largest minority in Allen County after the African-American population, were geographically distributed across the County.

The 2017 ACS data reveals that the minority population in Allen County grew in the last seven years. The population that grew the most dramatically was the Hispanic population which exhibited a 19.18 percent increase between the 2010 and 2017. Despite this dramatic percentage increase the population still accounted for just 2.9 percent of the total population. The African-American population experienced a decrease of 3.0 percent between 2010 and 2017.

The 2017 ACS data reveals that the Hispanic population in Allen County grew dramatically in the last seven years (19.18%).

Most notably the highest rate of minority growth took place in The City of Delphos (334%) and Marion Township (310%). The white population in Allen County decreased by .08 percent. Table 2-10 reveals the extent to that change within the major racial categories.

TABLE 2-8 TOTAL MINORITY POPULATION BY RACE BY POLITICAL SUBDIVISION 2010-2017					
Political Subdivision	2010 Minority Population	2017 Minority Population	Change	Percent Change	
Allen County	17,242	17,650	408	2.4%	
Beaverdam	12	7	-5	-41.7%	
Bluffton	192	200	8	4.2%	
Cairo	12	10	-2	-16.7%	
Delphos	103	447	344	334.0%	
Elida	109	198	89	81.7%	
Harrod	3	13	10	333.3%	
Lafayette	10	0	-10	-100.0%	
Lima	12,759	12,645	-114	-0.9%	
Spencerville	78	65	-13	-16.7%	
Amanda Township	40	104	64	160.0%	
American Township	1,601	1,582	-19	-1.2%	
Auglaize Township	49	134	85	173.5%	
Bath Township	677	820	143	21.1%	
Jackson Township	43	18	-25	-58.1%	
Marion Township	30	123	93	310.0%	
Monroe Township	31	0	-31	-100.0%	
Perry Township	323	132	-191	-59.1%	
Richland Township	33	26	-7	-21.2%	
Shawnee Township	897	1,298	401	44.7%	
Spencer Township	15	42	27	180.0%	
Sugar Creek Township	25	13	-12	-48.0%	
ACS B02001 2017					

The growth of the minority populations coupled with the movement of populations amongst the townships changed the distribution of white and minority populations between 2010 and 2017. For example in 2000 30.1 percent of Allen County's white population resided in the City of Lima. By 2017, this percentage had declined to 28.8 percent. Map 2-2 depicts the re-distribution of minority residents between the 2010 and 2017 by census tract.

Along with the growth of minority populations in general the size of the Limited English Proficient (LEP) population has also risen in the last decade. The majority of growth has been in concentrated pockets across the County. Two concentrated areas with LEP populations over 5 percent were found in the City of Delphos and Shawnee Township. The growth of this LEP population has implications

for all government and government funded organizations when it comes to public outreach and program administration, including fair housing policies (Appendix D).

TABLE 2-9 MINORITY RACE/ETHNICITY IN ALLEN COUNTY BY POLITICAL SUBDIVISION								
Political Subdivision	Black & African American	Asian	American Indian	Other Races	Two or More Races	Hispanic or Latino Origin	Total	Percent
Allen County	12,260	756	221	921	3,492	2,995	19,539	18.7%
Beaverdam	0	0	3	0	4	4	11	0.0%
Bluffton	102	37	0	26	35	49	215	5.0%
Cairo	0	4	0	0	6	21	28	5.2%
Delphos	11	0	0	198	11	220	242	6.1%
Elida	139	0	0	2	57	61	257	13.5%
Harrod	0	0	0	13	0	13	13	3.3%
Lafayette	0	0	0	0	0	2	2	0.5%
Lima	9,633	288	124	350	2,250	1,434	13,664	36.3%
Spencerville	37	0	4	14	10	18	65	2.9%
Amanda Township	0	73	0	0	31	21	125	7.2%
American Township	974	7	20	107	474	402	1,851	13.1%
Auglaize Township	0	0	19	0	115	206	252	9.3%
Bath Township	480	146	0	105	89	186	901	10.4%
Jackson Township	0	0	0	0	18	48	66	2.2%
Marion Township	103	0	0	0	11	8	131	1.9%
Monroe Township	0	0	9	0	0	0	0	0.0%
Perry Township	67	0	28	0	37	5	137	4.1%
Richland Township	3	0	0	0	23	0	26	0.4%
Shawnee Township	711	201	14	93	279	186	1,400	13.0%
Spencer Township	0	0	0	0	42	0	42	1.4%
Sugar Creek Township	0	0	0	13	0	111	111	9.8%
*ACS B02001& B03002 2013-2017								

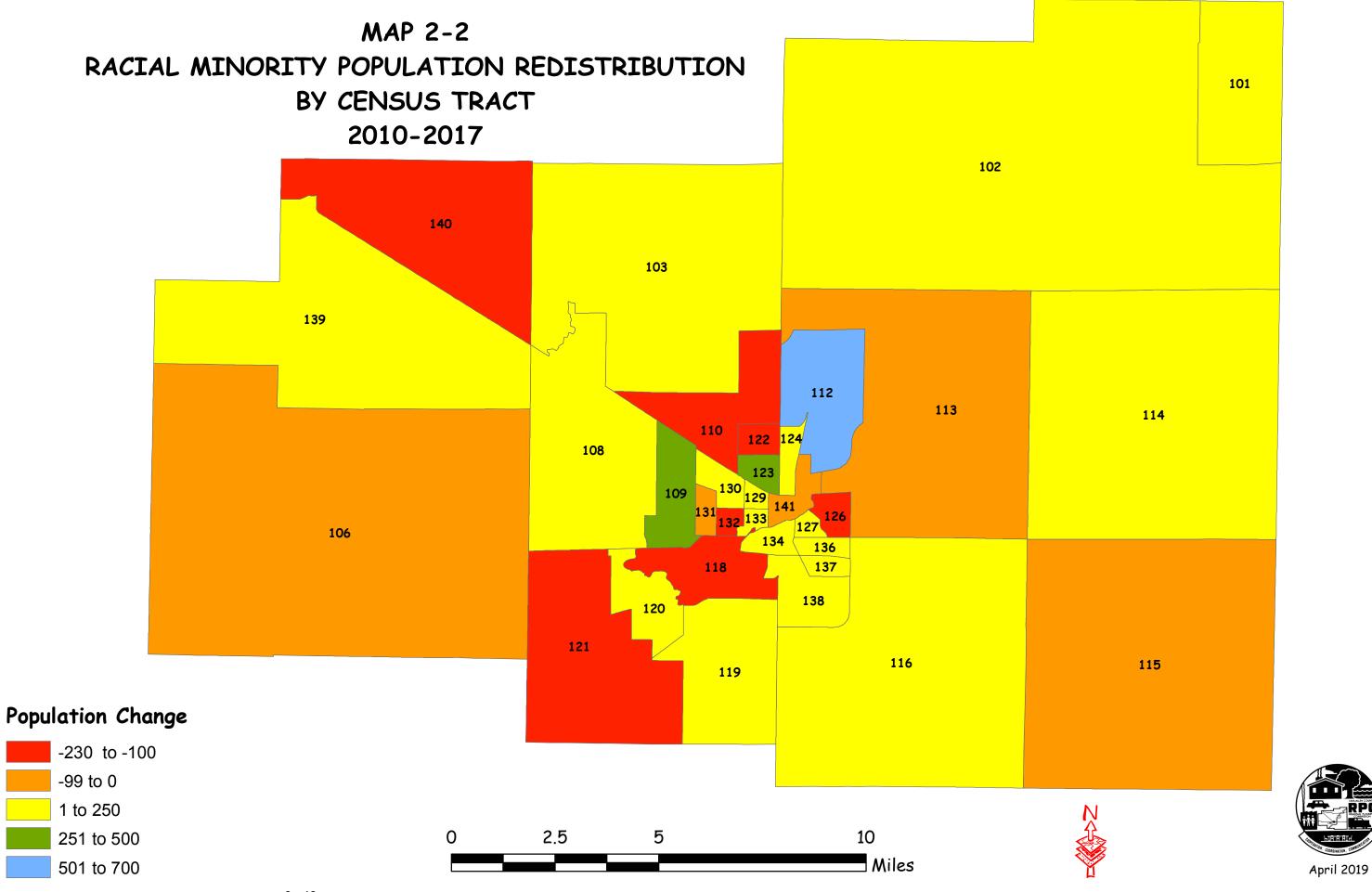
TABLE 2-10 POPULATION CHANGE BY RACE/ETHNICITY IN ALLEN COUNTY										
Year White African- Hispanic American Asian							% Asian			
2010	86,576	81.4%	12,639	11.9%	2,513	2.4%	207	0.2%	740	0.7%
2017	86,507	83.1%	12,260	11.8%	2,995	2.9%	221	0.2%	756	0.7%
Change	-69	-0.08%	-379	-3.00%	482	19.18%	14	6.76%	16	2.16%
*ACS B0	2001 2013-	-2017								

The Disabled Population

Persons with disabilities face some of the greatest barriers to fair housing choice due to needed accessibility features, (single story, ramps, wide doors, etc.), as well as access to public transit, support services, and/or housing affordability. Persons with various Federal legislative initiatives have

Within Allen County 13,864 persons, age 5 or older, suffer from a disability.

established the civil rights of the disabled, especially as it relates to areas of housing, employment, education, and transportation. Each of these Acts also utilizes different terms and definitions to address specific criteria of eligibility and/or services. ACS 2017 5-Year estimates on the disabled within Allen County have reported that 15,563 persons suffer from a disability, representing 15.3



percent of all non-institutionalized persons. Map 2-3 depicts the disability rate for those 18 years of age and older by political subdivision. For purposes of this report it is important to mention 1.5 percent (100) Allen County residents under the age of 5 years have a disability within the County.

Within the four primary conditions which define the disabled, the Census further identifies persons whose disability restricts employment and those whose disability affects their ability to "go-outside-the-home" without assistance. The U. S. Census Bureau identifies those with a go-outside-the-home disability as having ambulatory difficulties. This component of the larger disabled population is that group of individuals most likely in need of specialized paratransit consideration, as they would most likely not be able to drive, walk independently or utilize public fixed-route transportation services. Map 2-4 reveals the proportion of Allen County's mobility limited population by census tract. ACS tabulations suggested that 7,342 persons were considered to have ambulatory difficulties or 7.7 percent of all non-institutionalized individuals (Table 2-11). Among those non-institutionalized persons, identified as 65 or older, 3,350 were considered mobility-impaired or 19.7 percent of the total elderly population. Only a small percentage of the current housing stock in Allen County meets the requirements needed by much of the disabled population.

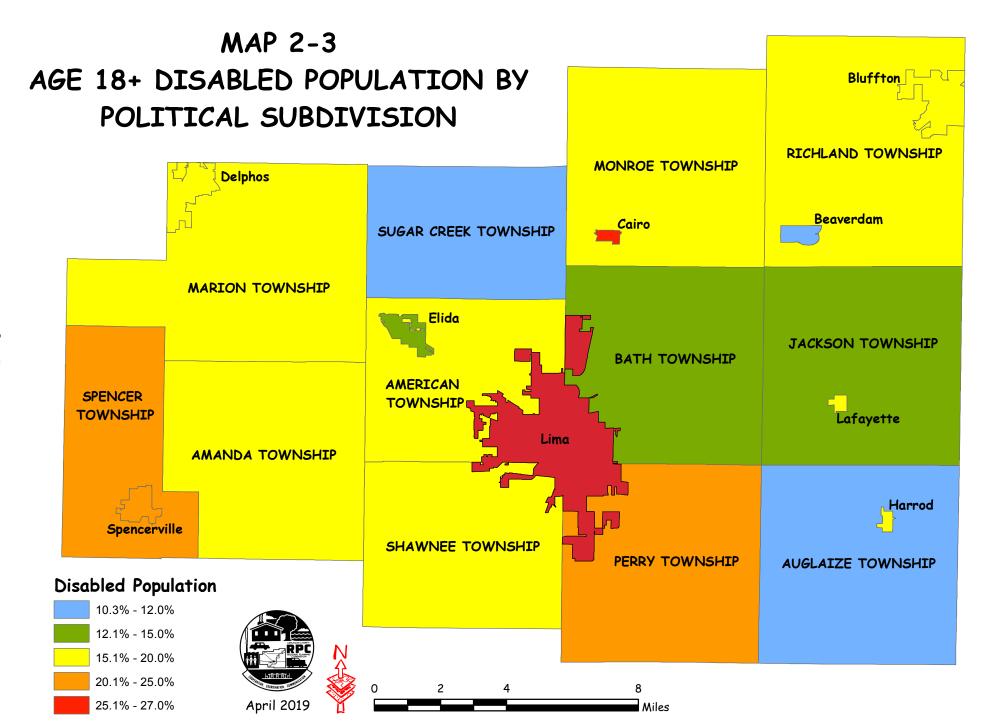
TABLE 2-11 AGE & DISABLITY STATUS RESIDENTS OF ALLEN COUNTY 2017									
Political Subdivision	NI POP	# DIS	% DIS	Hearing	Vision	Cognitive	Ambulatory	Self- Care	Ind. Living
Allen County	101,696	15,563	15.3%	4,579	2,982	6,002	7,342	2,189	4,825
Beaverdam	469	71	15.1%	8	22	31	28	7	12
Bluffton	4,248	525	12.4%	156	102	91	304	27	143
Cairo	534	96	18.0%	37	15	40	73	4	38
Delphos	6,996	1,124	16.1%	431	216	378	565	122	420
Elida	1,908	190	10.0%	66	11	90	81	35	77
Harrod	399	56	14.0%	24	12	23	23	7	11
Lafayette	402	53	13.2%	13	6	17	40	13	8
Lima	35,799	6,824	19.1%	1,570	1,356	3,303	3,138	919	2,183
Spencerville	2,186	377	17.2%	77	80	120	186	42	123
Amanda Township	1,861	233	12.5%	127	45	71	68	27	47
American Township	12,008	1,606	13.4%	635	292	588	800	256	607
Auglaize Township	2,314	231	10.0%	31	0	104	122	48	48
Bath Township	9,590	1,059	11.0%	358	266	272	499	153	296
Jackson Township	2,565	361	14.1%	169	111	87	120	36	35
Marion Township	2,864	326	11.4%	166	79	47	149	37	108
Monroe Township	1,827	233	12.8%	34	25	64	114	0	49
Perry Township	3,402	689	20.3%	239	153	153	352	155	215
Richland Township	1,457	198	13.6%	111	0	20	58	10	37
Shawnee Township	12,106	1,600	13.2%	460	268	618	812	313	482
Spencer Township	798	137	17.2%	26	52	8	183	23	45
Sugar Creek Township	1,248	146	11.7%	52	51	52	57	14	9

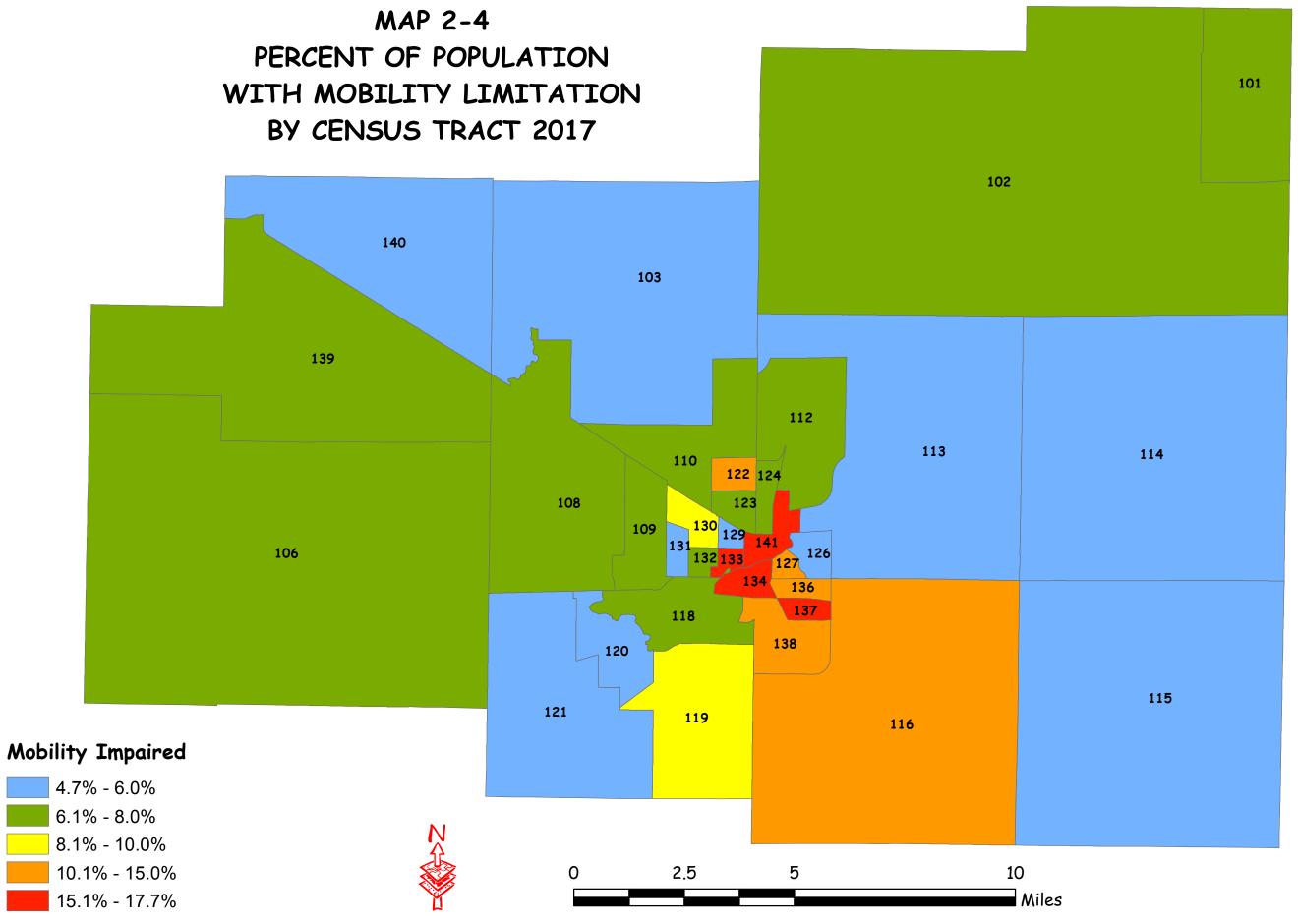
Educational Attainment

Many factors affect income and employment rates among adults. None, however, may be as important as educational attainment levels. Higher levels of educational attainment have repeatedly demonstrated higher income earnings regardless of gender. In addition, positions that require higher educational attainment levels tend to offer more job satisfaction. Moreover, individuals

Although higher educational attainment levels have demonstrated higher income earnings, only 17.7% of residents have completed a 4-year college degree program or higher.

with lower educational attainment levels, those with no high school diploma or GED, experience higher rates of unemployment (nearly 3 times the rate for those that have completed a bachelor







degree) and less income when they are employed. Therefore, it is extremely important to support local school initiatives, post-secondary advancement and continuing educational programs to strengthen the skill sets of the local population and labor force. Table 2-12 presents data summarizing the educational attainment levels of the Allen County population aged 25 years or more. This data shows that there are over 7,209 individuals or 10.75 percent of all individuals 25 years of age or older that have not completed a high school education. This statistic compares fairly well against State and national attainment levels where high school diplomas fail to be earned

Locally accessible post-secondary schools include:

- The Ohio State University
- Ohio Northern University
- Rhodes State College
- Bluffton University
- University of Northwestern Ohio
- University of Findlay

by 10.2 and 12.7 percent of the respective populations. However, given that there are a number of very respectable post-secondary schools locally accessible, it is somewhat disappointing that only 11,777 adult residents have completed a 4-year and/or graduate degree programs (17.56%), especially when compared to State (27.2%) and national (30.9%) benchmarks.

TABLE 2-12 EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS & OVER 2017						
Educational Attainment White Population Black Population					Total Population	
Number	Percent	Number	Percent	Number	Percent	
5,613	9.44%	1,596	20.92%	7,209	10.75%	
22,987	38.68%	2,702	35.41%	25,689	38.30%	
19,766	33.26%	2,625	34.40%	22,391	33.39%	
11,070	18.63%	707	9.27%	11,777	17.56%	
	White Po Number 5,613 22,987 19,766	White Population Number Percent 5,613 9.44% 22,987 38.68% 19,766 33.26%	White Population Black Population Black Population Black Population Number Percent Number 5,613 9.44% 1,596 22,987 38.68% 2,702 19,766 33.26% 2,625	TAINMENT FOR THE POPULATION 25 YEARS & O 2017 White Population Black Population Number Percent Number Percent 5,613 9.44% 1,596 20.92% 22,987 38.68% 2,702 35.41% 19,766 33.26% 2,625 34.40%	TAINMENT FOR THE POPULATION 25 YEARS & OVER 2017 White Population Black Population Total Population Number Percent Number Percent 5,613 9.44% 1,596 20.92% 7,209 22,987 38.68% 2,702 35.41% 25,689 19,766 33.26% 2,625 34.40% 22,391	

Income: Household, Family & Per Capita

Data for the three most widely used indices of personal income, including per capita income, household income and family income are displayed in Table 2-13. The data suggests Allen County income continues to lag behind that of State and national

Allen County is lagging behind the State and national income levels with respect to household, family, and per capita income.

income trend lines. The median household income within Allen County has lagged behind that of Ohio and the United States in most of recent history. The income gap has increased slightly from -7.9 percent in 2010 to -8.6 percent in 2017 when comparing median household incomes with the State. The results when compared to the United States also reveal an increasing gap since 2010 as the deficit increased from -15.9 percent in 2010 to -16.9 percent in 2017.

Examining family median income, a similar pattern exists. Median family incomes across the County slipped over the last decennial period when comparing them to State and national trend lines. Median family income in Allen County slipped to 84.3 percent of the nation's median family income in 2017, a decrease of 3.9 percent when compared to the 2010 level (88.2%). When comparing Allen County's median family income against the State the data shows the gap continued to grow, adding an additional 3.8 percent difference between the two.

The median non-family income for the County followed a downward trend during the decennial period. In 2017, the median non-family income was 79.5 percent of the State's median value and

¹ http://www.bls.gov/emp/ep_chart_001.htm

71.2 percent of the entire nation. While in 2010, the County's proportion of median non-family income levels was higher at 86.6 percent and 75.7 percent of the State and national levels respectively. Per capita income for Allen County in 2017 was

Households with incomes less than \$15,000 in 2017 totaled 14.5 percent of all households in Allen County.

\$24,551, a jump of 13.1 percent from 2010 figures. This compares with the increases of the State and national per capita figures, 15.5 and 14.1 percent respectively. Therefore, per capita income level growth was slower in comparison to State and national figures over the seven year period. In 2017 Allen County per capita income was 84.6 percent of that of the State and 78.7 percent of the national figure.

TABLE 2-13 COMPARATIVE INCOME MEASURES BY DECENNIAL CENSUS & AMERICAN COMMUNITY SURVEY								
Income: By Type & Year United States Ohio Allen County Allen County as Allen County as of Ohio Allen County States								
2017								
Median Household	\$57,652	\$52,407	\$47,905	83.1%	91.4%			
Median Family	\$70,850	\$66,885	\$59,752	84.3%	89.3%			
Median Non-Family	\$34,611	\$30,986	\$24,647	71.2%	79.5%			
Per Capita	\$31,177	\$ 29,011	\$24,551	78.7%	84.6%			
2010								
Median Household	\$51,914	\$47,358	\$43,632	84.1%	92.1%			
Median Family	\$62,982	\$59,680	\$55,549	88.2%	93.1%			
Median Non-Family	\$31,305	\$27,366	\$23,701	75.7%	86.6%			
Per capita \$27,334 \$25,113 \$21,713 79.4% 86.5%								
*ACS 51903 & B19301 2013-	-2017							

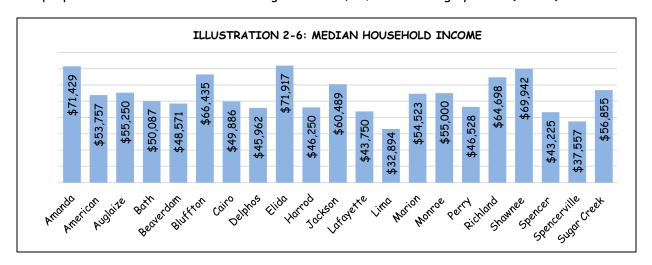
Table 2-14 provides a detailed breakdown of household income by type and income levels for 2017. Households with incomes less than \$15,000 in 2017 totaled 14.5 percent of all households in Allen County. An examination of family and non-family households provides greater detail. Data suggests that 7.96 percent of all families and 27.3 percent of all non-family households earned less than \$15,000 in 2017. Examination of income by household type reveals that the largest concentration of households and family incomes were found in the \$50,000 to \$74,999 income bracket with 19.8 and 26.7 percent respectively; the incomes of five in ten (46.6%) non-family households were concentrated below \$25,000.

TABLE 2-14 INCOME IN 2017 BY ALLEN COUNTY HOUSEHOLD TYPE							
T	House	hold	Fam	ilies	Non Family	Household	
Income Range	Number	Percent	Number	Percent	Number	Percent	
Less than \$10,000	4,292	10.50%	1,348	5.09%	2,491	18.40%	
\$10,000 - \$14,999	1,635	4.00%	784	2.96%	1,205	8.90%	
\$15,000 - \$24,999	4,373	10.70%	2,140	8.07%	2,613	19.30%	
\$25,000 - \$34,999	3,515	8.60%	2,588	9.76%	1,083	8.00%	
\$35,000 - \$49,999	5,886	14.40%	3,678	13.87%	2,396	17.70%	
\$50,000 - \$74,999	8,093	19.80%	6,272	23.66%	2,220	16.40%	
\$75,000 - \$99,999	5,313	13.00%	4,401	16.60%	311	2.30%	
\$100,000 - \$149,999	5,804	14.20%	3,344	12.61%	961	7.10%	
\$150,000 - \$199,999	1,185	2.90%	1,186	4.47%	54	0.40%	
\$200,000 or more	777	1.90%	768	2.90%	217	1.60%	
Totals	40,872	100.00%	26,509	100.00%	13,539	100.00%	
*ACS S1901 2017 1-Year	Estimates						

Between 2010 and 2017 the percentage of households earning less than \$25,000 decreased 5.9 percent.

The County median household income was \$47,905 in 2017. Household income levels in the Townships ranged from \$43,275 to \$71,429. The median household income in Lima was 31.4 percent lower than the County median and significantly lower than the median in a number of other local political subdivisions. Illustration 2-6 highlights the

income disparities across the community. Another way to examine the income disparity across the County is to identify the distribution of persons with low incomes by political subdivision. Table 2-15 depicts those households earning less than \$25,000 by political subdivision. Between 2010 and 2017 the proportion of households with low (<\$25,000) and very low incomes (<\$15,000), increased in Allen County. In 2017, 27.0 percent of households had incomes of less than \$25,000 and 14.5 percent had incomes less than \$15,000. Between 2010 and 2017 the percentage of households with incomes less than \$15,000 decreased by 5.2 percent while the percentage of households earning less than \$25,000 decreased by 5.9 percent. Lima still stands out for having the highest proportion of low income residents across the community. This is particularly true when examining the lowest income households. While 1 in 6 Allen County (14.5%) households earned less than \$15,000 in 2017, the proportion of Lima households earning less than \$15,000 was roughly 1 in 5 (22.9%)



Poverty Status: Persons & Families Below Poverty Level

The 2017 ACS provides information for the number of individuals and families whose incomes fall below the established poverty level. ACS 2017 5-year estimates revealed, 14,835 individuals or 14.9 percent of all individuals, 6,335 households or 15.7 percent of all households and 2,889 families or 10.9 percent of all families were below the established poverty level based on income and household size.

In 2017, 15.0% of all individuals, 15.7% of all households and 10.9% of all families in Allen County were below poverty level.

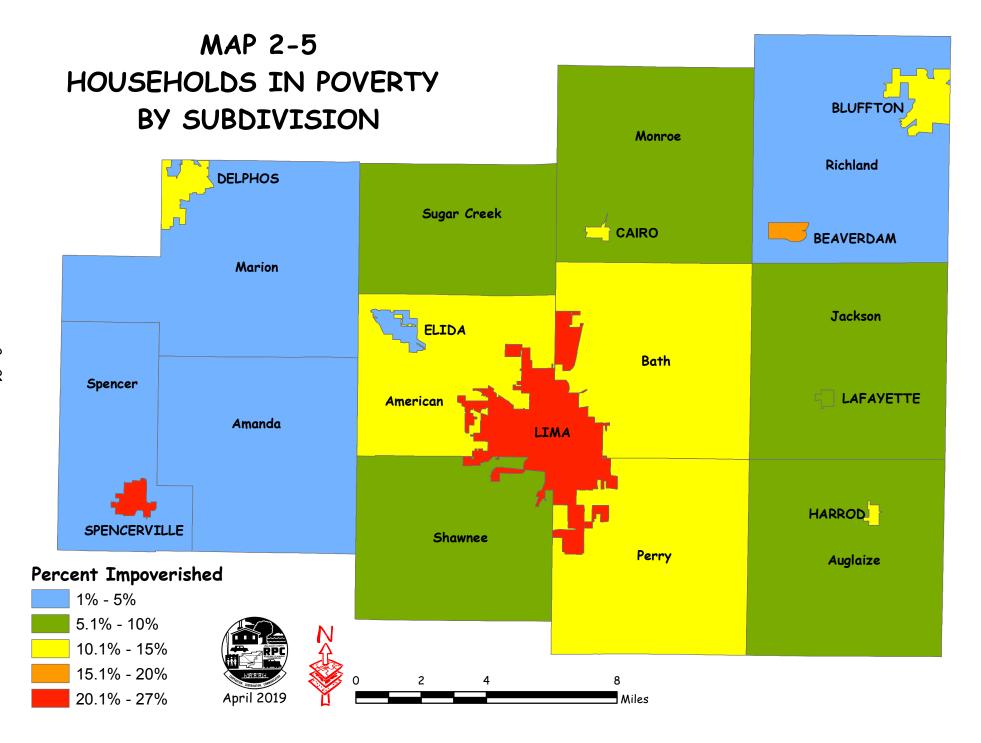
Families with children were more likely to encounter poverty status than those families without children. In fact, of all families suffering poverty conditions, 80.9 percent had children and 37.1 percent had children under 5-years of age. For purposes of comparison, data indicates that 14.4 percent of all households and 10.8 percent of all families within the State of Ohio were below the established poverty level. Map 2-5 reveals the extent of household poverty by political subdivision while Map 2-6 identifies the proportion of elderly existing below the poverty level by political subdivision.

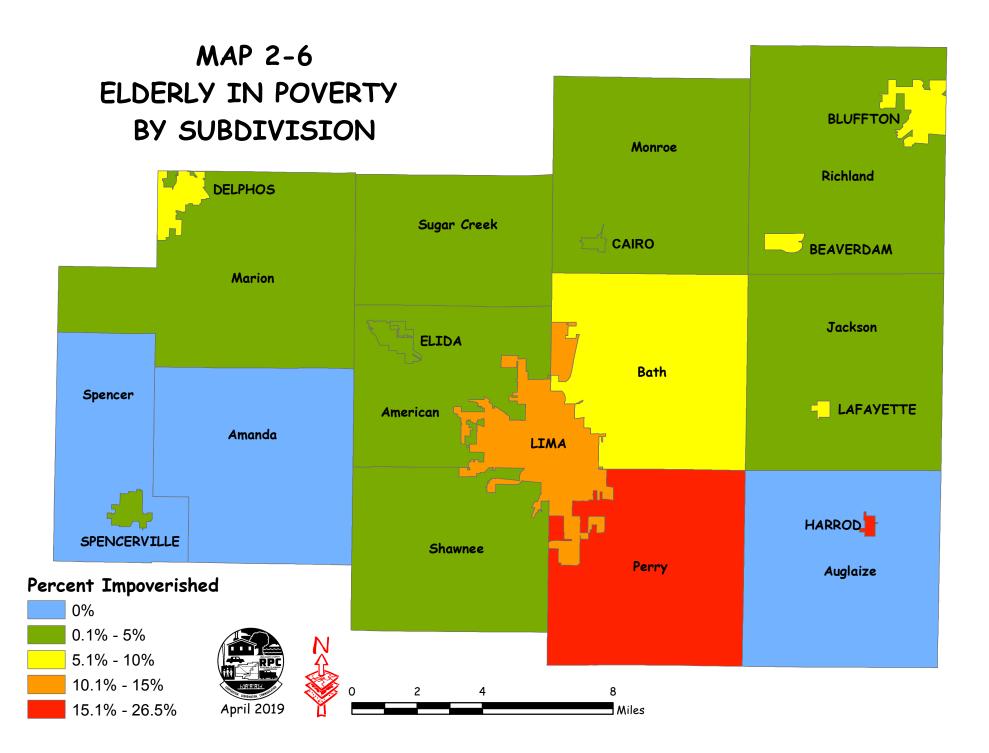
An examination of income data from the 2010 census report reveals positive trend in the proportion of individuals in poverty. In fact, 1,820 individuals rose from poverty status between 2010 and 2017 tabulations, representing a drop of 10.9 percent.

TABLE 2-15 LOW MEDIAN INCOME BY POLITICAL SUBDIVISION						
Political Subdivision	Households	Less than \$10,000	\$10,000 to \$14,999	\$15,000 to \$24,999	Total Less than \$25,000	
Allen County	40,319	8.4%	6.1%	12.5%	27.0%	
Beaverdam	194	3.1%	3.6%	14.4%	21.1%	
Bluffton	1,719	6.0%	6.5%	8.4%	20.9%	
Cairo	183	12.6%	1.6%	5.5%	19.7%	
Delphos	2,890	6.3%	4.6%	14.0%	24.9%	
Elida	699	0.6%	1.9%	8.4%	10.9%	
Harrod Village	145	5.5%	7.6%	6.9%	20.0%	
Lafayette Village	153	0.0%	5.2%	16.3%	21.6%	
Lima City	14,312	13.4%	9.5%	16.2%	39.1%	
Spencerville Village	851	9.2%	12.0%	13.9%	35.0%	
Amanda Township	700	1.3%	0.0%	8.3%	9.6%	
American Township	5,156	8.4%	5.3%	13.7%	27.4%	
Auglaize Township	807	9.3%	0.0%	9.0%	18.3%	
Bath Township	3,751	6.2%	3.7%	10.2%	20.1%	
Jackson Township	930	5.1%	0.8%	4.1%	9.9%	
Marion Township	1,150	2.5%	3.1%	8.6%	14.3%	
Monroe Township	639	6.7%	3.6%	3.8%	14.1%	
Perry Township	1,350	7.2%	6.7%	16.7%	30.7%	
Richland Township	552	2.5%	1.4%	3.3%	7.2%	
Shawnee Township	4,767	2.5%	4.0%	6.6%	13.2%	
Spencer Township	304	0.0%	7.9%	21.1%	28.9%	
Sugar Creek Township	452	2.2%	0.9%	11.1%	14.2%	
*ACS B19001 2013-2017						

TABLE 2-16 RATIO OF INCOME TO POVERTY LEVEL AMONG INDIVIDUALS						
0	2010		2017			
Poverty Level	#	%	#	%		
Below 50% of Poverty Level	8,292	8.1%	8,156	8.2%		
50% to 99% of Poverty Level	8,363	8.2%	6,679	6.7%		
100% to 149% of Poverty Level	8,769	8.6%	8,484	8.5%		
150% to 199% of Poverty Level	9,721	9.5%	7,691	7.7%		
200% of Poverty Level or more	67,174	65.7%	68,717	68.9%		
*ACS B17002 2017 5-Year Estimates						

TABLE 2-17 POVERTY STATUS BY FAMILY STATUS					
Family Type by Presence of Related Children					
Total Families	26,509	100.0%			
Married - Related Children	7,341	27.7%			
Male Alone - Related Children	1,285	4.8%			
Female Alone - Related children	3,167	11.9%			
Family - No Children	14,072	53.1%			
Poverty Status of Families with Related Children					
Total Families	2,883	100.0%			
Married - Related Children	462	16.0%			
Male Alone - Related Children	272	9.4%			
Female Alone - Related children	1,599	55.5%			
Family - No Children	550	19.1%			
*ACS B17010 2017 5-Year Estimates					





Labor Force Profile

The total labor force in Allen County, reflecting those 16 years of age and over, numbered 82,706 persons according to the ACS 2017 5-year estimates; those not participating in the labor force reflected 30,601 or 37.0 percent of the total available labor force. The civilian labor force in Allen County, as documented by the ACS 2017 5-year estimates, was 52,104 of which 48,352 (92.8%) were employed.

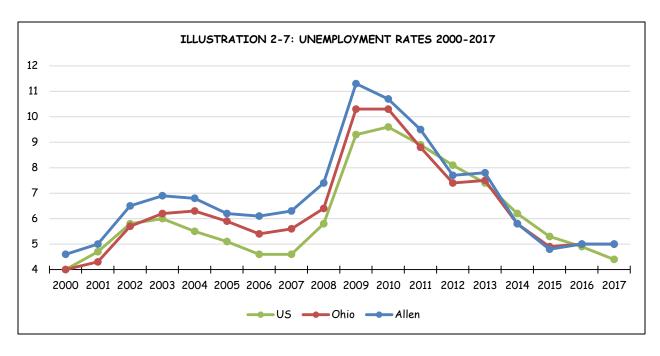
According to the 2017 ACS21, employment was largely restricted to 3 key sectors that represent nearly 6 in 10 jobs (56.5%) within Allen County.

•	Manufacturing	10,175	21.0%
•	Health & Edu. Services	11,873	24.5%
•	Retail Trade	5,338	11.0%

A perspective on the labor force can be gained by examining the number of employed persons by type of occupation. Table 2-18 uses ACS 2017 5-year estimates to identify the dominant occupations in the region: Manufacturing (10,175) followed by Healthcare & Social Services (8,037), Retail Trade (5,338), Accommodation & Food Services (4,087) and Educational Services (3,836).

TABLE 2-18 2017 ALLEN COUNTY EMPLOYMENT BY SECTOR			
Sector	NAICS	Employees	Percent
Agricultural, Forestry, Fishing & Hunting - Services	11	350	0.7%
Mining	21	64	0.1%
Utilities	22	269	0.6%
Construction	23	2,483	5.1%
Manufacturing	31-33	10,175	21.0%
Wholesale Trade	42	1,413	2.9%
Retail Trade	44-45	5,338	11.0%
Transportation & Warehousing	48-49	1,876	3.9%
Information	51	614	1.3%
Finance & Insurance	52	1,331	2.8%
Real Estate and Rental & Leasing	53	743	1.5%
Professional, Scientific & Technical Services	54	1,250	2.6%
Management of Companies/Enterprises	55	37	0.1%
Administrative Support & Waste Management Services	56	1,929	4.0%
Education Services	61	3,836	7.9%
Health Care/Social Assistance	62	8,037	16.6%
Arts/Entertainment/Recreation	71	523	1.1%
Accommodation & Food	72	4,087	8.5%
Non-Public Other Services	81	2,185	4.5%
Public Administration	92	1,811	3.7%
Total		48,351	
*ACS 52403 2013-2017 5-Year Estimates			

In Allen County, the employment-population ratio, the proportion of the population 16 years of age and over in the workforce, has ticked up over the last seven years, from 57.0 percent in 2010 to 58.5 percent in 2017. The unemployment rates over the past 17 years reflect the impact of major employers relocating or instituting major cutbacks in response to market events or economic trends between 2008 and 2010 and then a recovery to nearly 2000 level rates since 2015. Illustration 2-7 suggests that Allen County typically experiences higher unemployment rates than that experienced by the State of Ohio or the nation as a whole. After severe stress from 2008 to 2010 the County witnessed some relief, and unemployment in Allen County has dropped to early 2000 levels.



HUDs Protected Classes

To further define the task of Affirmatively Furthering Fair Housing Choice under the Fair Housing Act and pursue fair housing planning this analysis examines those specific populations historically negatively impacted by persons interested in buying or renting a home. Currently, there are seven (7) broadly defined protected classes identified and protected by HUD and the Fair Housing Act which governs housing discrimination including:

- Race
- + Color
- National Origin
- Religion

- Sex
- Familial Status
- Disability

Moreover, some states have added protection to other populations that are not identified under Federal statutes including: military service, veterans status, gender identify and same sex marriage and while not currently under Federal protection, policy experts suggest that such discrimination will be banned in the near future.

While Federal Statutes protecting certain population are absent, policy experts suggests that such discrimination will be banned in the future.

Examining the exact size of each population subgroup is challenging as membership is not exclusive and a single household may have members of several classes. Race, color, and national origin are sometimes used interchangeably; HUD attempts to provide specific clarity to each. Table 2-9 (page 2 - 12) identified minority populations accounting for 18.7 percent of the 2017 population in Allen County; with all other major racial and ethnic groups identified. Hispanics account for 2.9 percent of the Allen County population in 2017. Table 2-10 (page 2 - 12) revealed changes in population by race and ethnicity between 2010 and 2017 while Map 2-2 (page 2 - 13) revealed changes in the minority population by Census Tract. Fair Housing regulations establish criminal penalties for illegal housing discrimination such as refusing to show apartments to, or return the calls of, a prospective buyer/tenant after learning they are of a minority status.

National Origin refers to one's birthplace, ancestry, language, and/or customs. Examining Allen County's ancestral population reveals largely western European roots with a sizeable proportion of

German (31.9%), English (14.9%), Irish/Scottish (13.8%) and Italian (3.9%) roots.² Subsequent ancestral datasets for the year 2017 have identified a new influx of foreign born residents with approximately 1,373 foreign born persons residing in the Lima Metro area of which 48.7 percent are naturalized citizens.³ Of concern, Fair Housing regulations stipulate that it is illegal for a landlord to deny housing or treat someone differently in a housing transaction because of a person's name, appearance, accent, association with, or participation in, customs associated with a nationality.

Religion is not typically tracked or addressed by local government sources. However, a review of local resources indicates the vast majority of formal religious institutions are present in Allen County and while most reflect dominant mainline Christian sects, smaller congregations of Mennonite, 7th Day Adventists, Judaism, Islam, and Baha'i adherents are present. Data suggests that 52.2% of the local population are affiliated with one of the 125 religious congregations serving the community.⁴ And, based on the Fair Housing Act which made it illegal to discriminate in the sale or rental of housing based on religion, local realtors, brokers and landlords cannot steer an individual to another development they believe better suits them or where they would live near other tenants of the same religion.

In January 2012, HUD issued regulations explicitly prohibiting discrimination on the basis of gender identity, sexual orientation, or marital status in all federally-funded housing programs.

The Fair Housing Act prohibits discrimination based on sex in the sale or rental of housing and in mortgage lending. In recent years, courts have increasingly held that discrimination because a person fails to conform to gender stereotypes, is sex discrimination under federal civil rights laws. In 2010, HUD issued guidance stating

that it would investigate complaints of housing discrimination against transgender people based on this understanding of the law. In January 2012, HUD issued regulations explicitly prohibiting discrimination on the basis of gender identity, sexual orientation, or marital status in all federally-funded housing programs. These regulations apply to all public and assisted housing and rental assistance (voucher) programs that receive federal funds (including homeless shelters and other temporary housing), as well as to federally-insured home mortgages.

In general, the familial status provisions are aimed at discrimination based on the presence of children in a household. The law covers parents, guardians, and others who have permission to have custody of the child. It also protects pregnant women and those in the process of obtaining legal custody of a child under the age of 18. Fair Housing discrimination against families with children includes refusing to rent, different terms or conditions (i.e., higher deposits/rents), rules just for children, and discriminatory advertising (i.e., "adults preferred"). Occupancy standards which unfairly limit or exclude families with children violate the Fair Housing Act. Table 2-3 (page 2 - 6)

revealed 2017 ACS data that identified 12,548 households with children in Allen County or 31.1 percent of all households. Of specific concern are those larger households with 6 persons and 7+ person memberships (762 and 349 households respectfully (See Table 2-4 page 2 - 7).

Of specific concern are those larger households with 6 persons and 7+ person memberships.

² 1990 Census of Population, Social & Economic Characteristics (1990 CP2-37), Table 137.

³ http://mcdc.missouri.edu/pub/data/acs/Readme.shtml

⁴ http://www.city-data.com/county/Allen_County-OH.html

Disability was addressed from a Census Bureau perspective where specific criteria identified a disabled population within specific criteria within Allen County at 15.3 percent according to ACS 2017 5-year estimates. HUD however, also has specific criteria defining disability – as one which must "substantially limit" one or more "major life activities." This means that a disability must significantly affect activities such as walking, talking, seeing, hearing, breathing, performing manual tasks, caring for one's self, learning, and working. The FHA protects prospects and tenants

suffering from "physical or mental impairments." Of local concern seems to be the ability to adequately address the housing needs of those with mental impairments. Complicating the issue is the disparities in defining the nature and scope of the population group.

HUD has specific criteria defining disability - as one which must "substantially limit" one or more major life activity.

Summary

The population of Allen County has experienced a general decline since 1980 when it reached a population plateau of 112,241 persons. Comparison to the 1980 population reveals the current population has decreased by 8,084, or 7.2 percent. Examining more recent 2010-2017 data, Allen County has lost only 2,174 residents, a loss in population of 2.1 percent. However, population change is not static nor is it uniform. Many of the political subdivisions within Allen County have experienced an extended period of continued growth while others have experienced overall growth in cyclical spurts since 1960. Table 2-19 and Appendix G provide an overview of key demographic groups that need to be considered during this assessment.

Consistent with national trends the County's population is aging. The median age of the population is 38.6 years. That compares with a median age of 39.3 and 37.8 years with the State of Ohio and the United States respectively. By 2017, the elderly population within Allen County grew to 16,988 persons or approximately 16.3 percent of the population. To compound matters more, the elderly made up 8.2 percent of all individuals existing below the poverty level and while the largest concentration of the impoverished were residents of the City of Lima, 85.0 percent of all outlying areas were found to have concentrations of the elderly poor. The housing stock will need to reflect this influx and be designed or retrofitted to accommodate the lifestyle of senior citizens. Data

By 2017, the elderly population within Allen County grew to 16,988. The housing stock will need to reflect this influx and be designed or retrofitted to accommodate the lifestyle of senior citizens.

suggests that simply due to age of the population more than a third of the population is not able to fully contribute to the economic growth and earning power of the community. The desire of the elderly to age in place, the design and inclusion of appropriate housing designs and the need for assisted living arrangements need to be reflected in local fair housing planning efforts.

ACS 2017 5-Year estimates on the disabled within Allen County have reported that 15,563 persons suffer from a disability, representing 15.3 percent of all non-institutionalized persons. For persons under the age of 5 years 100 or 1.5 percent have a disability within the County. Persons

Persons with disabilities face some of the greatest barriers to employment and housing.

with disabilities face some of the greatest barriers to fair housing due to needed accessibility features, as well as access to public transit, support services and/or affordability. ACS tabulations suggested that 7,342 persons were considered mobility-impaired or 7.7 percent of all non-institutionalized individuals. Among those non-institutionalized persons, identified as 65 or older, 3,350 were considered mobility-impaired or 19.7 percent of the total elderly population.

The County's population has grown more racially and ethnically diverse during the past decade. Racially, the white population comprises the largest percentage of the population at 83.1 percent. The largest minority group within Allen County is African-American, which comprises 11.8 percent of the total population. All other minority groups comprise approximately 5.1 percent of the total County population. Although dispersed across the County, the County's largest minority, the African-American population, is primarily concentrated in the City of Lima where it constitutes 25.6 percent of the City's population.

TABLE 2-19 DEMOGRAPHIC SUMMARY BY POLITICAL SUBDIVISION 2017									
Political Subdivision	Total Population	Total Minority	PCT Minority	Total Over 65 Population	PCT Over 65	Individuals in Poverty	PCT in Poverty		
Ohio	11,609,786	2,101,371	18.1%	1,844,642	15.9%	1,729,858	14.9%		
Allen County	104,157	19,539	18.7%	16,988	16.3%	15,623	15.0%		
Beaverdam	469	11	0.0%	61	13.0%	109	23.2%		
Bluffton Village (pt.)	4,254	215	5.0%	911	21.4%	262	6.2%		
Cairo	534	28	5.2%	86	16.1%	115	21.5%		
Delphos City (pt.)	3,941	242	6.1%	740	18.8%	411	10.4%		
Elida Village	1,910	257	13.5%	277	14.5%	24	1.3%		
Harrod Village	399	13	3.3%	49	12.3%	60	15.0%		
Lafayette Village	402	2	0.5%	63	15.7%	46	11.4%		
Lima City	37,592	13,664	36.3%	4,507	12.0%	9,005	24.0%		
Spencerville Village	2,240	65	2.9%	338	15.1%	558	24.9%		
Amanda Township	1,861	125	7.2%	239	12.8%	97	5.2%		
American Township	12,182	1,851	13.1%	2,699	22.2%	1,345	11.0%		
Auglaize Township	2,314	252	9.3%	209	9.0%	135	5.8%		
Bath Township	9,590	901	10.4%	1748	18.2%	986	10.3%		
Jackson Township	2,565	66	2.2%	478	18.6%	165	6.4%		
Marion Township	2,864	131	1.9%	561	19.6%	209	7.3%		
Monroe Township	1,827	0	0.0%	237	13.0%	175	9.6%		
Perry Township	3,464	137	4.1%	733	21.2%	379	10.9%		
Richland Township	1,527	26	0.4%	276	18.1%	76	5.0%		
Shawnee Township	12,176	1,400	13.0%	2,440	20.0%	776	6.4%		
Spencer Township	798	42	1.4%	134	16.8%	34	4.3%		
Sugar Creek Township	1,248	111	9.8%	202	16.2%	66	5.3%		
ACS 2013-2017									

Many factors affect employment rates among adults. None, however, may be as important as educational attainment levels. Data shows that there are over 7,209 individuals or 10.75 percent of all individuals 25 years of age or older that have not completed a high school education. However, given that there are a number of very reputable post-secondary schools readily accessible, it is disappointing that less than 17.6% of adult residents have completed a 4-year and/or master's college degree program.

Allen County income has continued to lag behind that of State and national income trend lines.

Allen County income has continued to lag behind that of State and national income trend lines. The gap increased when comparing median household income to the State in the 2017 ACS (-8.6%). The gap nationally was -16.9 percent. Median family income in Allen County was only 89.3 percent of Ohio's median family income in 2017 and only

84.3 percent of the national median income. The median non-family income was 79.5 percent of the State's median value and about 71.2 percent of the entire nation. In 2017 Allen County per capita income was only 84.6 percent of that of the State and 78.7 percent of the national figure. ACS 2017 5-year estimates revealed, 14,835 individuals or 14.9 percent of all individuals, 6,335 households or 15.7 percent of all households and 2,889 families or 10.9 percent of all families were

below the established poverty level based on income and household size. Families with children were more likely to encounter poverty status than those families without children. In fact, of all families suffering

The ACS revealed 18.9 percent of all households were below the established poverty level in 2011. Of all families suffering poverty conditions, eight in ten (88.2%) had children.

poverty conditions, 80.9 percent had children and 37.1 percent had children under 5-years of age. For purposes of comparison, data indicates that 14.4 percent of all households and 10.8 percent of all families within the State of Ohio were below the established poverty level.

HUD and the Fair Housing Act identify seven (7) protected classes (race, sex, color, familial status, national origin, disability, and religion) that have been historically negatively impacted by persons interested in buying or renting a home.

The Fair Housing Act also protects those prospects and tenants suffering from "physical and mental impairments."

Examining the size of each of these population subgroups is challenging as membership is not exclusive and a single household may have members of several of these classes. Fair Housing regulations established criminal penalties for illegal housing discrimination against each of these seven (7) classes. Of recent concern in Allen County has been the ability to adequately address the housing needs of those with mental impairments. ACS 2017 estimates for Allen County show 15.3 percent of the population identified as suffering from a "physical or mental" disability.

SECTION 3 COMMUNITY HOUSING STOCK

Traditionally, housing development has grown outward from village and city centers capitalizing upon easy access to employment opportunities, public utilities and transportation infrastructure. Since the 1960's however, the automobile and unbridled utility extensions coupled with cheap land fueled urban sprawl and the resultant white flight and economic segregation that we currently find in many of the region's older urban centers.

In an effort to understand its housing issues, the local community must address topics ranging from homelessness, dilapidated housing, an aging infrastructure and suburban competition. More specifically, the housing issues facing the larger community include the following:

- current housing choice that fails to fully meet the needs of individuals of all ages, incomes and ability levels
- an inadequate supply of housing that can attract upwardly mobile individuals with many housing choices
- recognizing and adapting housing incentives to address changing market conditions
- homelessness and the associated needs for supportive services
- excessive numbers of dilapidated and abandoned residential buildings
- weak private sector market for housing rehabilitation
- obstacles to assembling sites for new large-scale housing developments

Historical Overview

Allen County, and more specifically its municipalities especially Lima, its county seat, are overly represented by older homes many of which were built in the early 1900s. Many of the homes were built in close proximity to railroad lines and/or factories giving residents access to available jobs. As advancements in transportation grew, the more affluent residents began to move further out, abandoning the housing in the central city neighborhoods for newer more modern housing in neighborhoods with larger lots. As families moved from the older neighborhood to the outskirts of the communities, the quality and condition of the older housing began to decline - albeit slowly over time and from various influences including age, weathering and occupancy status. Many houses were converted to two-family and multi-family homes to accommodate new groups of lower socioeconomic status people that were migrating to the area.

As a result of migration patterns, the number of homes that were either rented or abandoned in the older municipalities continued unabated until a pattern of disinvestment was readily apparent. Some residents found it difficult to obtain loans from banks for home improvements or for the purchase of a home either because of the condition of the home, the character of the neighborhood or their economic/credit status. As a result, the quality and value of housing began to decline and people moved out of the City of Lima and some of the smaller municipalities at alarming rates, which resulted in a glut of older houses on the market further eroding home values and decreasing the community's tax base and its ability to provide government services at the level of service desired/needed by remaining residents.

Housing Stock

An overview of the housing stock is presented using various indices at varying levels of geography. Data at the county and political subdivision level is presented with census tract and street address level data introduced when required/available. The heart of the assessment relies upon American

Community Survey data for the 2013-2017 time period and 2017 data from the Allen County Auditor's Office. A study of the data provides a broad picture of the housing challenges faced by Allen County and its political subdivisions. More housing data can be found in Appendix G.

A pattern of disinvestment in the older housing stock has developed which left a visible scar on the face of neighborhoods in the older communities.

• Housing Units: In 2010, Census efforts documented 44,999 housing units existing in Allen County. Since then the number of housing units increased ever so slightly to 45,005 in 2017. The City of Lima witnessed a minimal increase in housing units even given the demolition efforts over the last few years to remove the neglected housing stock. Map 3-1 depicts the location of recent housing demolitions conducted by the City of Lima. Beaverdam and Bluffton saw the largest increase in the number of housing units since 2010, experiencing reported increases of 26.8 percent and 14.7 percent, respectively. Table 3-1 identifies the change over time in all of the political subdivisions.

TABLE 3-1 TOTAL HOUSING UNITS BY POLITICAL SUBDIVISION 2010-2017									
Political Subdivision	2010 Housing Units	Change	Percent Change						
Allen County	44,999	45,005	6	0.01%					
Beaverdam	153	194	41	26.80%					
Bluffton	1,522	1,747	225	14.78%					
Cairo	214	213	-1	-0.47%					
Delphos	3,137	3,211	74	2.36%					
Elida	741	732	-9	-1.21%					
Harrod	161	154	-7	-4.35%					
Lafayette	172	183	11	6.40%					
Lima	16,784	17,019	235	1.40%					
Spencerville	886	889	3	0.34%					
Amanda Township	789	700	-89	-11.28%					
American Township	5,727	5,369	-358	-6.25%					
Auglaize Township	948	907	-41	-4.32%					
Bath Township	4,111	4254	143	3.48%					
Jackson Township	1,069	985	-84	-7.86%					
Marion Township	1,049	1,150	101	9.63%					
Monroe Township	669	639	-30	-4.48%					
Perry Township	1,516	1,502	-14	-0.92%					
Richland Township	631	601	-30	-4.75%					
Shawnee Township	5,194	5,215	21	0.40%					
Spencer Township	344	365	21	6.10%					
Sugar Creek Township	535	482	-53	-9.91%					

• Tenure: In 2017, Allen County experienced an increase in the number of renter occupied housing units (9.2%) and a decrease in owner-occupied housing units (-5.2%) identified in 2010. However, occupancy varied across the community. Owner occupancy rates for Allen County fell to 66.1 percent in 2017. The percentage of owner-occupied units increased in 5 of the 21

municipalities, including the villages of Beaverdam (23.6%), Bluffton (19.6%), and Cairo (0.6%), as well as Marion (9.2%) and Monroe (2.4%) townships. The percent of renter occupied units increased both overall and in 14 of the 21 political subdivisions. Tables 3-2 and 3-3 provide more detailed information at the political subdivision level.

Owner occupancy rates for Allen County fell to 66.1 percent in 2017.

MAP 3-1 2017 DEMOLITIONS BY CENSUS TRACT

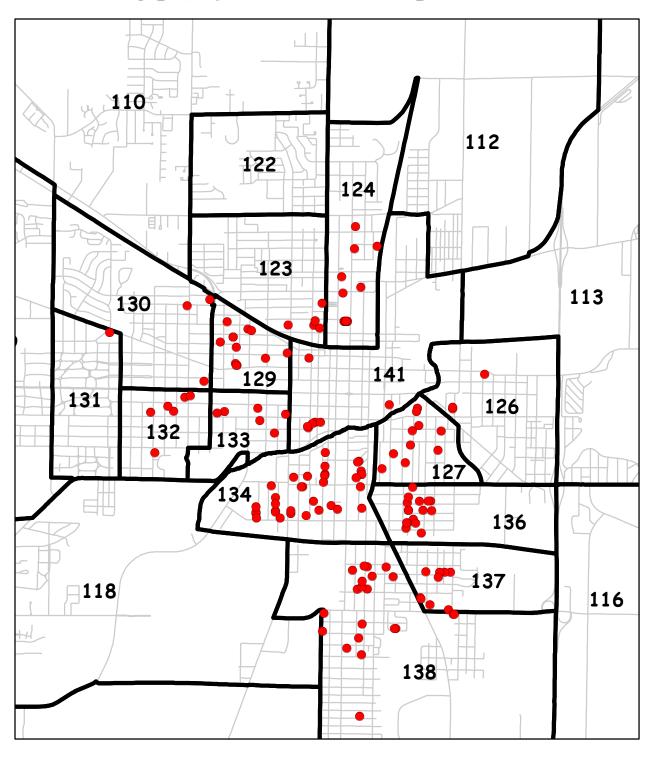




TABLE 3-2 OWNER OCCUPIED HOUSING UNITS CHANGE 2010-2017									
Political Subdivision	2010	% Owner	2017	% Owner	Change				
Political Subdivision	Census	Occupied	Census	Occupied	Amount	Percent			
Allen County	28,099	69.2%	26,645	66.1%	-1,454	-5.2%			
Beaverdam	106	73.6%	131	67.5%	25	23.6%			
Bluffton	957	67.0%	1,145	66.6%	188	19.6%			
Cairo	161	81.3%	162	88.5%	1	0.6%			
Delphos	2,122	73.3%	1,904	65.9%	-218	-10.3%			
Elida	622	87.9%	620	88.7%	-2	-0.3%			
Harrod	125	87.4%	115	79.3%	-10	-8.0%			
Lafayette	120	74.5%	112	73.2%	-8	-6.7%			
Lima	7,191	50.6%	6,515	45.5%	-676	-9.4%			
Spencerville	594	72.7%	541	63.6%	-53	-8.9%			
Amanda Township	690	90.9%	620	88.6%	-70	-10.1%			
American Township	3,589	67.2%	3,276	63.5%	-313	-8.7%			
Auglaize Township	776	86.9%	672	83.3%	-104	-13.4%			
Bath Township	3,064	80.1%	2,932	78.2%	-132	-4.3%			
Jackson Township	893	89.0%	881	94.7%	-12	-1.3%			
Marion Township	938	92.3%	1,024	89.0%	86	9.2%			
Monroe Township	549	86.6%	562	87.9%	13	2.4%			
Perry Township	1,162	80.0%	1,075	79.6%	-87	-7.5%			
Richland Township	625	90.8%	487	88.2%	-138	-22.1%			
Shawnee Township	4,170	86.3%	4,069	85.4%	-101	-2.4%			
Spencer Township	292	89.6%	273	89.8%	-19	-6.5%			
Sugar Creek Township	417	84.2%	364	80.5%	-53	-12.7%			

TABLE 3-3 RENTER OCCUPIED HOUSING UNITS CHANGE 2010-2017								
Political Subdivision	2010	% Renter	2017	% Renter	Char			
	Census	Occupied	ACS	Occupied	Amount	Percent		
Allen County	12,520	30.8%	13,674	33.9%	1,154	9.2%		
Beaverdam	38	26.4%	63	32.5%	25	65.8%		
Bluffton	471	33.0%	574	33.4%	103	21.9%		
Cairo	37	18.7%	21	11.5%	-16	-43.2%		
Delphos	771	26.7%	986	34.1%	215	27.9%		
Elida	86	12.1%	79	11.3%	-7	-8.1%		
Harrod	18	12.6%	30	20.7%	12	66.7%		
Lafayette	41	25.5%	41	26.8%	0	0.0%		
Lima	7,030	49.4%	7,797	54.5%	767	10.9%		
Spencerville	223	27.3%	310	36.4%	87	39.0%		
Amanda Township	69	9.1%	80	11.4%	11	15.9%		
American Township	1,755	32.8%	1,880	36.5%	125	7.1%		
Auglaize Township	117	13.1%	135	16.7%	18	15.4%		
Bath Township	763	19.9%	819	21.8%	56	7.3%		
Jackson Township	110	11.0%	49	5.3%	-61	-55.5%		
Marion Township	78	7.7%	126	11.0%	48	61.5%		
Monroe Township	85	13.4%	77	12.1%	-8	-9.4%		
Perry Township	291	20.0%	275	20.4%	-16	-5.5%		
Richland Township	63	9.2%	65	11.8%	2	3.2%		
Shawnee Township	663	13.7%	698	14.6%	35	5.3%		
Spencer Township	34	10.4%	31	10.2%	-3	-8.8%		
Sugar Creek Township	78	15.8%	88	19.5%	10	12.8%		
*ACS 2017 5-Year Estimates								

 Vacancy Rate: Across the County, the vacancy rates increased between 2010 and 2017, increasing by 306 units or 7.0 percent. Three municipalities saw their vacancy rates more than double in the last seven years; City of Delphos (+191/146.9%), Village of

3 Townships and 1 village saw a 100% decline in vacant units.

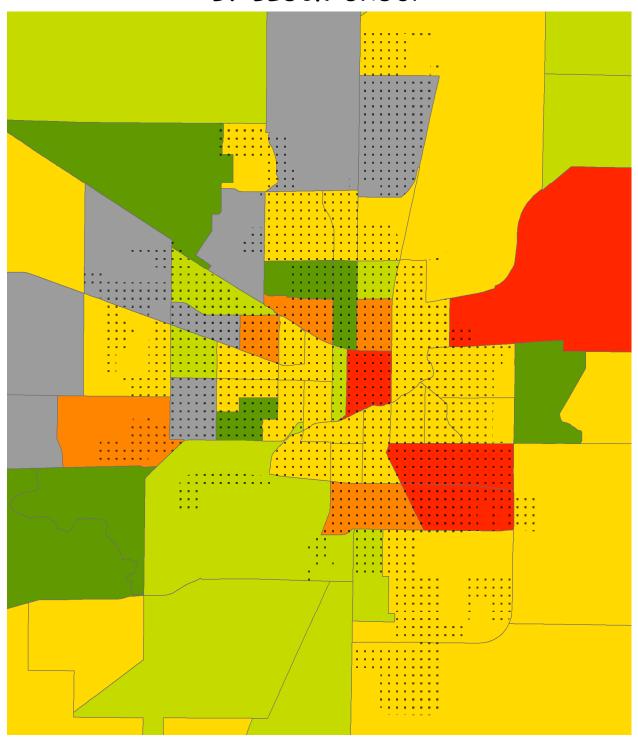
Lafayette (+19/172.7%), and Spencer Township (+43/238.9%). The City of Lima also witnessed a small increase in vacant housing units (5.6%). Amanda, Marion and Monroe Townships as well as the Village of Beaverdam saw a complete 100% decrease with no vacant units reported in 2017. Table 3-4 reveals the extent of change by political subdivision. Map 3-2 depicts the location and density of vacant residential units in Lima at the census block level identified in the 2017 ACS.

- Size of Housing Units: Data on the size of housing units is somewhat restricted. However, ACS does provide tabulations on the number of rooms and bedrooms of unit. Table 3-5 suggests that the median number of rooms in a house including kitchen, dining room, family room, bedrooms excluding mud rooms, utility rooms and bathrooms ranged from a high of 7.1 rooms in Amanda Township to a low of 5.4 rooms in the City of Lima. The median number of rooms in a dwelling unit was 5.9 rooms in Allen County. Of note, just over two-thirds (67.2%) of the housing units in Allen County contain 3 or more bedrooms. Data on the square footage of housing units was not readily available and should be targeted for subsequent reporting purposes.
- Age of Housing Stock: The villages of Lafayette and Harrod have the distinction of having the oldest housing stock in Allen County, both with median year built before 1940. According to the data, the median year to which residential structures date in Lima is 1953, as compared to the County median of 1963. The oldest housing in the City of Lima is found in the neighborhoods immediately adjacent to the central business district, while the newest is located in the Jerry Lewis and Westgate neighborhoods that lie closer to the city's western and northern borders with American Township. Table 3-6 identifies the number of housing units by median age and political subdivision.
- Residential Housing Quality: The quality of housing varies across the County. The quality of construction largely reflects the architectural detail, the quality of the materials used and age of the housing stock. Table 3-7 identifies the quality of the housing with a general grading of the single-family residential housing in Allen County. The grading reflects the extent of architectural detail, quality of materials and workmanship as reflected in appraisals conducted for the Allen County Auditor through 2017. The grading scale works from A thru E with multiple levels within each letter grade e.g. AAA to EE. Variations within each letter grade reflect the extent and type of material used on such components as: the exterior roofs (heavy slate, shake/wood shingles, copper flashing, ornamental wood cornices versus asbestos shingles, roll or metal roofing); exterior walls (stucco, brick, stone granite versus aluminum siding, vinyl siding); interior finish (hardwood trim throughout, excellent built-in kitchen china, broom, linen cabinetry, high grade decorating, ornamental woodwork in all major rooms, tiled bathrooms with high quality shower doors and large vanities versus pine/fir doors, plywood or composite cabinetry, drywall/plaster/plywood walls); and, flooring (marble, slate, hickory, cherry, oak, versus other hard/soft wood flooring, carpeting, vinyl, asbestos tile flooring). Within the grading system:
 - Grade A residences reflect the highest quality materials and workmanship exhibiting unique and elaborate architectural styling and treatments and having all the features typically characteristics of mansion type homes.

TABLE 3-4 VACANCY STATUS BY POLITICAL SUBDIVISION									
Political Subdivision	2010	Percent	2017	Percent	Chai				
All C	Census	Vacant	ACS	Vacant	Amount	Percent			
Allen County	4,380	6.0%	4,686	10.4%	306	7.0%			
Beaverdam	9	5.9%	0	0.0%	-9	-100.0%			
Bluffton	91	6.0%	28	1.6%	-63	-69.2%			
Cairo	16	7.5%	30	14.1%	14	87.5%			
Delphos	130	7.5%	321	10.0%	191	146.9%			
Elida	33	4.5%	33	4.5%	0	0.0%			
Harrod	18	11.2%	9	5.8%	-9	-50.0%			
Lafayette	11	6.4%	30	16.4%	19	172.7%			
Lima	2,563	15.3%	2,707	15.9%	144	5.6%			
Spencerville	69	7.8%	38	4.3%	-31	-44.9%			
Amanda Township	30	3.8%	0	0.0%	-30	-100.0%			
American Township	383	6.7%	213	4.0%	-170	-44.4%			
Auglaize Township	55	5.8%	100	11.0%	45	81.8%			
Bath Township	284	6.9%	503	11.8%	219	77.1%			
Jackson Township	66	6.2%	55	5.6%	-11	-16.7%			
Marion Township	33	3.1%	0	0.0%	-33	-100.0%			
Monroe Township	35	5.2%	0	0.0%	-35	-100.0%			
Perry Township	108	6.9%	152	10.1%	44	40.7%			
Richland Township	27	4.3%	49	8.2%	22	81.5%			
Shawnee Township	361	7.0%	448	8.6%	87	24.1%			
Spencer Township	18	5.2%	61	16.7%	43	238.9%			
Sugar Creek Township	40	7.5%	30	6.2%	-10	-25.0%			

TABLE 3-5 PERCENTAGE HOUSING UNITS BY NUMBER OF ROOMS & BEDROOMS BY POLITICAL SUBDIVISION									
Political Subdivision	Median Rooms	Percent No Bedroom	Percent 1 Bedroom	Percent 2 Bedrooms	Percent 3 Bedrooms	Percent 4 Bedrooms	Percent 5 or more Bedrooms		
Allen County	5.9	1.9%	7.6%	23.3%	49.2%	15.0%	3.0%		
Beaverdam	6	5.1%	7.3%	19.9%	42.8%	20.7%	4.2%		
Bluffton	6.5	0.0%	9.0%	23.9%	51.7%	11.9%	3.4%		
Cairo	6.1	1.0%	3.1%	20.6%	53.6%	19.1%	2.6%		
Delphos	6.1	4.9%	7.0%	20.7%	43.0%	20.4%	4.1%		
Elida	6.6	0.0%	1.9%	16.0%	60.1%	17.4%	4.7%		
Harrod	6.6	0.2%	8.8%	26.3%	48.2%	13.2%	3.3%		
Lafayette	6.6	0.4%	2.0%	8.3%	67.1%	21.4%	0.7%		
Lima	5.4	0.0%	2.6%	15.6%	59.1%	16.9%	5.8%		
Spencerville	6.2	0.0%	5.5%	22.4%	47.0%	19.7%	5.5%		
Amanda Township	7.1	3.7%	11.6%	29.1%	45.6%	8.8%	1.1%		
American Township	6	0.6%	4.4%	28.8%	47.8%	17.3%	1.1%		
Auglaize Township	6.1	0.0%	2.3%	13.4%	50.9%	24.3%	9.1%		
Bath Township	6	1.1%	7.7%	23.3%	47.3%	17.7%	3.0%		
Jackson Township	6.6	1.1%	1.9%	16.5%	61.9%	17.1%	1.5%		
Marion Township	6.5	0.4%	3.8%	24.8%	49.0%	18.8%	3.2%		
Monroe Township	6.4	0.0%	1.9%	10.4%	70.8%	15.3%	1.6%		
Perry Township	5.7	1.1%	0.8%	13.5%	61.5%	18.4%	4.7%		
Richland Township	6.8	0.0%	9.1%	8.9%	57.9%	14.4%	9.7%		
Shawnee Township	6.6	0.9%	14.0%	26.8%	40.5%	15.6%	2.3%		
Spencer Township	6.4	0.0%	0.0%	6.3%	56.7%	26.8%	10.1%		
Sugar Creek Township	6.7	0.4%	2.9%	16.5%	51.2%	22.2%	6.9%		
*ACS 2017 5-Year Estir	nates								

MAP 3-2 2017 VACANT HOUSING UNITS BY BLOCK-GROUP



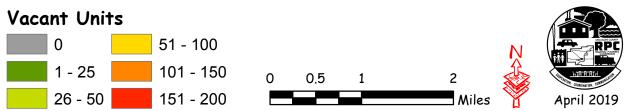


	TABLE 3-6 HOUSING UNITS BY AGE & VALUE BY POLITICAL SUBDIVISION									
Subdivision	Total Residential Units	Prior to 1940	1940 to 1959	1960 to 1979	1980 to 1989	1990 to 1999	2000 to 2009	After 2010	Median Year Built	Median Value
Allen County	45,005	23.8%	22.1%	29.0%	7.7%	9.2%	7.5%	0.7%	1963	\$110,900
Beaverdam	194	43.3%	16.0%	30.4%	5.7%	2.1%	2.6%	0.0%	1949	\$74,300
Bluffton	1,747	32.3%	19.9%	19.3%	5.8%	12.2%	9.3%	1.1%	1958	\$147,200
Cairo	213	39.4%	23.0%	20.7%	4.2%	2.8%	9.9%	0.0%	1952	\$91,400
Delphos	3,211	32.7%	22.2%	22.9%	4.9%	10.0%	5.9%	1.4%	1956	\$90,200
Elida	732	17.2%	21.4%	10.8%	12.8%	31.8%	5.9%	0.0%	1980	\$143,200
Harrod	154	51.9%	11.7%	20.1%	8.4%	3.9%	2.6%	1.3%	1939	\$76,300
Lafayette	183	53.0%	26.8%	1.1%	9.3%	6.0%	3.8%	0.0%	1939	\$81,600
Lima	17,019	34.7%	29.3%	23.7%	4.3%	4.6%	3.3%	0.1%	1951	\$66,000
Spencerville	889	33.9%	23.7%	21.0%	7.5%	6.7%	5.3%	1.8%	1954	\$83,100
Amanda Township	700	14.0%	11.6%	28.6%	13.3%	13.3%	14.1%	5.1%	1978	\$168,900
American Township	5,369	5.8%	13.6%	47.9%	12.0%	9.8%	10.9%	0.0%	1974	\$127,800
Auglaize Township	907	31.1%	12.9%	28.8%	4.6%	16.2%	2.6%	3.7%	1962	\$123,000
Bath Township	4,254	7.6%	17.7%	33.8%	10.0%	16.6%	13.9%	0.3%	1975	\$125,700
Jackson Township	985	12.1%	6.8%	28.5%	10.2%	21.8%	17.1%	3.6%	1977	\$152,900
Marion Township	1,150	23.1%	14.0%	23.7%	12.9%	14.5%	11.8%	0.0%	1959	\$112,800
Monroe Township	639	20.7%	12.5%	22.4%	15.6%	5.9%	12.4%	10.5%	1969	\$126,800
Perry Township	1,502	21.3%	24.0%	21.3%	13.4%	9.7%	10.3%	0.0%	1968	\$88,100
Richland Township	601	42.4%	13.5%	16.0%	1.5%	19.6%	7.0%	0.0%	1955	\$148,000
Shawnee Township	5,215	7.2%	22.5%	42.3%	9.8%	8.4%	8.9%	1.0%	1969	\$143,900
Spencer Township	365	48.5%	7.7%	11.0%	8.8%	1.9%	22.2%	0.0%	1953	\$95,700
Sugar Creek Township	482	34.2%	14.1%	25.5%	7.5%	14.7%	3.9%	0.0%	1961	\$133,700
*ACS 2017 5-Year Estin	nates									

ASSESS	TABLE 3-7 ASSESSED QUALITY OF RESIDENTIAL PROPERTIES BY POLITICAL SUBDIVISION 2017								
Political Subdivision	# of Residential Homes	A	В	% A/B	С	% C	D	E	% D/E
Allen County	36,383	487	2,875	9.2	21,922	60.3	10,938	161	30.5
Beaverdam	128	1	0	0.8	25	19.5	102	0	79.7
Bluffton (Part)	1,155	6	136	12.3	702	60.8	309	2	26.9
Cairo	211	0	0	0.0	90	42.7	121	0	57.3
Delphos (Part)	1,390	6	100	7.6	501	36.0	777	6	56.3
Elida	726	1	157	21.8	463	63.8	105	0	14.5
Harrod	155	0	0	0.0	38	24.5	113	4	75.5
Lafayette	145	0	1	0.7	92	63.4	51	1	35.9
Lima	12,232	53	256	2.5	7,390	60.4	4,505	28	37.1
Spencerville	783	0	3	0.4	349	44.6	427	4	55.0
Amanda Township	779	8	50	7.4	533	68.4	181	7	24.1
American Township	4,651	81	405	10.4	3,685	79.2	476	4	10.3
Auglaize Township	844	1	25	3.1	385	45.6	424	9	51.3
Bath Township	3,281	18	458	14.5	2,077	63.3	691	37	22.2
Jackson Township	992	1	41	4.2	514	51.8	425	11	44.0
Marion Township	1,021	1	69	6.9	627	61.4	318	6	31.7
Monroe Township	604	1	22	3.8	353	58.4	222	6	37.7
Perry Township	1,137	1	15	1.4	453	39.8	645	23	58.8
Richland Township	676	1	32	4.9	422	62.4	220	1	32.7
Shawnee Township	4,668	305	1,083	29.7	2,769	59.3	503	8	10.9
Spencer Township	323	1	10	3.4	186	57.6	124	2	39.0
Sugar Creek Township	482	1	12	2.7	268	55.6	199	2	41.7
*Allen County, Novemb	er 2017								

- Grade B units reflect good quality materials and workmanship exhibiting pronounced architectural styling and treatments and having an ample amount of built-in features. Custom built tract homes typically fall into this category.
- Grade C homes are constructed of average quality materials and workmanship, exhibiting moderate architectural styling and treatment and having a minimal amount of built-in features. Typical tract built housing normally falls into this classification.
- Grade D dwellings are constructed of fair quality material and workmanship, generally lacking architectural styling and treatment and having only a scant amount of built-in features. Economical mass built homes normally fall into this classification.
- Grade E residences are constructed of cheap quality material and poor workmanship void of any architectural treatment and built-in features. Such units are typically self-built with mechanical contractor assistance.

Map 3-3 illustrates the quality of residential properties. For mapping purposes all letter grades were collapsed to a simple A thru E. As depicted in the map, housing located closer to the central and southeast side of Lima was found in the lowest grades, while the housing in neighborhoods along the border of the City are rated above average quality. The highest concentrations of low-quality housing are found in the in the older small villages, like Beaverdam (79.7%) and Harrod (75.5%).

• Housing Value: As housing quality varies across Allen County so does the value of such housing. According to the ACS 2017 5-Year Estimates, the median housing value of owner-occupied units in the City of Lima was \$66,000 as compared to \$110,900 for Allen County. Table 3-8 indicates homes with the highest median value were located in Amanda Township (\$168,900); the City of Lima had the lowest median values (\$66,000). The largest jump in median owner-occupied home valuations between 2010 and 2017 were experienced in Amanda Township (17.5%) and the Village of Bluffton (16.8%).

In order to provide a more recent picture of housing valuation, Table 3-9 reflects some 1300+ home sales by census tract occurring in 2017. The data, obtained from the Allen County Auditor's Office, includes the number of home sales, the mean price by tract and reflects the extent of increased home valuation occurring between the 2017 census period

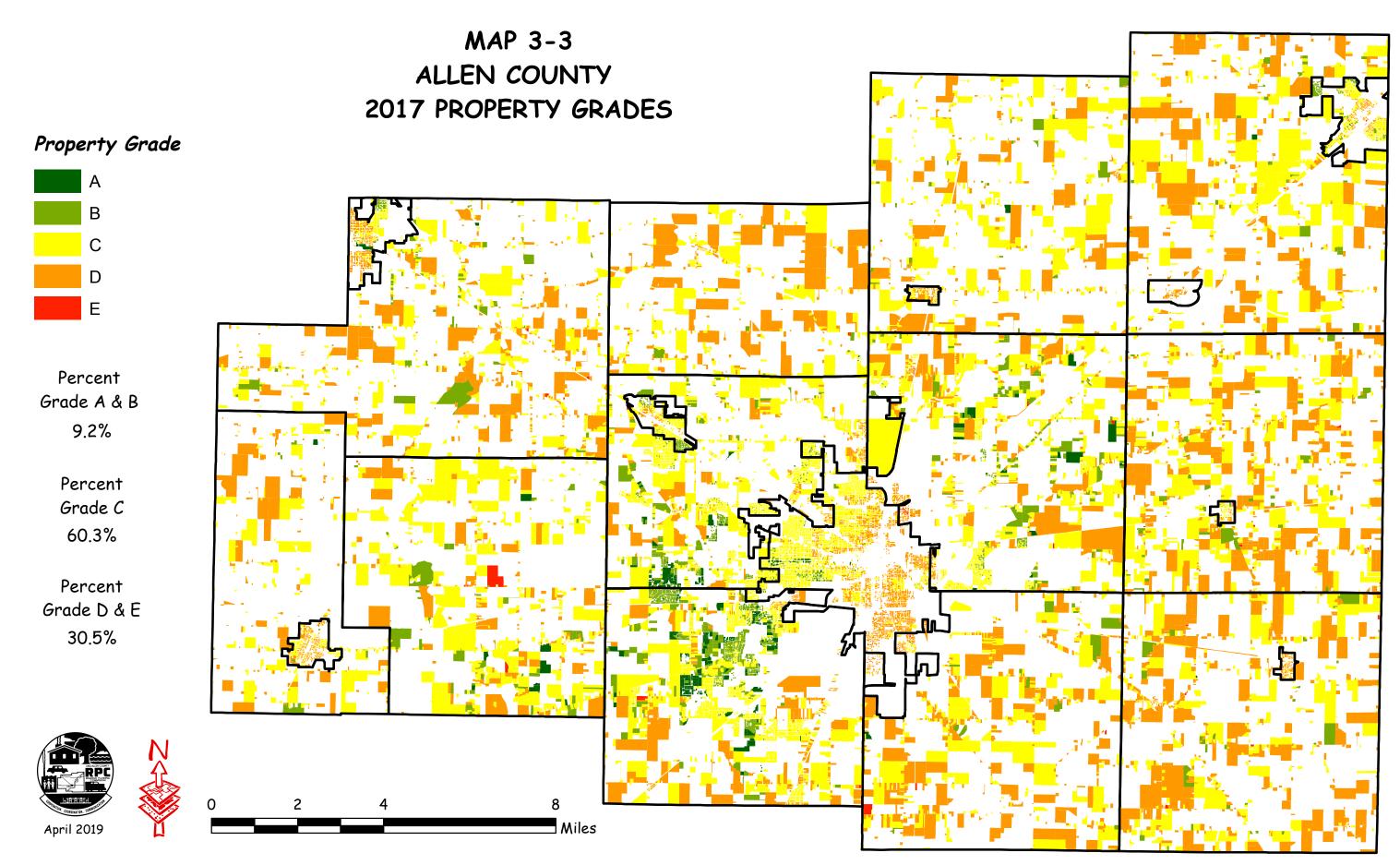
The City of Lima has repeatedly ranked as one of the most affordable cities in the United States. and 2017 ACS. The highest mean sales price occurred in census tracts 120 and 121 of Shawnee Township while the lowest mean sales occurred within census tracts 127, 134, 136 and 137 located in south and southeast quadrants of the City of Lima. Map 3-4 identifies 2017 housing unit sales and mean sales prices by census tract.

• Manufactured/Mobile Homes: The ACS documented 1,452 manufactured/mobile homes within Allen County in 2017. ACS data suggests that manufactured/mobile homes represented roughly 3.2 percent of the total housing stock in Allen County in 2017. The largest concentration of mobile homes was found in Bath Township (433 units), and when coupled with those in Perry Township (168 units), and Lima (186 units) collectively they reflect more than half of all units (54.2%) in Allen County. When considering occupancy, 84.6 percent of all occupied units were owner occupied and 15.4 percent were renter occupied. Such owner occupancy rates are higher than the rates established for all housing units documented at 66.1 percent. In 2017 the average occupants per unit for owner occupied manufactured mobile homes across Allen County was 1.9 persons. This was

significantly lower than the rental occupants per unit at 3.1 persons. Mobile home occupancy ranged in size from 1.27 persons per unit in Amanda Township to 4.8 persons per unit in Sugar Creek Township for owner occupied units. Table 3-10 examines tenure and occupancy of manufactured homes.

TABLE 3-8 MEDIAN VALUE OWNER OCCUPIED UNITS									
Political Subdivision	2010	2017	Change						
Political Subdivision	2010	2017	Amount	Percent					
Allen County	\$104,800	\$110,900	\$6,100	5.8%					
Beaverdam	\$75,300	\$74,300	-\$1,000	-1.3%					
Bluffton	\$126,000	\$147,200	\$21,200	16.8%					
Cairo	\$86,900	\$91,400	\$4,500	5.2%					
Delphos	\$85,000	\$90,200	\$5,200	6.1%					
Elida	\$139,900	\$143,200	\$3,300	2.4%					
Harrod	\$93,000	\$76,300	-\$16,700	-18.0%					
Lafayette	\$84,400	\$81,600	-\$2,800	-3.3%					
Lima	\$73,200	\$66,000	-\$7,200	-9.8%					
Spencerville	\$84,500	\$83,100	-\$1,400	-1.7%					
Amanda Township	\$143,700	\$168,900	\$25,200	17.5%					
American Township	\$119,000	\$127,800	\$8,800	7.4%					
Auglaize Township	\$139,700	\$123,000	-\$16,700	-12.0%					
Bath Township	\$125,900	\$125,700	-\$200	-0.2%					
Jackson Township	\$141,400	\$152,900	\$11,500	8.1%					
Marion Township	\$109,400	\$112,800	\$3,400	3.1%					
Monroe Township	\$117,600	\$126,800	\$9,200	7.8%					
Perry Township	\$96,200	\$88,100	-\$8,100	-8.4%					
Richland Township	\$130,300	\$148,000	\$17,700	13.6%					
Shawnee Township	\$141,800	\$143,900	\$2,100	1.5%					
Spencer Township	\$89,000	\$95,700	\$6,700	7.5%					
Sugar Creek Township	\$133,000	\$133,700	\$700	0.5%					
*ACS 2017 5-Year Estima	tes								

TABLE 3-9 2017 HOUSING SALES IN ALLEN COUNTY BY CENSUS TRACT									
Tracts	Sales	Average Price	Tracts	Sales	Average Price				
101	62	\$157,475	123	45	\$56,894				
102	49	\$175,602	124	25	\$35,014				
103	18	\$149,611	126	23	\$48,171				
106	60	\$130,653	127	9	\$18,444				
108	121	\$176,017	129	7	\$41,914				
109	65	\$123,795	130	76	\$80,912				
110	81	\$113,487	131	49	\$78,852				
112	14	\$100,642	132	37	\$94,160				
113	116	\$147,621	133	9	\$77,666				
114	39	\$179,748	134	13	\$25,598				
115	32	\$130,756	136	6	\$22,750				
116	27	\$126,375	137	7	\$21,914				
118	48	\$127,598	138	12	\$34,516				
119	38	\$122,007	139	54	\$109,253				
120	62	\$202,484	140	42	\$141,152				
121	64	\$192,494	141	9	\$52,455				
122	34	\$79,713	2017 Total	1,353	\$126,723				
			2012 Total	957	\$110,663				



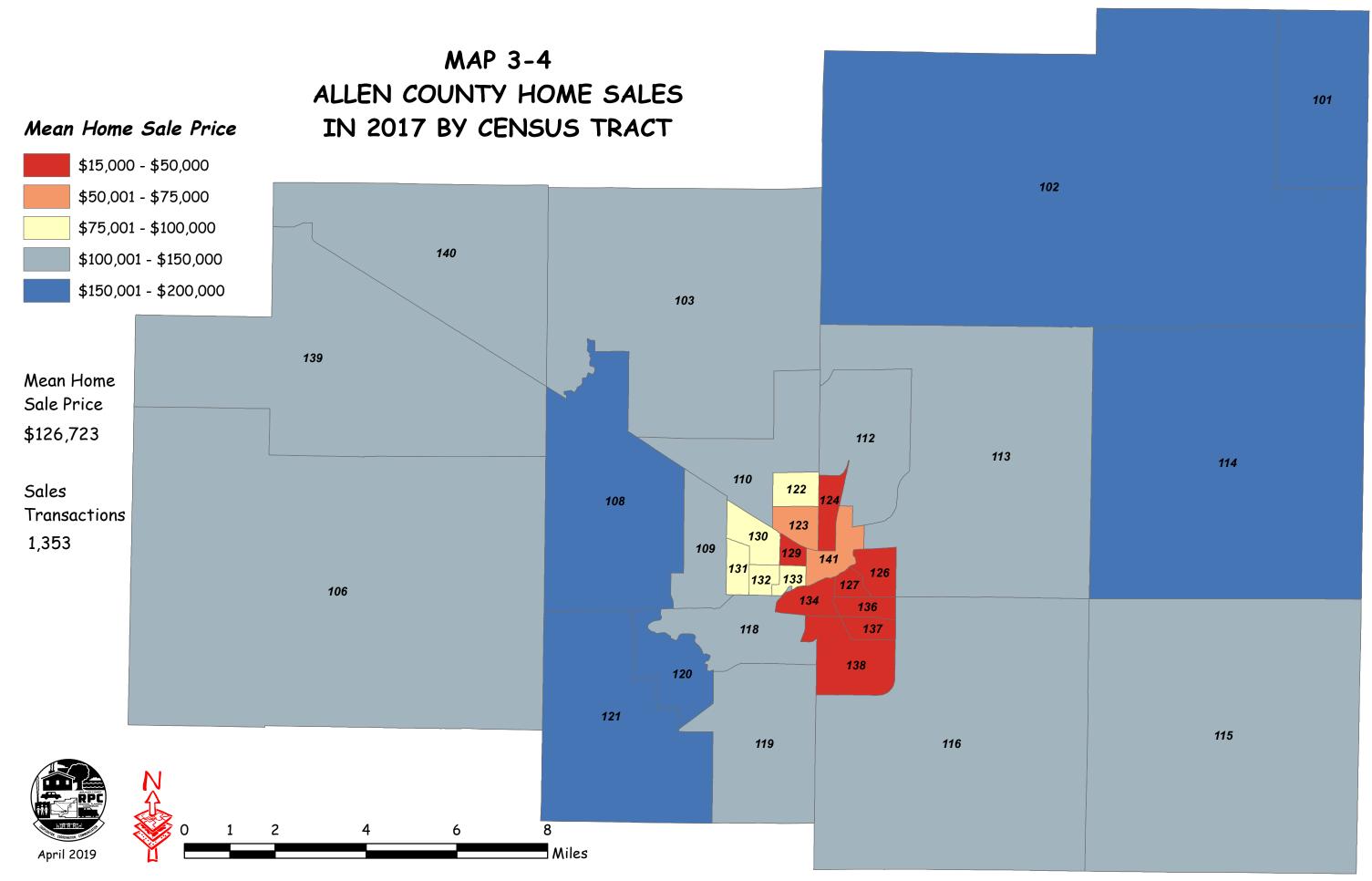
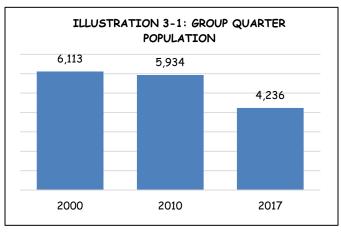


TABLE 3-10 MOBILE HOME OCCUPANCY BY POLITICAL SUBDIVISION									
Political Subdivision	Mobile Homes	Owner Occupied	Renter Occupied	Owner Occupants Per Unit	Renter Occupants Per Unit				
Allen County	1,452	1,228	224	1.90	3.10				
Beaverdam	45	16	29	1.44	3.17				
Bluffton	0	0	0	0.00	0.00				
Cairo	6	0	6	0.00	11.67				
Delphos	275	120	155	2.12	2.15				
Elida	2	2	0	1.00	0.00				
Harrod	10	8	2	1.38	3.00				
Lafayette	3	3	0	3.33	0.00				
Lima	186	186	0	2.15	0.00				
Spencerville	63	25	38	1.36	3.92				
Amanda Township	22	22	0	1.27	0.00				
American Township	83	83	0	1.60	0.00				
Auglaize Township	16	8	8	4.63	3.88				
Bath Township	433	401	32	1.73	1.94				
Jackson Township	104	93	11	2.00	4.00				
Marion Township	59	48	11	1.46	2.00				
Monroe Township	51	51	0	2.29	0.00				
Perry Township	168	168	0	1.90	0.00				
Richland Township	10	0	10	0.00	6.10				
Shawnee Township	129	89	40	2.09	3.05				
Spencer Township	8	0	8	0.00	1.00				
Sugar Creek Township	17	12	5	4.83	1.00				
*ACS 2017 5-Year Estir	nates								

• Manufactured/Mobile Home Parks: Manufactured/Mobile Home Parks are licensed and controlled by the Ohio Department of Commerce. In June 2017 State lawmakers voted to abolish the Ohio Manufactured Homes Commission that had been the regulatory agency previously. Lawmakers cited strong corporate interests and poor safety quality control as reasons for the change. Such parks are required to be annually inspected and licensed when 3 or more such homes are used for habitation on any tract of land. In 2017 the Allen County Auditor identified 24 licensed and approved manufactured/mobile home parks. Table 3-11 identifies the mobile parks by political subdivision, number of units, size of park and density. Notice the disparity in the density of such parks between political subdivisions. Mobile home parks are identified in Map 3-5.

Group Quarters

The Census Bureau identifies two general types of group quarters: institutional (e.g. nursing homes, hospital wards, hospices and prisons) and non-institutional (e.g. college dormitories military barracks, group homes, shelters, missions, etc.). Certain group quarters house persons with disabilities – both physical and cognitive as well as people with severe mental illnesses. Some argue that group quarters should be equally distributed so that persons with disabilities are not segregated into certain areas within

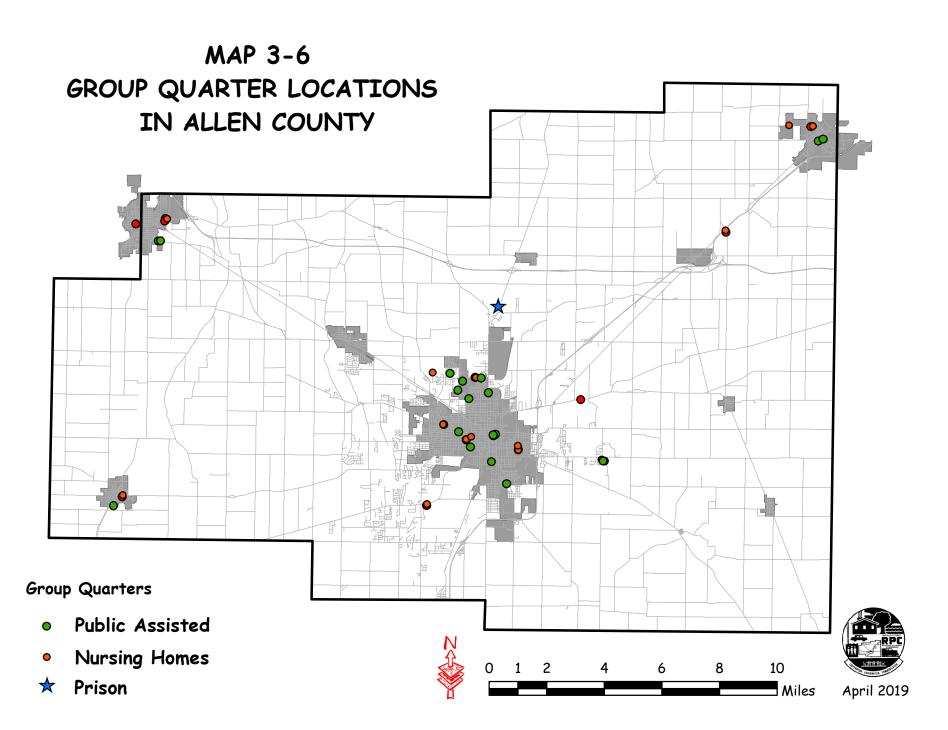


the community. However, persons occupying group quarters often require services that are most readily available in an urban/suburban setting. Map 3-6 depicts the distribution of group quarters across the study area. Data reveals a concentration of such group quarters in and immediately adjacent to, the City of Lima. In 2000, the U. S Census identified 6,113 individuals residing in Group Quarters within Allen County. Since then the number has fallen to 4,236 individuals in Allen County in 2017.

TABLE 3-11 MOBILE HOME PARKS IN ALLEN COUNTY 2018								
Political Subdivision	Park	Units	Acres	Units Per Acre				
	Holland Court	62	6.5	9.5				
	Southside Community	56	10.7	5.2				
City of Delphos	Ulm's Mobile Home Court	91	14.2	6.4				
	Ulm's Mobile Home Court II	65	8.8	7.4				
	Park Court	7	0.3	24.1				
City of Lima	Crestwood Estates	199	35.6	5.6				
	Westwood Park	16	1.0	16.5				
Spencerville Village	Village Courts I	21	3.3	6.4				
	Village Courts II	13	1.2	11.2				
	Hunter's Chase	135	31.7	4.3				
American Township	Woodlawn Trailer Park	63	4.7	13.3				
American Township	Woodlawn Trailer Park I	40	3.2	12.6				
	Woodlawn Trailer Park II	4	1.0	3.8				
	Country Estates	225	37.5	6.0				
	Marilee Estates	22	2.9	7.6				
Bath Township	Maplewood MHC	99	17.5	5.6				
Barn rownship	Oakhaven Park	43	7.2	6.0				
	Offenbacher	42	3.4	12.4				
	Plaza Mobile Home Park	119	13.9	8.5				
Perry Township	The Colony Park	139	41.4	3.4				
Terry Township	Eastwoods Estates	168	113.1	1.5				
	Indian Village	204	48.4	4.2				
Shawnee Township	Mobile Living Estates	72	14.3	5.0				
	Shawnee Park	67	10.4	6.5				
	Allen County	1,972	432.2	4.6				

Housing Rehabilitation Needs

Data that identifies the condition of housing or the extent to which housing rehabilitation needs are not available at the County or political subdivision level of analysis. Although Map 3-3 identified the quality of the housing stock, quality is different from the condition of the housing stock. The lack of a countywide building code and the absence of any specific conditional assessment in the appraisal and re-appraisal process prevent any such systematic assessment. However, for purposes of this report proxy indicators have been considered in establishing rehabilitation needs of the existing housing stock.



• Essential Amenities: To provide additional insights into the condition and need for improved housing conditions, the extent of absent housing amenities is presented. The total number of units lacking complete kitchen facilities in 2017 totaled 3,047 units. The total number of units lacking complete plumbing facilities in 2017 totaled 1,746 units. Table 3-12 indicates the number of units lacking kitchen and bathroom facilities by political subdivision coupled with the number of those units built prior to 1940 and which are presumed to need extensive rehabilitation as well as the number of vacant units to summarize the extent of rehabilitation needs in Allen County.

НО	TABLE 3-12 HOUSING STOCK PRESUMED TO NEED REHABILITATED IN 2017											
Political Subdivision	Pre 1940 Units by Political Subdivision	Lack of Kitchen Facilities	Lack of Plumbing Facilities	Vacant Units								
Allen County	10,729	3,047	1,746	4,686								
Beaverdam	84	0	0	0								
Bluffton	564	30	10	28								
Cairo	84	6	6	30								
Delphos	1,050	189	30	321								
Elida	126	30	14	33								
Harrod	80	0	0	9								
Lafayette	97	19	21	30								
Lima	5,900	2,033	1,224	2,707								
Spencerville	301	21	0	38								
Amanda Township	98	0	0	0								
American Township	313	139	14	213								
Auglaize Township	282	87	78	100								
Bath Township	325	209	141	503								
Jackson Township	119	32	32	55								
Marion Township	266	0	0	0								
Monroe Township	132	0	0	0								
Perry Township	320	73	73	152								
Richland Township	255	0	0	49								
Shawnee Township	375	154	73	448								
Spencer Township	177	27	0	61								
Sugar Creek Township	165	30	30	30								
*ACS 2017 5-Year Estir	nates											

• Lead-Based Paint: Lead-based paint was used in area housing until 1978. Any house built before 1979 therefore may have layers of lead paint present. When chips of this paint are exposed they may be ingested, or ground into dust which may be ingested or inhaled. HUD estimates that 90 percent of pre-1940 housing units have lead-based paint, 80 percent of those units built between 1940 and 1959 have lead-based paint and 62 percent of housing built from 1960 to 1979 have lead-based paint. Given the age of the housing stock it is not surprising to find that in 2017 25,688 units in Allen County were estimated to contain lead-based paint. An estimate of the number of units with lead-based paint in Allen County is provided by political subdivision in Table 3-13.

Of concern, the potential reflects 57.1 percent of all housing stock in Allen County. However, estimates from HUD based on national surveys suggest that only a percentage of these 25,688 units actually pose a lead hazard and are in need of lead abatement. HUD suggests that of those units built before 1940, 44.0 percent pose a hazard, with those built between 1940 and 1959 identified at a somewhat lesser hazard at 18.0 percent of units,

while the hazard of those built after 1960 thru 1979 is established at just 9.5 percent. Given the age of the housing stock, vacancy rates and occupancy status, there may be exposure to lead hazard in some 6,447 units. Table 3-14 identifies the extent of a lead hazard in housing by political subdivision by year of construction.

Table 3-13 identifies the number of total housing units with lead paint (25,688) while Table 3-14 identifies the total number of units with potential lead hazards (6,447) stemming from conditions of age, weathering and a lack of maintenance. Examining tenure and occupancy statistics, data in Table 3-15 suggests that 3,439 of units with lead hazards are owner occupied while rentals account for 2,067; vacancies, abandoned and dilapidated housing consume the remainder. HUD estimates suggest that low to moderate income (LMI) households occupy 44.5 percent of the dwellings with lead hazards. The exposure to the Allen County population reflects some 1,530 owner-occupied and 920 renter occupied units. Table 3-15 reveals lead hazard exposure to the LMI population in occupied housing units.

PRESEN	CE OF LEA	ND BASED PA	TABLE 3- INT BY YE 2017	-13 EAR OF HOUS	ING CONS	STRU <i>C</i> TION	
	Pre	-1940	1940	to 1959	1960	Total Units w/	
Political Subdivision	Built	Lead Paint Exposure	Built	Lead Paint Exposure	Built	Lead Paint Exposure	Lead Paint Exposure
Allen County	10,729	9,656	9,930	7,944	13,045	8,088	25,688
Beaverdam	84	76	31	25	59	37	137
Bluffton (Part)	564	508	348	278	338	210	996
Cairo	84	76	49	39	44	27	142
Delphos (Part)	1,050	945	714	571	734	455	1,971
Elida	126	113	157	126	79	49	288
Harrod	80	72	18	14	31	19	106
Lafayette	97	87	49	39	2	1	128
Lima	5,900	5,310	4,979	3,983	4,028	2,497	11,791
Spencerville	301	271	211	169	187	116	556
Amanda Township	98	88	81	65	200	124	277
American Township	313	282	730	584	2,572	1,595	2,460
Auglaize Township	282	254	117	94	261	162	509
Bath Township	325	293	752	602	1,439	892	1,786
Jackson Township	119	107	67	54	281	174	335
Marion Township	266	239	161	129	272	169	537
Monroe Township	132	119	80	64	143	89	271
Perry Township	320	288	361	289	320	198	775
Richland Township	255	230	81	65	96	60	354
Shawnee Township	375	338	1,172	938	2,204	1,366	2,642
Spencer Township	177	159	28	22	40	25	207
Sugar Creek Township	165	149	68	54	123	76	279

In order to address and minimize the potential negative impact of lead to human health the Ohio Department of Health (ODH) and the Allen County Health Department (ACHD) commonly monitor and test school age children for lead poisoning. The ACHD also provides education to at-risk children. In 2017, 1,124 children under the age of 6 years were tested for elevated lead levels in their blood reflecting a sample of approximately 14.4 percent of all children under 6 years. Test results found 13 children with elevated levels (>10ug/dL) suggesting .17 percent of all children under the age of 6 years with elevated blood levels for lead. Lead abatement remains an issue for local stakeholders to address.

ESTIMATED E	TABLE 3-14 ESTIMATED EXPOSURE TO LEAD HAZARD BY YEAR OF HOUSING CONSTRUCTION 2017											
Political Subdivision	Pre-1	940	1940 to	1959	1960 to 1979		Total Pre-1940 to 1979					
Political Subdivision	Lead Paint Exposure	Hazard	Lead Paint Exposure	Hazard	Lead Paint Exposure	Hazard	Lead Paint Exposure	Hazard				
Allen County	9,656	4,249	7,944	1,430	8,088	768	25,688	6,447				
Beaverdam	76	33	25	4	37	3	137	41				
Bluffton (Part)	508	223	278	50	210	20	996	293				
Cairo	76	33	39	7	27	3	142	43				
Delphos (Part)	945	416	571	103	455	43	1,971	562				
Elida	113	50	126	23	49	5	288	77				
Harrod	72	32	14	3	19	2	106	36				
Lafayette	87	38	39	7	1	0	128	46				
Lima	5,310	2,336	3,983	717	2,497	237	11,791	3,291				
Spencerville	271	119	169	30	116	11	556	161				
Amanda Township	88	39	65	12	124	12	277	62				
American Township	282	124	584	105	1,595	151	2,460	381				
Auglaize Township	254	112	94	17	162	15	509	144				
Bath Township	293	129	602	108	892	85	1,786	322				
Jackson Township	107	47	54	10	174	17	335	73				
Marion Township	239	105	129	23	169	16	537	145				
Monroe Township	119	52	64	12	89	8	271	72				
Perry Township	288	127	289	52	198	19	775	198				
Richland Township	230	101	65	12	60	6	354	118				
Shawnee Township	338	149	938	169	1,366	130	2,642	447				
Spencer Township	159	70	22	4	25	2	207	76				
Sugar Creek Township	149	65	54	10	76	7	279	82				

	TABLE 3-15 ESTIMATED LEAD HAZARD AFFECTED HOUSEHOLDS IN ALLEN COUNTY 2014												
Year Built	Tenure	Total Occupied Units	PCT w/ Lead Paint	Number w/ Lead Paint	PCT w/ Hazard	Number w/ Hazard	PCT Units Occupied by LMI	LMI Units w/ Lead Hazard Exposure					
Pre-1940	Owner	5,346	90.0%	4,811	44.0%	2,117	44.5%	942					
Pre-1940	Renter	3,501	90.0%	3,151	44.0%	1,386	44.5%	617					
1940 to	Owner	6,017	80.0%	4,814	18.0%	866	44.5%	386					
1959	Renter	3,027	80.0%	2,422	18.0%	436	44.5%	194					
1960 to	Owner	7,733	62.0%	4,794	9.5%	455	44.5%	203					
1979	Renter	4,155	62.0%	2,576	9.5%	245	44.5%	109					
D. 1040	Owner	19,096	75.5%	14,419	18.0%	3,439	44.5%	1,530					
Pre-1940	Renter	10,683	76.3%	8,149	19.3%	2,067	44.5%	920					
to 1979	Total	29,779	75.8%	22,568	25.0%	7,445	44.5%	3,313					

Affordable Housing

The Allen County housing stock has routinely been recognized as one of the most affordable communities in the State. The median home costs were found to be the 3^{rd} lowest of central cities in Ohio's MSA's at \$46,200; with the range established between Dayton (\$45,000) and Columbus (\$142,800). When compared to the median household income of central cities in Ohio's MSAs, the

⁵ https://www.bestplaces.net/cost-of-living/

City of Lima also ranked low - in fact it ranked 6^{th} lowest with an average median household income of \$32,894; the range was established between Youngstown (\$26,295) and Columbus (\$49,478).

Data in Section II identified the character and complexity of the local population. Section II examined the community's demographics including household size, age, income and disability status in order to develop the background necessary to understand the community's housing needs.

Earlier in this section, data was presented that establishes the parameters of the current housing stock in Allen County. However, the nature and scope of affordable housing remains to be addressed. The local demand for safe, clean, appropriate and affordable housing is the focus of the remaining subsection. The extent to which affordable housing exists in a community can be assessed based on a number of factors. Census data allows us to examine housing affordability on a number of different measures. Included within such baseline housing parameters: overcrowding, and affordability including rental rates and ownership costs.

• Overcrowding: Tables 2-16 and 2-17 in Section 2 identified poverty rates by person and family units. Map 2-5 identified households in poverty by political subdivisions. Census data identifying the number of occupants per room is considered another measure of poverty that provides insights into housing affordability, for as the number of occupants rise over the threshold of 1.0 person per room overcrowding is thought to be experienced. This measure helps identify the relationship between housing costs, size of units and size of household. Table 3-16 identifies the extent of overcrowding by degree and political subdivision for renter occupied persons while Table 3-17 identifies the degree of overcrowding in owner occupied units by political subdivision.

Data suggests that in 2017, overcrowding was experienced in 212 rental units in Allen County representing 1.6 percent of the 13,674 occupied rental units. Over one half (55.7%) or 118 of the rental units experiencing overcrowding were found within the City of Lima. However, as so many rental units are located within the City (7,797/57.0%) overcrowding was only experienced in 1.5 percent of all Lima's rental units. Political subdivisions where overcrowded units account for 5+ percent of all housing units, included Cairo, Spencerville and Marion Township.

Similar data from the 2017 ACS suggests that one percent (1.0%) of owner-occupied units were found to be experiencing overcrowding in the County as a whole. Sugar Creek Township experienced the highest proportion of overcrowding in owner occupied units with 6.9 percent of such units. Perry Township (3.3%), Bath Township (1.9%), Auglaize Township (4.8%) and the City of Lima (1.8%) all experienced overcrowding greater than the countywide average (1.0%).

• Housing Costs: The extent to which affordable housing can be secured in a community can be assessed based on the relationship between income and housing costs. Housing costs must therefore reflect mortgage payments or rental payments plus related costs including taxes, insurance, fees and utilities. Mortgage payments tend to reflect the value of owner-occupied units while rent tends to reflect the utility value of the unit as it varies by size, character, location and condition.

⁶ 2013-2017 American Community Survey 5-Year Estimate – Table B19013

OCCUPANTS PER	TABLE 3-16 OCCUPANTS PER ROOM IN RENTER OCCUPIED HOUSEHOLDS BY POLITICAL SUBDIVISION												
Political Subdivision	Units	1.00 or less	Percent	1.01 to 1.50	Percent	1.51 or more	Percent	Overcrowding as Percent					
Allen County	13,674	13,462	98.4%	150	1.1%	62	0.5%	1.6%					
Beaverdam	63	63	100.0%	0	0.0%	0	0.0%	0.0%					
Bluffton	574	574	100.0%	0	0.0%	0	0.0%	0.0%					
Cairo	21	15	71.4%	0	0.0%	6	28.6%	28.6%					
Delphos	986	986	100.0%	0	0.0%	0	0.0%	0.0%					
Elida	79	76	96.2%	0	0.0%	3	3.8%	3.8%					
Harrod	30	30	100.0%	0	0.0%	0	0.0%	0.0%					
Lafayette	41	41	100.0%	0	0.0%	0	0.0%	0.0%					
Lima	7,797	7,679	98.5%	92	1.2%	26	0.3%	1.5%					
Spencerville	310	293	94.5%	17	5.5%	0	0.0%	5.5%					
Amanda Township	80	80	100.0%	0	0.0%	0	0.0%	0.0%					
American Township	1,880	1,848	98.3%	32	1.7%	0	0.0%	1.7%					
Auglaize Township	135	135	100.0%	0	0.0%	0	0.0%	0.0%					
Bath Township	819	805	98.3%	0	0.0%	14	1.7%	1.7%					
Jackson Township	49	49	100.0%	0	0.0%	0	0.0%	0.0%					
Marion Township	126	117	92.9%	9	7.1%	0	0.0%	7.1%					
Monroe Township	77	77	100.0%	0	0.0%	0	0.0%	0.0%					
Perry Township	275	262	95.3%	0	0.0%	13	4.7%	4.7%					
Richland Township	65	65	100.0%	0	0.0%	0	0.0%	0.0%					
Shawnee Township	698	698	100.0%	0	0.0%	0	0.0%	0.0%					
Spencer Township	31	31	100.0%	0	0.0%	0	0.0%	0.0%					
Sugar Creek Township	88	88	100.0%	0	0.0%	0	0.0%	0.0%					
*ACS 2017 5-Year Estir	nates												

OCCUPANTS PER	TABLE 3-17 OCCUPANTS PER ROOM IN OWNER OCCUPIED HOUSEHOLDS BY POLITICAL SUBDIVISION											
Political Subdivision	Units	1.00 or less	Percent	1.01 to 1.50	Percent	1.51 or more	Percent	Overcrowding as Percent				
Allen County	26,645	26,368	99.0%	203	0.8%	74	0.3%	1.0%				
Beaverdam	131	130	99.2%	1	0.8%	0	0.0%	0.8%				
Bluffton	1,145	1,145	100.0%	0	0.0%	0	0.0%	0.0%				
Cairo	162	162	100.0%	0	0.0%	0	0.0%	0.0%				
Delphos	1,904	1,904	100.0%	0	0.0%	0	0.0%	0.0%				
Elida	620	618	99.7%	2	0.3%	0	0.0%	0.3%				
Harrod	115	115	100.0%	0	0.0%	0	0.0%	0.0%				
Lafayette	112	112	100.0%	0	0.0%	0	0.0%	0.0%				
Lima	6,515	6,399	98.2%	83	1.3%	33	0.5%	1.8%				
Spencerville	541	536	99.1%	0	0.0%	5	0.9%	0.9%				
Amanda Township	620	620	100.0%	0	0.0%	0	0.0%	0.0%				
American Township	3,276	3,276	100.0%	0	0.0%	0	0.0%	0.0%				
Auglaize Township	672	640	95.2%	10	1.5%	22	3.3%	4.8%				
Bath Township	2,932	2,876	98.1%	56	1.9%	0	0.0%	1.9%				
Jackson Township	881	881	100.0%	0	0.0%	0	0.0%	0.0%				
Marion Township	1,024	1,019	99.5%	5	0.5%	0	0.0%	0.5%				
Monroe Township	562	562	100.0%	0	0.0%	0	0.0%	0.0%				
Perry Township	1,075	1,040	96.7%	21	2.0%	14	1.3%	3.3%				
Richland Township	487	487	100.0%	0	0.0%	0	0.0%	0.0%				
Shawnee Township	4,069	4,069	100.0%	0	0.0%	0	0.0%	0.0%				
Spencer Township	273	273	100.0%	0	0.0%	0	0.0%	0.0%				
Sugar Creek Township	364	339	93.1%	25	6.9%	0	0.0%	6.9%				
*ACS 2017 5-Year Estin	nates											

Table 3-2 revealed the median value of owner-occupied units and the increased valuation experienced between 2010 and 2017 by political subdivision. Table 3-18 reveals median rent by political subdivision and the percent change between decennial census periods by political subdivision. Comparison of Tables 3-2 and 3-18 reveals that in large measure rents decreased while the valuation of owner-occupied homes increased. Of note was the increased rent experienced in the Villages of Lafayette (28.1%) and Perry Township (64.6%).

	TABLE 3-18 MEDIAN GROSS RENT BY POLITICAL SUBDIVISION										
Political Subdivision	2010	2017	Change								
TOTTICAL SUBDIVISION		- '	Amount	Percent							
Allen County	\$663	\$611	-52	-7.8%							
Beaverdam	\$729	\$688	-41	-5.6%							
Bluffton	\$609	\$486	-123	-20.2%							
Cairo	\$647	-	N/A	N/A							
Delphos	\$733	\$628	-105	-14.3%							
Elida	\$769	\$679	-90	-11.7%							
Harrod	\$688	\$775	87	12.6%							
Lafayette	\$850	\$1,089	239	28.1%							
Lima	\$626	\$588	-38	-6.1%							
Spencerville	\$721	\$620	-101	-14.0%							
Amanda Township	\$884	-	N/A	N/A							
American Township	\$734	\$649	-85	-11.6%							
Auglaize Township	\$640	\$483	-157	-24.5%							
Bath Township	\$749	\$660	-89	-11.9%							
Jackson Township	\$728	\$803	75	10.3%							
Marion Township	\$688	\$630	-58	-8.4%							
Monroe Township	\$668	\$623	-45	-6.7%							
Perry Township	\$432	\$711	279	64.6%							
Richland Township	\$702	\$581	-121	-17.2%							
Shawnee Township	\$766	\$674	-92	-12.0%							
Spencer Township	\$707	\$625	-82	-11.6%							
Sugar Creek Township	\$774	\$520	-254	-32.8%							
*ACS 2017 5-Year Estimat	es										

Examining affordability, the census looks at housing related costs including rent/mortgage, utilities, taxes, etc., and defines a housing burden when housing costs are greater than 30 percent of income. The Census also differentiates such costs based on owner occupied and renter occupied.

Table 3-19 revealed that the proportion of renters paying in excess of 30 percent increased by 15.9 percent between 2010 and 2017. Examining this relationship from a ownership perspective, data indicates that such a housing burden affected 17.0 percent of all owner occupied housing units in 2017 a decrease from 21.4 percent in 2010. The number of units with rental costs greater than 30 percent of income between 2010 and 2017 stayed relatively stable, even though the number of rental households spending more than 30% on housing actually increased by 853.

When reviewing the issue of affordability however, the obvious question is how much is too much and how much can you afford to pay? The U.S. Department of Housing and Urban Development (HUD), and most state housing departments consider annual housing costs to

be "affordable" if they do not exceed 30 percent of a family's annual income (including utility payments). Geographic variations do exist and where one selects to live has implications as housing costs (rent/mortgages) are almost always a product of the area's economy to geographic variations. In addition to the place (political subdivision, rural/urban) of residency one selects (apartment or house), its condition, amenities, and proximity to employment, schools and services determine the housing costs for that property. Balancing these factors is key.

OWNER/REI	TABLE 3-19 OWNER/RENTER OCCUPIED HOUSING UNITS COSTS GREATER THAN 30% INCOME												
		Owner	Occupied			Renter Occupied							
Political Subdivision	2010	2017	Change		2010	2017	Change						
	2010	2017	Amount	Percent	2010	2017	Amount	Percent					
Allen County	6,216	4,546	-1,670	-26.9%	5,358	6,211	853	15.9%					
Beaverdam	25	18	-7	-28.0%	14	28	14	100.0%					
Bluffton	171	101	-70	-40.9%	141	275	134	95.0%					
Cairo	30	43	13	43.3%	0	10	10	+					
Delphos	338	273	-65	-19.2%	460	410	-50	-10.9%					
Elida	138	75	-63	-45.7%	36	27	-9	-25.0%					
Harrod	26	19	-7	-26.9%	4	12	8	200.0%					
Lafayette	15	12	-3	-20.0%	8	6	-2	-25.0%					
Lima	2,160	1,151	-1,009	-46.7%	3,344	3,864	520	15.6%					
Spencerville	175	111	-64	-36.6%	77	158	81	105.2%					
Amanda Township	147	91	-56	-38.1%	0	25	25	+					
American Township	675	621	-54	-8.0%	676	725	49	7.2%					
Auglaize Township	153	79	-74	-48.4%	19	92	73	384.2%					
Bath Township	732	542	-190	-26.0%	331	230	-101	-30.5%					
Jackson Township	147	142	5	-3.4%	31	20	-11	-35.5%					
Marion Township	175	129	-46	-26.3%	18	26	8	44.4%					
Monroe Township	83	91	8	9.6%	11	48	37	336.4%					
Perry Township	331	249	-82	-24.8%	187	127	-60	-32.1%					
Richland Township	111	67	-44	-39.6%	0	19	19	+					
Shawnee Township	693	738	45	6.5%	119	297	178	149.6%					
Spencer Township	15	32	17	113.3%	0	0	0	0.0%					
Sugar Creek Township	86	64	-22	-25.6%	3	40	37	1233.3%					
*ACS 2017 5-Year Est	imates												

Using ACS 2017 estimates Tables 3-20 and 3-21 identify the relationship between the number of low to moderate income households and the units available at less than 30 percent of the median income by tenure and political subdivision. Notice that the number of rental units available is extremely limited with just over a quarter of the units (26.2%) available in the County.

The National Low Income Housing Coalition (NLIHC) annually releases "Out of Reach" to identify across the 50 states the "Housing Wage" or wage one must earn in order to afford a modest rental home by state. Its 2017 report identifies the Fair Market Rent (FMR) for a two-bedroom apartment in Ohio at \$780. In order to afford this level of rent (and utilities) - without paying more than 30% of income on housing - a household must earn \$2,600 monthly or \$31,194 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a "housing wage" of \$15.00/hour. However, in Ohio minimum

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⁷ http://nlihc.org/oor

TABLE 3-20
AVAILABLE RENTAL STOCK AT 30% OR LESS OF MEDIAN INCOME BY
POLITICAL SUBDIVISION 2017

Political Subdivision	Units	30% Monthly Median Income	% Housing Stock Available
Allen County	13,647	\$631	26.2%
Beaverdam	63	\$839	73.0%
Bluffton	574	\$641	51.0%
Cairo	21	-	-
Delphos	986	\$778	56.6%
Elida	79	\$951	73.4%
Harrod	30	\$609	26.7%
Lafayette	41	\$1,070	34.1%
Lima	7,797	\$566	33.3%
Spencerville	310	\$525	16.5%
Amanda Township	80	\$1,253	87.5%
American Township	1,880	\$726	50.2%
Auglaize Township	135	-	-
Bath Township	819	\$967	80.6%
Jackson Township	49	\$854	50.0%
Marion Township	126	\$755	59.7%
Monroe Township	77	\$708	53.1%
Perry Township	275	\$442	55.3%
Richland Township	65	\$650	46.0%
Shawnee Township	698	\$836	47.7%
Spencer Township	31	\$543	28.7%
Sugar Creek Township	88	\$615	10.2%
*ACS 2017 5-Year Estim	ates		•

TABLE 3-21

AVAILABLE HOUSING STOCK AT 30% OR LESS OF MEDIAN INCOME BY POLITICAL SUBDIVISION 2017

Political Subdivision	Units	30% Monthly Median Income	% Housing Stock Available
Allen County	26,645	\$18,362	88.3%
Beaverdam	131	\$17,344	100.0%
Bluffton	1,145	\$24,794	95.7%
Cairo	162	\$15,794	82.1%
Delphos	1,904	\$17,147	98.6%
Elida	620	\$24,000	98.5%
Harrod	115	\$17,531	99.1%
Lafayette	112	\$13,875	84.8%
Lima	6,515	\$15,100	92.2%
Spencerville	541	\$14,006	92.2%
Amanda Township	620	\$1,872	88.7%
American Township	3,276	\$1,583	88.1%
Auglaize Township	672	\$1,567	93.3%
Bath Township	2,932	\$1,429	90.5%
Jackson Township	881	\$1,598	76.1%
Marion Township	1,024	\$1,557	92.2%
Monroe Township	562	\$1,434	85.6%
Perry Township	1,075	\$1,424	91.3%
Richland Township	487	\$1,917	94.5%
Shawnee Township	4,069	\$1,948	89.8%
Spencer Township	273	\$1,384	96.7%
Sugar Creek Township	364	\$1,719	97.3%
*ACS 2017 5-Year Estima	tes		

wage is \$8.55/hour. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 70 hours per week, 52 weeks per year. Or a household must include 1.8 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In Ohio, the average wage for a renter is \$12.87. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 47 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.2 workers earning the mean renter wage in order to make the two-bedroom FMR affordable.

In Allen County, the FMR cost was identified as \$681 and would require a household income of \$27,240 annually; and, this level of income would not reflect that needed to cover energy costs. Income data presented in Table 2-14

Nearly 40% of Lima households and 30% of Allen County households earned less than \$25,000 annually.

revealed that more than 4 in 10 Lima households earned less than \$25,000 annually and nearly a third (27.0%) of those across Allen County failed to earn more than \$25,000 creating a squeeze on disposable income and housing affordability.

• Utility Costs & Affordability: A study addressing the "energy burden" of utility bills was examined by the Economic Opportunity Studies in conjunction with Oak Ridge National Laboratories to assess the impact on discretionary spending and on household well-being. The report suggested that heating and cooling together make up just 50-60% of annual low-income consumer bills. The energy burden was determined to be the percent of annual income a household would spend to buy utilities and all other residential fuels. The reports summary suggests numerous tools other than direct payment assistance can contribute to relieving energy burden the most efficient of which were: home energy efficiency investments, increased household income, and a lowering of energy prices.

A later study, conducted annually since 2012 highlights state by state differences in heating costs - entitled the "home energy affordability gap." This study looked at utility affordability for household below 200% poverty. The analysis reveals the number of low-income households at various levels of poverty and their home energy burdens. The most current analysis examined 2017 residential energy prices and home energy bills predicated upon:

- Energy use intensities (by fuel)
- Tenure of household (by tenure)
- Housing unit size (by tenure)
- Household size (by tenure)
- Heating fuel mix (by tenure)
- Heating Degree Days and Cooling Degree Days

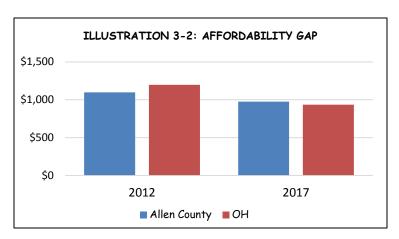
The 2017 Home Energy Assistance Gap Ranking revealed an average gap of \$935 for Ohio low income households. Home energy bills reflected all home energy end uses, including heating, cooling, lighting, electric appliances and hot water. Calculation of home energy bills also reflected main stream home heating fuels including natural gas,

⁸ Economic Opportunity Studies, The Burden of FY 2008 Residential Energy Bills on Low-Income Consumers, March 2008.

⁹ http://www.homeenergyaffordabilitygap.com/

electricity, propane (LPG) and fuel oil. It also detailed the extent to which federal/state energy assistance programs are inadequate and the amount low-income energy bills exceeded "affordable" energy bills capped at 6% of gross income.

In the original 2012 report Ohio ranked 21/51 states and District of Columbia in terms of the "most" affordable gaps in home energy assistance costs. The most current ranking revealed an average gap in household affordability for Allen County of \$975 in 2017. For comparison purposes the gap in 2012 was \$1,098.



In Allen County WOCAP works to assist low-income residents having trouble managing home energy costs. WOCAP works with private industry and the Ohio Development Services Agency to facilitate the HEAP and LIHEAP programs designed to address seasonal heating and cooling needs and the PIPP program which works to establish manageable year-round energy budgets for eligible households. In addition, WOCAP works with its partner HHWP in Hancock County to deliver eligible residents needed insultation, windows and doors to establish more comfortable and energy efficient dwellings under a federally subsidized Home Weatherization Assistance Program.

SECTION 4 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The Al is a HUD mandated review of barriers to fair housing choice in the public and private sectors. The Al serves as the basis for fair housing planning as it provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates. The Al also assists in building public support for fair housing efforts. Of significance, conducting the Al is a required component of continued HUD certification and eligibility to draw federal CDBG funding.

According to HUD, impediments to fair housing choice are:

- any actions, omissions, or decisions taken because of race, color, religion, gender, disability, familial status or national origin that restrict housing choices or the availability of housing choices; and/or,
- any actions, omissions, or decisions that have the effect of restricting housing choices or availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.

To address the mandates the analysis involves: a review of Allen County's various communities regulations and administrative policies, procedures and practices; an assessment of how those laws, policies and practices affect the location and availability of housing; and, an assessment of public and private sector conditions affecting fair housing choice. More specifically HUD requires:

- An extensive review of local laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws affect the location, availability, and accessibility of housina:
- An evaluation of conditions, both public and private, affecting fair housing choice for all protected classes; and,
- An assessment of the availability of affordable, accessible housing by a range of unit sizes.

The following subsections will review and identify potential areas/issues which may pose impediments to fair housing choice, including governmental regulatory barriers, lending activities of financial lending institutions including predatory lending and tax policies. Such review is intended to support appropriate actions to overcome the effects of any impediments identified through the analysis and establish public record reflecting the analysis and subsequent warranted actions to be taken. The section concludes with an assessment of affordable, accessible housing within the Allen County community.

Regulatory Barriers

Regulatory barriers to fair housing and affordability include: zoning restrictions; complex administrative and permitting processes; rigid building codes; excessive permitting fees; lack of fair housing law enforcement; as well as, restrictions in planning, growth, in fill, redevelopment, and tax policies. Common administrative/permitting obstacles to affordable housing include: duplicative and/or time-consuming design review processes; multiple and/or duplicative layers of approval processes; out-of-date building codes; excessive fees; complicated and/or unnecessary federal regulations; excessive environmental restrictions; and burdensome rehabilitation codes. Administrative processes regulating development are thought to be complex and increasing in their complexity due to longer and longer review processes imposed by an increasing number of agencies. The review process is often thought of to be burdensome in terms of time and permit fees. Some

Fair Housing critics go so far as to argue that existing regulations are not reviewed to determine whether they are effective or still needed.

Housing critics suggest that the approval system may be consciously or unconsciously used as a growth management tool and a method for keeping affordable housing out of a respective community. Critics argue local communities should revisit such regulatory standards to assess

Some Communities have adopted rigorous standards to preclude lower cost developments.

their collective impact on fair housing choice. Included in a list of community standards thought to needlessly raise housing costs are over regulated subdivision ordinances, zoning ordinances, building codes, and impact fees. Critics are concerned that while some communities have adopted rigorous standards to reduce long-term maintenance costs on the infrastructure they will eventually inherit from developers, such actions can preclude lower cost developments. Critics argue that impact fees pose the greatest barrier to affordable housing if they are developed in such a way as to be regressive. For unlike property taxes, which are based on home value, impact fees are said to be regressive when they are assessed on a per-unit basis. Regulatory barriers to development or redevelopment in older communities typically reflect infill development which include the additional complexities caused by multi-layered approval processes requiring the developer to plan and coordinate timetables across different agencies/departments regarding the design/construction of infrastructure, site assembly, and outdated building codes that act to deter rehabilitation efforts/activities.

• Zoning Regulations: Pursuant to the Ohio Revised Code (ORC) Section 303, 519 and 711, Ohio counties, municipalities, and townships have the ability to adopt zoning regulations to regulate land use in accordance with a comprehensive plan. Such regulations address the location, height, bulk, number of stories, and size of buildings including homes and other structures; percentages of lot areas that may be occupied, set back building lines, sizes of yards, courts, and other open spaces; the density of population; the uses of buildings and other structures; and the uses of land for trade, industry, residence, recreation; as well as, may establish reasonable landscaping standards and architectural standards in the interest of the public health, welfare, safety, convenience, comfort, prosperity, or general welfare. And, for all these purposes divide all or any part of its respective territory into districts or zones of such number, shape, and area as determined as long as all such regulations are uniform for each class or kind of building or other structure or use throughout any district or zone, but the regulations in one district or zone may differ from those in other districts or zones.

In Allen County, most political subdivisions have adopted zoning regulations that stipulate distinct land use by district, establish maximum density, identify minimum area requirements, minimum square footage for structures or homes, and specify height restrictions. Allen County has not adopted zoning regulations for

Townships have adopted variations of Euclidean Zoning while municipalities maintain an older form of zoning referred to as Pyramidal.

the unincorporated areas which has resulted in eleven of twelve townships adopting independent zoning regulations. All townships, with the exception of Monroe Township, have adopted variations of Euclidean Zoning which segregates uses by district while most of the municipalities maintain an older form of zoning referred to as Pyramidal in which higher order uses (single family residential) are permitted in any lower order districts (multi-family. commercial, industrial). Euclidean zoning has the effect of segregating uses while Pyramidal Zoning fails to regulate the location of housing in any district and tends to prompt land use conflict between single family residential and more intense commercial and/or industrial uses.

Fair housing choice is said to be negatively affected when restrictive attributes exist over the density of development allowed, minimum yard areas and excessive square footage requirements. Table 4-1 identifies the nature and attributes of the individual zoning regulations by political subdivision. Data therein suggests a wide disparity in the minimum yard requirements. However, such yard requirements reflect the absence of municipal water and sewer facilities in the more rural communities and townships where environmental health concerns necessitate lower density. Minimum square footage requirements for housing units vary from 650 square feet to 1,700 square feet. While more than half of all zoned communities have adopted or allow mixed use (some recognizing zero lot line standards) no community has mandated, thru inclusionary zoning, affordable housing be integrated within a particular housing development.

ZONING	TABLE 4-1 ZONING REGULATION RESIDENTIAL ATTRIBUTES BY POLITICAL SUBDIVISION											
		Restrictive A		Permissive Attributes to Fair Housing								
Subdivision	Туре	Minimum Yard Area Square Footage	Maximum Density Units Per Acre	Height	Minimum Unit Square Footage	Mixed Uses	Zero Lot Lines	Density Bonus				
Amanda Twp	Е	108,900	.8	40	1,000							
American Twp	Е	12,000	16	35	800	✓	✓					
Auglaize Twp	Е	108,900	.4	35	900							
Bath Twp	Е	2,500	17.4**	75	650	✓	✓					
Jackson Twp	Е	2,500	4.0	35	980	✓	✓					
Lima	Р	2,500	17.4	35	650	✓						
Marion Twp	Е	9,600	4.5	35	1,000							
Perry Twp	Е	15,000	11.6	45	720	✓	✓					
Richland Twp	Е	108,900	.8	35	1,000	✓	✓					
Shawnee Twp*	Е	3,600	12.1	35	750	✓	✓					
Spencer Twp	Е	9,600	4.5	35	1,000							
Sugar Creek Twp	Р	10,000	4.3	35	1,100							
Bluffton	Р	2,500	17.4	50	550	✓	✓					
Cairo	Р	15,000	8.7	30	750							
Delphos	Р	10,900**	17.4**	55	650	✓						
Elida	Е	2,500	17.4	50	950	✓	✓					
Lafayette	Е	7,800	5.5	35	1,700	✓	✓					
Spencerville	Р	12,000	14.5	45	800							

Notes: E = Euclidean Zoning
P = Pyramidal Zoning
* = Currently Under Review

** = Assumed

municipalities have the ability to adopt subdivision regulations. Such regulations enable jurisdictions to process the division of land into two or more parcels, sites, or lots for the purpose of transfer of ownership, and/or the improvement of one or more parcels of land for residential, commercial, or industrial structures or groups of structures involving the division or allocation of land for the opening, widening, or extension of any public or private street or streets, or involving the division or allocation of land as open spaces for common use by owners, occupants, or leaseholders or as easements for the extension and maintenance of public or

Subdivision Regulations: Pursuant to Ohio Revised Code (ORC) Section 711, Ohio counties and

private sewer, water, storm drainage, or other similar facilities. Such subdivision regulations must be legislatively developed and approved by the political subdivision and uniformly employed.

Unincorporated areas (townships, hamlets) are not authorized to develop or adopt independent subdivision regulations.

In Allen County, individual cities and incorporated villages have adopted subdivision regulations pursuant to ORC Section 711. The Lima-Allen County Regional Planning Commission (LACRPC) developed and the Allen County Board of Commissioners adopted such regulations for the unincorporated areas of the County pursuant to the ORC. The County Commissioners have delegated the platting authority to the LACRPC for uniform application across the unincorporated area. The 12 townships in Allen County are subject to the same Allen County Subdivision Regulations. Of note, all municipalities except the small villages of Cairo, Harrod, and Lafayette have independently developed subdivision standards and regulations.

The extent of the platting process varies by political subdivision. Table 4-2 identifies the attributes of the various subdivisions across Allen County. The most cumbersome review process occurs in the unincorporated

The platting process varies by political subdivision. The LACRPC facilitates a 3-stage review which typically lasts 180-days.

area where the LACRPC facilitates a 3-stage review which typically includes as many as 10 representatives from individual agencies/departments and requires a minimum of 60 days to proceed from an Overall Development Plan submittal through to Final Plat approval. However, the platting process for a major subdivision typically exceeds 180 days due to plan development, technical reviews, weather, inspections, etc. Subdivision regulations have minimum pavement design standards and utility standards. An assessment of the review and approval process reveals less than half (42.9%) of the political subdivisions require any fees, costs per lot or per plat and none charge impact fees.

	TABLE 4-2 SUBDIVISION REGULATION ATTRIBUTES BY POLITICAL SUBDIVISION											
Restrictive Attributes to Fair Housing												
	Design S	tandards	R	eview Proc	ess		Develop	ment Cos	sts			
Subdivision	Minimum Pavement Standards	Utility Standards	Tiered Multi- Agency	Number of Reviews	Minimum Review Period	Fee Based Review	Cost per Plat	Cost per Lot	Mandatory Impact Fees			
Allen County	✓	✓	✓	3	60	✓	✓					
Lima City	✓	✓		3	60							
Beaverdam	✓	✓		3	60	✓	✓					
Bluffton	✓	✓		3	60							
Delphos	✓			3	60							
Elida	✓	✓		3	60							
Spencerville	✓	✓		3	60	✓	✓					

• Building Codes: The Ohio Revised Code (ORC) Section 3781 established the Board of Building Standards to formulate and adopt rules governing the erection, construction, repair, alteration, and maintenance of all buildings including land area incidental to those buildings, the installation of equipment, and the standards or requirements for materials used in connection with those buildings. The board has incorporated such rules into separate residential and nonresidential building codes with their respective standards designed to address energy conservation and the safety and sanitation of those buildings. The Board also established a corollary to the Building Code regulations governing electric safety (ORC 3783).

Locally, the City of Lima manages the Allen County Building Department. The City of Lima manages both residential and commercial building codes for its environs and offers its services outside the City corporation limits to those communities who wish to provide that service to residents, contractors, developers, etc. No residential building code has been adopted by any other political subdivision in Allen County. Plumbing and sewage regulations are adopted and enforced by the Allen County Health Department in those areas beyond municipal sewage facilities. All commercial and industrial building must be inspected and approved by either the Allen County Building Department or the State of Ohio before occupancy is permitted under state law (ORC 3791).

- Impact of Such Regulations: The purpose of the aforementioned codes is stipulated in the ORC. Collectively, they are intended to protect the public health, safety and welfare, across the larger community thru the standardization of development's scale, density and design. Acknowledging the intent of such regulations however, their uniform interpretation and application are predicated upon independent individual actions and subject to local variation. Clarity of language and extended knowledge of public policies/regulations with respect to residential development would help eliminate potential bias, delay or obstruction to housing choice.
 - A case in point is the relationship between local land use planning and the adoption of zoning regulations.
 The ORC specifically ties the adoption of zoning "in accordance with a comprehensive plan". Yet while most political subdivisions have adopted local zoning

While most political subdivisions have adopted local zoning codes they have yet to adopt a comprehensive plan upon which the zoning they adopted is to be predicated.

codes, they have yet to adopt a comprehensive plan upon which the zoning they adopted is to be predicated. Also, of note, while some communities have an adopted comprehensive plan, some have not been adopted within the last 40 years fueling critic's cries for a review of the existing plans and regulatory standards.

Zoning regulations not only determine the minimum land area and unit size requirements they can also establish parking and open space requirements. More importantly zoning establishes permitted and conditional uses where residential units may be developed. Regulating the land available for high density housing or large lot development impacts the extent of availability and ultimately cost. And, while Pyramidal Zoning effectively allows single-family residential housing in all districts, it has several potentially detrimental effects: it can regulate higher density housing to areas with heavier traffic making such sites less safe for pedestrians, bicyclists, children and less attractive; it can permit areas where environmental conditions are not conducive to long term exposure to serve as housing sites; and, this type of zoning permits housing to be developed at densities much lower than needed to ensure long term desirability and affordability. However, it will allow housing developments in a broad array of zoning districts creating greater opportunities to increase the supply of housing with greater diversity in terms of architectural type, size, cost, etc.

Euclidean Zoning on the other hand works to segregate land uses making single-family housing of the highest purpose. Euclidean zoning effectively works to relegating single family residential outwards from the urban centers to the suburbs due to cheaper land costs associated with distances from urban centers. Once rural and suburban land increases in value, new single-family housing pushes further out. This has the effect of segregating single-family housing from other housing types and creating sterile, economically segregated

Small, rural political subdivisions lacking infrastructure and/or emergency services are forced to adopt larger lots with lower density and height requirements.

neighborhoods. To the suburban political subdivision, Euclidean Zoning offers succinct, easily managed zoning districts, with a caveat of escalating costs associated with infrastructure needs, demands for new municipal services and increased commuting times.

Small, rural political subdivisions lacking infrastructure and/or emergency services are forced to adopt larger lots with lower density and height requirements to prevent the spread of environmental degradation or protect existing housing from fire damage furthering urban sprawl and the loss of the community's rural landscape/character. Unless used with care Euclidean Zoning will also foster automobile dependent communities increasing the transportation costs and utility costs.

 Local policy decisions effect the land division process and infrastructure investments that collectively have an impact on the availability of land to support affordable housing developments. Local subdivision regulations govern

Policy decisions effect the land division process and infrastructure investments that impact affordable housing.

the physical attributes and amenities of major subdivision developments as well as minor land divisions. In Allen County, minor land divisions are defined as the creation of five or less lots, including the remainder, that do not involve the opening or widening of road or easement of access. Such lots comprised more than half (805/51.4%) of all residential lots created (1,565) outside of municipal boundaries in Allen County between 2000 and 2018. Minor land division creating new residential lots were typically located in the more rural areas of Allen County where the unavailability of sewer and water required new lots to be 2.5 acres or greater in size. The expense of residential development at that density tends to exclude low-to-moderate income residents.

Major subdivisions, discussed earlier, are defined as the creation of more than five lots and/or the opening, widening, or extension of a road or easement of access. Such developments require specific infrastructure improvements specified by local government regulations for essential items such roadways, utilities, fire hydrants, sidewalks, etc. A statewide comparison suggests local subdivision regulations and their affiliated review process are relatively quick and inexpensive. Costs reflect recoupment of public funds expended in the review process; and there are no per lot costs charged and no impact fees. Moreover, the permitted density of residential development is on par when examining subdivision regulations across west central Ohio.

Within the municipalities of Allen County new residential subdivision development has been limited in terms of their number and scale since the Great Recession of 2008. In fact, since 2008 the Village of Bluffton has approved a single plat (2013) with 37 single family lots. No other municipality has platted a formal subdivision plat. The City of Lima did however see a new apartment complex of 228 units develop in the Elida School District in 2018.

However, major residential developments are currently required to provide both municipal water and sewer service. In the unincorporated area of Allen County, which constitutes some 241,948 acres or 92.9% of the total area in Allen County, sanitary sewer services are developed under the authority of the Allen County Board of Commissioners, while municipal water services are typically provided by the Allen Water District (or a local municipality). In many areas the co-location of both water and sewer is limited and therefore high-density

subdivision development in suburban and rural areas is largely precluded. As testimony to this factor only two single family residential subdivisions have been expanded since 2008 reflecting a total of 50 lots; a condominium complex in Jackson Township also saw modest growth with 9 units constructed since 2008 in a golf course community.

As the availability of land for high density residential land is restricted by not only the zoning district designation adopted by the local political subdivision land also must have access to necessary water and sewer required and provided

Data suggests an absence of larger vacant tracts available for higher density residential development.

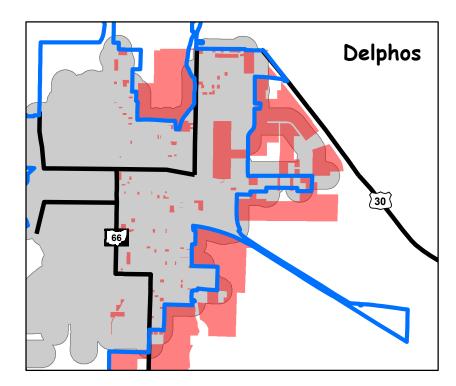
by the County, or the Allen Water District. Map 13 depicts the vacant land where water and sewer is currently available to support higher density housing developments (10+ units per acre) across the County. Data suggests an absence of larger vacant tracts available for higher density residential development except in those tracts identified as commercial and industrial parks; and, given the difficulty of assembling smaller parcels to construct affordable housing such development may be dependent upon specific public policy decisions/actions to assemble such parcels and/or to increase the availability of water and sewer to specific areas. Appendix E provides insights based on zoning.

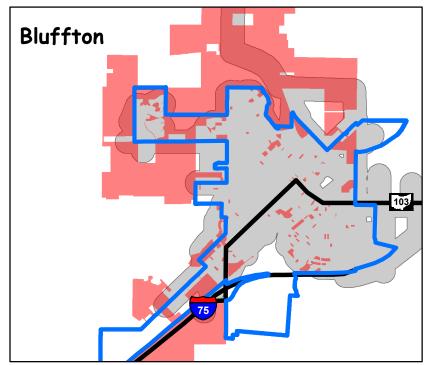
The adoption of residential building codes across Allen County has been debated for a number of years. Proponents of adopting such codes identify safety, accountability and aesthetics. Opponents argue increased housing costs, bloated bureaucracies and construction delays. Township and village support for the adoption of such regulations has been tepid. Although Townships have the inherent ability to adopt and enforce residential building codes as per the ORC the complexity and staffing requirements to support such a position is beyond the means of most local governments. And although the issue has been acknowledged, adoption of any residential building codes for the unincorporated areas has lacked political support at the township/county levels. The impact of failing to adopt county-wide building codes is not seen as a detriment to affordable housing choice. More likely it impacts the number of safe, sanitary, and sometimes habitable housing units as housing conditions deteriorate due to poor construction, cheap materials, disinvestment in high percentage rental environments and the lack of any regulatory oversight to correct same.

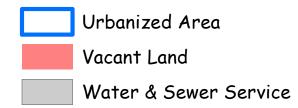
Lending Institutions

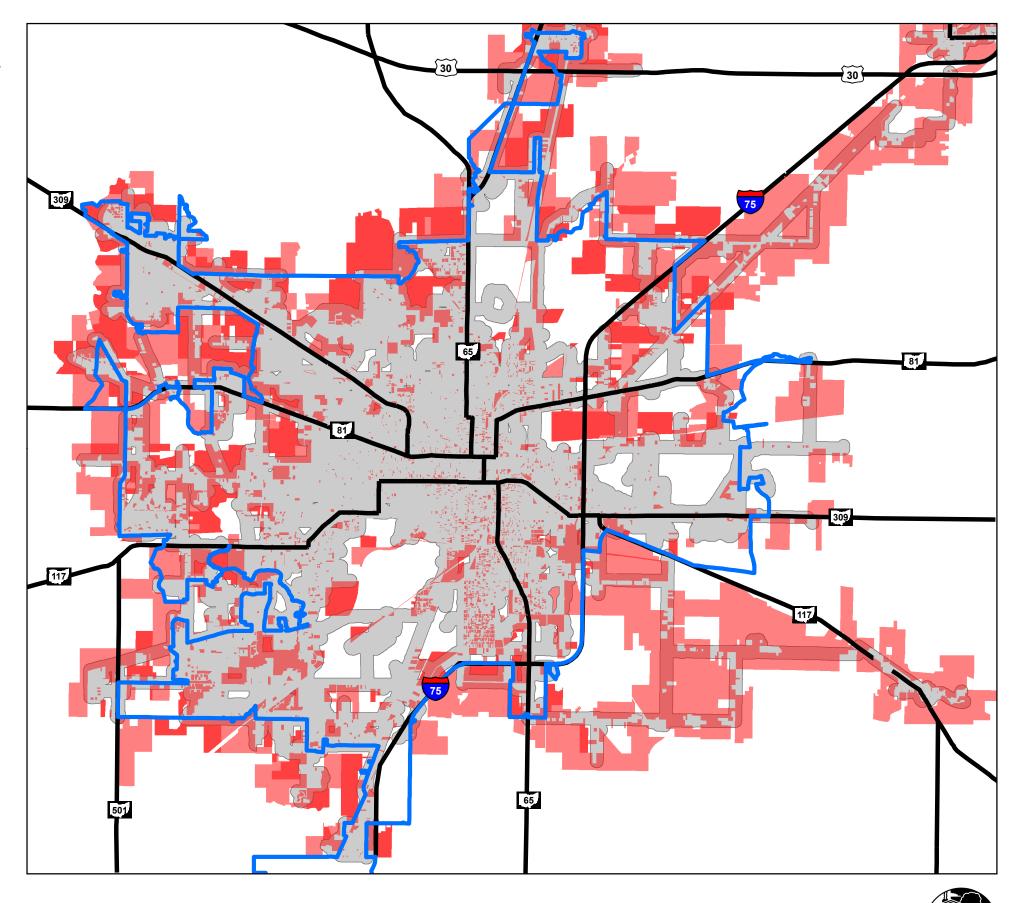
There are various types of financial lending institutions used to finance a home including local retail banks, credit unions, savings & loan associations and mortgage companies. Retail or commercial banks are the typical large banks where branches provide customer services ranging from savings and checking accounts, mortgages, personal loans, credit cards and certificates of deposit (CDs). Credit unions are a type of financial cooperative that provides traditional banking services. Credit unions follow a basic business mode in which members pool their money in order to be able to provide loans, deposit savings into individual savings or checking accounts. They are non-profit entities established to benefit the community and interests of their members. Savings & Loan Associations are financial institutions that specialize in accepting savings, deposits, and making mortgage and other loans. The S&Ls were created largely to serve residential mortgage market during the depression - such institutions have declined in popularity since the S&L crisis occurring between 1986 and 1995 at which time many became insolvent. A mortgage company is a firm engaged in the business of originating and/or funding mortgages for residential or commercial property. A mortgage company is often just the originator of a loan; it markets itself to potential borrowers and seeks funding from one of several client financial institutions that provide the capital for the mortgage itself. Mortgage companies typically offer turnkey mortgage services,

MAP 4-1
AVAILABLE LAND FOR HIGH DENSITY
RESIDENTIAL DEVELOPMENT













including the origination, funding and servicing of mortgages. The factors that differentiate mortgage companies include relationships with banks, products offered and internal underwriting standards.

Lending institutions are often classified as full-service financial institutions, subprime lenders, or alternative financial institutions. Full service financial institutions offer a full range of integrated financial services including banking, brokerage, mortgage, insurance and ATM services for their customers; they will typically assist with deposits loans, debit/credit cards, pensions A subprime lender specializes in lending to borrowers with weak or limited credit history. Subprime lenders offer subprime loans to individuals who do not qualify for prime rate loans. By definition, all subprime loans have rates higher than the prime rate offered on conventional loans. As a result, they typically have higher interest rates, higher closing costs, and/or require a more substantial down payment. Alternative financial service providers (AFSPs) include check cashing services, payday lenders, pawnshops, title lenders, tax refund lenders, rent-to-own stores, and other businesses that make short-term consumer loans. For locations of Allen County financial institutions see Appendix F.

- Fair Housing Implications: The number of subprime mortgage lenders and AFSPs is a concern as both of these sectors involve higher fees for their services and disproportionately target low-income and minority households. Another common concern is the propensity of lower income persons to use these higher-cost financial services - due in part to the absence of commercial banks from LMI income areas. Some suggest that while subprime lending is disproportionately concentrated in African American neighborhoods, AFSPs are most likely to be found in Hispanic neighborhoods and in areas where US citizenship may be challenging. The presence of larger commercial banks provide for employment and can support significant financial interactions and a certain financial literacy in minority neighborhoods that otherwise would be absent. "Unbanked" households fail to develop basic financial skills such as cashing and depositing checks, writing checks - paying bills and balancing a checking account. Raising the financial literacy of the community's LMI consumers may be the simplest and most pressing issue to arrest the use of the sub-prime lending institutions and the AFSPs. Rather than examining the appeal and marketing of these two institutional sectors it could be more productive to work thru the educational system and our commercial banks to develop a phased educational experience in which students participate in actual banking as recently instituted by Superior Credit Union in the Bath High School cafeteria. 1,2
- Lending Practices: Many parameters can affect one's ability to obtain a home loan each financial institution establishes its own policies and procedures with regards to granting prime loans, sub-prime loans or denying loans to the general public. Credit

Census tract data reveals household median incomes range from \$91,875 to \$18,529, a difference of 395.8%.

history obviously plays a large role. Not only is a history of timely payments a factor in establishing a credit score, but also one's debt-to-income ratio. A third factor is the amount of loan requested leveraged against the banks appraised value of the home in question. Allen County is a diverse community representing all aspects of socio-economic demographics. Census tract data reveals that the household median incomes range from \$91,875 in Census Tract 120 to \$18,529 in Census Tract 129, a difference of 395.8%. It is not surprising; therefore, that HMDA data recognized this wide variance in income. Table 4-3 examines 2017 HMDA data at the tract level exposing income and housing data against total loan applications by type and total

¹ https://www.superiorcu.com/home/about/studentbranches

² https://www.limaohio.com/news/347414/student-run-credit-union-opens-at-bath

denial rate. Tract data is presented ranked by total loan denial rate. Tract 120 having the lowest denial rate (8.3%) had a median household income of \$91,875, while Tract 134 which had the highest overall denial rate of 72.4 percent had a median income of just \$20,547.

	TABLE 4-3 2017 HOME LOAN ACTIVITY BY TRACT & LOAN TYPE												
Tract	Median Income	% POV	% Own	% Rent	FHA	Conv.	REF	REM	Total	% Denied			
134	\$20,547	46.8%	31.5%	68.5%	1	3	14	11	29	72.4%			
137	\$29,410	35.4%	42.7%	57.3%	1	1	8	0	10	70.0%			
127	\$21,722	45.5%	36.0%	64.0%	0	4	10	8	22	63.6%			
136	\$24,453	41.8%	45.6%	54.4%	3	0	4	4	11	45.5%			
141	\$21,908	33.6%	23.1%	76.9%	2	6	3	3	14	42.9%			
130	\$35,781	17.2%	53.0%	47.0%	27	41	31	26	125	32.0%			
126	\$39,132	18.6%	64.0%	36.0%	8	11	10	7	36	30.6%			
133	\$33,125	21.7%	50.6%	49.4%	4	6	6	1	17	29.4%			
138	\$32,679	24.4%	43.9%	56.1%	1	4	16	13	34	29.4%			
124	\$29,863	24.3%	40.8%	59.2%	11	9	16	10	46	28.3%			
123	\$38,214	17.2%	55.8%	44.2%	22	29	29	8	88	27.3%			
122	\$35,637	21.3%	49.5%	50.5%	21	27	34	10	92	27.2%			
119	\$55,923	14.5%	82.0%	18.0%	17	31	44	15	107	25.2%			
109	\$52,303	13.7%	58.9%	41.1%	26	61	53	15	155	22.6%			
116	\$39,545	13.2%	78.8%	21.2%	6	37	40	7	90	22.2%			
102	\$55,846	11.9%	85.4%	14.6%	26	39	76	20	161	18.6%			
132	\$54,241	16.8%	57.1%	42.9%	17	29	21	9	76	18.4%			
106	\$55,604	14.2%	77.3%	22.7%	31	29	79	26	165	18.2%			
115	\$55,250	9.2%	82.7%	17.3%	17	26	41	21	105	18.1%			
112	\$45,114	13.7%	76.3%	23.7%	6	7	13	9	35	17.1%			
110	\$39,902	23.2%	45.0%	55.0%	23	54	55	14	146	16.4%			
139	\$52,790	10.6%	79.0%	21.0%	20	37	29	10	96	15.6%			
113	\$55,685	8.1%	81.3%	18.7%	43	104	132	37	316	15.2%			
140	\$59,779	7.8%	78.2%	21.8%	14	36	34	15	99	15.2%			
129	\$18,529	41.0%	24.2%	75.8%	2	4	5	3	14	14.3%			
121	\$80,625	3.4%	85.9%	14.1%	30	47	56	18	151	13.9%			
103	\$65,658	4.7%	86.3%	13.7%	7	15	35	9	66	13.6%			
118	\$62,358	6.9%	77.3%	22.7%	14	43	25	12	94	10.6%			
114	\$60,489	7.2%	91.7%	8.3%	16	26	59	13	114	10.5%			
108	\$64,978	3.1%	77.8%	22.2%	54	87	129	39	309	10.0%			
101	\$66,545	6.4%	67.6%	32.4%	12	52	34	13	111	9.9%			
131	\$51,558	12.6%	62.4%	37.6%	23	34	36	10	103	9.7%			
120	\$91,875	0.8%	97.0%	3.0%	14	53	49	17	133	8.3%			

Table 4-4 presents the 2017 HMDA by loan type and denial rate. Of note, only 84 Conventional loans were denied out of 827 applications, a rate of 10.2 percent. The loan type with the second lowest denial rate were FHA loans which were denied at a rate of 18.1 percent while refinancing and home remediation loans were denied at a rate of 25.2 and 29.9 percent respectively. Examining only those tracts with conventional loan applications, the 10 tracts with median incomes higher than the County average had an average denial rate of 6.0 percent with the remaining 23 tracts having an average denial rate of 20.6 percent. Similarly, tracts with minority populations above the County average had an average denial rate of 19.7 percent while those tracts below the County average had a average denial rate of just 7.0%. Other characteristic to examine is home ownership in these tracts and how that compares to home purchase loan denial rates. In tracts with a home ownership rate above that of the County average the denial rate for Conventional loans was just 7.7 percent while that same number increased to 18.1 percent in tract where home ownership levels fall below the County average.

	TABLE 4-4 2017 MORTGAGE DENIAL ACTIVITY BY TRACT & LOAN TYPE													
Tract	Median Income	Own	FHA Denials	%	Conv. Denials	%	Ref. Denials	%	Rem. Denials	%				
101	\$66,545	67.6%	0	0.0%	2	3.8%	7	20.6%	2	15.4%				
102	\$55,846	85.4%	7	26.9%	4	10.3%	15	19.7%	4	20.0%				
103	\$65,658	86.3%	2	28.6%	0	0.0%	7	20.0%	0	0.0%				
106	\$55,604	77.3%	5	16.1%	0	0.0%	20	25.3%	5	19.2%				
108	\$64,978	77.8%	6	11.1%	3	3.4%	17	13.2%	5	12.8%				
109	\$52,303	58.9%	5	19.2%	15	24.6%	10	18.9%	5	33.3%				
110	\$39,902	45.0%	2	8.7%	3	5.6%	14	25.5%	5	35.7%				
112	\$45,114	76.3%	2	33.3%	2	28.6%	1	7.7%	1	11.1%				
113	\$55,685	81.3%	5	11.6%	7	6.7%	29	22.0%	7	18.9%				
114	\$60,489	91.7%	2	12.5%	0	0.0%	10	16.9%	0	0.0%				
115	\$55,250	82.7%	0	0.0%	1	3.8%	9	22.0%	9	42.9%				
116	\$39,545	78.8%	1	16.7%	5	13.5%	12	30.0%	2	28.6%				
118	\$62,358	77.3%	2	14.3%	1	2.3%	5	20.0%	2	16.7%				
119	\$55,923	82.0%	6	35.3%	7	22.6%	9	20.5%	5	33.3%				
120	\$91,875	97.0%	0	0.0%	2	3.8%	7	14.3%	2	11.8%				
121	\$80,625	85.9%	4	13.3%	2	4.3%	12	21.4%	3	16.7%				
122	\$35,637	49.5%	4	19.0%	3	11.1%	16	47.1%	2	20.0%				
123	\$38,214	55.8%	7	31.8%	2	6.9%	11	37.9%	4	50.0%				
124	\$29,863	40.8%	3	27.3%	1	11.1%	5	31.3%	4	40.0%				
126	\$39,132	64.0%	2	25.0%	3	27.3%	3	30.0%	3	42.9%				
127	\$21,722	36.0%	0	0.0%	0	0.0%	6	60.0%	8	100.0%				
129	\$18,529	24.2%	0	0.0%	1	25.0%	1	20.0%	0	0.0%				
130	\$35,781	53.0%	5	18.5%	7	17.1%	15	48.4%	13	50.0%				
131	\$51,558	62.4%	3	13.0%	2	5.9%	5	13.9%	0	0.0%				
132	\$54,241	57.1%	3	17.6%	0	0.0%	9	42.9%	2	22.2%				
133	\$33,125	50.6%	1	25.0%	0	0.0%	3	50.0%	1	100.0%				
134	\$20,547	31.5%	1	100.0%	1	33.3%	11	78.6%	8	72.7%				
136	\$24,453	45.6%	0	0.0%	0	0.0%	3	75.0%	2	50.0%				
137	\$29,410	42.7%	0	0.0%	1	100.0%	6	75.0%	0	0.0%				
138	\$32,679	43.9%	0	0.0%	0	0.0%	4	25.0%	6	46.2%				
139	\$52,790	79.0%	4	20.0%	2	5.4%	8	27.6%	1	10.0%				
140	\$59,779	78.2%	0	0.0%	4	11.1%	9	26.5%	2	13.3%				
141	\$21,908	23.1%	0	0.0%	3	50.0%	1	33.3%	2	66.7%				
Total	\$47,905	66.1%	82	18.1%	84	10.2%	300	25.2%	115	29.9%				

The HMDA data identifies nine classifications for denial, including: debt-to-income (D2I) ratio, employment history, credit history, collateral, insufficient cash, unverifiable information,

incomplete credit application, mortgage insurance denied and other. Of the 581 applications denied, Table 4-5 identifies credit history (45.3%) as the greatest single reason for denial of a home loan across all loan types. Government loans were denied due to credit history 23.6 percent of the time while, conventional loans,

Of the applications denied, Table 4-5 revealed credit history as the greatest single reason for the denial of a home loan.

refinancing loans and remodeling loans were denied to a greater extent reflecting 46.0%, 41.5% and 63.6% respectively. The second greatest reason for denial across all loan types was the D2I ratio of the potential buyer at 25.0 percent. Government loans were denied under the ratio category 18.2 percent of the time, with conventional, refinancing and remodeling loans all having double digit showings in the ratio category, 14.0%, 28.4% and 25.0%, respectively. The third highest reason for denial was the assessed value of the property being less than the size of the loan, accounting for 11.7 percent of all denials. At 8.3 percent, incomplete loan applications were the 4^{th} ranked reason for denial across all loan types.

	TABLE 4-5 PERCENTAGE HOME LOAN DENIALS BY REASON FOR DENIAL BY TYPE OF LOAN IN 2017														
Туре	D2I Ratio	Work History	Credit History	Value	Cash	Lack of Information	Incomplete	Ins.	Other	Total					
FHA	18.2%	14.5%	23.6%	20.0%	3.6%	5.5%	12.7%	0.0%	1.8%	100.0%					
Conv.	14.0%	0.0%	46.0%	16.0%	2.0%	6.0%	10.0%	0.0%	6.0%	100.0%					
Ref.	28.4%	0.9%	41.5%	12.7%	0.9%	0.4%	9.6%	0.4%	5.2%	100.0%					
Rem.	26.4%	0.0%	63.6%	3.6%	0.0%	2.7%	2.7%	0.0%	0.9%	100.0%					
Total	25.0%	2.3%	45.3%	11.7%	1.1%	2.3%	8.3%	0.2%	3.8%	100.0%					

 Lending Patterns: Consistent higher percentage denial rates between races and certain ethnic groups is a cause for concern. When looking at the Lima Metropolitan Statistical Area (MSA) 2017 HMDA data, it is readily apparent that African-Americans were

African Americans were awarded FHA loans at a lower rate than Whites, Hispanics or Asians.

denied loans at a higher rate than all other major racial and ethnic groups. African-Americans received approvals for FHA Loans 42.1 percent of the time, Conventional Loans 82.9 percent of the time, Refinancing Loans at a rate of 39.7 percent and Remodeling Loans 42.9 percent of the time, with an overall approval rate of 50.6 percent. Table 4-6 reveals African Americans were awarded loans at a lower rate than Whites, Hispanics or Asians.

	TABLE 4-6 2017 LOAN APPROVAL RATES BY TYPE, RACE & ETHNICITY													
Race/Ethnic Group FHA Conventional Refinance Remodel All Loans														
White	72.1%	83.5%	63.8%	76.2%	73.5%									
Black	42.1%	82.9%	39.7%	42.9%	50.6%									
American Indian	100.0%	66.7%	33.3%	0.0%	44.4%									
Asian	0.0%	78.6%	25.0%	50.0%	65.0%									
Hispanic	85.7%	86.7%	42.9%	40.0%	70.6%									
Race Unknown	81.1%	76.5%	34.4%	14.3%	49.1%									
Total Population	71.4%	83.0%	59.1%	69.4%	70.0%									

The disparity in overall loan approval rates continued when holding income constant across racial and ethnic lines. Table 4-7 reveals African-Americans were denied more often than

African-Americans were denied more often than Whites regardless of income.

Whites regardless of income. Approval rates between White and African Americans did not improve as income increased; the gap between Whites and African Americans stayed steady. Conversely, loan approvals for Hispanics were for the most part higher at the lower income levels.

Table 4-8 reflects conventional loan approval rates by race for 2012 and 2017. Findings suggest a significant improvement in the proportion of approvals for African-Americans between 2012 and 2017 data points when holding income constant. Whites, however witnessed slight approval rating decreases across income levels.

When assessing reasons given for the denial of loans, the primary reason identified was "credit history". And, while credit history accounted for a 22.5 percent rejection of government applications for Whites, a quarter (25%) of the denials resulted from the property assessment value.

Government FHA loans were denied to African-Americans due to high debt-to-income ratio or a bad credit history 2/3 of the time. Conventional loans were denied to African-Americans 100 percent of the time because of a poor credit history. Credit history was given as the number one reason for conventional loan denials for all racial and ethnic groups that applied for such loans. Tables 4-9 through 4-12 inclusive, provide detailed 2017 HMDA denial rates based on race and ethnicity.

	2017 LOA	AN APPLICATION	TABLE 4-7 N DENIAL RATE	ES BY RACE & I	NCOME	
D / [#] : -	Less Than	50% MSA Medi	an Income	50% - 7	9% MSA Media1	n Income
Race/Ethnic <i>G</i> roup	Total Applications	Total Denials	% Denied	Total Applications	Total Denials	% Denied
White	277	87	31.4%	545	107	19.6%
Black	31	16	51.6%	48	19	39.6%
American Indian	5	3	60.0%	2	1	50.0%
Asian	4	2	50.0%	1	0	0.0%
Hispanic	9	1	11.1%	9	2	22.2%
Race Unknown	27	13	48.1%	53	19	35.8%
	80% - 99	% % MSA Medic	an Income	100%	+ MSA Median I	income
White	404	58	14.4%	1,338	142	10.6%
Black	25	9	36.0%	65	18	27.7%
American Indian	0	0	0.0%	3	1	33.3%
Asian	4	0	0.0%	11	3	27.3%
Hispanic	7	2	28.6%	11	0	0.0%
Race Unknown	34	14	41.2%	136	49	36.0%

TABLE 4-8 APPROVAL RATES OF CONVENTIONAL HOME PURCHASE LOAN APPLICATIONS BY RACE & INCOME (2012-2017)													
Dace (Fabric Cours Low/Mod (80% AMI) Middle (80% -120%) Upper (>120% AMI)													
Race/Ethnic Group	2012	2017	2012	2017	2012	2017							
White	84.1%	80.5%	91.7%	83.4%	87.9%	85.8%							
Black	33.3%	78.6%	75.0%	75.0%	50.0%	92.3%							
American Indian	0.0%	66.7%	100.0%	0.0%	100.0%	0.0%							
Asian	100.0%	66.7%	0.0%	80.0%	100.0%	83.3%							
Hispanic	100.0%	83.3%	100.0%	66.7%	100.0%	100.0%							
Race Unknown	50.0%	68.8%	100.0%	85.7%	91.3%	78.6%							

PERCENTAGE	TABLE 4-9 PERCENTAGE HOME LOAN DENIALS BY REASON FOR DENIAL IN 2017: GOVERNMENT LOAN														
Race/Ethnic Group	Race/Ethnic Group D2I Work Credit Ratio History History Value Cash Information Incomplete Ins. Other														
White	15.0%	15.0%	22.5%	25.0%	2.5%	7.5%	10.0%	0.0%	2.5%						
Black	33.3%	16.7%	33.3%	0.0%	0.0%	0.0%	16.7%	0.0%	0.0%						
American Indian	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
Asian	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
Hispanic	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
Race Unknown	22.2%	11.1%	22.2%	11.1%	11.1%	0.0%	22.2%	0.0%	0.0%						

PERCENTAGE	TABLE 4-10 PERCENTAGE HOME LOAN DENIALS BY REASON FOR DENIAL IN 2017: CONVENTIONAL LOAN														
Race/Ethnic Group D2I Work Credit History Value Cash Unverifiable Incomplete Ins. Other															
White	16.7%	0.0%	45.2%	16.7%	2.4%	4.8%	9.5%	0.0%	4.8%						
Black	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
American Indian	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
Asian	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	50.0%						
Hispanic	Hispanic 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0% 0.0														
Race Unknown	16.7%	0.0%	0.0%	16.7%	0.0%	16.7%	33.3%	0.0%	16.7%						

PERCENTAG	TABLE 4-11 PERCENTAGE HOME LOAN DENIALS BY REASON FOR DENIAL IN 2017: REFINANCE LOAN														
Race/Ethnic Group D2I Work Credit Value Cash Unverifiable Incomplete Ins. Other															
White	26.5%	0.00%	47.7%	9.9%	1.3%	0.0%	7.3%	0.7%	6.6%						
Black	25.0%	41.7%	54.2%	8.3%	0.0%	0.0%	4.2%	0.0%	4.2%						
American Indian	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
Asian	50.0%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
Hispanic	0.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
Race Unknown	35.3%	2.0%	19.6%	19.6%	0.0%	2.0%	19.6%	0.0%	2.0%						

PERCENTAGE H	TABLE 4-12 PERCENTAGE HOME LOAN DENIALS BY REASON FOR DENIAL IN 2017: HOME IMPROVEMENT LOAN														
Race/Ethnic Group	D2I Ratio	Work History	Credit History	Value	Cash	Unverifiable Information	Incomplete	Ins.	Other						
White	26.1%	0.0%	65.2%	4.3%	0.0%	1.4%	2.9%	0.0%	0.0%						
Black	33.3%	0.0%	66.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
American Indian	50.0%	0.0%	0.0%	0.0%	0.0%	50.0%	0.0%	0.0%	0.0%						
Asian	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%						
Hispanic	0.0%	0.0%	33.3%	33.3%	0.0%	33.3%	0.0%	0.0%	0.0%						
Race Unknown	11.8%	0.0%	64.7%	5.9%	0.0%	5.9%	5.9%	0.0%	5.9%						

Predatory Lending & Real Estate Foreclosures: Allen County
has continued to experience a gradual decline in foreclosure
filings after the record rates in 2008-2010. In essence a
foreclosure is a legal action taken by a lender to address a

A foreclosure is a legal action taken by a lender to address a borrower who has failed to make mortgage payments.

borrower who has failed to make mortgage payments. The lender essentially seeks a court order to sell the house so that money can be raised to pay the borrower's debt to the lender. Two of the primary causes cited for the home foreclosure crisis included sub-prime mortgages and predatory lending.

Predatory lending occurs when a mortgage loan with unwarranted high interest rates and fees is set up to primarily benefit the lender or broker. The loan is not made in the best interest of the borrower, often locks the borrower into unfair terms, and tends to cause severe financial hardship or default. In addition, the Center on Urban Poverty and Community Development at Case Western Reserve University identified a ballooning negative impact on other properties within 500' of a foreclosed home, and increased the possibility of a foreclosure on those properties by 40 percent. Refinance characteristics of predatory lending include:

• Encouraging borrowers to lie about their income, expenses, or cash available for down payments in order to get a loan.

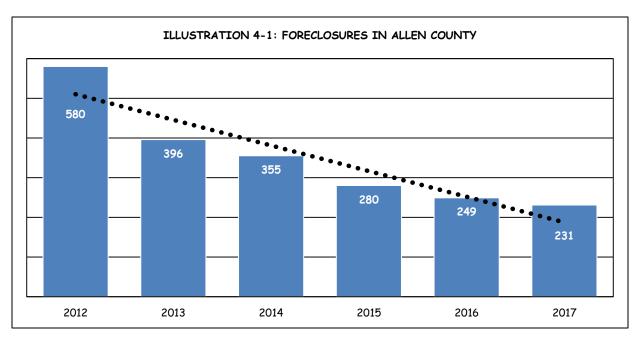
- Use false appraisals to loan inflated amounts on properties for much more than they are worth.
- Knowingly lend more money than a borrower can afford to repay.
- Charge high interest rates to borrowers based on their race or national origin and not on their credit history.
- Charge fees for unnecessary or nonexistent products and services.
- Pressure borrowers to accept higher-risk loans such as balloon loans, interest-only payments, and steep pre-payment penalties.
- Target vulnerable borrowers to cash-out refinance offers when they know borrowers are in need of cash due to medical, unemployment, or debt problems.
- "Strip" homeowners' equity from their homes by convincing them to refinance again and again when there is no benefit to the borrower.
- Use high-pressure sales tactics to sell home improvements and then finance them at high interest rates.

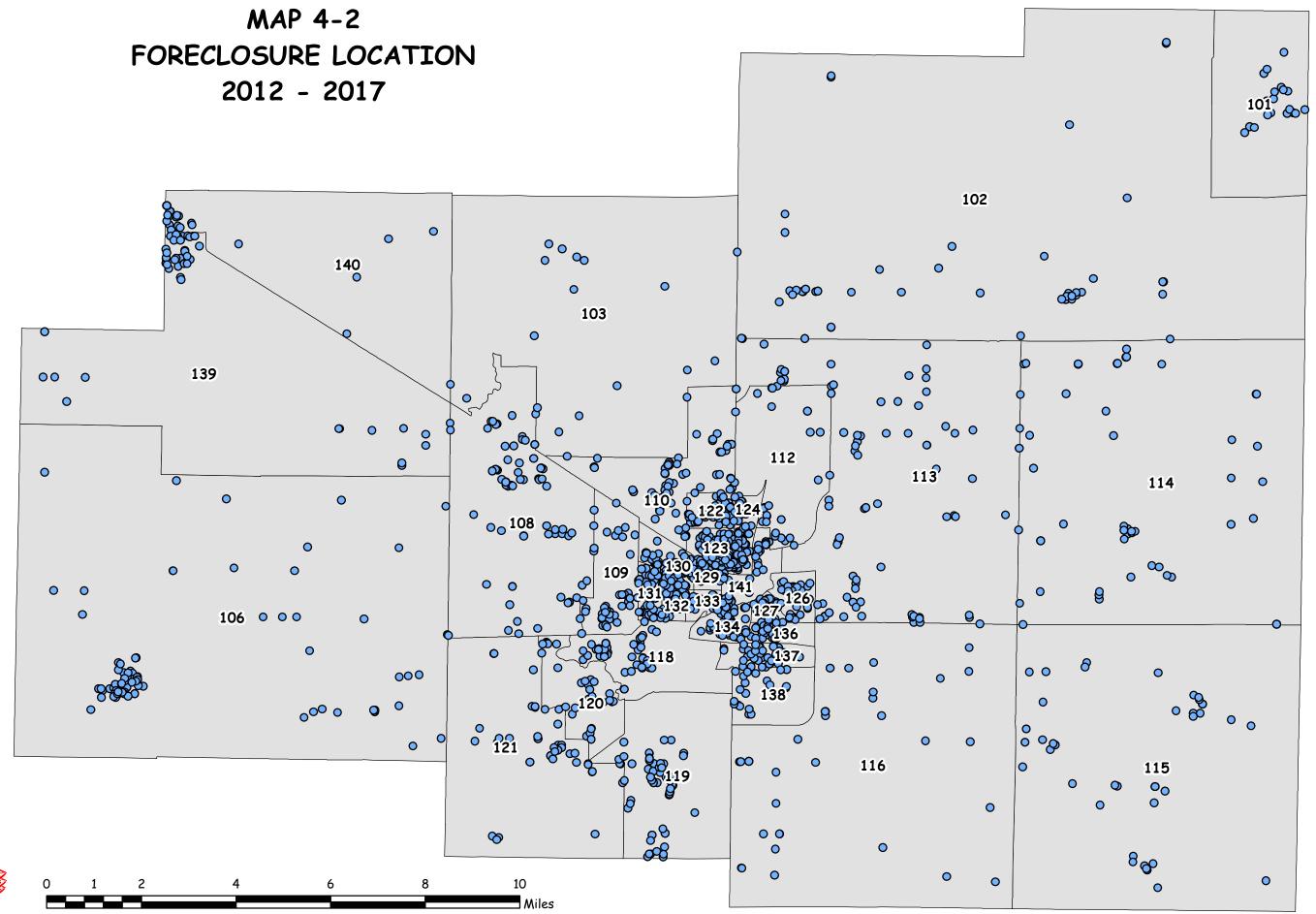
Sub-prime lending, also called "B-Paper", "Near Prime", or "Second Chance" lending, has been presented as a general term that refers to the practice of making loans to borrowers who, because of problems with their credit history, do not qualify for market interest rates. Opponents to sub-prime lending practices accuse the industry of predatory practices such as targeting

Sub-prime lending refers to the practice of making loans to borrowers who, because of problems with their credit history, do not qualify for market interest rates.

borrowers who do not have the resources to meet the terms of their loan over the long term. These criticisms increased in response to the growing crisis in the U.S. sub-prime mortgage industry.

Illustration 4-1 reveals decline in foreclosure activity since 2012; a drop of nearly 60.2 percent since 2012 levels. In 2017, there were 231 foreclosures filed in the Allen County Common Pleas Court. Map 4-2 identifies foreclosure activity by street address across Allen County for the 2012 through 2017 period. Examining local data, there were a total of 2,091 foreclosures filed over the 2012 - 2017 period. Table 4-13 reflects the percent of foreclosures from 2012 through 2017 by census tract.





	PE	ERCENT OF	TABL FORECLOSURES	.E 4-13 BY <i>C</i> ENSU	US TRACT 2012-2	017									
Tract															
101	1.2%	114	3.7%	124	3.9%	136	1.8%								
102	3.4%	115	2.6%	126	2.7%	137	1.9%								
103	1.3%	116	1.8%	127	2.3%	138	3.0%								
106	4.3%	118	2.7%	129	3.4%	139	3.1%								
108	4.2%	119	4.0%	130	6.7%	140	1.5%								
109	2.6%	120	2.1%	131	3.8%	141	3.2%								
110	4.0%	121	1.9%	132	3.0%										
112	1.4%	122	4.4%	133	2.1%										
113	4.9%	123	7.0%	134	2.5%										

Tax Policy

Unfunded mandates, increased demands by citizens for more, and better, public services as well as the ever-rising costs of providing such services; and, a plethora of legal and political restrictions on raising tax revenue have left many local governments in fiscal straits. Some economists argue that local governments cannot handle the load without significant restructuring. They argue failure to reform fiscal taxation policies could result in a loss of the current American local government system (federal, state and local). Experts contend that local governments must be able to establish stable tax revenue to support public demands or by necessity they will cede financial and political control to the states.

Because of local governments' place in the federal system, Allen County and its component parts must operate under existing federal and state policy guidelines. Local tax policies must not only recognize statutorial limitations but develop and advance local policies based to some extent on either a philosophy of benefits derived or an ability-to-pay philosophy. Benefit taxes are those designed to tax only those receiving local public services; while, an ability-to-pay implies a progressive or redistributive tax. The largest proportion of local government finances has historically been the property tax. However, with the property tax under siege since the late 1970's, county governments have increasingly turned to other sources of tax revenue to pay for public services including excise and sales taxes collectively considered consumption taxes. Such consumption taxes have not proven effective replacements for the property tax based on a number of internal, administrative, technical and political limitations.

So, with property taxes under siege and other tax sources limited, local governments have been forced to rely more heavily on non-tax revenue. The two most important sources of non-tax revenues, are intergovernmental aid and user fees and charges.

The two most important sources of nontax revenues are intergovernmental aid and user fees and charges.

Intergovernmental aid is the largest single source of revenue for local governments. State governments fund local government services, especially elementary and secondary education, more than ever; the problem is the centralization of policies and the loss of local control. State control results in not only a loss of local control but also the political accountability that helps ensure local government efficiency. Of concern is whether ceding control to state leadership would improve local fire, police and emergency respondents or address local roadway conditions. Also of concern is the level of service (LOS) or quality of such services rendered. Some communities will always strive for higher standards; will the state decide which community gets the additional revenue to meet such aspirations.

User fees and charges are used by almost all local governments today due in large measure to the limited revenue streams currently available. Since the onset of the tax revolts in the late 1970s both state and local governments have increasingly relied on user fees and charges to

User fees and charges are among the most efficient manner of delivering public services.

fund public services. Many policy analysts suggest that user fees and charges are among the most efficient manner of delivering (financing) public services. The argument goes that if the public is forced to realize the cost of a particular service directly that they will not needlessly use such services and ultimately waste less community resources. More importantly local governments can better gauge demand for such services, allowing them to staff and establish user fees more appropriately. Critics argue that such fees/charges are incapable of raising enough revenue to meet public demands, because of their limited base. They also argue that such charges/fees are regressive impacting those least likely able to afford them. That being said, local governments have difficulty imposing user fees on every services especially those services deemed necessary to everyone.

Balancing the public health, safety and welfare within the fiscal constraint of local governments is a difficult task. The decision as to which service is provided by the public sector and to what extent affects everyone at some level within the community. The need to balance local tax revenue with the costs associated with certain public services is critical. To match the desired level of service, with an appropriate tax or user fee to fund such a service is fertile grounds for public policy debates. How local tax policies impact aspects of the housing sector is the remaining focus of this Section.

- Local Taxes: Local taxes are an additional tax atop those of federal and state taxes when applicable. Locally, taxes are collected in the form of sales, income and property taxes.
 - Income taxes are a tax that governments impose on financial income generated by all taxable entities (persons/businesses) within their respective jurisdiction. By law, businesses and individuals must file an income tax return annually. Income tax is a key source of funds that governments (federal/state/local) use to fund activities that further the public's interests.
 - Property taxes are a tax assessed by local governments on real estate. The tax is usually based on the value of the property (including the land) owned. This tax is mainly used by local governments for repairing roads, operating schools, snow removal and other services.
 - Sales taxes are imposed by state and local governments at the point of sale on retail goods and services; they are collected by retailers and passed to the state and local governments.

In Allen County, income tax policies vary by political subdivision. In Lima, in addition to paying the federal and state rates, residents, businesses and employees therein, support a local income tax of 1.5% over federal and state income taxes. Income taxes are assessed at various rates by political subdivisions across the county including Bluffton (1.25%), Cairo (.50%), Delphos (1.75%), Elida (.75%) and Spencerville (1.50%). Reciprocity tax agreements exist between certain political subdivision based on the inherent needs of the political subdivision in which the individual works and lives.

Property taxes in Allen County are variable as they reflect permissive taxes approved by the voters for a specific purpose, amount and period of time. The millage rate refers to the amount taxed per \$1,000 that is used to calculate taxes on property. At the County level local, millage rates reflect assessments for joint vocational schools, Children's Services, the Johnny

Appleseed Metropolitan Park District, watershed maintenance and Senior Citizens levies. At a local level, school district boundaries are used to establish millage rates for such items as local school levies, police and fire levies, ditch maintenance, etc. To somewhat complicate matters residential, commercial and agricultural properties are taxed at different rates; and, specific exemptions exist for certain populations (elderly, disabled, veterans, etc.) for specific land uses. The range in millage across the County reflects a rate of 50.040 per 1,000 in the Spencerville Local School District in Amanda Township on the low end to a high of 70.191 per 1,000 in the Lima City School District in American Township (Appendix C).

Locally, Allen County has levied a sales tax of 1.25% over the existing 5.5% tax rate imposed by the State on each sale that occurs within Allen County. The total effective sales tax in Allen County is \$.075 per \$1.00 resulting in an effective tax rate of 6.75% on all taxable items. No other local political subdivision has the capability of levying a sales tax.

• Taxation Policies & Housing Tools: To encourage the development of affordable housing various federal, state and local legislative initiatives have created an array of tools. Property tax incentives, community land trusts, and creative public-private partnerships have subsequently been created to provide the necessary financial incentives to private, public, and non-profit housing developments. Such tools have been proven to be flexible, accountable and administratively possible. Each are unique but can be bundled to offer a package of economic benefits to support housing initiatives.

Tools deemed to be most suitable for local application include Tax Increment Financing, Land Banks, Tax Abatements and Housing Trust Fund Accounts. Under the first approach, a community designates a TIF district and sets a baseline expectation for future tax revenues in the designated area. Incremental revenues above this baseline are captured as revenue that can be used to fund projects in the district. Establishing TIF districts allow new property tax revenue to be amassed within the district and allocated to qualifying projects. No tax increase occurs; funds are disbursed as additional tax revenue accrues. Funds may be used for public improvements, including affordable housing development. Flexible standards allow many areas to qualify for TIF designation. Some jurisdictions borrow against expected tax increment revenues, allowing the future tax revenues to pay for the initial investment that produces them.

Land banks are a publicly created tool used to hold, manage and develop tax-foreclosed property. Land banks act as a legal and financial mechanism to transform vacant, abandoned and tax-foreclosed property back to productive use. Land banks offer incentives for redevelopment in older communities that generally have little available land and neighborhoods that have been blighted by an out-migration of residents and businesses.

Land banks act as a legal and financial mechanism to transform vacant, abandoned and taxforeclosed property.

Tax abatements are financing strategies to stimulate a public benefit.

Tax abatements are similar to tax increment financing strategies in that they involve voluntarily relinquishing expected future tax revenues for a specified period

of time to stimulate a public benefit. The principal difference is that tax abatements are much more focused, providing a specific tax benefit for a specific activity undertaken by the taxpayer. Tax abatements also can be applied city- or countywide, rather than simply in a

³ City Land Banks are established under Section 5722 of the Ohio Revised Code (ORC); County Land Banks are established under Sections 1724 and 5722 of the ORC.

particular district. In the housing sector, tax abatements most often are used as an incentive for the construction or rehabilitation of rental homes.

Housing Trust Funds (HTFs) are flexible local accounts that can be used to distribute funds to support the creation or preservation of affordable housing developments. Housing Trusts can help leverage other public resources and private equity to finance developments. Trusts allow communities to custom fit funds to their particular priorities with minimal administrative burden. HTFs can provide a flexible source of financing for affordable housing development. HTF dollars can be used to supply gap financing and to help projects meet match requirements for other funding sources such as federal HOME funds and Housing Trust Fund Program. In this way, communities can leverage local HTF funds to secure additional funds for developments, make projects more competitive for Low Income Housing Tax Credits, and promote developments, such as special purpose housing, that might otherwise not receive funding.

• Impact of Local Tax Polices on Fair Housing: Public sector tax polices affect fair housing choice in direct and indirect manners. Policies governing tax abatements and/or the creation of TIF Districts are direct impacts. The public sector support of transit services or parks and recreational programming or educational opportunities are considered indirect effects to fair housing choice. However, the level of taxation directly impacts the funding for specific services across Allen County and the affordability of housing within its various political subdivisions. As presented earlier the costs associated with the provision of specific public sector services increases the costs for all residents whether they reside in owner occupied or rented units. The heaviest millage rates were typically found in smaller rural communities (Delphos, Harrod, Lafayette, Cairo), with small minority populations and low poverty rates. However, based on housing valuations and median income, such communities are not thought to be engaged in discriminatory practices.

Because of changes at the state level and the current reevaluation process, Allen County anticipates that the tax burden will continue to shift towards owners of residential

The tax burden will continue to shift towards owners of residential property.

property. This will have negative effects on the ability of both home owners and renters. Additionally, as a result of having to pay increased residential property taxes, property owners may not be able to afford improvements to their properties, which could further erode the housing stock in older neighborhoods. Those owners who own rental properties will be forced to raise rents, making rental units less affordable for tenants, especially those of low incomes.

Several forms of residential tax relief do exist for veterans, seniors and the disabled with assessment exemptions for taxpayers who are legally blind, those who are totally disabled and receiving retirement benefits. Some disabled homeowners who are totally disabled also qualify for tax credits under the State Homeowners Program.

Currently, the City of Lima offers tax abatement under its community reinvestment area (CRA) program guidelines. The tax abatement targets the elimination of slum and blight and includes abatements for real property improvement investments within specified districts of the City effectively freezing increased assessments stemming from the

The effect of CRA investments on the housing sector has resulted in \$21.1 million in investments.

improvement for a period of time ranging from 10 to 15 years. The effect of CRA investments on the housing sector between 2013 and 2018 has resulted in \$21.1 million in investments. No such program exists outside of the City of Lima. Currently, no TIF or HTF exists in Allen

County. However, the City of Lima and Allen County are actively engaged in land banking efforts to process and offer vacant underutilized properties for redevelopment purposes. The Land Banks acquire tax delinquent property; parcels are then offered for private redevelopment or public use. While the impact the land banks will have on housing affordability remains to be determined, community leaders are however, cautiously optimistic.

Equity in the Real Estate Industry

According to the Ohio Department of Commerce, there are 28 licensed real estate brokers with offices within Allen County. Such brokers are dispersed across Lima and Allen County. Inside these Broker offices 158 active real estate agents work and live in Allen County. Only 6 (3.8%) active agents live in Low/Moderate Income Census Tracts while 22 (13.9%) live in Census Tracts with over a 25% minority population.

A cursory survey of 21 real estate websites conducted by Planning Commission personnel conducted in February 2019. Only 19 of the 27 brokers had websites that could be reviewed without a password (70.3%). Of those 19 websites that could be reviewed: only 9 (47.4%) had posted the Fair Housing logo (a); only 2 of 19 had posted picture(s) of a person(s) of color depicted - (10.5%); only 1 (5.2%) had posted a complaint Fair Housing Complaint Form; and, none (0) of 19 had posted an Equal Opportunity Employer logo.

Given the lack of a physical presence in minority neighborhoods, industry representatives should undertake a self-evaluation of their independent contractors to ensure that licensed professionals serve the needs of those minority neighborhoods.

Real Estate Brokers and professional real estate agents must fulfill specific academic training to sit for their state licensure; and, after acquiring such certification must obtain additional professional training annually thereafter, as measured in continuing educational units (CEUs), to retain such licensure. Fair Housing is a critical component of the real estate industry's practice and is therefore integrated within the State's licensure examination.

In 2018, the Ohio Department of Commerce identifies 565 persons residing in Allen County who obtained a professional real estate license and have been or are currently are associated with the aforementioned brokers. Of those persons licensed as real estate agents, more than $2/3^{\rm rds}$ (69.6%) have resigned, voluntarily placed their license in an inactive status (12.0%) or have had their licensures suspended, revoked, voided, or terminated due to death. Of the 160+ realtors still active and working as independent contractors for area brokers, determining the agency for which they receive adequate exposure to FHC topics is unknown.

Given the lack of a physical presence in minority neighborhoods, industry representatives should undertake a self-evaluation of their independent contractors to ensure that licensed professionals adequately serve the needs of those minority neighborhoods. Furthermore, such brokers would seem well served to recruit and encourage minority candidates from such neighborhoods to serve those minority communities that appear underserved to ensure their ability to successfully participate and compete in the real estate industry.

Fair Housing Administration & Enforcement

The City of Lima and Allen County provide contractual support to the West Ohio Community Action Partnership (WOCAP) to monitor and enforce fair housing choice across the county. WOCAP is charged with the responsibility to receive, investigate, resolve

The City of Lima and Allen County provide contractual support to the West Ohio Community Action Partnership (WOCAP) to monitor and enforce fair housing choice across the county.

(through conciliation or referral to enforcement agency) housing discrimination complaints; to conduct workshops/seminars; and, disseminate written fair housing information. WOCAP provides landlord-tenant mitigation services to mediate and counsel renter/owner on their respective rights and responsibilities. To support a wider role in the fair housing arena, WOCAP provides training and technical assistance programming with a concentration on housing finance and housing acquisition as well as property maintenance workshops and serving on quasi-government technical advisory and working groups. Finally, WOCAP enforces local discriminatory violations conducting housing audits and tests; and, referring discrimination cases to the Ohio Civil Rights Commission or private attorneys.

According to Table 4-14, in 2017, WOCAP's Fair Housing Office processed 283 complaints, with the overall majority (92.93%) being self-reported. The Allen County Metropolitan Housing Authority (2.83%) and the Allen County Health Department (1.06%) also referred clients to WOCAP. None of the complaints were addressed thru mediation as both parties must agree to mediation and landlords have been reluctant to participate.

	TABLE 4-14 COMPLAINT REFERRALS RECEIVED BY WOCAP IN CY 2017													
Referral Agency	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	% of Total
Code Enf.	0	0	0	0	0	0	0	0	0	0	0	0	0	0.00%
Met Housing	2	1	0	0	0	1	0	0	1	2	1	0	8	2.83%
Legal Aid	0	0	0	0	0	0	0	0	0	2	0	0	2	0.71%
ACHD	0	0	0	0	0	0	0	0	1	1	1	0	3	1.06%
Self	20	16	10	10	27	35	29	43	27	14	17	15	263	92.93%
Other	0	1	0	1	1	0	0	0	0	4	0	0	7	2.47%
Total	22	18	10	11	28	36	29	43	29	23	19	15	283	100.00%

*Other reflects Friend, Nurse, Utilities Department, City/Township/Village/County officials, Local Churches, Allen County Board of Children's Services, Lutheran Social Service, Lima Police Department, City of Lima Home Repair, Better Business Bureau, Landlord, Attorneys, Lima Municipal Court, and others.

A review of the disposal of referrals in 2017 revealed 11 were landlord-tenant disputes (Table 4-15). Of concern were the number of cases that required the intervention of Legal Aid (20 cases/20%). The Allen County Health Department addressed only 4.0 percent of cases while not a single case was mediated by WOCAP; not surprising as both parties must agree and landlords have been reluctant to participate.

	TABLE 4-15 DISPOSAL OF REFERRALS IN CY 2017														
Action Agency	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total	% of Total	
Mediation - WOCAP	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	
Lima Code Enforcement	4	0	2	0	1	2	2	0	1	0	3	3	18	17%	
Allen Metropolitan Housing	2	1	0	0	2	1	0	1	1	1	2	0	11	12%	
Legal Aid	5	2	0	0	2	0	1	1	1	2	2	4	20	20%	
Allen County Health Dept	3	0	0	0	0	0	0	0	0	1	0	1	5	4%	
Declined Assistance	2	0	0	0	0	0	0	0	0	1	3	0	6	5%	
Ohio Civil Rights Comm.	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	
Landlord	3	3	0	0	0	0	0	0	0	2	4	0	12	11%	
Other*	4	1	0	0	1	0	0	0	0	14	5	7	32	31%	
Total	23	7	2	0	6	3	3	2	3	21	19	15	104	100%	
*Other reflects City/Township/Village/County	official	s, City o	f Lima H	lome Rep	oair, LAC	CA HEA	P, Attor	neys, Li	ma Muni	cipal Cour	t, and o	thers.			

WOCAP routinely conducts testing to assure local FHC compliance. Testing reflects phone tests, field tests and the monitoring of ads. The testing targets violations based on familial status, disability status and race. Eight tests are conducted each month. Of the 115 tests conducted in CY 2017, no discrimination was detected (Table 4-16).

TABLE 4-16 FAIR HOUSING TESTING 2017														
Type of Test Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec Total % of Total														
Phone Test	0	0	0	0	0	4	0	4	6	0	0	0	14	9%
Field Test	0	0	0	9	6	0	24	8	6	0	0	0	45	47%
Monitored Ads														
Total	4	4	4	13	10	8	28	16	16	4	4	4	115	100%

Summation

Local social service agencies, WOCAP, City of Lima and the RPC identified and explored a number of FHC issues ranging from regulatory barriers (zoning, subdivision & building code regulations) to tax policies, and practices of the finance and real estate industry before summarizing the testing and dismissal of FHC complaints. While no one indicator or test suggests rampant FHC violations, when taken collectively, anecdotal findings suggest that both public and private sector impediments exist. Data suggests there are a number of issues that bear further examination.

Local regulatory controls need to be examined further in terms of minimum housing size and land availability to ensure that these policies and regulations do not exclude or discourage the development of affordable housing. These issues will need to be addressed in the more rural communities as the cities of Delphos and Lima are already compliant with these measures. Other issues that need to be explored include:

Local regulatory controls need to be examined further in terms of minimum housing size and land availability to ensure that these policies and regulations do not exclude or discourage the development of affordable housing.

- The provision of municipal services, especially the limited area where water and sanitary sewer services are co-located has effectively limited land in the unincorporated areas from higher density development.
- The lack of public transportation services hinders the development of low to moderate income
 housing outside the City of Lima resulting in economic segregation. The lack of fiscal support
 from local governments has restricted the transit service largely to those environs. Coupled
 with the lack of sidewalks, most residential development outside of the cities and villages
 should be considered auto-dependent. Appendix B details the level of service provided by public
 transportation.
- The absence of residential building codes in the unincorporated areas of Allen County may negate arguments suggesting that such regulations inflate the costs of housing unnecessarily; however, due to their absence the documentation of the adequacy and safety of the housing stock in the rural community is absent and the housing suspect.
- The lack of residential building codes and rental registries limits local governments' ability to
 assess the availability and affordability of housing units across a range of unit sizes and
 geographic locations.

Financial institutions were examined to assess lending practices; HMDA data provided the basis of the examination. Lending patterns revealed some positive trends in loan denials with the minority population facing similar conventional loan denial rates in 2017 as the rest of

Lending patterns revealed some positive trends in loan denials with the minority population facing similar conventional loan denial rates in 2017 as the rest of the County.

the County, where in 2012 large disparities were evident across race and certain ethnic lines in all loan categories. Recognize however, that no attempt was made herein to run independent analyses reflecting FICO scores, loan to value or payment to income ratios, market rate dynamics or housing price indices, And, because of the foreclosure crisis, the recession and the credit squeeze a limited number of loans were available for review and assessment; an improved fiscal environment, one - less risk-adverse would provide a more equal footing for such assessments. Those factors noted - certain issues will need to be investigated over a longer period to assure compliance with FHC and develop a stronger public/private response; these concerns reflect:

- The absence and general lack of competition between full-service financial institutions in minority neighborhoods has been offset financially in part with CRA provisions. Their absence however, may play a larger role in determining the long term financial health of minority residents as their accessibility to, and interaction with, such institutions has been curtailed and recognition of their institutional services remains less than complete. Such accessibility constraints and restrictive information flows are considered problematic in the low income, low-wealth neighborhoods as formal educational attainment levels lag and borrowers are less likely knowledgeable about the mortgage process and less likely to search extensively for the best rates. Borrowers who do not have mortgage market experience who do not search for the best interest rates or who do not have the opportunity to make choices about their mortgage options disproportionately end up with subprime loans, as do those borrowers who search for "affordable" monthly payments.
- Recognizing the contradictory findings of recent studies over the location factors of alternative financial service providers (subprime mortgage loans, payday advances, pawn brokers, check cashing, and bill paying services) one must acknowledge their proliferation in recent years. Whether such products and services are the free market response to meeting the financial service needs of largely low income, low-wealth, and credit impaired consumers or the result of fraud, abuse and poor consumer protection regulations remains to be determined. Sorting out how low-wealth, low-income consumers, as well as consumers with poor and/or no credit histories, go about making choices between "mainstream" and "alternative" mortgage and financial services is perhaps the biggest challenge facing those policy analysts, government officials and regulators operating in the rapidly evolving mortgage and financial services marketplace.
- The ability to adequately address the use of subprime loans remains. Our ability to identify why some consumers make what appears to others to be "irrational choices" is at the crux of the issue. Of course, many of these seemingly "irrational choices" may be the product of simple fraud and abuse, however, some studies suggest that in many cases customers of subprime lenders and AFSPs are, in fact, making rational choices given their limited choices in the marketplace. Outreach by local consumer advocacy groups, or community-based non-profit housing organizations may be able to serve as the conduit necessary to ensure customers have access to the information needed to make informed decisions. Outreach by consumer advocates,

non-profits and community-based housing organizations may be able to provide the information necessary to ensure customers have access to the information needed to make an informed choice.

 Several studies including those authored by the San Francisco and Boston Federal Reserve Banks suggest the need to develop culturally and linguistically relevant foreclosure prevention resources for multiple market segments, and to conduct outreach through a much larger network of nonprofits and community-based organizations.

Up thru the 1960s racial discrimination in housing and real estate markets was overt. The real estate industry has changed; and practices examined over the 2016-2018

Practices examined during CY 2017 by WOCAP FHC testing identified no overt discrimination.

period by WOCAP FHC testing identified no overt discrimination. However, there were anecdotal signs that challenged objective conclusions as to the extent of compliance with FHC practices suggesting that certain issues be revisited:

- The location of real estate offices were largely absent from minority neighborhoods. This absence may work to preclude minority homeowners from listing or buying homes thru the formal real estate service industry. It may also indicate a lack of industry interest in minority neighborhoods and by omission result in depreciated property values. Further documentation as to the presence of the real estate industry in minority neighborhoods is warranted.
- In general conversation most realtors argue that their agencies doors have always been open to
 qualified real estate agents, regardless of race or ethnicity. However, their absence suggests
 that the development of work force diversity programs is necessary and only makes good
 business sense.

SECTION 5 5-YEAR ASSESSMENT

Status of Action Items

The Analysis of Impediments to Fair Housing Choice ((AI) (December 2013)) document established existing conditions and challenges as well as a vision and goal statements before developing a detailed Action Plan. The AI and its Action Plan are predicated on federal planning requirements, existing conditions and what were believed to be warranted actions to accommodate future community development activities. The Action Plan incorporates the community's assets, its challenges and recommended actions to address regulatory controls and to remediate and support Fair Housing Choice. The following tables reflect the goal statements identified above and are intended to provide the community and ODSA with an overview of the steps identified as necessary to develop a healthy (physically and financially) housing market and eliminate the barriers to housing choice by providing quantitative benchmarks, timelines and responsible parties.

The tables contained in Section 5 reflect identified goal statements, policies, strategies, objectives and summary statements attesting to the most recent efforts of local housing advocates, social service agencies and area governments. The implementation status reflects the Plan's 5-year (2014-2018) horizon. Actions taken by local stakeholders and the status of such efforts are highlighted by year and reflect efforts thru CY/PY 2018. Offered as a key: a " \checkmark " suggests that significant progress has and continues to be made; an "X" suggests that no progress has been made; a ticking clock " \circlearrowleft " suggests some progress is being made.

Of note, while this report reflects the efforts of many agencies, the majority of which do not receive monies from HUD/ODSA directly, Allen County, the City of Delphos and City of Lima do receive such funding and are attempting to use this Assessment Update to satisfy CDBG and FH reporting requirements with ODSA.

Local CDBG Program Overview

The Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community development needs. There are more than 20independent CDBG programs supporting aspects of community development, neighborhood revitalization, downtown revitalization, and critical infrastructure development. Each of the programmatic activities must meet one of the following national objectives for the program:

- benefit low- and moderate-income persons;
- address community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community for which other funding is not available; or,
- prevention or elimination of slums or blight.

This final section of the 2014-2018 Assessment looks to address how CDBG Program funding was used and how such programmatic funding targeted specific actionable items identified previously in the AI. This assessment is a requirement for receiving CDBG Program funds. Grantees are required to identify how they are using the CDBG funds to help mitigate existing conditions or barriers that limit equal opportunity in housing choice within their jurisdiction.

Both Allen County and the City of Lima receive federal Community Development Block Grant (CDBG) Program funding either directly from the US Department of Housing & Urban Development (HUD)

	GOAL: ADVANCE PUBLIC A		ABLE 5		OF SA	FE, C	ÆAN,	HEALTHY & AFFORDABLE HOUSING IN ALLEN COUNTY.
DOLTAVITES)	CTD 4TFC\\/TFC\	OD TEGTTVE(C)	IMP	LEMEN	TATIC	N ST	ATUS	CT 4TH C (GOODDTN ATTN C ACTN GV(TCC)
POLICY(IES)	STRATEGY(IES)	OBJECTIVE(S)	2014	2015	2016	2017	2018	STATUS/COORDINATING AGENCY(IES)
Increase public awareness and support for the need to address LMI housing conditions and affordability.	safe, clean, healthy, accessible and appropriate housing into the policies, programs, plans and regulations of local	Identify opportunities and target needed change in the Housing Voucher Programs, Building Codes, Health Codes, Subdivision Regulations, Zoning Regulations, Comprehensive Plans, Strategic Plans, etc., to ensure that housing is addressed and that housing standards, choice and affordability are integrated therein.	C	✓	✓	✓	✓	In 2015, agreement on the specific standards, letters of support and a FINAL MOU were completed and integrated into the AMHA and WOCAP Section 8 and Housing Voucher programs. The MOU continues to support the delivery of tenants to clean, healthy housing amongst participating human and social service agencies. In 2017 conversations and interest in developing the Community Health Improvement Plan began to include clean, safe, healthy and accessible housing. The RPC has completed Comprehensive Plans in Cairo (2015), Elida (2015), Perry (2015), Auglaize (2017), and Bath (2017). In 2018, Allen County Public Health initiated its Community Health Improvement Plan (CHIP) planning process and when adopted targeted the maintenance of "safe, clean & healthy" housing.
programming to support and guide local housing organizations, LMI	standards and responsibilities of property owners and landlords as to what clean, safe, healthy, and affordable housing	Develop a forum for a broad-based group of like-minded individuals to provide crystal clear direction and advocacy.	O	(P	✓	✓	Initiated in 2014, WOCAP, Allen Metropolitan Housing Authority (AMHA), Lima-Allen County Neighborhoods in Partnership (LACNIP), members of Lima Allen County Housing Consortium and staffers of local government and social service agencies researched and supported the development of specific uniform standards in 2017 stipulating when homes were safe, clean and healthy. This activity will need to part of any future FHP efforts.
advocacy groups, financial institutions, health professionals, local developers, property owners, renters, and local political subdivisions in the redevelopment of		Develop informational packets that can be easily understood and distributed for public consumption.	✓					A Housing Guide was developed by WOCAP, City of Lima and RPC in 2014. The guide targeted renters and detailed responsibilities of landlords and owner occupants. The guide was a "How To" select a new rental unit and emphasized the need for safe, clean, healthy and accessible properties; pamphlets were re-printed & distributed thru 2018.
the local housing stock and stabilization of area neighborhoods.		Institute Landlord & Public Housing Training and Tennant/Landlord Dispute Mediation Services.	√	✓	✓	✓	✓	WOCAP has provided training and mediation services to local landlords since 2014. In 2018 WOCAP and AMHA provided free training to 21 local landlords for the purpose of recruitment of landlords into WOCAP and AMHA rent assistance and section 8 programs to increase quality affordable housing. WOCAP services continue but are underutilized. This activity will need to part of any future FHP efforts.
		Develop a Landlord Licensure & Rental Registry program within the City of Lima.	(B	(P)	X	(P)	Even with extensive media coverage, a broad base of activists and moral support, attempts to develop regulatory policy in 2016 and 2017 failed to curry favor with Lima City Council in November 2017; 2018 saw some progress and renewed interest within Lima City Council but interest outside of the City is politically absent.
Maximize public awareness of existing and available housing programs and services for the LMI homeowners and renters.		Develop, support and market supportive services and programming targeting the home ownership of first time LMI home buyers; and, the necessity to address home maintenance and family budgeting required to retain the home after its purchase. • Financial Literacy Training • Preventative Maintenance (PM) Training • Home Repair/Rehabilitation Programs • HEAP Assistance • LIHEAP • PIPP • Weatherization Programming • Home Ownership	✓	✓	✓	✓	~	The City of Lima and WOCAP have coordinated to provide Financial Literacy Training on a quarterly basis. Housing counseling and homeownership classes provide technical assistance for homeowners and home buyers. Programming works to identify the personal finances necessary to support home ownership and increase the capacity of first-time home buyers in order to maintain and retain the home after its purchase. Since 2014, WOCAP has completed a minimum 4 Homeownership Program classes each year. In 2015, Superior Federal Credit Union provided WOCAP down payment assistance up to \$4,000 for 15 LMI homeowners. The program ended in 2018 with 10 homes purchased in Allen, and 5 in surrounding counties. Since 2014 Preventative Maintenance Training has been offered by WOCAP in concert with New Lima whereby the Maintenance Training is part of the First Home Lima (FHL) Program and where participants of FHL attend class. Each participant prepared a maintenance plan to receive course credits. The City of Lima and the RPC provide CDBG monies to assist with eligible emergency repair and housing rehabilitation across the community. The Home Energy Assistance Program (HEAP/LIHEAP) provides funding for certain LMI households when needed to meet the high costs of heating and cooling their homes. WOCAP supports American Electric Power Community Assistance Program which supports low income consumer education, insulation and appliance replacement to incur energy savings. Local agencies are notified in the Lima News, agency newsletters, press releases, local electronic media outlets, and social media to promote the availability of such local programs and services. The City of Lima, LACNIP, WOCAP and First Federal Bank have worked to re-institute the Annual Home Ownership Fair. This activity will need to part of any future FHP efforts.
		Identify additional alternative funding sources to advance public information and awareness campaigns, special projects, or to match grant opportunities deemed necessary to advance and support the development of safe, clean, healthy & affordable housing for LMI and protected classes.	(4)	P	((✓	In 2018, WOCAP worked with the Lima Rotarians to raise the funding needed to serve the homeless. The Rotarians provided match monies necessary to support the "No Excuses" campaign and to provide awareness to chronically homeless individuals who are in need of assistance. An additional \$10,000, was able to serve 42 individuals in 17 families that could not stay in any shelter. The funds paid for 38 weeks of beds or hotel rooms; 11 families were eventually housed, 9 of which WOCAP assisted with rent. WOCAP spent another \$30,535 of CSBG funds for rooms or beds that served 71 individuals in 31 families, 15 families were rehoused, 13 with rent assistance through WOCAP. This activity will be essential to future FHP efforts as CDBG monies continue to dwindle.

TABLE 5-2 GOAL: EXPAND THE RANGE OF AVAILABLE, ACCESSIBLE & APPROPRIATE HOUSING OPPORTUNITIES TO MEET THE NEEDS OF THE DISABLED.

							ATUS	
POLICY	STRATEGY	OBJECTIVES	2014	2015	2016	2017	2018	STATUS/COORDINATING AGENCY(IES)
Support the (re)development of appropriate residential housing to meet the needs of special populations including all - especially the elderly and disabled residents.	Develop and maintain an active broad-based coalition of housing advocates representing governmental, social services, health care, financing and housing providers to address the needs of the elderly, disabled, low income, and homeless.	Develop appropriate services and housing for the elderly, disabled, ill and homeless.	&	(4)	(*)	(*)	P	This is an ongoing process requiring dedication and time to maintain a diverse group of individuals focused on disparate aspects of rendering public assistance services to the protected classes. Local housing advocates have been able to work collaboratively and coordinate unified positions on a number of housing programs, services and policies. The Allen County Housing Consortium reflects a broad spectrum of government and social service agencies, health care providers including mental health and substance abuse, faith-based organizations, banking interests, anti-poverty agencies, public housing and housing providers including: Aids Resource Center, Coleman, WOCAP, MHRSB, Crossroads Crisis Center, Guiding Light Maternity Home, Lima Samaritan House, ACJFS, Council on Aging, Huntington Bank, Superior Federal Credit Union, First Federal Bank, Family Promise, ONU Legal Clinic, YMCA, New Lima, AMHA, Lima, and the RPC. In 2018, the Coalition undertook an examination of its mission and began to investigate whether member efforts undertaking a focused committee-based structure relative to, the Continuum of Care, chronically homelessness, developing affordable housing, and supportive housing services would be more productive. Each committee is now working goals, and identifying what is already in place. In 2018, the Allen County Community Health Improvement Plan incorporated the Housing Consortium's goals of increasing safe, healthy and affordable housing to the CHIP plan. The addition adds both hospitals, Ohio State University, the Chamber of Commerce, Allen County Public Health, United Way, Allen Economic Development Group to the list of stakeholders who want to improve housing. As some of these affected populations continue to grow in size and proportion this activity will need to be part of any future FHP activities.
		Quantify/establish special needs of distinct populations annually.	✓	√	✓	✓	✓	The RPC has developed annual estimates of the protected classes under Title VI and Executive Order 12898 (EJ) inclusive of the disabled population by mobility limitation using secondary data sources annually. The homeless population remains elusive and the numbers of those suffering from a specific disability type remains difficult to document. The "Blueprint to End Homelessness" identified 202 individuals in need of supportive housing between the ages of 19 and 59. The RPC worked with local school districts to identify 59 Limited English Proficiency (LEP) households in 2015. The RPC also worked with the local Learning Center to document those adults who suffered from low literacy comprehension. The LLC population aged 16+ are estimated at 11,950 in 2017. In 2018, the RPC worked to provide an enumeration of disability types across Allen County using census data. In 2018, the Housing Consortium used HMIS reports to define disabilities assigned to the homeless population. This activity is essential to guide ongoing FHP activities.
		Advance new supportive housing developments to meet the needs of the chronic homeless population with social services including mental health care.	(✓		O	(4)	As a direct result of ongoing collaboration between Coleman Professional Services, Testa Enterprises, the City of Lima and AMHA to meet the need for supportive housing in Allen County Union Square was developed in 2015 as a 24-unit permanent supportive housing development. The project was located at 200 E. Elm Street in downtown Lima with direct access to public transportation, health and social services. Residents are a blended population including the homeless, those at-risk of homelessness, those with serious long_term disabilities, mental illness, addiction, and those with intellectual or developmental disabilities. While no other comparable development has been developed since 2015, New Lima has worked with the City of Lima to develop an 88-unit supportive housing project in the former YWCA in 2018. Given the size and need of the special needs population such activities will need to be an integral part of any future FHP efforts.
		Coordinate efforts of local social and health service agencies, including substance abuse & mental health services to develop an effective public information & education campaign targeting housing for special needs populations.	✓	✓	✓	✓	✓	Collaboration between the MHRSB and Coleman Professional Services established monthly forums locally known as "Open Gate" which serves as a 1-Stop community resource center where public information on local housing opportunities are shared and residents can be screened for a variety of local community resources including behavioral health services, employment services, medical services and utility assistance. Coleman Professional Services also offers walk-in access at its South Main St. facility during business hours and at the Crisis Stabilization Unit during evening/weekend hours. The 24-hour access allows those with special needs to receive a screening that identifies needed community resources including a full housing assessment. Coleman and MHRSB continue to attend and participate in meetings with the Housing Consortium and the Region 12 Continuum of Care to discuss and market housing opportunities with other community resources for those with special needs requirements. In 2018, The Rotarians and WOCAP underwrote the "No Excuses" campaign to provide awareness to chronically homeless individuals who are in need of assistance. With such generosity WOCAP was able to provide 113 individuals and 32 families housing for 38 weeks. This will continue as an active and ongoing FH element.

TABLE 5-3 GOAL: EXPAND AVAILABLE HOUSING OPPORTUNITIES TO MEET THE NEEDS OF ALL ALLEN COUNTY RESIDENTS.

DOLTO	CTD ATECV	OD TESTIVES	IMP	LEMEN	TATIC	ON STA	TUS	CT ATUS (GOODDTNIATTNIS ASSNIGATES)
POLICY	STRATEGY	OBJECTIVES	2014	2015	2016	2017	2018	STATUS/COORDINATING AGENCY(IES)
Develop alternative housing types to meet the physical and social needs of residents.	Develop appropriate, accessible and affordable housing for senior citizens.	Assist New Lima and other developers in obtaining OHFA low income tax credit funding for housing projects.	✓	√	✓	√	√	In 2014 the City of Lima assisted New Lima with ancillary funding for the Whittier Place project in 2014. In 2014 and 2015, the City worked to successfully to support the siting of Union Square Project. In 2017 the City of Lima and WOCAP worked successfully to secure LIHTC funding for the 43 Town Square project. In 2018 the City of Lima worked with New Lima and a partner developer to make application for LIHTC for a new 88-unit senior housing project in the former YWCA.
		Allow seniors to remain independent as long as feasible.	√	✓	✓	✓	✓	The Area Agency on Aging, ACCOA, Delphos Senior Citizens, and Senior Services Center, work off of informal, semi-formal and formal referrals for senior's health and well-being. Programming including home-delivered meals, chore services including other than routine cleaning, transportation and socialization services. Homemaker services, emergency response services, medical equipment, that are available thru Medicaid are provided under AAA³ case management and home health care agencies. Home Weatherization and Home Repair referrals are made by "senior" agencies as provided by HWAP, WSOS, City of Lima and RPC. Given the growing size and proportion of the senior population, this activity will continue in future FHP efforts.
		Develop appropriate housing in proximity to shopping, medical facilities, social services, and public transit to support their ability to remain independent.		((•	✓	In 2015 the City of Lima had ongoing conversations with New Lima for a new proposed Senior Housing development near downtown and its environs/services. Discussions in 2018 with New Lima targeted areas near the American Mall, and the Allentown and Eastown area. In 2018, the City of Lima funded New Lima's construction of additional senior rental units near the existing Shirley Daley Senior Village through its HOME program. These units have good access to transportation and various services. New Lima and a partner developer are planning a new senior development in the heart of downtown Lima, and are evaluating other sites for future development.
		Promote and encourage the use of universal design standards for all newly constructed housing.	X	X	X	X	X	No work has been completed to date. Discussions with Habitat and Senior organizations suggest this objective is an important agenda item but a sense of urgency and a lack of commitment continued to exists thru 2018.
	Promote alternative housing to support live-work spaces and a wide variety of housing choice.		&	e	O	O	O	In 2015 the RPC worked with the Village of Elida and Perry Township to develop new zoning standards for residential and mixed-use planned unit development districts (PUDs). The Village of Elida focused on the SR 309 corridor as well as the Central Business District (CBD). Perry Township efforts focused on a repurposing and increased density in the Eastgate area on SR 309. In 2016 and 2017 the RPC worked with Bath Township to promote commercial and higher density infill development along the SR 309 and SR 65 corridors. Such areas in Bath, Elida and Perry are currently receiving public transit services and offer ready access to social service amenities. In 2017, the RPC worked with Auglaize Township to support more sustainable, high density development in the hamlet of Westminster. In 2018 the RPC worked with New Lima to identify potential opportunity zones. In 2018 Bath Township began to investigate new legislation supporting mixed use development.
			P	(((P	In 2014 & 2015, the RPC worked with Perry Township and the Village of Elida to adopt comprehensive plans targeting the redevelopment of SR 309, Greely Chapel and SR 117 in Perry Township; and SR 309 and Greenlawn in Elida. In 2016 & 2017 the RPC prepared redevelopment scenarios in Auglaize and Bath townships targeting the redevelopment of SR 117 and SR 65. In 2017 & 2018 discussions regarding building codes in Allen County was ongoing and press coverage was intensive. Discussion was focused upon commercial residential codes but there was little appetite for residential building codes being adopted by jurisdictions other than the City of Lima.
Support a wider geographic availability of appropriate housing.	Identify the type of housing available across the community by type and location.	Quantify/establish the range of housing by type and location.	✓	✓	✓	✓	✓	Over the 2014-2018 period the RPC has worked to document the housing stock in Auglaize, Bath, Jackson, Perry, Richland and Shawnee townships. In 2014 and again in 2017, the RPC also worked with Allen County Auditor, City of Lima and LACNIP to inventory the housing stock in the NW Perry, Lakewood West, Country Club Hills, City View Terrace, Boulevard Westgate, Southside, Riverside and Northside neighborhoods. In 2015 and 2018 the Allen County Council on Aging (ACCOA) documented the extent of subsidized housing available to senior citizens by provider. Data on units, availability, address and vacancy were documented as were names/phone numbers of site managers. In 2018 the AEDG commissioned a housing study of the community - results pending.
	Develop the fiscal and legislative ability to identify appropriate land/property to develop residential housing alternatives for special needs population.		✓	√	✓	✓	✓	In 2014, the RPC worked with Shawnee Township to downsize the minimum square footage requirements of homes and lots in large lot residential, planned unit development and historic districts. In 2015 the RPC worked with the Village of Elida and Perry Township to downsize square footage requirements for multi-family and SF residential lots and units. In 2016 and 2017, the RPC worked with Auglaize and Bath townships to minimize lot sizes and introduce higher density housing within its traditional Euclidean zoning codes and adopting PUDs to better integrate and establish mixed uses as formal districts. In, 2018 the RPC reviewed local zoning and subdivision regulations to assess compliance with FHP principles. Testing activities will need to continue to advance FH goals.

TABLE 5-4 GOAL: DEVELOP NEIGHBORHOOD & CORRIDOR PLANS TO ENSURE SUPPORTIVE ENVIRONMENTS FOR REDEVELOPMENT.

	60	AL: DEVELOP NEIGHBORHOOD & CORRIDOR PLANS TO	ENSU	IRE SU	PPORT:	IVE EN	NVIRON	NMENTS FOR REDEVELOPMENT.
POLI <i>C</i> Y	STRATEGY	OBJECTIVES					ATUS	STATUS/COORDINATING AGENCY(IES)
Promote community development and affordable housing using strategic, proactive land assembly.	Work with local stakeholders including CDC's, developers, market analysts and/or community to identify acquisition strategies for priority areas for development of housing.	Complete corridor development plans for South Main, Bellefontaine corridors and state routes in adjacent townships/villages.	2014 ✓	✓	(P)	(P)	(*)	The City of Lima completed corridor development plans for South Main and Bellefontaine. While the plans were both developed in 2014 the City of Lima failed to adopt the Bellefontaine Corridor study. The RPC targeted development on the SR 309, Greely Chapel and SR 117 corridors in Perry Township; and SR 309 and Greenlawn in Elida in 2014 with formal adoption achieved in 2015. The RPC proposed redevelopment along the SR 309 and SR 65 corridors in Bath Township in 2016 and 2017. The RPC proposed a corridor redevelopment plan along SR 117 in Auglaize Township in 2017. The RPC reviewed commercial redevelopment along the SR 309 and SR 117 area in Bath Township in 2018. In 2018 Bath Township began to investigate new legislation supporting mixed use development.
		Complete township/village comprehensive plans, and neighborhood development plans including Kibby Corners and Riverside North Neighborhood Plans.	0	(4)	✓	✓	✓	A considerable amount of work was completed in 2014 and 2015 to develop, comprehensive plans for the villages of Cairo & Elida as well as Perry Township - all approved in 2015. The RPC undertook the preparation of comprehensive plans in 2016 for Auglaize, Bath and Richland townships. Auglaize and Bath Plans were successfully completed in 2017; work in Richland Township continued thru 2018.
		Identify and remediate Brownfield sites necessary to support existing and future housing development.	0	(•	In 2014, the City of Lima and Allen County submitted an unsuccessful grant application to identify brownfield s to the EPA; a revised grant application was submitted in 2015 but was also unsuccessful. In 2018 the City of Lima identified specific brownfield sites for redevelopment. The City sought assistance through the State of Ohio Brownfield Program but it was determined that sites in Lima did not meet eligibility criteria. Future efforts can be expected.
	Strengthen land bank holdings.	Complete strategic review of vacant and abandoned properties for land bank acquisition.	✓	œ	✓	✓	✓	In 2014 and 2015 the City of Lima and RPC began the process of inventorying vacant parcels. The City of Lima Land Reutilization Program which includes the Lima Land Bank Program was created to foster the return of nonproductive land within its boundaries to tax revenue generating status or devotion to public use Both the City and County Land Banks have been judicious in efforts to identify parcels that could be cleared and repurposed based on the interests of adjacent property owners or willing buyers. The City of Lima Land Bank typically holds between 45-50 parcels for redevelopment. The County Land Bank currently holds 230 parcels that are available for reuse by qualified applicants. In 2018 the City of Lima identified and pursued acquisition of four vacant, abandoned properties for strategic neighborhood redevelopment.
		Rezone areas to reflect optimal land use and redevelopment plans.	√	√	√	✓	✓	Over the 2014 thru 2018 period, the RPC was able to support rezoning efforts in the villages of Cairo and Elida as well as in American (6), Bath (2), Jackson (3) Marion (3), Perry (4), Shawnee (8), and Spencer (2) townships in order to support sustainable development and accommodate higher density housing in mixed use developments without establishing conflicts. The City of Lima adopted an overlay zoning district to promote optimal redevelopment of the South Main Street Corridor.
		Develop property maintenance capacity and standards for holding property until it can be reused at its highest and best use.	✓	✓	✓	✓	✓	The City and County have adopted property maintenance standards for Land Bank properties. Contracts exist for the provision of basic yard maintenance and securement of properties where structures remain. Given the extent of housing units slated for demolition and the financial costs and political pressure now placed on the County and City Land Banks for maintenance this will likely be an ongoing CDBG activity.
		Identify and demolish deteriorated residential and commercial structures needed to assemble sites and support redevelopment.	✓	~	✓	√	✓	Over the 2014-2018 period 368 housing structures were demolished in the City of Lima. The City of Lima has been able to identify and demolish abandoned blighting residential units in strategic neighborhoods and placed same into a land bank for future use. Sites within the County have been identified by each of the townships and villages independently; however, the County Land Bank has selectively demolished structures on the basis of safety as well as reuse. The County Land Bank has worked with social/human service agencies, including ACBDD and Habitat, to advance redevelopment for special needs populations. The City of Lima supports targeted demolition activities with various sources of funding including CDBG allocations. The City is currently working to identify socially-responsible developers for redevelopment of sites in the City's Land Bank. Given the extent of housing units slated for demolition efforts to identify potential opportunities will only increase.
		Identify, demolish deteriorated residential and commercial structures needed to assemble sites and support redevelopment.	✓	✓	✓	✓	✓	Over the 2014-2018 period 368 housing structures were demolished in the City of Lima. The City of Lima been able to identify and demolish abandoned blighting residential units in strategic neighborhoods and placed same into a land bank for future use. Sites within the County have been identified by each of the township and villages independently; however, the County Land Bank has selectively demolished structures on the basis of safety as well as reuse. The County Land Bank has worked with social and human service agencies, including ACBDD and Habitat, to advance redevelopment for special needs populations. The City of Lima supports targeted demolition activities with various sources of funding including CDBG allocations. The City is currently working to identify socially-responsible developers for redevelopment of sites in the City's Land Bank.

TABLE 5-5 GOAL: PROVIDE HOUSING OPTIONS IN NEIGHBORHOODS THAT RESPECT ARCHITECTURAL CHARACTER WHILE MAXIMIZING HOUSING CHOICE.

POLICY	STRATEGY	OBJECTIVES	IMP	LEMEN	TATIO	N STA	TUS	STATUS/COORDINATING AGENCY(IES)
FOLICY	SIRATEGY	OBJECTIVES	2014	2015	2016	2017	2018	STATUS/COORDINATING AGENCY(IES)
Support a wide range of appropriate housing types to meet the needs of area neighborhoods.	Identify and determine the appropriate mix of housing types within specific locales.	Develop specific plans for communities, neighborhoods and corridors to ensure housing is appropriately understood and addressed in policy development.	✓	✓	✓	✓	(4)	The City of Lima developed the South Main and Bellefontaine corridor plans in 2014. In 2014, the City and County implemented an adopted Analysis of Impediments: Affirmatively Furthering Fair Housing Choice. In 2015, the Village of Cairo, Village of Elida and Perry Township reviewed their existing housing characteristics and established specific policies to improve housing within their respective communities. In 2017 housing and housing policies were integrated within the Comprehensive Plans of Auglaize and Bath townships. In 2018 Richland Township housing was analyzed - policies were reviewed but not approved.
	Promote and encourage the use of universal design standards for all newly constructed housing; provide design info to developers via planning/zoning officials.	Increase the number of safe, accessible and appropriate housing for residents of all incomes, ages, ability levels and social circumstances.	X	X	X	X	X	No work has been completed to date. Discussions with Habitat and Senior organizations suggest this objective is an important agenda item but a sense of urgency and a lack of commitment continued to exist thru 2018. This strategy deserves a champion to support this FH component.
Integrate LMI housing into existing and proposed mixed use neighborhoods.	Provide financial incentives to development that improves housing quality within specific neighborhoods and increases the affordability of housing for low-and- moderate income families.	Recognize and develop incentives for private sector development that satisfies market demands while incorporating innovation in projects that increase housing choice.	✓	B	()	✓	✓	The City of Lima and Coleman Professional Services worked with several consultants to develop supportive housing engendered in the Union Square project. The City of Lima, Rhodes State College and local elected state representatives worked with several consultants and the WODA GROUP to develop successful financing and a municipal service package that ultimately initiated the siting of the 43 Town Square Project and the Rhodes State Project within the Central Business District of the City of Lima. Moving forward this activity will need to continue.
		Maximize the use of Low-Income Housing Tax Credits the Ohio Housing Trust Fund, Tax Exempt Bonds and the Home Program.	✓	(O	()	(Coleman Professional Services and the City of Lima secured financial assistance for the Union Square project. New Lima and the City of Lima worked with consultants to prepare application for LIHTC and historic Tax Credits for the renovation of the former YWCA project. Increased awareness of such funding is necessary.
Support the interest and capacity of local partners to rebuild the	Ensure that the design of new and renovated houses/commercial structures	Implement a design review process that is effective, expeditious and equitable.	\odot	✓				In 2015 Lima implemented design review standards for the Downtown Lima Business District addressing commercial and mixed-use development. No such work was begun in unincorporated areas.
architecture and streetscape of the community's neighborhoods.	complements the character of the surrounding neighborhood.	Implement design review of Downtown Lima Business District and Bellefontaine Corridor.	0	✓			(Drafted in 2014, the City of Lima failed to adopted the Bellefontaine Corridor study. In 2015 Lima implemented design review standards for the Downtown Lima Business District addressing commercial and mixed-use development. In 2018, Bath Township began to investigate the potential of new legislation to accomplish same.
	Examine local zoning and land use controls to support infill development plans.	Establish guidelines and policies for redevelopment proposals to share with developers.	(→	((✓	The City of Lima established guidelines and policies for redevelopment proposals; such guidelines are posted to its website. In 2015 the RPC worked with Perry Township to adopt landscaping and entryway design standards for commercial and residential developments. In 2016 and 2017 the RPC worked with Shawnee Township to integrate design criteria for commercial/industrial properties. The City of Lima Land Bank revised its policies in 2018 to facilitate developer acquisition of vacant lots for infill development and began foreclosure action on its first parcel for proposed new construction of a single-family home within an established neighborhood.
		Redevelop neighborhood housing structures and green space in a manner that respects existing neighborhood dynamics.	→	→	✓	✓	✓	In 2014, the City of Lima completed the West & Elizabeth St. Project. The project modified traffic to 1-way streets with bike lanes, provided ADA ramps and reverse angle parking. Trees were established along the corridors; shrubs and perennials were integrated within the landscape within stormwater gardens. In 2014 the All-Lima Bikeway Phase V Project integrated ADA Ramps and shade trees. The RPC worked with Shawnee Township to develop greenscaping and hardscaping requirements for commercial and industrial properties abutting residential properties in 2014. In 2014 the RPC worked with the Village of Lafayette and PDG to develop a neighborhood revitalization plan and an unsuccessful CDBG grant application to address the commercial revitalization of Main St. In 2015 the City of Lima completed the East Kibby St. Project that added 5' sidewalks, ADA ramps and shade trees. In 2015 the RPC worked with Village of Cairo on the Main Street Project that was funded with 5' sidewalks. In 2015 the City of Lima constructed a new parking lot at the corner of High and Central. The parking lot incorporated pervious pavement and shade trees. In 2016, the RPC assisted the villages of Elida and Cairo upgrade SR 309 and Main St. respectively. New curbs, gutters, sidewalks and storm water facilities were integrated into the projects. In 2017 the RPC assisted Bluffton in the construction of a 1-mile 10' bike connector and the construction of new 5' sidewalks on Cable Rd within the City of Lima. In 2018, ODOT, Lima and the RPC completed improvements on SR 65 to include new stormwater improvements, pavement, curbs, gutters and 5' sidewalks. LACNIP continues to assist in maintaining community gardens with plans for more.
		Work with local universities, non-profits and/or philanthropic organizations to develop prototype buildings suitable for replacement of common older obsolete structures including both large and small commercial buildings.		(((In 2015 the City of Lima networked with Ohio State University and undertook a technical analysis of vacant and blighted parcels to develop strategies for repurposing such land. The City of Lima issued an RFP in 2015 to secure a developer to renovate the historic structure at 43 Town Square into 47 residential rental units. The City provided assistance with HOME funds to support the project. The renovation is expected to be complete in 2019.

TABLE 5-6 GOAL: ELIMINATE HOMELESSNESS IN ALLEN COUNTY.

		GOAL: ELIMINATE HOMI		1200 .	IN ADD	.2.1 00	01117 .	
POLICY	STRATEGY	OBJECTIVES OBJECTIVES		LEMEN	1	1	1	COORDINATING AGENCY(IES)
			2014	2015	2016	2017	2018	3
Support the efforts of a local multi- agency coalition focused on a	Establish community based educational programming to further local resident understanding and public acceptance.	Establish baseline of community homeless problem.	✓	✓	✓	✓	✓	The Continuum of Care members and WOCAP complete a Point in Time Analysis of homeless persons annually. Point in Time data revealed the following populations: 2014 (69), 2015 (73), 2016 (78), 2017 (81), and 2018 (54).
comprehensive strategy that delivers emergency shelter services, medical services, social services, permanent supportive housing, and job training to combat homelessness.	Assure that everyone with an emergency programs providing assistance in previous programs providing assistance program programs providing assistance program program program programs prog		✓	✓	√	✓	✓	WOCAP's overall rental programs including: HCRP, TBRA, and HUD Housing Counseling Grant programs provide case-by-case management, resource information, education and budgeting. The rental programs also offer follow-up service on a case-by-case basis. WOCAP provides Fair Housing education to community members and those in the housing profession. Customers and clients are typically referred by Fair Housing (WOCAP) to legal services provided by Legal Aid of Western Ohio or Advocates for Basic Legal Equality for assistance with landlord tenant cases that require legal representation. In 2014 and 2015 WOCAP provided fair housing and tenant landlord information to 639 persons, of which 15 were referred to the Ohio Civil Rights Commission (OCRC) with no findings reported. In 2016 there were 268 calls or which 8 were referred to the OCRC. In 2017 there were 302 calls and 5 sent to OCRC, In 2018 282 persons were counseled by WOCAP with no referrals to OCRC. AMHA provides Family Self Sufficiency programming that helps families repair their credit, get out of debt, earn their college degrees, find well-paying jobs and purchase homes.
	need for shelter has access to shelter.	Encourage all homeless service providers to adopt a housing first policy which seeks to minimize shelter stays and stabilize individuals and families as soon as feasible within permanent housing linked to supportive services as needed.	✓	✓	✓	✓	✓	In 2014 WOCAP worked with the Allen County Housing Consortium - Continuum of Care membership, the Ohio Department of Jobs & Family Services, the Allen County Department of Jobs and Family Services, Family Promise. Samaritan House Allen County Children's Service Board, Allen County Metropolitan Housing Authority, Coleman Professional Services, Lima Rescue Mission, Our Daily Bread, Safe Harbor and St Rita's Medical Center to adopt a Housing 1st Model and signed-on to the Region 12 MOU for Coordination of Homelessness Plan. The model states that maintaining or obtaining housing is the first priority when providing any Homeless service dollars for families. WOCAP developed a Coordinated Entry Plan with ODJFS and the Samaritan House. Within this plan the Samaritan House sends a copy of the persons application over to WOCAP, if WOCAP is out of funds a letter is forwarded to ODJFS notifying them that the person was denied due to lack of funding. This system allows WOCAP to begin working on a long-term housing solution for the family as soon as they enter the Samaritan House. The MOU has remained in place since 2015. In 2018, the Coordinated Entry Plan was revised with additional State required language that included naming only three entities as access entry points, Family Promise, Samaritan House and Wocap. All other entities will refer or deliver clients to these access points.
		Utilize street outreach workers to seek out those homeless persons living outside the shelter system. Coordinate through Blueprint for Homelessness.	✓	✓	✓	✓	✓	Since 2014 WOCAP has coordinated social service agency efforts across the region (Allen, Auglaize & Mercer) with CoOhio to count homeless persons living outside the shelter system.
	Within the shelter system, provide immediate assessment and linkages to case management and mainstream social services, including agencies providing mental health care, substance abuse treatment, medical services and assistance to veterans. Blueprint for Homelessness.	Provide referral and services for the homeless.	✓	✓	✓	✓	✓	In 2014, a dozen agencies agreed to adopt a Housing 1 st Model and signed-on to the Region 12 MOU for Coordination of Homelessness Plan. This plan is a coordinated effort between partners that ensures that individuals that present themselves in an emergency state of homelessness will receive accelerated/escalated services. The MOU has remained in place thru 2018.
	Continue to support the production of permanent supportive housing units that can offer the opportunity for long-term homeless persons to leave the shelter system.	Establish supportive housing in Allen County.	e	✓			O	Initiated in 2014 the City of Lima and Coleman Services took the opportunity to provide supportive housing units for Veterans requiring mental health services. Union Square was developed in 2015 as a 24-unit permanent supportive housing development. AMHA continues to administer 32 project-based vouchers (PBV) for special needs and supportive housing. In 2015, WOCAP leveraged HCRP to support 5 persons residency within Union Square project. In 2018, New Lima and the City of Lima made application to redevelop the former YWCA.
	Work with the criminal justice system to strengthen the support for the reentry into the community of person returning from incarceration. Blueprint for homelessness.	Include criminal justice system in homeless prevention planning.	✓	✓	✓	✓	✓	Since 2014 WOCAP has continued to work with interested partners in the criminal justice system to strengthen the support for the reentry into the community of persons returning from incarceration. WOCAP created and signed on to the Region 12 MOU Coordinated Plan for Homeless individuals. This Plan is a coordinated effort between partners that ensures that individuals, that present themselves in an emergency state of homelessness may receive escalated services. The Plan allows a flow of communication to all that sign off on the MOU including the City of Lima Police Department and Allen County Sheriff.

		TA GOAL: IDENTIFY, ASSEMBLE & DEVELOP UNDERUTILI	ABLE 5		OR FU	TURE R	REDEVE	LOPMENT OPPORTUNITIES.
DOLTOV/TEC)	CTDATECW(TEC)	OBJECTIVES	IMP	LEMEN	NTATIO	N STA	ATUS	STATUS/COORDINATION/AGENCY(IES)
POLICY(IES)	STRATEGY(IES)	OBJECTIVES	2014	2015	2016	2017	2018	STATUS/COORDINATION/AGENCY(IES)
Support private housing investments and public revitalization efforts in area neighborhoods across the community.	Develop independent neighborhood redevelopment plans with local neighborhood associations business partners and government officials to provide support, direction and funding necessary for neighborhood revitalization.	Develop neighborhood-based plans that work to prioritize problems and identify needed capital expenditures including the removal of blighting conditions, housing rehabilitation, crime, and capital improvements including streets, curbs and gutters to increase curb appeal to support neighborhood investments and stability.	✓			✓		In 2014, the City of Lima worked with the Kibby Corner's Development Corporation to develop a zoning overlay district along South Main Street intended to provide guidance for revitalization and redevelopment of the corridor. A mixture of uses was planned for the district to enhance economic sustainability. The overlay requirements have since been applied in order to direct desirable development to the corridor. In 2017, the RPC worked with Jackson Township to identify land use conflicts in the hamlets of Westminster, West Newton and Maysville and made recommendations for certain policy, regulatory and capital improvements; zoning changes were made shortly thereafter.
		Identify, prioritize and mitigate existing obstacles to neighborhood investments and revitalization efforts.			✓	✓	✓	In 2016, the City Land Bank, acquired several parcels of land along the South Main St corridor mitigate declining property values and stabilize the neighboring properties. In 2018 the City of Lima began acquisition of more parcels in the South Main corridor that became eligible for the land bank process and is establishing a plan for future development of those parcels.
Support the revitalization and redevelopment of older commercial corridors serving the community.	Develop corridor plans that minimize congestion and advance economic development opportunities with local businesses, governments and area neighborhoods in order to drive and support the capital investments necessary to advance economic opportunities and	Develop corridor plans that foster improved accessibility, with multiple mobility options and increased safety using a complete street philosophy.		P	✓	✓	✓	In 2016, the Village of Cairo worked with ODOT and the RPC to reconstruct the Historic Lincoln Hwy with new storm drainage, curbs, gutters, signage, pavement and bike lanes; total project costs \$1.6M. In 2017, the City of Delphos worked with ODOT and the RPC to develop a complete street plan for the 5th St Corridor which was also identified as US 44 BR; project costs total \$11M. In 2018, the City of Lima worked with ODOT and the RPC to develop the Wayne Street project which will serve to return traffic to a 2-way flow between Wayne and Cole, provide new curbs, gutters, sidewalks, signage and pavement. The project will minimize traffic and slow traffic and allow the neighborhood to return to a slower-paced residential neighborhood. Project costs \$1.9M.
	enhance QOL.	Maximize the use of existing public infrastructure and support redevelopment within the urban core of local communities.	(4)	(O	(B	The City of Lima worked with ODOT and the RPC to develop a RR grade separation on the I&O RR at the intersection of Elm. Shawnee & Calumet. An underpass and roundabout will facilitate traffic flow at slower speeds along the corridor. Total project costs \$12.8M. While construction began in 2018 completion is not expected until 2020.
		Develop corridor plans to identify potential employment, services, entertainment and recreation opportunities.		O		✓	~	In 2015, the Village of Bluffton worked with ODOT and the RPC to develop a corridor plan for Main St (SR 103) thru the Village. In 2017, the RPC worked with Jackson Township to maximize development potential along SR 309; zoning changes were made shortly thereafter. In 2018, the City of Lima worked with ODOT and the RPC to rehabilitate West St from Grand to SR 115 with new storm sewers, curbs, gutters, sidewalks, signage and pavement. Total project costs \$3.7M.
		Develop corridor plans to provide the engineering direction, preliminary costs and needed public participation.			✓	✓		In 2016, the Village of Bluffton worked with ODOT and the RPC to develop plans for the SR 103 Corridor; total project cost estimates approached \$10M; the project has since been pared down into multiple phases. In 2017, the City of Delphos worked with ODOT and the RPC to develop plans for the 5th St Corridor. Total project cost estimates approached \$11M; the project has since been pared down across 2 phases.
Demolish vacant and underutilized structures that cannot be rehabilitated in a cost-effective manner.		Redirect federal funds to concentrate a larger portion of those resources on the rehabilitation and demolition of vacant and abandoned property in areas with a specific redevelopment plan.	✓	✓	✓	✓	✓	The Village of Spencerville (12), Shawnee (4), and Perry townships have completed demolitions in targeted LMI neighborhoods to support redevelopment. Federal funds have not been available to support such activities and they have been forced to use the limited local monies in such strategic actions. The City has an active list of vacant and dangerous buildings using multiple sources of funding, including Federal, to demolish dilapidated structures. Ohio State University is currently working on mapping vacant residential properties and had contact with local nonprofits for future development plans. The County has not delegated funding for such purposes.
		Work with the City and County Land Banks to help assemble strategic tracts of land that can be repurposed for housing development.			✓	✓	✓	The City and County Land Banks have actively pursued the demolition of targeted properties. Since 2014 the City has demolished some 70 SF structures and 5 Two-Family vacant structures. A total of 368 Single Family, 45-Two Family, and 2 Three-Family structures have been demolished since 2014. The County has demolished 233 units over the 2016-2018 period. While the first priority is always safety, local political subdivisions were targeting redevelopment as a priority from 2016 forward.

TABLE 5-8 GOAL: SAFE, ACCESSIBLE, APPROPRIATE & AFFORDABLE HOUSING IN OUR NEIGHBORHOODS.

		GUAL: SAFE, ACCESSIBLE, APPROPRIATE &	AI I ORDADI	L FIOO	21146 1	LIN OOK	. NEIBURIOUSS.
POLICY	STRATEGY	OBJECTIVES	IMPLEME	NTATI	ON ST	ATUS	STATUS/COORDINATING AGENCY(IES)
, 65267	S	0504072740	2014 201	.5 201	2017	7 2018	
	developments with the infrastructure necessary to meet the employment, physical, social and transportation needs of area residents especially the very	Ensure compliance with requirements concerning the creation of accessible units for new construction or substantial rehabilitation housing development being assisted with OFHA, CDBG, HOME or other federal funds.	✓ ✓	✓	✓	✓	Habitat homes constructed built in Allen County are all readily accessible (1-8"entry step with ramps). The homes interiors are ADA accessible with respect to exterior entry/exits. Interior halls and doorways are all 36" wide. The Union Square project was designed and constructed in 2015 to meet commercial ADA standards. The 43 Town Square project was also built to meet current ADA standards. The Allen County Building Department has worked to ensure that every commercial residential structure built has met the ADA requirements.
	young, the elderly, and the increasing senior and disabled populations.	Develop Safe Route to School Plans to promote student safety, walkability and use of school buses and/or public transit where available.		✓		(2)	Several local communities working with ODOT and the RPC have developed Safe Route to School (SRTS) Plans for their students including the Village of Spencerville (2009), the Village of Elida (2011), and the City of Lima (2013). Collectively the 3 communities designed and constructed a number of safety treatments to enhance the walkability to local elementary and middle schools. In 2016, to serve their campus school setting Elida saw improvements located along Sunnydale from Baxter to Howard and on Pioneer from Sunnydale to Elida; improvements totaled \$19,602. STRS projects in Lima included the construction of sidewalks and intersection improvements near West, Unity, Heritage elementary schools and North Middle School; total improvements totaled \$488,856. At the Spencerville school campus, sidewalks and signage targeted 2 nd and Elizabeth and totaled \$98,5637. Acknowledging the success of their previous efforts Spencerville, Elida and Lima initiated an update to their former STRS Plan in 2018. The City of Delphos also started work towards completing such a Plan in 2018.
		Develop ADA Transition Plans to promote walkability and use of public transit.			P	(4)	In 2017 the RPC started working with the villages of Lafayette, Elida, and Beaverdam as well as the City of Delphos to adopt ADA Transition Plans. In 2018, Lafayette, Beaverdam and the City of Lima adopted Draft Plans.
		Integrate bicycle and pedestrian amenities using funding available from the Safe Route to School Program Transportation Alternative Program, Clean Ohio Program, MPO CMAQ and STP Program funding,	C	✓	✓		Using \$460,000 of SRTS Program funding Lima improved various intersections adjacent to West, Unity, Heritage elementary schools and North Middle School. Using MPO CMAQ monies in 2017 Lima worked with ODOT and the RPC to integrate sidewalks on Cable Road; project costs total \$400,000. Using MPO CMAQ monies in 2017 Bluffton worked with ODOT and the RPC to program \$260,000 to construct the Augsburger Rd. Pathway project.
Ensure the disabled have access to safe, appropriate and affordable housing.	Promote and encourage the use of universal design standards for all newly constructed housing.	Promote and encourage the use of universal design standards for all newly constructed housing; provide design info to developers via planning/zoning officials.	x x	X	X	X	No work has been completed to date. Discussions with Habitat and Senior organizations suggest this objective is an important agenda item but a sense of urgency and a lack of commitment continue to exist thru 2018.
	Enforce Fair Housing and ADA compliance.	Increase the number of safe, accessible and appropriate housing for residents of all incomes, ages, ability levels and social circumstances.	x x	X	X	X	No work has been completed to date. No data relative to the number of accessible units has been developed. Discussions with Habitat and Senior organizations suggest this objective is an important agenda item.
		Support increase Fair Housing Testing to support compliance.	✓ ✓	✓	✓	✓	WOCAP has provided Fair Housing Testing for both the City and the County to the extent funded. With no increase in funding since 2013 the ability to increase testing of compliance issues remains a challenge.
	community stakeholders to investigate a county-wide residential building and property maintenance standards and a	Develop a unified set of expectations and standards to ensure the residents' health, safety and welfare regardless of the neighborhood in which they reside.	e e	(4)	(4)	(4)	The Housing Consortium coupled with LACNIP provide 2 coalitions to be used as sounding boards for local governments interested in advancing such codes. A more holistic approach to establishing impacts and expectations across the county is still developing. This objective will remain a fundamental component of any future success.
	mechanism for continuous review and improvement of such standards to protect and enhance property values.	Investigate county-wide residential building and exterior maintenance codes.	(4)	(((Local governments need to work with LACNIP rr local neighborhood associations and the Housing Consortium to provide perspective and regarding the adoption of such codes. A more holistic approach to establishing impacts and expectations across the county is still developing.
		Target and address vacant and abandoned structures using code enforcement in a manner that stabilizes neighborhoods and protects property valuations.	✓	✓	✓	✓	Since 2014 local governments have demolished and removed more than 320 vacant, abandoned and inhabitable single family and 12 multi-family structures over the 5-year 2014-2018 period. Given the extent of abandoned, dilapidate and uninhabitable structures – such activities will continue to seek CDBG support into the near future.
		Minimize fire and safety hazards.	(P)	✓	✓	✓	Red Cross volunteers and local Fire Departments have worked to install some 400 fire alarms/batteries in LMI neighborhoods in Delphos, Lima, Bath and Shawnee townships annually and at no cost to occupants. Local fire departments conduct more than 225 safety checks in existing commercial/single-family housing units annually.
		Work with Allen County Public Health, ODH and local stakeholders to remove lead and asbestos from all subsidized housing units receiving federal/state funding.	✓ ✓	✓	✓	✓	WOCAP, WSOS, the City of Lima and RPC are working to eliminate lead and asbestos in HOME, LIHTC and other Federal/State funded programs/projects.
		Develop local capacity to abate and rehabilitate homes with lead, asbestos and mold.				P	WOCAP is working to develop the financial and technical support to develop and deliver effective lead abatement programming a ross the region.

TABLE 5-9 GOAL: AN ENHANCED QUALITY OF LIFE IN AREA NEIGHBORHOODS.

	GOAL: AN ENHANCED QUALITY OF LIFE IN AREA NEIGHBORHOODS. IMPLEMENTATION STATUS													
POLI <i>C</i> Y(IES)	STRATEGY(IES)	OBJECTIVE(S)						STATUS/COORDINATING AGENCY(IES)						
, ,	` ,		2014	2015	2016	2017	2018	· ·						
Develop, adopt and support "Clean Sweep", "Beautification" and "Anti- Litter" policies in area neighborhoods along local streets, parks, vacant lots and upon vacant lands in highly visible	community stakeholders to investigate property maintenance standards, exterior maintenance codes, litter abatement programs, litter collection activities and	Seek public and private support to undertake and successfully complete a KACB litter inventory and subsequently establish "adopt a street," "adopt a park" or "adopt a waterway" programming to ensure litter is adequately addressed. Work to adopt litter regulations.	✓	√	✓	✓	✓	The Allen County Chapter of KAB, LACNIP and the LACRPC annually work to support and document the Litter Inventory. The Ottawa River Coalition is working to support the Adopt a Street Program. Little progress has been towards the implementation of Adopt a Park and Adopt a Waterway programing.						
and traveled public places.	beautification projects.	Clear the Ottawa River of debris and litter by supporting the annual Ottawa River Clean-Up campaign is adequately supported and maintained.	✓	✓	✓	✓	✓	The Ottawa River Clean-Up is supported by the Ottawa River Coalition, local businesses and volunteers which grew to some 400 volunteers in 2018; and, they removed some ### bags of litter from the river. The North Central Ohio Solid Waste District supports area communities with financial assistance for clean-up projects typically held in the spring or fall.						
		Maintain area recycling initiatives, and investigate curbside recycling opportunities across the community.	✓	✓	✓	✓	✓	Monthly drop-off recycling efforts continue in Amanda, American, Auglaize, Bath, Marion and Jackson townships as well as Gomer, Cairo, Harrod, and Lafayette. Curbside recycling existing in Bluffton, Delphos, Elida & Lima. Recycling efforts attempted in Shawnee failed due to costs and compliance issues in 2016. No additional opportunities have been developed.						
		Maintain and develop public spaces where yard waste can be repurposed for mulch, where landscaping materials can be maintained and where plantings can beautify heavily traveled corridors or support pollinator programs.	✓	√	✓	✓	✓	Several communities support the North Central Ohio Solid Waste District supports communities with financial assistance for managing yard waste projects. The City of Lima and Shawnee Township support yard waste programming and their reuse.						
		Develop and advance community gardens throughout the County.	✓	✓	✓	✓	✓	LACNIP and several local neighborhood organizations have worked with the City of Lima and the City Land Bank to develop community gardens.						
		Develop pollinator gardens on large vacant lots.					(Both ODOT and ODNR have developed formal pollinator garden programming. KAB has worked with local governments in hopes of fostering development of a template to be used in highly visible areas across the county.						
enforcement and other emergency responders in area neighborhoods	unstructured venues for increased interaction between residents and law	Increase residents' familiarity with local law enforcement personnel and emergency responders to advance personal familiarity and to increase enhanced communications.	✓	✓	✓	✓	✓	CDBG funding in the City of Lima supported the interaction of some 33,229 individuals with local law enforcement and emergency responders over the 5-year planning period.						
and parks.	enforcement personnel as well as other first responders.	Improve community relations with law enforcement and other first responders.	e	((4)	e	(While prejudicial treatment against minorities has been alleged by the NAACP over the period, the participation of local law enforcement and other first offenders in such community events has been providing positive reinforcement.						
advance both active and passive recreational opportunities for area	of the health effects of regular	Assess existing parks for LMI access and improve local parks to promote a consistent LOS.	✓	✓	✓	✓	✓	The RPC works with RTA routinely to support access to public city parks. The very nature of the Metro Park system however precludes ready access due to their more rural location. Access to city and municipal parks is thought to be reasonable; albeit their compliance with all ADA standards has not been undertaken county-wide.						
residents.	physical/recreational activities.	Work with local health and recreation professionals to serve LMI persons within neighborhood parks and venues.	✓	✓	✓	✓	✓	CDBG funding in Lima provided professional health and recreation services to 1,123 persons in LMI neighborhoods over the 2014-2018 period.						
neighborhoods by updating the local regulatory environment as well as increasing public awareness of adopted codes and the need for	ensure that they are promoting both QOL	Review, update, adopt building, and exterior maintenance, subdivision and zoning codes	✓	✓	✓	✓	✓	Local governments periodically review existing and proposed regulations. The Building Code is adopted by the State and enforced uniformly. The County last updated local subdivision codes in 2013; only 19 variances were requested - the County granted approval for 16 based on cause. Local zoning codes are updated as the need arises; the RPC provided formal technical zoning recommendations to local governments on 66 occasions over the 2014-2018 period.						
compliance with adopted codes.		Review potential FH threats/violations of existing codes with local code enforcement officials to advance FH compliance issues and gain a better understanding of well-intentioned and unintended consequences of such codes and regulations.			✓			The City of Lima and the RPC prepared an AI in 2013 for all local governments. The community posted the findings in 2013 and presented same thru the public involvement process. The RPC conducted a similar assessment in 2016. However, there has not been a concerted effort to work with the actual code officials of all 20 local governments. Additional testing and funding for same is required. This area will need to be a future focus of FHP efforts.						
	Develop a marketing campaign aimed at identifying common violations and the economic, health and social impacts of	Educate the public, establish public accountability, improve public perceptions, and advance community support.				(4)	(4)	A new approach to an old problem that will need to be targeted for future successful programming to be introduced and supported across community wide. The objective lacks a champion.						
	noncompliance with such regulations.	Develop public support for code inspections that will effectively deliver, safe, clean, healthy and affordable housing andn advance a neighborhoods quality of life.				(4)	e	A new approach to an old problem that will need to be targeted for future successful programming to be introduced and supported across community wide. The objective lacks a champion.						

as an entitlement community or as a pass thru the Ohio Development Services Agency (ODSA). Allen County must apply to the ODSA for CDBG program funds based in part on project eligibility, viability and local priorities. The City of Delphos is considered a Designated City and receives a specified amount of HOME funding with the Allen County CHIP allocation. As an entitlement community, Lima receives an allocation of funds to develop viable neighborhoods by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low- and moderate-income persons. While differences exist between the CDBG programs utilized by the City of Lima and Allen County such programming and services are used to target the same three national objectives as well the tasks identified in the previous section of this assessment. The following provides an overview of 2014 thru 2018 accomplishments undertaken by Allen County and City of Lima respectively.

Allen County HUD Programming

Over the course of 2014 thru 2018 period Allen County successfully participated in the Allocation Program (3), Water & Sewer Program (1), and Revolving Loan Fund Program (2) and the HOME Program (2). Allen County also applied to the CDBG Neighborhood Revitalization Program and Critical Infrastructure Program but without success. The Board of Allen County Commissioners have approved of all CDBG program grant applications, bid documents and contracts. The Commissioners have relied upon the services of the Allen County Sanitary Engineer, the Allen Water District, the Regional Planning Commission as well as local political subdivisions and consulting engineers to deliver CDBG-funded projects.

Allen County Community Allocation Program

The ODSA distributes funding allocations based on a per capita basis to non-entitlement communities including Allen County. Community Allocation Program projects (formerly known as FORMULA Funds) reflect improvements to/for public facilities, public services, housing, economic development and fair housing activities. The program provides communities with flexible housing and community development resources that can be used to address locally identified needs that are eligible CDBG activities and qualify under the national objective of low- and moderate-income (LMI) benefit or elimination of slum and blight.

During 2014 thru 2018 Allen County Commissioners worked to deliver effective public notice and opportunities for public participation in the CDBG programming. Legal notifications of public meetings in the newspaper of largest circulation, agency newsletters, website postings, press releases, and public hearings held to provide pertinent HUD/CDBG programmatic opportunities and discuss eligible activities and projects with the public.

• Lafayette Waste Water Treatment Project: In 2015 CDBG Formula Funds were allocated to the Village of Lafayette Waste Water Treatment Project. The project added specific equipment to the Village Wastewater Treatment Plant. The Village upgraded its sanitary sewer system introducing an ultraviolet disinfection system, post aeration system and sludge drying and storage pad serving the Waste Water Treatment Plant. The project served approximately 18 persons served by the public wastewater treatment system in and adjacent to the Village. Total project costs totaled \$147,790; of which CDBG Allocation Program funds covered \$116,000 and the Village secured an Ohio Water Development Agency (OWDA) loan in the amount of \$14,000. Technical services on the project amounted to \$17,940 and were also financed by and OWDA loan. The Commissioners awarded the bid award and signed the Notice to Proceed in August 2015. The project started in November 2015 and was completed in

December 2015. The CDBG funded project serves the entire Village area and Allen East School campus; the proportion of the project's service area population is 58.02% LMI.

- Bath Street Improvement Project: In 2014 CDBG Formula funds were allocated to the Bath Township Street Resurfacing Improvement Project. The project required the resurfacing of: Daytona Drive, Edsel Avenue, Ford Avenue, Lane Avenue, Michigan Avenue, Taylor Avenue and Kent Avenue between Boyer and Summit Streets; as well as Adams Street between Williams Street and Robb Avenue in Bath Township. The Commissioners bid the project requiring the resurfacing of 11,560 liner feet with 1 3/8" of asphalt concrete. The project was awarded and a Notice to Proceed signed in May 2014 for \$132,529. The Township opted for some additional improvements including some additional grading and the use of 448-70-22 asphalt concrete. The total project cost for 11,674 linear feet increased to \$153,000 of which \$122,400 were CDBG funds and the remainder was paid for by Bath Township. The project benefitted some 235 persons of whom 67.06% were LMI. The project was finalized in December 2015.
- Bath Road Reconstruction: The 2015 CDBG formula grant included funds for the Bath Road Reconstruction on McCullough Street from Robb Avenue to Bible Road 5330.00 linear feet. The full allocation cost of \$107,200 was awarded and used on the project. The LMI of the area of the project was 86.7% based on a door to door survey. Several change orders were approved and paid for by Bath Twp. The project was finalized in August of 2016.
- Lafayette Village Street Reconstruction: In 2016 CDBG Formula funds of \$87,800 were allocated to the Village of Lafayette Street Reconstruction for West Main Street (N. High Street to Washington Street) and E. Sugar Street (N. High Street to E. Main Street). The projects require 1,829 linear feet of resurfacing. The project was awarded to Bluffton Paving for a bid total of \$81,862.00, the project came in under bid at \$76,828.75. The project was finalized in December of 2017.
- Bath Township Shearin Street Drainage: In 2016 CDBG Formula fuds were allocated to the Bath Township Shearin Street Drainage project. The project experienced several setbacks because of a gas line that needed to be moved. When the application was made the gas company had agreed to move the line before the project was set to start. The gas company had other projects that did not fall into place and were not able to move the line in time for the project to proceed. The project was never completed and no funding was drawn.

ALLEN	TABLE 5-10 ALLEN COUNTY COMMUNITY ALLOCATION PROGRAM													
S	Delive	erables	Expen	ditures	Grant	Targets								
Program Activity	Planned	Finished	Projected	Actual	Met	UnMet								
Bath Streets	11,560	11,674	132,529	153,000	Х									
Lafayette Waste Water Treatment			147,000	147,790	Х									
 Ultraviolet disinfection 	1	1												
 Post aeration system 	1	1												
 Sludge drying and storage pad 	1	1												
Bath Road Reconstruction	5,330	5,330	107,200	130,700	Х									
Lafayette Street Reconstruction	1,829	1,829	87,800	76,829	X									
Bath Twp Shearin Street Drainage	The project r	an into gas line p	problems and did	not go forward		Х								
Total			474,529	508,319										

Allen County CDBG Water & Sewer Programming

The Allen County Commissioners were awarded CDBG grant monies from ODSA's Small Cities Water and Sanitary Sewer Competitive Program to construct a pump station, force main and gravity sewer replacing the Indian Village Mobile Home Park's OEPA non-compliant wastewater treatment plant. Indian Village Mobile Home Park owners and the Allen County Commissioners on April 17, 2013 entered into a cooperative agreement, per Resolution #157-13, for the design, construction, operation and maintenance of a County owned sanitary sewer improvement to allow for the abandonment of the park's privately owned and operated wastewater treatment plant. The County used CDBG Water and Sanitary Sewer Competitive funds for the project as follows: The construction of a sanitary sewer collection system consisting of approximately 114 linear feet of 12" sanitary sewer line 957, linear feet of 10" sanitary, 75 linear feet of 8" sanitary sewer line, 6,608 linear feet of 8" force main, 8 manholes and one pump station to serve the Indian Village Mobile Home Park, Shawnee Township (formerly Village of Ft. Shawnee), Allen County, Ohio. The project was designed and constructed to serve approximately 143 mobile homes Indian Village Mobile Home Park as well as areas within the immediate service as defined in the long-range study completed by Kohli & Kaliher Associates, Inc. for the County. Project construction was completed in 2014. The final cost of the project was \$954,822.43 of which approximately \$480,300.00 was provided by the CDBG Water & Sanitary Sewer Program. The remaining funds came from the Ohio Water Development Agency Loan Program (\$426,857.65) being paid back by the Indian Village Mobile Home Park (\$362,522.43) and the County (\$112,000). A total of 143 LMI households were served. The project close-out was completed by OSDA in April 2015. In 2015 CDBG Water & Sewer Grant Program funding was not being used.

Allen County Revolving Loan Fund Programming

- Eagle Rail Project: During 2014 the Allen County Commissioners, owners of Eagle Rail, Allen Water District and the City of Lima agreed to collaborate to extend water and sewer lines north of the Village of Cairo to advance economic development and employment opportunities. The County Commissioners and the Allen County Revolving Loan Fund (RLF) Administration Board were approached as their willingness to extend the utility services. The project would install approximately 1,400 lineal feet of 8-inch sanitary sewer, 4200 lineal feet of force main, one pump station and 5,600 lineal feet of 12-inch water line to serve Eagle Rail Car. The project cost was \$288,000 for water and \$312,000 for sewer of CDBG Revolving loan funds. This project would create an additional 60 jobs with 6 of those jobs being held by LMI individuals. The project was finalized in 2016.
- Lima Rail Project: In 2015 the Allen County Sanitary Engineer requested the allocation of \$17,000 dollars of Revolving Loan Funds to contract for the completion of a preliminary engineering study to determine the feasibility and construction factors for the provision of water and sewer to the Lima Pallet Company in Bath Township. The study and final design phases were completed in September of 2016. In 2017 the construction of the project proceeded. There were several agencies involved in the project. The water would come from the Allen Water District. The sewer through Allen County and the operation, maintenance and billing of the facilities on behalf of the Allen Water District and Allen County would come thru the City of Lima. The Allen County Commissioners used \$240,000 of revolving loan funds for the construction of the water and sewer lines to Lima Pallet. This water and sewer line extension allowed Lima Pallet Company to create twenty (20) additional jobs primarily for low to moderate income personnel. This construction of the lines was completed June 2017.

Allen County HOME Programming

Allen County collaborated with WSOS to provide program management of its HOME Program. Allen County also contracted with LACCA to facilitate Fair Housing Education and Testing. The County HOME Program spans the 2014 thru 2018 period. The HOME Program is predicated upon Fair Housing Planning identified in the AI. The results of the program thru December 2018 follow.

TABLE 5-11 ALLEN COUNTY HOME PROGRAM								
Program Activity	Deliverables		Expend	itures	Grant Targets			
	Planned	Finished	Projected	Actual	Met	UnMet		
Private Rehabilitation	15	14	376,000	410,073		Х		
Home Repair	31	33	334,000	256,580	Х			
New Construction (Habitat)	2	2	44,000	44,000	Х			
Homeless Prevention	3	16	10,000	15,000	Х			
Housing Counseling	26	27	13,000	3,695	Х			
Fair Housing	1	1	4,600	4,600	Х			
Down Payment Assistance	1	1	42,000	46,192	Х			
Total			823,600	780,140		•		

City of Lima HUD Programming

Over the course of 2014 thru 2018 period the City of Lima successfully participated in HUD CDBG and HOME programming as an entitlement community. As stated earlier, the City of Lima receives a direct CDBG/Home allocation from HUD to underwrite specific projects on a federal fiscal year basis (October 1, 2013-September 30, 2017) pursuant to the adopted 5-Year HUD Consolidated Plan (CP) and AI Action Plans.

The available federal funds reflected CDBG and CDBG HOME funds. After an extensive public involvement process Lima City Council approved of the CDBG/HOME programmatic elements and budgets. The Public Works Department, Community Development Department, City Engineer and the Building Commissioner worked to deliver the majority of the CDBG projects; WOCAP and New Lima Housing for the Future Inc. provided the bulk of counseling and development services. The following summaries are broken down by year and by CDBG program elements.

City of Lima 2014 CDBG Program:

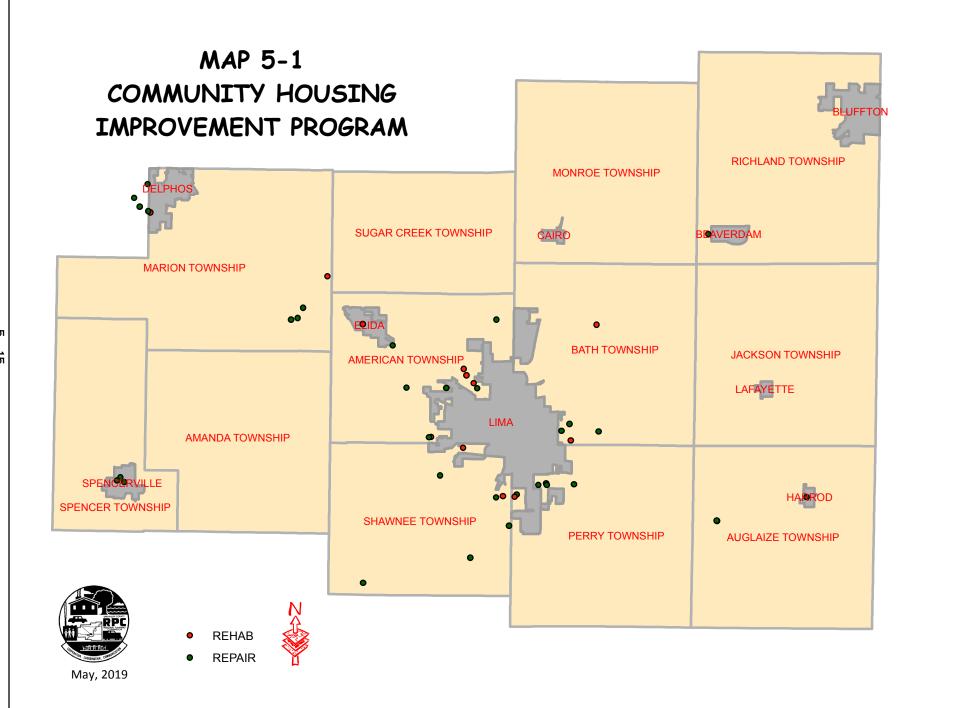
Decent Affordable Housing:

GOAL: Financial and Homeownership counseling programs and fair housing services will benefit
at least 460 LMI households who will have improved access to and choices of decent affordable
housing. (Fair Housing and Housing Counseling)

RESULT: LACCA provided 363 LMI households with Fair Housing services and an additional 60 participants received Housing Counseling for a total 423 LMI households benefitting from these programs.

• GOAL: New Construction and down payment assistance projects will benefit 16 LMI households who will have new decent, affordable homes available to them.

RESULT: No new construction this year but Whittier Place project was completed. 5 HOME funded single family units were sold and occupied by LMI households this year completing development and sale of 7 units on site. 2 lots were transferred to Allen County Habitat for Humanity where 2 single family ownership homes were built and sold to LMI household by



Habitat. 3 undeveloped lots were repaid to HOME and \$41,542.44 was placed within Lima HOME account to be allocated in 2014-15. \$2,000 HOME funds were expended to complete marketing and sales of 5 remaining units. 19 LMI households benefitted from the down payment assistance program and Update loans.

GOAL: Home repair, updates and rehabilitation projects will sustain the availability of
affordable housing that would benefit almost 7 LMI households whose dwelling units will be
repaired top address safety and health issues and/or brought up to local building and property
maintenance standards (Home Update and ReNew).

RESULT: No Renew repair loans were used due to lack of qualified LMI home-owners; 4 Update repair loans were made that benefitted 4 LMI households.

Suitable Living Environment:

• GOAL: Five projects will have a community-wide benefit through increased availability and improved access to services/facilities for housing and community development; emergency preparedness and safety; crime awareness; parks and recreation; and grass-root organizing.

RESULT: Four projects reached community-wide including 5,000 adults and children benefitting from various Police Support Programs and an additional 164 children, 92 of them from LMI households benefitted from summer recreation programs at Parks and Recreation. In addition, approximately 2,279 people volunteered during the plan year contributing over 10,543 volunteer hours (valued at \$224,566@21.40/hr) toward City or LACNIP neighborhood network sponsored events.

GOAL: Reconstruction/resurfacing of streets and other improvements to public infrastructure
in CDBG eligible areas will improve the accessibility of places and destinations that would
benefit approximately 999 households, 100 businesses and 5,555 LMI persons.

RESULT: Reconstruction and resurfacing of streets including 49 city blocks or 23,570 linear feet and 7,891 square feet of sidewalk reconstruction that provided improved accessibility directly to 3,898 LMI persons in 1,411 households and also benefitted several area businesses. In addition, with Ottawa River Bikeway Phase 5 program, bike path right-of -ways were acquired from Button Bush Preservation to the existing Ottawa River path and from there to Faurot Park.

• GOAL: Property Maintenance as well as Clearance and Demolition of blighted structures and areas will have a community-wide impact by improving the livability of residential neighborhoods.

RESULT: 9,150 inspections were performed by the Property Maintenance Inspectors to 2,382 properties that included structural, weed, specified properties and junk autos. A total of 23 dilapidated structures were demolished using various funding sources (8 of them with CDBG funds) to improve the livability of residential neighborhoods.

• GOAL: One project will sustain and improve the availability and accessibility of summer recreation programs that would benefit at least 200 children by holding such programs in public parks in CDBG-eligible areas (Summer Playground Recreation Program).

RESULT: 164 children benefitted from the Parks and Recreations Summer Recreation programs of which 92 children were from LMI households.

Economic Opportunities:

• GOAL: One project will improve the accessibility of services for labor skill upgrading that will benefit between 60 LMI resident-adults who are either unemployed or underemployed. (Rhodes State College Career Pathways Program)

RESULT: This program was recognized by HUD in 2014 and mentioned in their 40 year CDBG success stories. Six Basic Manufacturing classes were held at Rhodes State College during 2013-14 program year where 36 Lima LMI residents registered with 13 of them receiving certification An additional 5 LMI students were certified at Bradfield Center for a total of 18. They are also provided with job placement information and employment.

• GOAL: One project will defray part of the cost of providing grant search/writing specialist to operate as a community resource and for grant writing skills development for at least 35 local nonprofit organizations (Lima United Way Grant Writing program).

RESULT: This program provided for grant search/writing specialist and training to improve grant writing skills development for the local nonprofit organizations. For Program Year 2013-14, three grant workshops were conducted for 40 community organizations enrolled in the grant writing training course. This was the first year of the grant; 60 potential sources of appropriate grants have been identified for over a \$1M but no funding has been received yet.

TABLE 5-12 CITY OF LIMA 2014 HOME PROGRAM								
Dona a company A a delicidado	Delive	rables	Expend	Grant Targets				
Program Activity	Planned	Finished	Projected	Actual	Met	Unmet		
Home Repair (ReNew)	1	0	\$44,865	\$0		Х		
Home Repair (Update)	6	4	\$177,580	\$68,862		Х		
Down Payment Assistance	16	15	\$383,499	\$130,697		X		
New Construction	none	Lot Sold	\$37,553	\$2,000	Х			
		Total	\$643,497	\$201,559	1	4		

TABLE 5-13 CITY OF LIMA 2014 CDBG PROGRAM								
Dunner Antivity	Deliverables		Expenditure		Grant Targets			
Program Activity	Planned	Finished	Projected	Actual	Met	Unmet		
Fair Housing Program	400	363	\$34,405	\$34,405		Х		
Housing Counseling	60	60	\$25,200	\$24,928	Х			
Housing Rehab Administration	N/A	-	\$91,296	\$66,174	Х			
Street Reconstruction & Resurfacing	5,000 LF	5,000 LF	¢504.405	\$268,616	Х			
Sidewalk Construction/ADA Access	-	7,891 SF	\$521,425					
Park Improvements	1	1	\$56,000	\$1,827	Х			
Housing Demolition	3	23/8	\$133,692	\$64,561	Х			
Property Maintenance Service	2,000	2,563	\$223,766	\$137,097	Х			
Economic/Employment Training	50	18	\$7,034	\$7,034		Х		
Police Support Services (people)	5,000	5,000	\$35,974	\$17,451	Х			
Neighborhood Development Program	12	10/3	\$74,912	\$60,768	Х			
Community Grant Workshops	3	3	\$35,000	\$27,000	Х			
Program Administration	N/A	-	\$228,905	\$172,822	Х			
Summer Recreation Programming	170	92	\$11,265	\$5,486		Х		
		Total	\$1,478,874	\$888,169	11	3		

City of Lima 2015 CDBG Program:

Decent Affordable Housing:

GOAL: Financial and Homeownership counseling programs and fair housing services will benefit
at least 460 LMI households who will have improved access to and choices of decent affordable
housing (Fair Housing and Housing Counseling).

RESULT: LACCA provided 267 LMI households with Fair Housing services and an additional 17 participants received Housing Counseling and 1 received Update Counseling for a total 285 LMI households benefitting from these programs.

• GOAL: New Construction and down payment assistance projects will benefit 20 LMI households who will have new decent, affordable homes available to them. (First Home Lima)

RESULT: No new construction this year but Whittier Place project was completed. 12 LMI households benefitted from the down payment assistance program.

• **GOAL**: Home repair, updates and rehabilitation projects will sustain the availability of affordable housing that would benefit almost 9 LMI households whose dwelling units will be repaired top address safety and health issues and/or brought up to local building and property maintenance standards (Home Update).

RESULT: No Update loans were completed that benefitted any LMI households. One loan is in the process of completion and another potential project went out for bid.

Suitable Living Environment:

• GOAL: 5 projects will have a community-wide benefit through increased availability and improved access to services/facilities for housing and community development; emergency preparedness and safety; crime awareness; parks and recreation; and grass-root organizing.

RESULT: 4 projects reached community-wide including 5,000 adults and children benefitting from various Police Support Programs and an additional 164 children from LMI households benefitted from summer recreation programs at Parks and Recreation. In addition, approximately 3,652 people volunteered during the plan year contributing over 15,528 volunteer hours (valued at \$333,230@21.46/hr) toward City or LACNIP neighborhood network sponsored events. LACNIP used \$1,000 of CDBG funding to defray the cost of HVAC upgrade at their meeting place at 1440 W. Spring Street. Bradfield Center assisted 167 LMI Seniors with various health education and exercise programs.

• GOAL: Reconstruction/resurfacing of streets and other improvements to public infrastructure in CDBG eligible areas will improve the accessibility of places and destinations that would benefit approximately 999 households, 100 businesses and 5,000 LMI persons.

RESULT: Reconstruction and resurfacing of streets including 48 city blocks or 24,740 linear feet and 3,795 square feet of sidewalk reconstruction that provided improved accessibility directly to 3,774 LMI persons in 1,378 households and also benefitted several area businesses.

• GOAL: Property Maintenance as well as Clearance and Demolition of blighted structures and areas will have a community-wide impact by improving the livability of residential neighborhoods.

RESULT: 8,722 inspections were performed by the Property Maintenance Inspectors to 2,563 properties that included structural, weed, specified properties and junk autos. A total of 19 dilapidated structures were demolished using CDBG funds to improve the livability of residential neighborhoods.

 GOAL: One project will sustain and improve the availability and accessibility of summer recreation programs that would benefit at least 200 children by holding such programs in public parks in CDBG-eligible areas. (Summer Playground Recreation Program) One project will sustain and improve health and wellness programs that would benefit at least 100 LMI seniors in CDBGeligible areas.

RESULT: 164 children from LMI households benefitted from the Parks and Recreations Summer Recreation programs. 167 LMI Seniors benefitted from the Bradfield Wellness program.

Economic Opportunities:

 GOAL: One project will improve the accessibility of services for labor skill upgrading that will benefit between 60 LMI resident-adults who are either unemployed or underemployed (Rhodes State College Career Pathways Program).

RESULT: This program was recognized by HUD in 2014 and mentioned in their 40 year CDBG success stories. Six Basic Manufacturing classes were held at Rhodes State College during 2014-15 program year where 31 Lima LMI residents registered with 14 of them receiving certification. An additional 2 LMI students were certified at Bradfield Center and Worth Center at no cost to CDBG for a total of 16. They are also provided with job placement information and employment.

GOAL: One project will defray part of the cost of providing grant search/writing specialist to
operate as a community resource and for grant writing skills development for at least 35 local
nonprofit organizations (Lima United Way Grant Writing program).

RESULT: This program provided for grant search/writing specialist and training to improve grant writing skills development for the local nonprofit organizations. For Program Year 2014-15, 3 grant workshops were conducted for 23 community organizations enrolled in the grant writing training course.

	CITY OF LIMA	ABLE 5-14 2015 HOME I	PROGRAM					
Donas and Assistant	Delive	rables	Expend	iture	Grant '	Targets		
Program Activity	Planned	Finished	Projected	Actual	Met	Unmet		
Home Repair (Update)	9	0	\$192,537	\$0		Х		
Down Payment Assistance	20	12	\$431,516	\$97,600		Х		
HOME Administration	N/A	\$32,610	\$24,630	X				
Total \$656,663 \$122,230 1								

	CITY OF LIM	ABLE 5-15 A 2015 CDBG	PROGRAM				
Dunaman Astivitus	Delive	rables	Expend	iture	Grant Targets		
Program Activity	Planned	Finished	Projected	Actual	Met	Unmet	
Fair Housing Program	400	276	\$25,000	\$17,093		Х	
Housing Counseling	60	17	\$25,200	\$24,928		Х	
Housing Rehab Administration	N/A	-	\$91,296	\$66,174	Х		
Street Reconstruction & Resurfacing	5,000 LF	5,000 LF	¢472.07/	£212.004	V		
Sidewalk Construction/ADA Access	-	3,789 SF	\$473,976	\$212,084	Х		
Park Improvements	1	1	\$56,000	\$1,827	Х		
Housing Demolition	3	19	\$133,692	\$64,561	Х		
Property Maintenance Service	2,000	2,382	\$256,836	\$196,571	Х		
Economic/Employment Training	50	16	\$7,034	\$7,000		Х	
Police Support Services (people)	5,000	5,000	\$35,974	\$17451	Х		
Neighborhood Development Program	12	10/3	\$74,912	\$60,768	Х		
Community Grant Workshops	3	3	\$35,000	\$27,000	X		
LACNIP	1	1	\$1,000	\$1,000	Х		
Bradfield	100	167	\$32,000	\$27,636	Х		
Program Administration	N/A	-	\$245,766	\$174,577	Х		
Summer Recreation Programming	200	164	\$11,265	\$5,486		Х	
-		Total	\$1,504,951	\$904,156	11	4	

City of Lima 2016 CDBG Program:

Decent Affordable Housing:

GOAL: Financial and Homeownership counseling programs and fair housing services will benefit
at least 460 LMI households who will have improved access to and choices of decent affordable
housing. (Fair Housing and Housing Counseling)

RESULT: West Ohio CAP (formerly LACCA) provided 268 LMI households with Fair Housing services and an additional 22 participants received Housing Counseling for a total 290 LMI households benefitting from these programs.

• GOAL: New Construction (5) and down payment assistance (16) projects will benefit 21 LMI households who will have new decent, affordable homes available to them. (First Home Lima)

RESULT: No new construction this year. 8 LMI households benefitted from the down payment assistance program and an additional 2 are in process but not completed in time to be included in 2015-16 count. Location and developer selection were completed for reconstruction of 43 Town Square to house 47 residential unit.

GOAL: Home repair, updates and rehabilitation projects will sustain the availability of
affordable housing that would benefit 10 LMI households whose dwelling units will be repaired
to address safety and health issues and/or brought up to local building and property
maintenance standards. (Home Update)

RESULT: 3 Update loans were completed that benefitted LMI homeowners. There were 3 Emergency loan completions reported in program year 2015-16.

Suitable Living Environment:

 GOAL: Five projects will have a community-wide benefit through increased availability and improved access to services/facilities for housing and community development; emergency preparedness and safety; crime awareness; parks and recreation; grass-root organizing and services for seniors and children from LMI households.

RESULT: Four projects reached community-wide including over 8,000 adults and children benefitting from various Police Support Programs and an additional 160 children from LMI households benefitted from summer recreation programs at Parks and Recreation. In addition, approximately 753 people volunteered during the plan year contributing over 5,800 volunteer hours (valued at \$124,468@21.46/hr) toward City or LACNIP neighborhood network sponsored events. Bradfield Center assisted 103 LMI Seniors with various health education and exercise programs.

GOAL: Reconstruction/resurfacing of streets and other improvements to public infrastructure
in CDBG eligible areas will improve the accessibility of places and destinations that would
benefit approximately 200 households, businesses and 5,555 LMI persons. Parks and Recreation
improvements will benefit approximately 50 youth and their families from various recreational
activities.

RESULT: Reconstruction and resurfacing of streets including 43 city blocks or 20,500 linear feet and 3,795 square feet of sidewalk reconstruction that provided improved accessibility directly to 3,420 LMI persons in 1,238 households and also benefitted 18 area businesses. In addition, 1,440 square feet of sidewalk and curb improvements were performed. Resurfacing and striping Schoonover Basketball Court and Cook Park Basketball Court were completed at a cost of \$35,882.

GOAL: Property Maintenance targets about 2000 parcels as well as 9 Clearance and Demolition
of blighted structures and areas will have a community-wide impact by improving the livability
of residential neighborhoods.

RESULT: 9,242 inspections were performed by the Property Maintenance Inspectors to 2,493 properties that included structural, weed, specified properties and junk autos. A total of 13 dilapidated structures were demolished using CDBG funds to improve the livability of residential neighborhoods.

• GOAL: One project will sustain and improve the availability and accessibility of summer recreation programs that would benefit at least 100 children by holding such programs in public parks in CDBG-eligible areas. (Summer Playground Recreation Program)

RESULT: 160 children, 97 of whom are from LMI households benefitted from the Parks and Recreations Summer Recreation programs.

Economic Opportunities:

 GOAL: One project will improve the accessibility of services for labor skill upgrading that will benefit about 15 LMI resident-adults who are either unemployed or underemployed. (Rhodes State College Career Pathways Program)

RESULT: Six Basic Manufacturing classes were held at Rhodes State College during 2015-16 program year where 31 Lima LMI residents registered with 11 of them receiving certification. Additional Lima residents were certified at Bradfield Center and Worth Center at no cost to

CDBG and not reported in CDBG accomplishments. They are also provided with job placement information and employment.

TABLE 5-16 CITY OF LIMA 2016 HOME PROGRAM								
D	Delive	rables	Expend	liture	Grant '	Targets		
Program Activity	Planned	Finished	Projected	Actual	Met	Unmet		
Home ReNew	10	8						
Home Update	10	4			7 ·			
Down Payment Assistance	16	17			✓			
New Construction	5	0				Х		
	<u>.</u>	Total						

Program Activity	Deliverab	les to LMI	Expend	iture	Grant Targets		
Households ¹ /Persons ^{2/} Parcels ³	Planned	Finished	Projected	Actual	Met	Unmet	
Fair Housing Program	400	268				Х	
Housing Counseling	60	22				Х	
Housing Rehab Administration	NA	NA				Х	
Street Reconstruction & Resurfacing ¹	200	1,238			✓		
Sidewalk Construction/ADA Access ²	5,555	3,428				Х	
Park Improvements ³	1	1		\$35,882	✓		
Housing Demolition	9	13			✓		
Property Maintenance Service ³	2,000	2,493			✓		
Economic/Employment Training ¹	15	31			✓		
Police Support Services ²	5,000	7,759			✓		
Neighborhood Development Programs	15	15			✓		
Community Grant Workshops	NA	NA	NA	NA	NA	NA	
Health Education/Exercise ²		156					
Summer Recreation Programming ¹		97				Х	
Program Administration	NA	NA	N <i>A</i>	NA	NA	NA	

City of Lima 2017 CDBG Program:

Decent Affordable Housing:

- GOAL: Financial and Homeownership counseling programs and fair housing services will benefit
 at least 460 LMI households who will have improved access to and choices of decent affordable
 housing. (Fair Housing and Housing Counseling)
 - RESULT: West Ohio CAP provided 323 LMI households with Fair Housing services and an additional 33 participants received Housing Counseling for a total 356 LMI households benefitting from these programs.
- GOAL: New Construction (5) and down payment assistance (16) projects will benefit 21 LMI households who will have new decent, affordable homes available to them. (First Home Lima)
 - RESULT: No new construction this year. 17 LMI households benefitted from the down payment assistance program (FHL) to become first time homeowners and the program exhausted most of the funding in 2016-17 plan year exceeding its stated annual goal. Location and developer

selection were completed for reconstruction of 43 Town Square to house 47 residential units. The City requested the First Substantial Amendment to the 2016-17 Annual Action plan to remove the 4 Unit Rental Program for lack of matching funding and moved funds for the CHDO 2 unit LMI rental project for 2017-18 projects.

 GOAL: Home repair, updates and rehabilitation projects will sustain the availability of affordable housing that would benefit 10 LMI households whose dwelling units will be repaired to address safety and health issues and/or brought up to local building and property maintenance standards (Home Update).

RESULT: 4 Update loans were completed that benefitted LMI homeowners. There were 8 Emergency loan completions reported in program year 2016-17.

Suitable Living Environment:

 GOAL: Five projects will have a community-wide benefit through increased availability and improved access to services/facilities for housing and community development; emergency preparedness and safety; crime awareness; grass-root organizations provided with technical assistance for community building and volunteering; and health services for seniors and children from LMI households.

RESULT: Four projects reached community-wide including over 7,759 adults and children benefitting from various Police Support Programs. In addition, approximately 680 people volunteered during the plan year contributing over 4,944 volunteer hours (valued at \$120,634@24.4/hr.) toward City or LACNIP neighborhood network sponsored events. Bradfield Center assisted 156 LMI Seniors and youths (94 seniors and 42 youth) with various health education and exercise programs.

GOAL: Reconstruction/resurfacing of streets and other improvements to public infrastructure
in CDBG eligible areas will improve the accessibility of places and destinations that would
benefit approximately 200 households, businesses and 5,555 LMI persons. Parks and Recreation
improvements will benefit approximately 50 youth and their families from various recreational
activities.

RESULT: Reconstruction and resurfacing of streets including 47 city blocks or 22,810 linear feet or 4.3 miles and 2,535 square feet of sidewalk reconstruction that provided improved accessibility directly to 3,805 LMI persons in 1,377 households and also benefitted 20 area businesses. Installation of playground structure on September 14, 2017 utilized \$44,158.62 and all funds were exhausted, no other park projects will be worked on this plan year. This program helped 4,846 Lima residents in a predominantly LMI area.

GOAL: Property Maintenance targets about 2000 parcels as well as 9 Clearance and Demolition
of blighted structures and areas will have a community-wide impact by improving the livability
of residential neighborhoods.

RESULT: 10,028 inspections were performed by the Property Maintenance Inspectors to 2,774 properties that included structural, weed, specified properties and junk autos. A total of 2 dilapidated structures including one residential and one commercial were demolished using CDBG funds to improve the livability of residential neighborhoods and business corridors.

Economic Opportunities:

 GOAL: One project will improve the accessibility of services for labor skill upgrading that will benefit about 15 LMI resident-adults who are either unemployed or underemployed. (Rhodes State College Career Pathways Program)

RESULT: Six Basic Manufacturing classes were held at Rhodes State College during 2016-17 program year where 27 Lima LMI residents registered with 12 of them receiving certification. Additional 12 Lima residents registered at Bradfield Center and Worth Center at no cost to CDBG and not reported in CDBG accomplishments. 3 of them completed and received certification. They were also provided with job placement information and employment.

	TA CITY OF LIMA	BLE 5-18 2017 HOME P	ROGRAM			
Durana Andinia	Delive	rables	Expend	liture	Grant ⁻	Targets
Program Activity	Planned	Finished	Projected	Actual	Met	Unmet
Home ReNew	10	8			./	
Home Update	10	4]	
Down Payment Assistance	16	17			✓	
New Construction	5	0				Х
		Total				

Program Activity	Deliverab	les to LMI	Expend	iture	Grant Targets		
Households ¹ /Persons ^{2/} Parcels ³	Planned	Finished	Projected	Actual	Met	Unmet	
Fair Housing Program	400	323				Х	
Housing Counseling	60	33				Х	
Housing Rehab Administration	NA	NA				Х	
Street Reconstruction & Resurfacing ¹	200	1,377			✓		
Sidewalk Construction/ADA Access ²	5,555	3,805				Х	
Park Improvements ³	1	1			✓		
Housing Demolition	9	2				Х	
Property Maintenance Service ³	2,000	2,774			✓		
Economic/Employment Training ¹	15	27			✓		
Police Support Services ²	5,000	7,759			✓		
Neighborhood Development Programs	15	15			✓		
Community Grant Workshops	NA	NA	NA	NA	NA	NA	
Health Education/Exercise ²		156					
Summer Recreation Programming ¹		4,846				Х	
Program Administration	NA	NA	NA	NA	NA	NA	

City of Lima 2018 CDBG Program:

Decent Affordable Housing:

GOAL: Financial and Homeownership counseling programs and fair housing services will benefit
at least 460 LMI households who will have improved access to and choices of decent affordable
housing. (Fair Housing and Housing Counseling)

RESULT: West Ohio CAP provided 283 LMI households with Fair Housing services and an additional 30 participants received Housing Counseling for a total 313 LMI households benefitting from these programs.

- GOAL: New Construction (49), down payment assistance (16) and 10 housing repair loan (Update & Emergency) projects will benefit 75 LMI households who will have new decent, affordable homes available to them. (First Home Lima)
 - RESULT: Two new rental units for LMI Seniors were constructed this year. 10 LMI households benefitted from the down payment assistance program (FHL) to become first time homeowners and the program exhausted most of the funding in 2017-18 plan year but did not meet its stated annual goal. Reconstruction of 43 Town Square to house 47 residential units is nearing completion. The City requested the First Substantial Amendment to the 2016-17 Annual Action plan to remove the 4 Unit Rental Program for lack of matching funding and moved funds for the CHDO 2 unit LMI rental project for 2017-18 projects which was completed successfully.
- GOAL: Home repair, updates and rehabilitation projects will sustain the availability of affordable housing that would benefit 10 LMI households whose dwelling units will be repaired to address safety and health issues and/or brought up to local building and property maintenance standards (Home Update).

RESULT: 4 Update loans were completed that benefitted LMI homeowners. There were 8 Emergency loan completions reported in program year 2017-18.

Suitable Living Environment:

- GOAL: Five projects will have a community-wide benefit through increased availability and improved access to services/facilities for housing and community development; emergency preparedness and safety; crime awareness; grass-root organizations provided with technical assistance for community building and volunteering; and health services for seniors and children from LMI households.
 - RESULT: Four projects reached community-wide including over 7,470 adults and children benefitting from various Police Support Programs. In addition, approximately 990 people volunteered during the plan year contributing over 6,477 volunteer hours (valued at \$164,271@24.14/hr.) toward City or LACNIP neighborhood network sponsored events. Bradfield Center assisted 181 LMI Seniors and youths (153 seniors and 28 youth) with various health education and exercise programs.
- GOAL: Reconstruction/resurfacing of streets and other improvements to public infrastructure
 in CDBG eligible areas will improve the accessibility of places and destinations that would
 benefit approximately 200 households, businesses and 5,555 LMI persons. Parks and Recreation
 improvements will benefit approximately 50 youth and their families from various recreational
 activities.
 - RESULT: Reconstruction and resurfacing of streets including 41 city blocks or 12,890 linear feet or 2.4 miles and 1,998 square feet of sidewalk reconstruction that provided improved accessibility directly to 1,640 LMI persons in 410 households and also benefitted 10 area businesses. In preparation of Schoonover Park Improvements Phase I and 2 in 2019, trees and vegetation were cleared from the proposed bicycle pump track site, 2018 utilized \$14,950, waiting ODNR funding to complete Lincoln Park playground project. This program helped 125 Lima residents in a predominantly LMI area. Repair/replacement of the HVAC for Family Resource Center, an office building providing mental help services to mostly LMI area children was completed.

GOAL: Property Maintenance targets about 2000 parcels as well as 9 Clearance and Demolition
of blighted structures and areas will have a community-wide impact by improving the livability
of residential neighborhoods.

RESULT: 10,028 inspections were performed by the Property Maintenance Inspectors to 4,271 properties that included structural, weed, specified properties and junk autos. A total of 5 dilapidated structures including four residential and one mixed use were demolished using CDBG funds to improve the livability of residential neighborhoods and business corridors.

Economic Opportunities:

 GOAL: One project will improve the accessibility of services for labor skill upgrading that will benefit about 15 LMI resident-adults who are either unemployed or underemployed. (Rhodes State College Career Pathways Program)

RESULT: Two Basic Manufacturing classes were held at Rhodes State College during 2017-18 program year where 8 Lima LMI residents registered with 2 of them receiving certification. They were also provided with job placement information and employment.

TABLE 5-20 CITY OF LIMA 2018 HOME PROGRAM							
Dungang Ashinita	Delive	rables	Expend	iture	Grant -	Targets	
Program Activity	Planned	Finished	Projected	Actual	Met	Unmet	
Home ReNew	10	8					
Home Update	10	4]		
Down Payment Assistance	16	10				Х	
New Construction	49	2				Х	
		Total					

C	TA TITY OF LIMA	BLE 5-21 2018 CDBG P	ROGRAM				
Program Activity	Deliverab	les to LMI	Expend	iture	Grant Targets		
Households ¹ /Persons ^{2/} Parcels ³	Planned	Finished	Projected	Actual	Met	Unmet	
Fair Housing Program	400	285				Х	
Housing Counseling	60	30				Х	
Housing Rehab Administration	NA	NA				Х	
Street Reconstruction & Resurfacing ¹	200	410			✓		
Sidewalk Construction/ADA Access ²	5,555	1,640				Х	
Park Improvements ³	2	0		\$35,882		Х	
Housing Demolition	9	5				Х	
Property Maintenance Service ³	2,000	4,271			✓		
Economic/Employment Training ¹	15	8				Х	
Police Support Services ²	5,000	7,470			✓		
Neighborhood Development Programs	15	15			✓		
Community Grant Workshops	NA	NA	NA	NA	NA	NA	
Health Education/Exercise ²		181					
Summer Recreation Programming ¹		97				Х	
Program Administration	NA	NA	NA	NA	NA	NA	
		Total					

Summation

In summation, this report offers a substantial reevaluation and update of the Analysis of Impediments to Fair Housing Choice submitted in PY 2016. The report follows the same format as the PY 2016 AI in order to ensure consistency and provide the background information necessary to understand the goals and objectives pursued since the adoption of the AI - originally submitted in December 2013. This report attempts to provide the latest available data in order to present a comprehensive overview of the population/demographics, local housing characteristics, and the impediments to fair housing choice including a summary of fair housing complaints. Finally, the report concludes with a 5-year assessment of the accomplishments made thru 2018 relative to the goals and objectives identified as necessary to advance FHC.

It is the opinion of the Regional Planning Commission that the material compiled for the population component of the report represents a fair and accurate assessment of available 2013-2017 ACS data. The report suggests an increasingly aging population with higher disability rates and a more female orientation. Racial and ethnic data suggests a decline in the White and African American Population slightly growth in the Hispanic, American Indian, and Asian populations. Data herein suggests that while poverty levels have dropped somewhat, income levels have not kept up with state or national income levels. In 2017, data suggests that 15.7 percent of all households were below the poverty level.

The RPC also contends that the 2nd section of the report provides a current and realistic picture of the local housing market. The report acknowledges the use of property level data made available by the Allen County Auditor in addition to that mad available by the ACS. Current, ACS data suggests housing vacancies have increased somewhat even while housing demolitions continue and home ownership levels reveal a general and slow decline. A pattern of disinvestment in the older housing stock has developed. Affordability of housing was found to be limited to just 26.2% of all renters. Data suggests that the total units with lead paint exposure represent nearly 6 in 10 units (57.1%). The age and condition of the housing stock remains a concern and has been identified in the Allen County Health Improvement Plan (CHIP).

The report then attempts to address the various policies, actions, omissions, or decisions that restrict housing choice for the protected classes. The report examines local regulatory barriers including the often-maligned processes related to the development of new housing primarily subdivision, zoning and building regulations.

- The Planning Commission reviewed the regulations (or lack thereof) for such insights. Building codes only exist within the City of Lima and their regulations work to accommodate higher densities (17.4 units per acre), with smaller external yard requirements 2,500 sq ft, and smaller minimum size units (650 sq ft).
- With respect to zoning the municipalities tended to adopt a Pyramidal type of zoning while the townships tended to adopt the more exclusive Euclidean approach. And while most of the townships (75%) did permit mixed use and zero lot line developments, the range in units minimum size ranged from 750 to 1,700 sq ft in size. Much of the disparities exist when examining density issues, and most can be explained by the lack of utilities in the rural area (71% of land is engaged in agriculture) and the minimum yard requirements recommended by the OEPA.
- Subdivision regulations governing the platting of residential, commercial and/or mixed-use
 developments require water, sewer, curbing, gutters, storm sewers and sidewalks. Such capital
 improvements are expensive and are typically borne by the developer. The municipalities support

their own respective subdivision regulations; the RPC reviews those proposed in the unincorporated areas (townships) of Allen County. The regulations are not uniform but are considered very similar in terms of design specifications and predicated on Ohio DOT, Ohio EPA and ADA standards.

The remainder of Section 4 documents land available for commercial housing - mapped based on the availability of municipal water and sewer services. The local lending institutions were then identified based upon the level of service provided and subsequently mapped to identify neighborhood characteristics. A review of HMDA data was used to identify variations in lending at the tract level; subsequently loan denials were examined by race, income and reason for denial. African Americans were found to receive a loan denial at higher rates than other ethnic or racial breakdowns regardless of loan type. In 2017, African Americans were denied access to FHA loans in every documented case due to having a poor credit history. The section concludes with a review of the Fair Housing complaints and referral services supported. Practices examined during CY 2018 in WOCAPs FH testing identified no overt discrimination to any of the protected classes.

Section 5 provides a fairly comprehensive status update on each of the goals and objectives that were established in the initial Fair Housing Planning process developed for the 2014-2018 AI. While some goals and objectives were readily identified early in the FH planning process, progress on achieving the objectives varied widely. Some of the goals and objectives actually morphed after repeated delays or new twists developed. And this is not to say that such an evolution process should not occur; in fact, it suggests change and that is what the AI called for. The AI attempted to address each of the following goals:

- Advance Public Awareness, Understanding & Support for the Development of Safe, Clean, Healthy & Affordable Housing in Allen County;
- Expand the Range of Available, Accessible & Appropriate Housing Opportunities to meet the Need of the Disabled;
- Expand Available Housing Opportunities to Meet the Needs of All Allen County Residents;
- Develop Neighborhood & Corridor Plans to Ensure Supportive Environments for Re-Development;
- Provide Housing Options in Neighborhoods that Respect Architectural Character while Maximizing Housing Choice;
- Eliminate Homelessness in Allen County;
- Identify, Assemble & Develop Underutilized Land for Future Re-Development Opportunities;
- Safe, Accessible, Appropriate & Affordable Housing in our Neighborhoods; and,
- An Enhanced Quality of Life in Area Neighborhoods.

Each of the goals, policies and strategies appear in a matrix identifying progress achieved. The RPC and local stakeholders acknowledge that the goals were lofty and that more work needs to be done to achieve them. However, all stakeholders contend that the basis for FHC has been established and is rooted on a strong and growing coalition. The locals suggest that the same goals and objectives should simply extend forward for another 5-year period to ensure the FHP process is allowed to evolve, that impediments are discussed and addressed, and real progress toward achieving Fair Housing Choice continues.

APPENDIX A:

Public Planning Process

Public Involvement Process

<u>Introduction</u>

The Analysis of Impediments (AI) to Fair Housing Choice - is a federally mandated report. The regulations at 24 CFR 570.487 and 24 CFR 91.325 include the affirmatively furthering fair housing requirements of the Fair Housing Act that apply to the Community Development Program. They specify that the affirmatively furthering fair housing certification requires grantees to engage in fair housing planning by conducting an analysis of impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of identified impediments, and maintaining records to document the analysis and actions taken.¹

Initially the AI looked to define an impediment to fair housing choice (FHC) as an action, or an inaction that restricts housing choice or that has the effect of restricting housing choice. Initially AIs were to develop a comprehensive review of:

- A comprehensive review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws, regulations, and practices affect the location, availability, and accessibility of housing;
- An assessment of conditions, both public and private, affecting fair housing choice for all
 protected classes. The protected classes under the Fair Housing Act are race, color,
 religion, sex, national origin, disability, and familial status (in other words, households with
 children); and
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

The AI and its successor the Analysis of Impediments - Affirmatively Furthering Fair Housing (AFH), ultimately set the parameters and the tone for FHP as well as the programs, services and actions deemed warranted to be undertaken by local governments and stakeholders to address FHC. Unfortunately, HUD regulations do not directly tie public participation in CDBG, the ConPlan, or the PHA Plan with the AI. 2 Insights were made however in the Fair Housing Planning Guide 3 and the Ohio Development Services Agency publication entitled "How to Analyze Impediments to Fair Housing and Develop a Plan. 4

The Public Planning Process

From a historical perspective, and as encouraged by HUD, program participants decided to collaborate to develop a regional AI, to better allow program participants to share resources and address fair housing issues that cross jurisdictional boundaries. Pursuant to 24 C.F.R. 5.160, and based on the input and direction from the City of Delphos, the City of Lima, the Allen County Board of Commissioners and 17 other local political subdivisions, the Regional Planning Commission was charged with the responsibility of compiling, analyzing, drafting, revising and rolling out an Analysis of Impediments to Fair Housing Choice (2008), an Analysis of Impediments to Fair Housing Choice -

 $^{{}^{1}\}text{https://www.development.ohio.gov/files/cs/Analyze\%20Impediments\%20to\%20Fair\%20Housing\%20Guidebook\%202016.pdf}$

² https://nlihc.ora/sites/default/files/AG-2018/Ch07-S03 AFFH-Old-Analysis 2018.pdf

³ HUD's Fair Housing Planning Guide, Vol. 1 (#HUD1582B-FHEO), http://apps.hud.gov/offices/fheo/images/fhpg.pdf

⁴https://www.development.ohio.gov/files/cs/Analyze%20Impediments%20to%20Fair%20Housing%20Guidebook%202016.pdf

Affirmatively Furthering Fair Housing Choice 2013), and this report, a Substantial Re-evaluation & Update of the Analysis of Impediments to Fair Housing Choice - Affirmatively Furthering Fair Housing Choice (2019).

The local community recognizes the lack of a final Assessment Tool and the Regional Planning Commission pursued development of the AI based on its historical relationship with ODSA and local governments. The Planning Commission identified and assembled the principle stakeholders and engaged them in the Fair Housing Planning (FHP) process to:

- Provide the necessary background information related to the community's demographics, income, employment patterns;
- A robust analysis of housing including costs, conditions, size, vacancy status, etc;
- Identify impediments to fair housing choice within the local jurisdictions;
- Take appropriate actions to overcome the effects of any impediments identified in the analysis; and,
- Maintain records reflecting the analysis and actions.

The Fair Housing Planning Guide suggests that before developing actions to eliminate the effects of impediments, a jurisdiction "should ensure that diverse groups in the community are provided a real opportunity to participate in the FHP process.

The AI was completed over the January thru June 2019 period. The Regional Planning Commission employed the use of its 20 members governments and internal committee structure (some 143 persons) reflecting: local, township, village, municipal elected officials; county and state agencies; regional community action commission; local legal aid and criminal justice system; area business and development organizations; environmental groups; housing development organizations; neighborhood associations; nonprofit and government social service agencies; area realtors/bankers; transit/paratransit professionals; and, zoning/planning commissions. This existing network of public/private for profit/not for profit and government interests/perspectives were fully aware of the Regional Planning Commission's efforts with respect AI data collection, analysis, discussions and recommendations.

Both internal committees and several external groups including: the Allen Metropolitan Housing Authority, Coleman Professional Services, West Ohio Community Action Partnership, Family Promise, and the Allen County Housing Consortium had full access to the initial copies of the DRAFT AI. Early drafts of the AI evolved and were refined based on various data items identified as necessary; this refined data was provided by the aforementioned offices/agencies. The early drafts were submitted through the internal committee structure of the Regional Planning Commission. Table 1 provides a glimpse of the public involvement meetings where the regional Planning Commission staff shared prepared materials or conducted in-depth interviews with internal/external stakeholders necessary to gain insights as to partner services, clients and limits. Table 1-1 on page 1-5 depicts the public participation calendar.

While the internal committees seemed to be more focused on data the external partners were more focused on impacts and the delivery or development of services. But the completion of this assessment was made possible only with the support and cooperation of multiple agencies and offices including: Allen Metropolitan Housing Authority, Coleman Professional Services, West Ohio Community Action Partnership, Family Promise, Allen County Housing Consortium, Allen County Commissioners, Allen County Auditor's Office, Allen County Building Department, Allen County

Engineer's Office, Allen County Sanitary Engineer's Office, Allen County Tax Map Office, Allen Water District, City of Lima Public Works Department, City of Lima Building & Zoning Office, City of Lima Community Development Office, City of Lima Police Department, and the City of Delphos Safety Services Office. Such agencies provided the bulk of information used to develop/validate specific data sets and conditions.

After the FINAL DRAFT AI was adopted by the Regional Planning Commission, a Press Release was sent to all local media outlets. The press release announced the availability of the document in various formats including options to request large print and a 21-day public involvement period. Copies of the Final DRAFT AI were made available for review and distribution at the Allen County Court House, the City of Lima Administration Building, the City of Delphos Administration Building and the Lima Public Library. Electronic copies were also made available on the websites of the Allen County Commissioners, City of Lima, City of Delphos and the Regional Planning Commission. Written comments and associated responses were solicited.

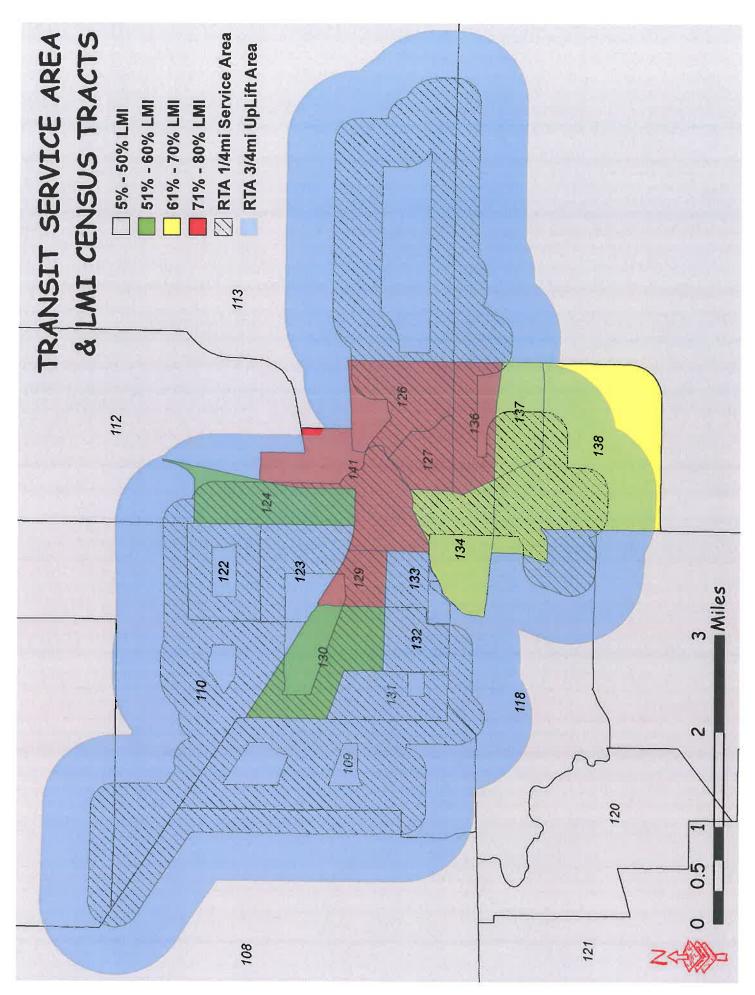
Public meetings to review the FINAL DRAFT were held at the offices Regional Planning Commission and the Allen County Court House, both sites meet ADA accessibility standards and are served by the Regional Transit Authority. The Board of Commissioners of Allen County Ohio approved of the 2019 AI submission on June 27, 2019. A signature page of the major stakeholders is presented in Appendix I. No public comments were received to be incorporated herein.

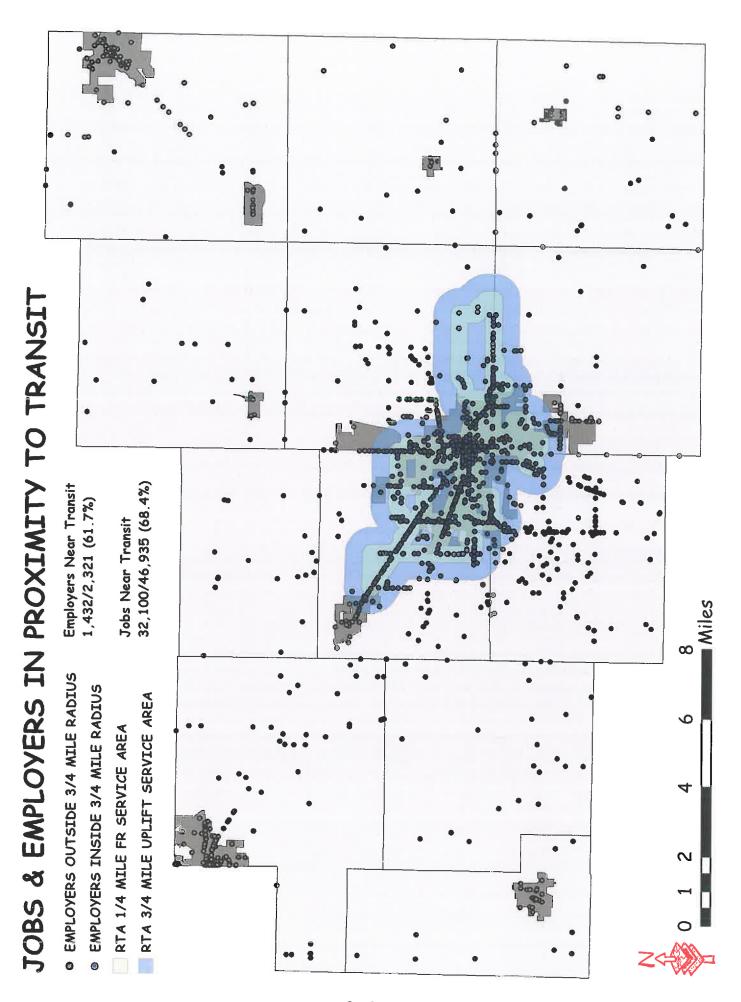
Summation

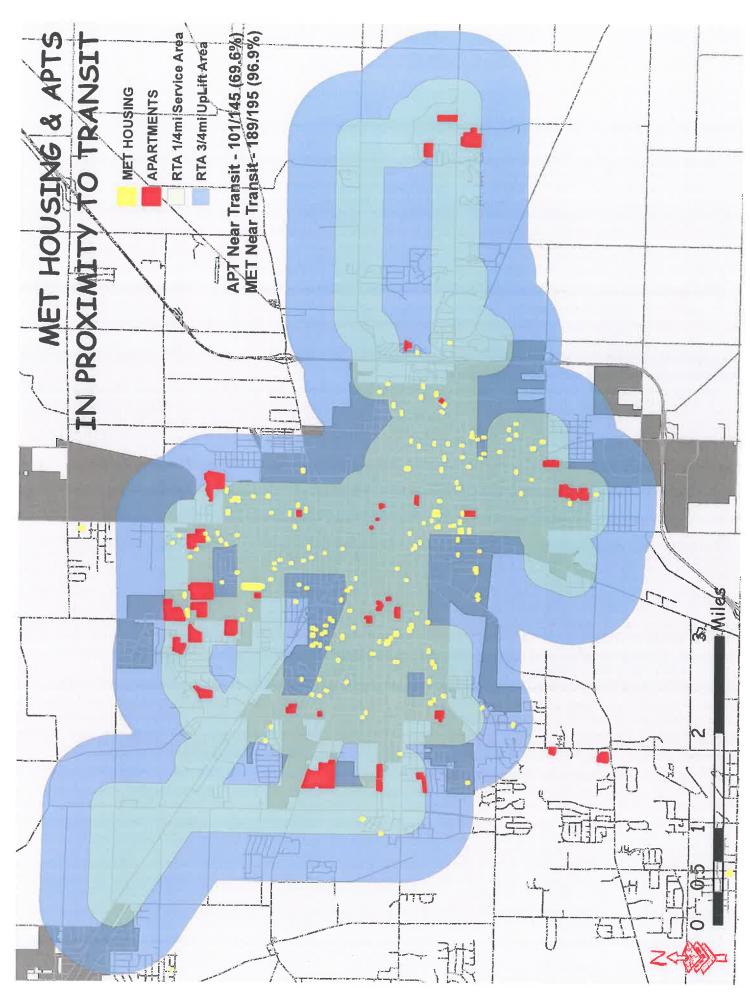
In closure, the Regional Planning Commission worked to: develop demographic and socioeconomic characteristics of the local population at the political subdivision and tract levels; presented employment and transportation-related information reflective of opportunities and barriers to existing and proposed housing development; and, assembled an extensive overview of housing characteristics, conditions, types, and costs of housing at the political subdivision and tract levels. The AI analyzed residency by race and ethnicity over time to reveal an increasing minority presence across the various political subdivision/tract boundaries. Such data was presented in written, tabular and mapped formats. Historical impediments were identified and tracked to assess their existence (real estate practices minority brokerage services, financial services). Several regulatory issues were dismissed (land use, zoning, subdivision, building regulations), others were investigated (board compositions, equalization of municipal services) to the extent practicable. The background information and the assessment gave way to the identification of certain actions needed to overcome the impacts and effects of identified impediments to fair housing choice. The AI provides a structured look at a shared housing vision and identifies the goals and objectives deemed necessary to achieve such a vision. More importantly in provides a summary of the actions taken, the accomplishments achieved, and the status of certain objectives still underway. Recognizing the diversity and relationships between the vested parties - the Regional Planning Commission recognized the responsibility to assemble and maintain the records reflecting the analysis of impediments and requisite actions taken heretofore and henceforth.

APPENDIX B:

Public Transportation







APPENDIX C:

Tax Rate

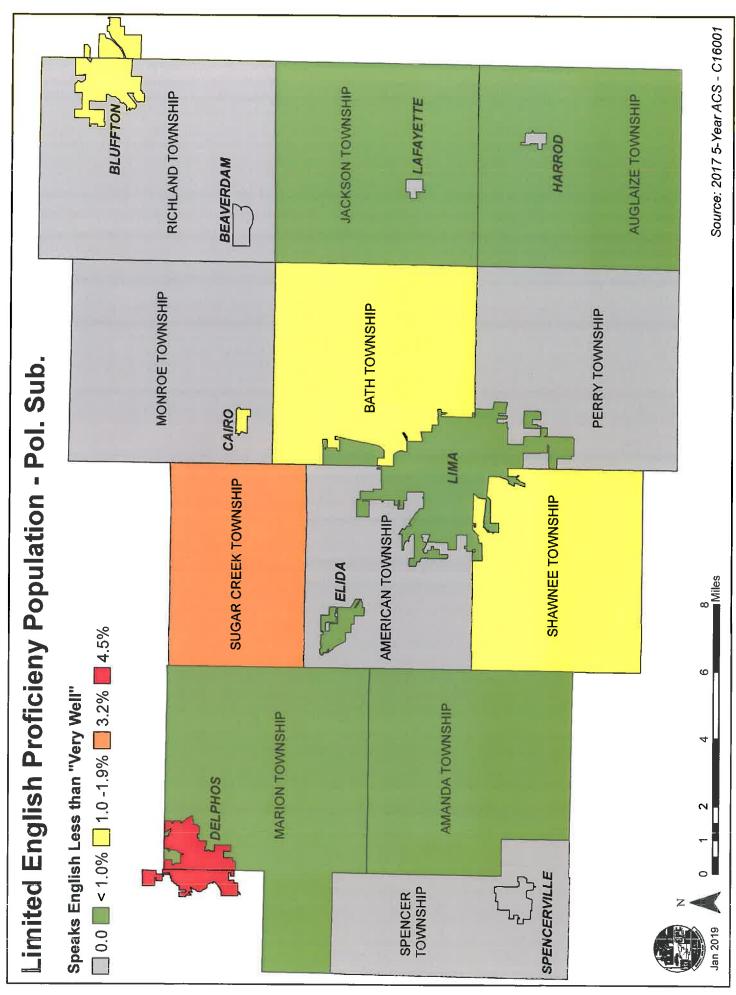
2017 Pay 2018 Tax Year - Allen County

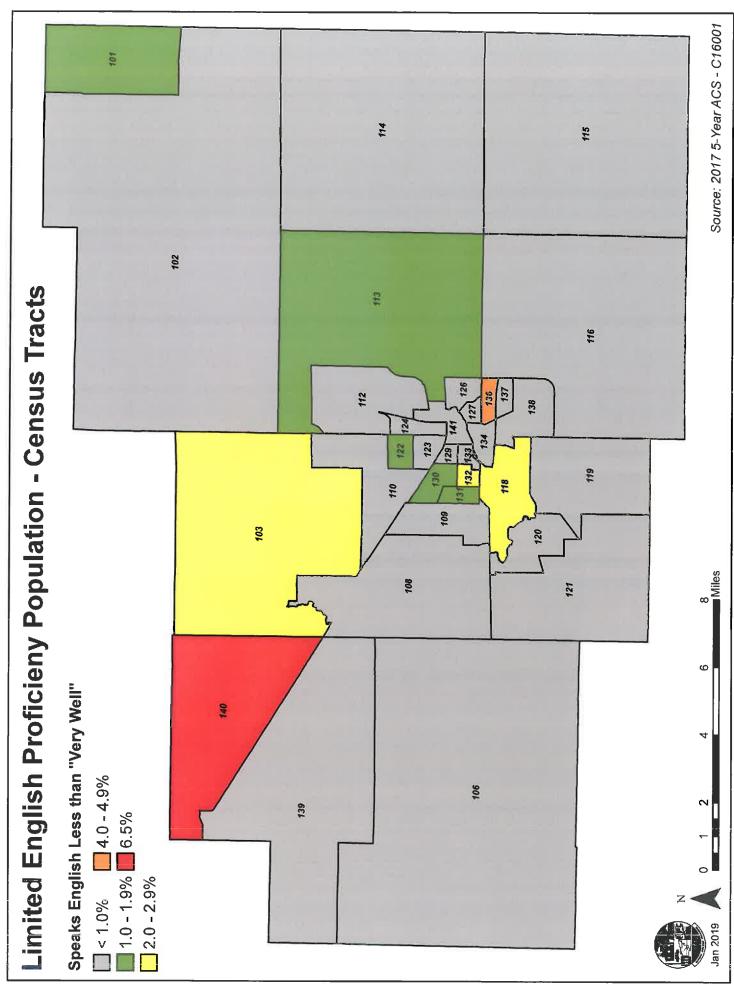
Color Colo									uy zo.	O TUX TOO	ii - Alleli C	ounty							
BLIFFTON CORP	TAX SET	POLITICAL SUBDIVISION				SCHOOL	VILLAGE	SCHOOL	FULL TAX	EFFECTIVE	REDUCTION	CREDIT AGR-	OCCUPIED	ROLLBACK	EFFECTIVE	REDUCTION	CREDIT	OCCUPIED	ROLLBACK
BEAVERLANK CORP	A01	BLUFFTON EX V S D	11.400	1.000	4.500	41.281	0.000	3.090	61.271	44.968295	0.266075	0.091765	0.022941	11.4706%	48.066408	0.215511	0.091980	0.022995	11.4975%
PANCORA-GIBLO 11,400 0.000 4.070 0.000 0.000 56.500 33.99214 0.22645 11,42275 46.16444 0.16907 0.09167 0.023779 11,98275 11,42757 11,400 0.000 2.990 32.000 0.000 3.000 58.700 0.024470 0.024620 11,44475 11,42275 56.50073 0.024627 11,44275 0.000 0.000 0.000 2.990 33.02 0.000 0.000 4.440 33.72779 0.19614 0.024620 11,44475 41,323158 0.169090 0.024607	A02	BLUFFTON CORP	11.400	1.000	2.500	41.281	2.500	3.090	61.771	45.468295	0.263922	0.091855	0.022963	11.4818%	48.566408	0.213767	0.092062	0.023015	11.5077%
BUFFTONEEXY, S. D.	A04	BEAVERDAM CORP	11.400	1.000	2.500	41.281	2.500	3.090	61.771	45.468295	0.263922	0.091855	0.022963	11.4818%	48.566408	0.213767	0.092062	0.023015	11.5077%
COLUMBUS GROWN L. S. D.	A05	PANDORA-GILBOA L.S.D.	11.400	0.000	4.500	40.750	0.000	0.000	56.650	38.369218	0.322697	0.094581	0.023645	11.8226%	46.164844	0.185087	0.095167	0.023791	11.8958%
BATHL S. D.	B06	BLUFFTON EX. V. S. D.	11.400	1.000	2.950	41.281	0.000	3.090	59.721	43.870333	0.265412	0.091559	0.022889	11.4448%	47.080877	0.211653	0.091812	0.022953	11.4765%
CAMPO COMP.	B08	COLUMBUS GROVE L. S. D.	11.400	0.000	2.950	32.000	0.000	3.090	49.440	39.742709	0.196143	0.094768	0.023692	11.8460%	41.233155	0.165996	0.094589	0.023647	11.8236%
Color Colo	B09	BATH L. S. D.	11.400	0.000	2.950	38.822	0.000	3.090	56.262	52.796693	0.061592	0.096062	0.024015	12.0077%	56.051778	0.003736	0.096019	0.024004	12.0023%
DELPHOS COPR 11.400	B10	CAIRO CORP.	11.400	0.000	2.050	38.822	7.400	3.090	62.762	56.983028	0.092078	0.096351	0.024087	12.0438%	60.843854	0.030562	0.096333	0.024083	12.0416%
DEF DEF PRIOS CORP. 11400 0.800 0.200 47400 6.750 0.000 6.530 3.524141 0.44952 0.09407 0.02376 11.7837 52.89130 0.20878 0.09271 0.02340 11.77715 0.000 0.0	C11	ELIDA L. S. D.	11.400	0.000	6.200	40.572	0.000	3.090	61.262	52.147124	0.148785	0.096013	0.024003	12.0016%	59.929122	0.021757	0.096277	0.024069	12.0346%
Fig. File	D13	DELPHOS CITY S. D.	11.400	0.600	6.200	47.400	0.000	0.000	65.600	36.197632	0.448207	0.094256	0.023564	11.7820%	52.236006	0.203719	0.095729	0.023932	11.9661%
ETT DELPHOS CITY S. D. 11.400 0.000 4.550 47.400 0.000 0.000 5.3850 35.788478 0.440881 0.094878 0.023346 11.77378, 51.72914 0.19188 0.09588 0.023221 11.8967% 0.0000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.000 0.0	D14	DELPHOS CORP.	11.400	0.600	0.200	47.400	6.750	0.000	66.350	36.524141	0.449523	0.094307	0.023576	11.7883%	52.630130	0.206780	0.095761	0.023940	11.9701%
E19 SPENCERVILLE L.S. D. 11.400 0.000 4.550 32.070 0.000 3.090 51.110 41.138400 0.19510 0.09446 0.022736 11.8652* 44.023622 0.099512 0.09512 0.022754 11.8670* E19 SPENCERVILLE CORP. 11.400 0.000 0.550 32.070 2.550 3.900 43.600 0.000 0.174635 0.004262 0.022731 11.8657** 44.786556 0.096499 0.056516 0.022754 11.8770* E72 SIANWREL S. D. 11.400 0.000 2.800 43.773 0.000 3.090 52.62 47.976727 0.082162 0.09665 0.022731 11.8657** 44.786556 0.096499 0.056516 0.022754 11.8770* E72 ELIDA L.S. D. 11.400 0.000 2.800 40.772 0.000 3.090 57.82 50.000 3.090 57.82 50.000 3.090 57.82 50.000 3.090 57.82 50.000 3.090 57.82 50.000 3.090 57.82 50.000 3.090 57.82 50.000 3.090 57.82 50.000 3.090 57.82 50.000 3.090 57.82 50.0000 3.090 57.82 50.000 3.090 57.82 50.000 3.090 57.82 50.00000 3.090 57.82 50.0000 3.090 57.82 50.00000 3.090 57.82 50.00000 3.090 57.82 50.00000 3.090 57.82 50.00000 3.090 57.82 50.000000 3.090 57.82 50.00000 3.090 57.82 50.00000 3.090 57.82 50.000000 3.090 57.82 50.000000 3.090 57.82 50.00000000 3.090 57.82 50.00000000000000000000000000000000000	D16	ELIDA L. S. D.	11.400	0.000	6.200	40.572	0.000	3.090	61.262	51.436936	0.160378	0.095958	0.023989	11.9947%	58.906206	0.038454	0.096212	0.024053	12.0265%
E19 SPENCERVILLE CORP. 11.400 0.000 0.550 32.070 2.550 3.090 49.660 40.976800 0.174653 0.094926 0.023731 11.857% 44.768556 0.098499 0.095016 0.023754 11.8770%	E17	DELPHOS CITY S. D.	11.400	0.600	4.550	47.400	0.000	0.000	63.950	35.768476	0.440681	0.094187	0.023546	11.7733%	51.723014	0.191196	0.095686	0.023921	11.9607%
F20 SHAWNEE L.S. D. 11.400 0.000 2.800 34.973 0.000 3.090 52.263 47.967927 0.082182 0.095665 0.023916 11.9581% 51.380961 0.016533 0.095659 0.023914 11.95735, F21 SPENCERVILLE L.S. D. 11.400 0.000 2.800 40.572 0.000 3.090 67.802 40.415107 0.151217 0.094855 0.023713 11.58585% 44.313409 0.102240 0.094855 0.023714 11.8705, F22 ELIDA L.S. D. 11.400 0.000 1.000 1.000 3.090 67.802 40.572 0.000 3.090 67.802 50.24487 0.19585 0.023713 11.58585% 44.313409 0.102240 0.094856 0.023741 11.8705% 66.82701 10.000 1.000 1.000 1.000 1.000 1.000 3.091 67.802 50.24487 0.19585 0.023711 0.009080 0.023946 10.12250% 59.470007 0.013025 0.081422 0.020355 10.2777% 0.000 1.00	E18	SPENCERVILLE L. S. D.	11.400	0.000	4.550	32.070	0.000	3.090	51.110	41.138400	0.195101	0.094946	0.023736	11.8682%	46.023922	0.099512	0.095152	0.023788	11.8940%
F21 SPENCERVILLE L. S. D. 11.400 0.000 2.800 32.070 0.000 3.000 49.360 40.415107 0.181217 0.094855 0.023713 11.8568% 44.313409 0.102240 0.094855 0.023741 11.8706% F22 ELIDA L. S. D. 11.400 0.000 10.000 10.000 3.090 67.762 0.000 3.090 57.827 0.000 3.090 60.283 58.857135 0.0737111 0.009580 0.023296 11.9337% 65.662701 0.020331 0.096064 0.024016 12.0069% 67.000 10.000 10.000 10.000 10.000 3.973 0.000 3.090 60.283 55.857135 0.0737111 0.009580 0.0232945 10.1225% 59.47052 0.013025 0.0081422 0.020355 10.1777% 67.000 0.000 10.000 47.545 0.000 0.000 65.865 68.173695 0.134893 0.023292 0.020598 10.2990% 61.874543 0.112466 0.082142 0.020555 10.2577% 625 ELIDA L. S. D. 11.400 0.000 10.000 47.545 0.000 3.000 65.865 81.73695 0.116734 0.081738 0.020444 10.21727% 65.167577 0.016050 0.082333 0.020760 13.3802% 62.345 62.34545 0.000 0.000 0.5570 3.8822 0.000 3.000 65.865 55.32464 0.072707 0.096242 0.024656 10.2227% 65.167577 0.016050 0.082343 0.020760 13.3802% 62.34545 0.000 0.000 1.5700 3.7037 0.000 3.000 57.227 45.4142246 0.027147 0.096242 0.024655 11.2327% 65.167577 0.016050 0.082343 0.020760 13.3802% 62.34545 0.000 0.000 0.5570 37.037 0.000 3.000 57.227 45.4142246 0.027147 0.096242 0.024655 11.2327% 65.167577 0.016050 0.096243 0.020660 12.0030% 62.34545 0.0000 0.000 0.5570 37.037 0.000 3.000 57.227 45.4142246 0.027147 0.096242 0.024655 11.3827% 65.058377 0.016050 0.096243 0.020660 12.0030% 62.34545 0.0000 0.000 0.5570 37.037 0.000 3.000 57.227 45.444246 0.027147 0.096242 0.024655 11.3827% 65.058377 0.016050 0.096243 0.024660 12.0030% 62.34545 0.0000 0.000 0.000 0.5570 37.037 0.000 3.000 64.327 52.462246 0.184444 0.00607 0.024069 12.0046% 67.597877 0.016050 0.096243 0.022660 12.0030% 62.34545 0.0000 0.000	E19	SPENCERVILLE CORP.	11.400	0.000	0.550	32.070	2.550	3.090	49.660	40.976800	0.174853	0.094926	0.023731	11.8657%	44.768556	0.098499	0.095016	0.023754	11.8770%
F22 ELIDA L. S. D. 11.400 0.000 2.800 40.572 0.000 3.090 57.862 50.28487 0.13058 0.095865 0.023966 11.9831% 56.682701 0.020381 0.096064 0.024016 12.0080% G23 SHAWNEEL S. D. 11.400 0.000 10.800 34.973 0.000 3.090 60.263 SH. S857135 0.073111 0.080909 0.020245 10.1225% 59.478057 0.013025 0.081422 0.020355 10.1777% G25 ELIDA L. S. D. 11.400 0.000 10.800 40.572 0.000 3.090 65.862 58.173895 0.116734 0.081730 0.020388 10.2329% 64.761797 0.016705 0.082933 0.020714 10.32677% G25 ELIDA CORP. 11.400 0.000 9.300 40.572 0.000 3.090 65.862 58.173895 0.116734 0.081730 0.020434 10.2172% 64.761797 0.016705 0.082933 0.020714 10.32677% G26 ELIDA CORP. 11.400 0.000 6.330 40.572 1.900 3.090 56.562 58.573895 0.116029 0.081862 0.020465 10.2227% 69.161797 0.016705 0.082933 0.020714 10.3672% G26 ELIDA CORP. 11.400 0.000 6.330 38.822 0.000 3.090 59.662 55.324164 0.072707 0.096242 0.020460 12.02307% 59.34858 0.004650 0.083043 0.020760 12.0033% G28 ALLEN EAST L. S. D. 11.400 0.000 5.750 37.037 0.000 3.090 57.277 45.412246 0.207147 0.095421 0.023855 11.9276% 50.555786 0.117346 0.095587 0.023896 11.9483% G29 LLEN EAST L. S. D. 11.400 0.000 7.500 37.037 0.000 3.090 59.625 0.024044 0.020745 0.084444 0.096037 0.024090 12.00467 57.597897 0.04608 0.095587 0.023896 11.9483% G29 LLEN EAST L. S. D. 11.400 0.000 7.500 37.037 7.000 3.090 59.057 245.488433 0.22365 0.024091 11.9276% 50.555786 0.117346 0.095587 0.023896 11.9481% G29 LLEN EAST L. S. D. 11.400 0.000 7.500 37.037 7.000 3.090 59.057 245.488433 0.22362 0.095479 0.023857 11.9276% 50.555786 0.117346 0.095587 0.023896 11.9481% G29 LLEN EAST L. S. D. 11.400 0.000 7.500 37.037 7.000 3.090 59.057 245.488433 0.22362 0.095479 0.023857 11.9276% 50.555786 0.117346 0.095587 0.023896 11.9481% G29 LLEN EAST L. S. D. 11.400 0.000 1.000 37.037 7.000 3.090 59.057 245.488433 0.023857 0.023857 11.9276% 50.555786 0.017738 0.0023896 11.9481% G29 LLEN EAST L. S. D. 11.400 0.000 0.000 37.037 0.000 3.090 59.657 45.488433 0.023857 0.023385 11.9276% 50.555786 0.0477788 0.023896 11.9481% G29 LLEN EAST L. S. D. 11.400	F20	SHAWNEE L. S. D.	11.400	0.000	2.800	34.973	0.000	3.090	52.263	47.967927	0.082182	0.095665	0.023916	11.9581%	51.398961	0.016533	0.095659	0.023914	11.9573%
C23 SHAWNEE L. S. D. 11.400 0.000 10.800 34.973 0.000 3.000 60.263 55.857135 0.073111 0.080980 0.020245 10.1225% 59.478057 0.013025 0.081422 0.020355 10.1777% C24 LIMA CITY S. D. 11.400 0.000 10.800 47.545 0.000 0.000 69.745 60.336856 0.134893 0.023929 0.029998 10.2999% 61.87443 0.112846 0.082142 0.020355 10.2577% C25 C2	F21	SPENCERVILLE L. S. D.	11.400	0.000	2.800	32.070	0.000	3.090	49.360	40.415107	0.181217	0.094855	0.023713	11.8568%	44.313409	0.102240	0.094965	0.023741	11.8706%
G24 LIMA CITY S. D. 11.400 0.000 10.800 47.545 0.000 0.000 69.745 60.358856 0.134893 0.082392 0.020598 10.2990% 61.874543 0.112846 0.082142 0.020535 10.2677% G25 ELIDA L. S. D. 11.400 0.000 10.800 40.572 1.900 3.090 65.862 58.173695 0.116734 0.081738 0.020434 10.2172% 67.676179 0.016705 0.082393 0.020734 11.3672 11.3607 0.000 1.	F22	ELIDA L. S. D.	11.400	0.000	2.800	40.572	0.000	3.090	57.862	50.284487	0.130958	0.095865	0.023966	11.9831%	56.682701	0.020381	0.096064	0.024016	12.0080%
C25 ELIDA L. S. D. 11.400 0.000 10.800 40.572 0.000 3.090 65.862 58.173695 0.116734 0.081738 0.020434 10.2172% 64.761797 0.016705 0.082938 0.020734 10.3672% 11.400 0.000 0.000 9.300 40.572 1.900 3.090 65.662 58.573695 0.116029 0.081862 0.020465 10.2327% 65.161797 0.016604 0.083043 0.020760 10.3003% 10.40078 11.400 0.000 0.3000 0.3000 0.3000 0.5000 3.090 0.52414 0.0207147 0.095421 0.023855 11.9276% 50.585786 0.117346 0.095587 0.023865 11.9276% 0.08587 0.023865 0.020465 0.024660 0.023855 0.024660 0.023855 0.024660 0.0	G23	SHAWNEE L. S. D.	11.400	0.000	10.800	34.973	0.000	3.090	60.263	55.857135	0.073111	0.080980	0.020245	10.1225%	59.478057	0.013025	0.081422	0.020355	10.1777%
C26 ELIDA CORP. 11.400 0.000 9.300 40.572 1.900 3.090 66.262 58.573695 0.118029 0.081862 0.020465 10.2327% 55.161797 0.016604 0.083043 0.020760 10.3033% 11.400 11.400 0.000 6.350 38.822 0.000 3.090 59.662 55.324164 0.072707 0.096242 0.024060 12.0302% 59.384885 0.004650 0.096243 0.024060 12.0302% 11.400 0.000 5.550 37.037 0.000 3.090 57.277 45.412246 0.027147 0.095421 0.023855 11.9276% 50.5555786 0.117460 0.095821 0.024060 12.0302% 11.400 0.000 0.000 4.400 37.037 8.400 3.090 64.327 52.482246 0.184444 0.096037 0.024009 12.0046% 57.597897 0.104608 0.096126 0.024031 12.0157% 11.400 0.000 7.500 37.037 0.000 3.090 59.027 45.488438 0.229382 0.095429 0.023857 11.9285% 50.540327 0.143776 0.095858 0.023886 11.9481% 11.400 0.000 7.500 37.037 7.050 37.037 7.050 3.090 64.077 49.223058 0.231814 0.095776 0.023944 11.9720% 53.545132 0.159540 0.095858 0.023886 11.9811% 11.400 0.000 7.500 42.300 0.000 2.000 52.000 45.066393 0.286924 0.023344 11.9232% 46.450944 0.05534 0.095158 0.023788 11.9813% 11.400 0.000 1.000 46.254 0.000 3.090 70.744 50.051394 0.292500 0.085667 0.021416 10.7083% 57.127988 0.192469 0.087051 0.021762 10.8813% 11.300 11.400 0.000 10.000 37.037 0.000 3.090 57.262 49.946180 0.121760 0.095837 0.023898 11.996% 55.236468 0.014028 0.023994 0.023998 11.996% 55.236468 0.014028 0.023994 0.023998 11.996% 55.236488 0.01706% 50.095947 0.023986 11.933% 11.400 0.000 0.000 40.572 2.200 3.090 57.262 49.946180 0.127760 0.095837 0.023999 11.996% 55.23748 0.017855 0.095947 0.023986 11.9933% 0.000 0.000 40.572 2.200 3.090 57.262 49.946180 0.127760 0.095837 0.023999 11.996% 55.23748 0.017855 0.0239947 0.023986 11.9933% 0.000 0.000	G24	LIMA CITY S. D.	11.400	0.000	10.800	47.545	0.000	0.000	69.745	60.336856	0.134893	0.082392	0.020598	10.2990%	61.874543	0.112846	0.082142	0.020535	10.2677%
H27 BATH L. S. D. 11.400 0.000 6.350 38.822 0.000 3.090 59.662 55.324164 0.072707 0.096242 0.024060 12.0302% 59.384885 0.004650 0.096243 0.024060 12.0303% 12.0303% 12.0303% 11.400 0.000 5.750 37.037 0.000 3.090 57.277 45.412246 0.207147 0.095421 0.023985 11.9276% 50.555786 0.117346 0.095587 0.024081 11.400 0.000 4.400 3.0737 8.400 3.090 64.327 52.482246 0.184444 0.096037 0.024009 12.0046% 57.597897 0.104608 0.096124 0.023857 11.9286% 50.555786 0.117346 0.095587 0.024081 12.01578 11.400 0.000 7.500 37.037 0.000 3.090 59.027 45.488438 0.229362 0.095429 0.023857 11.9286% 50.540327 0.143776 0.095585 0.023896 11.9481% 1.000 0.000 1.000 5.500 37.037 7.050 3.090 64.077 49.223058 0.231814 0.095776 0.023944 11.9720% 53.854132 0.159540 0.095857 0.023964 11.9481% 1.92278 11.400 0.000 7.500 46.254 0.000 2.000 63.200 45.056393 0.286924 0.095386 0.023846 11.9232% 46.400984 0.265334 0.095185 0.023984 11.9937% 1.000 1.000 46.254 0.000 3.090 70.744 50.051394 0.292500 0.085667 0.021416 10.7083% 57.127888 0.192469 0.087051 0.021762 10.8813% 13.400 0.000 1.000 10.000 10.000 37.037 0.000 3.090 65.527 45.535240 0.21155 0.095716 0.023945 51.20329 11.9465% 55.224686 0.104028 0.095953 0.023988 11.99178 11.300 0.000 10.000 10.000 37.037 0.000 3.090 65.527 45.535240 0.21155 0.095716 0.023929 11.9465% 55.124686 0.104028 0.095953 0.023988 11.99178 11.300 0.000 10.000 46.254 0.000 3.090 65.527 45.535240 0.21155 0.095716 0.023929 11.9465% 55.124686 0.104028 0.095953 0.023988 11.99178 11.300 0.000 10.000 40.572 2.200 3.090 65.527 45.535240 0.21155 0.095716 0.023929 11.9465% 55.236468 0.104028 0.095953 0.023988 11.99178 11.300 0.000 0.000 47.545 3.900 0.000 62.845 53.809341 0.143777 0.096138 0.024078 11.9496% 55.236468 0.104028 0.095947 0.023986 11.9333% 11.94078 11.400 0.000 0.000 47.545 3.900 0.000 62.845 53.809341 0.143777 0.096138 0.024078 11.9466% 48.83474 0.215752 0.098470 0.023986 11.94333	G25	ELIDA L. S. D.	11.400	0.000	10.800	40.572	0.000	3.090	65.862	58.173695	0.116734	0.081738	0.020434	10.2172%	64.761797	0.016705	0.082938	0.020734	10.3672%
ALLEN EAST L. S. D. 11.400 0.000 5.750 37.037 0.000 3.090 57.277 45.412246 0.207147 0.095421 0.023855 11.9276% 50.555786 0.117346 0.095587 0.023895 11.9483%	G26	ELIDA CORP.	11.400	0.000	9.300	40.572	1.900	3.090	66.262	58.573695	0.116029	0.081862	0.020465	10.2327%	65.161797	0.016604	0.083043	0.020760	10.3803%
LAFAYETTE CORP.	H27	BATH L. S. D.	11.400	0.000	6.350	38.822	0.000	3.090	59.662	55.324164	0.072707	0.096242	0.024060	12.0302%	59.384585	0.004650	0.096243	0.024060	12.0303%
330 ALLEN EAST L. S. D. 11.400 0.000 7.500 37.037 0.000 3.090 59.027 45.488438 0.229362 0.095429 0.023857 11.9286% 50.540327 0.143776 0.095585 0.023896 11.9481% 3.14	128	ALLEN EAST L. S. D.	11.400	0.000	5.750	37.037	0.000	3.090	57.277	45.412246	0.207147	0.095421	0.023855	11.9276%	50.555786	0.117346	0.095587	0.023896	11.9483%
HARROD CORP. 11.400 0.000 5.500 37.037 7.050 3.090 64.077 49.23058 0.231814 0.095776 0.023944 11.9720% 53.854132 0.159540 0.095857 0.023964 11.9621%	129	LAFAYETTE CORP.	11.400	0.000	4.400	37.037	8.400	3.090	64.327	52.462246	0.184444	0.096037	0.024009	12.0046%	57.597897	0.104608	0.096126	0.024031	12.0157%
322 WAYNESFLD GOSHEN L. S. D. 11.400 0.000 7.500 42.300 0.000 2.000 63.200 45.066393 0.286924 0.095386 0.023846 11.9232% 46.430894 0.265334 0.095195 0.023798 11.8993% 11	J30	ALLEN EAST L. S. D.	11.400	0.000	7.500	37.037	0.000	3.090	59.027	45.488438	0.229362	0.095429	0.023857	11.9286%	50.540327	0.143776	0.095585	0.023896	11.9481%
K33 PERRY L S. D. 11.400 0.000 10.000 46.254 0.000 3.090 70.744 50.051394 0.292500 0.085667 0.021416 10.7083% 57.127988 0.192469 0.087051 0.021762 10.8813% K34 ALLEN EAST L S. D. 11.400 0.000 11.000 37.037 0.000 3.090 65.063 56.41015 0.023929 11.9465% 55.126468 0.104028 0.095933 0.023988 11.9941% K35 SHAWNEE L S. D. 11.400 0.000 15.600 3.9473 0.000 3.990 65.063 56.410145 0.132992 0.096514 0.024078 12.0392% 63.280768 0.027392 0.096514 12.0392% K37 ELIDA L S. D. 11.400 0.000 0.000 40.572 2.200 3.090 57.262 49.946180 0.127760 0.09537 0.023959 11.976% 56.237848 0.017885 0.066033 0.024008 12.0014% K38 LIMA CITY S. D. 11.400 0.000 0.000 47.545 3.900 0.000 62.845 53.809341 0.143777 0.096136 0.024034 12.0170% 55.09594 0.124026 0.095947 0.023966 11.9933% K39 SHAWNEE L S. D. 11.400 0.000 0.000 34.973 1.800 3.090 51.263 47.229620 0.076670 0.095597 0.023993 11.9466% 50.554108 0.013829 0.095947 0.023966 11.9433% K40 PERRY L S. D. 11.400 0.000 0.000 46.254 1.600 3.090 62.344 44.104504 0.292562 0.063734 0.020933 11.4667% 48.837474 0.215752 0.084870 0.021217 10.4667%	J31	HARROD CORP.	11.400	0.000	5.500	37.037	7.050	3.090	64.077	49.223058	0.231814	0.095776	0.023944	11.9720%	53.854132	0.159540	0.095857	0.023964	11.9821%
K34 ALLEN EAST L. S. D. 11.400 0.000 10.000 37.037 0.000 3.090 61.527 48.535240 0.211155 0.095716 0.02322 11.9645% 55.126468 0.104028 0.095953 0.023988 11.9941% 1.35 SHAWWEE L. S. D. 11.400 0.000 15.600 34.973 0.000 3.090 65.063 56.410145 0.132992 0.096314 0.024078 12.0392% 63.280768 0.027392 0.096474 0.024118 12.0592% 1.400 0.000 0.000 40.572 2.200 3.090 67.262 49.946180 0.127760 0.095837 0.023985 11.9796% 56.237848 0.017885 0.096033 0.024008 12.0041% 1.400 0.000 0.000 47.545 3.900 0.000 62.845 53.809341 0.143777 0.096136 0.024034 12.0170% 55.055944 0.124026 0.095947 0.023986 11.9933% 1.400 0.000 0.000 3.4973 1.800 3.090 51.263 47.229620 0.078680 0.025592 0.033999 11.9499% 50.554108 0.013329 0.095587 0.023896 11.9433% 1.400 0.000 0.000 0.000 3.4973 1.800 3.090 51.263 47.229620 0.078680 0.025592 0.023899 11.9499% 50.554108 0.013329 0.095587 0.023896 11.9433% 1.400 0.000 0.000 0.000 46.254 1.600 3.090 62.344 44.104504 0.292562 0.083734 0.020933 10.4667% 48.893174 0.215752 0.084870 0.021217 10.6087%	J32	WAYNESFLD GOSHEN L. S. D.	11.400	0.000	7.500	42.300	0.000	2.000	63.200	45.066393	0.286924	0.095386	0.023846	11.9232%	46.430894	0.265334	0.095195	0.023798	11.8993%
L35 SHAWNEL LS.D. 11.400 0.000 15.600 34.973 0.000 3.090 65.063 56.410145 0.132992 0.096314 0.024078 12.0392% 63.280768 0.027392 0.096474 0.024118 12.0592% M37 ELIDA L.S.D. 11.400 0.000 0.000 40.572 2.200 3.090 57.262 49.946180 0.127760 0.095837 0.023959 11.9795% 56.23748 0.017885 0.096033 0.024008 12.0041% M38 LIMA CITY S.D. 11.400 0.000 0.000 47.545 3.900 0.000 62.845 53.809341 0.14377 0.096136 0.024034 12.0170% 55.056984 0.124026 0.095947 0.023989 11.9995% 59.534708 0.024008 11.9405% M39 SHAWNEE L.S.D. 11.400 0.000 0.000 34.973 1.800 3.090 51.263 47.229620 0.037680 0.095597 0.023899 11.9495% 50.554108 0.01329 0.095587 0.023896 11.9435% M40 PERRY L.S.D. 11.400 0.000 0.000 46.254 1.600 3.090 62.344 44.104504 0.292562 0.083734 0.02933 10.4667% 48.893174 0.215752 0.084870 0.021217 10.6087%	K33	PERRY L. S. D.	11.400	0.000	10.000	46.254	0.000	3.090	70.744	50.051394	0.292500	0.085667	0.021416	10.7083%	57.127988	0.192469	0.087051	0.021762	10.8813%
M37 ELIDA L. S. D. 11.400 0.000 0.000 40.572 2.200 3.090 57.262 49.946180 0.127760 0.095837 0.023959 11.9796% 56.237848 0.017885 0.096033 0.024008 12.0041% M38 LIMA CITY S. D. 11.400 0.000 0.000 47.545 3.900 0.000 62.845 53.809341 0.143777 0.096138 0.024094 12.0170% 55.095994 0.124026 0.099947 0.023986 11.933% M39 SHAWNEE L. S. D. 11.400 0.000 34.973 1.800 3.090 51.263 47.229620 0.076800 0.09597 0.02399 11.9496% 50.554108 0.013279 0.02319 11.400 M40 PERRY L. S. D. 11.400 0.000 0.000 46.284 1.600 3.090 62.344 44.104504 0.292562 0.063734 0.020933 10.4667% 48.89374 0.215752 0.084870 0.021217 10.6687%	K34	ALLEN EAST L. S. D.	11.400	0.000	10.000	37.037	0.000	3.090	61.527	48.535240	0.211155	0.095716	0.023929	11.9645%	55.126468	0.104028	0.095953	0.023988	11.9941%
M38 LIMA CITY S. D. 11.400 0.00 0.000 47.545 3.900 0.000 62.845 53.809341 0.143777 0.096136 0.024034 12.0170% 55.050594 0.124026 0.095947 0.023986 11.9933% M39 SHAWNEE L. S. D. 11.400 0.000 0.000 34.973 1.800 3.090 51.263 47.229620 0.078680 0.095597 0.023899 11.9496% 50.554108 0.013829 0.095587 0.02389 11.9496% 50.554108 0.013829 0.095587 0.023896 11.9463% M40 PERRY L. S. D. 11.400 0.000 0.000 46.254 1.600 3.090 62.344 44.104504 0.292562 0.083734 0.020933 10.4667% 48.893174 0.215752 0.084870 0.021217 10.6087%	L35	SHAWNEE L. S. D.	11.400	0.000	15.600	34.973		3.090		56.410145	0.132992	0.096314	0.024078		63.280768	0.027392	0.096474	0.024118	12.0592%
M39 SHAWNEL L. S. D. 11.400 0.000 0.000 34.973 1.800 3.090 51.263 47.229620 0.078680 0.095597 0.023899 11.9496% 50.554108 0.013829 0.095587 0.02389 11.94978 M40 PERRY L. S. D. 11.400 0.000 0.000 46.254 1.600 3.090 62.344 44.104504 0.292562 0.083734 0.020933 10.4667% 48.893174 0.215752 0.084870 0.021217 10.6087%	M37	ELIDA L. S. D.	11.400	0.000	0.000	40.572	2.200	3.090	57.262	49.946180	0.127760	0.095837	0.023959	11.9796%	56.237848	0.017885	0.096033	0.024008	12.0041%
M40 PERRY L. S. D. 11.400 0.000 0.000 46.254 1.600 3.090 62.344 44.104504 0.292562 0.083734 0.020933 10.4667% 48.89374 0.215752 0.084870 0.021217 10.6087%	M38	LIMA CITY S. D.	11.400	0.000	0.000	47.545	3.900	0.000	62.845	53.809341	0.143777	0.096136	0.024034	12.0170%	55.050594	0.124026	0.095947	0.023986	11.9933%
	M39	SHAWNEE L. S. D.	11.400	0.000	0.000	34.973	1.800	3.090	51.263	47.229620	0.078680	0.095597	0.023899	11.9496%	50.554108	0.013829	0.095587	0.023896	11.9483%
M41 LIMA - BATH SD 11.400 0.000 0.000 38.822 1.450 3.090 54.762 51.666221 0.056532 0.095975 0.023993 11.9968% 54.554744 0.003785 0.095910 0.023977 11.9887%	M40	PERRY L. S. D.	11.400	0.000	0.000	46.254	1.600	3.090	62.344	44.104504	0.292562	0.083734	0.020933	10.4667%	48.893174	0.215752	0.084870	0.021217	10.6087%
	M41	LIMA - BATH SD	11.400	0.000	0.000	38.822	1.450	3.090	54.762	51.666221	0.056532	0.095975	0.023993	11.9968%	54.554744	0.003785	0.095910	0.023977	11.9887%

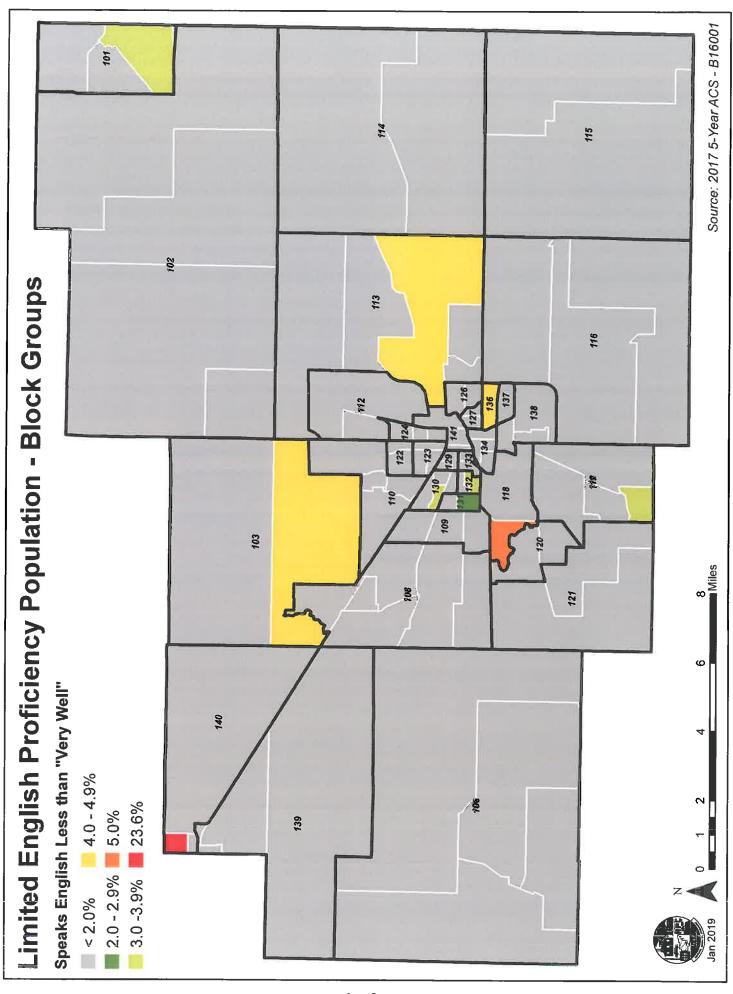
**COUNTY WIDE LEVIES 11.40 MILLS	Full Rate
ALLEN COUNTY GENERAL FUND	2.400
ACBDD	3.750
TRI-CTY MENTAL HEALTH	1.500
CHILDREN SERVICES	1.250
PARK DISTRICT	1.500
SENIOR CITIZENS	1.000
TOTAL MILLAGE	11.400

APPENDIX D:

Limited English Proficiency



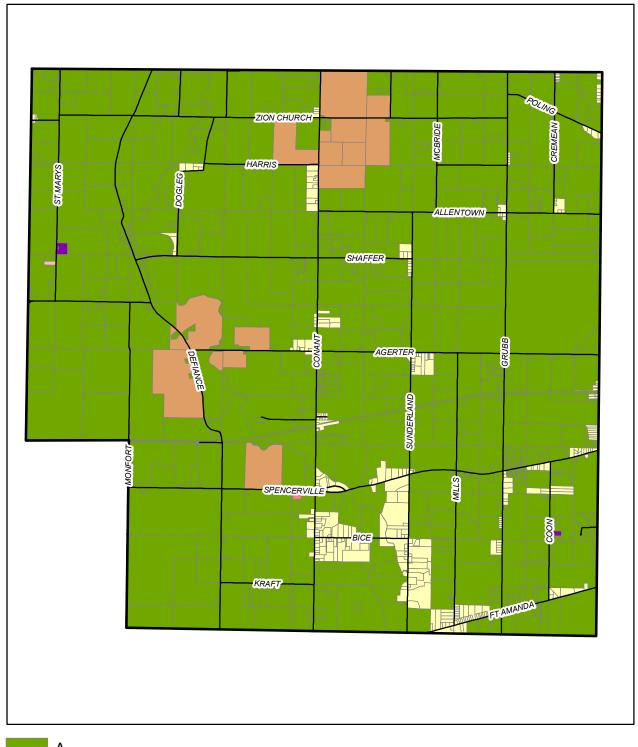


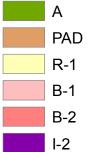


APPENDIX E:

Zoning

2019 Amanda Township Zoning



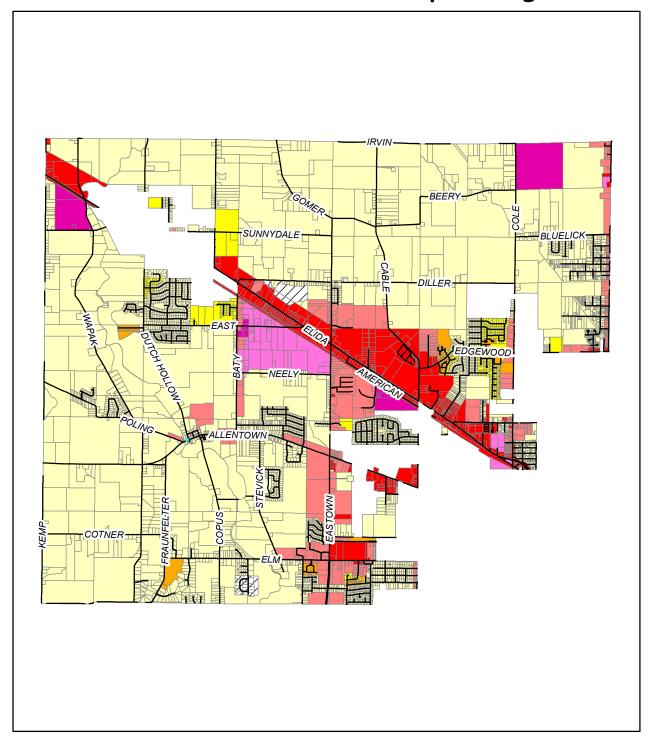


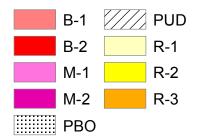


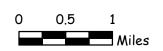




2019 American Township Zoning



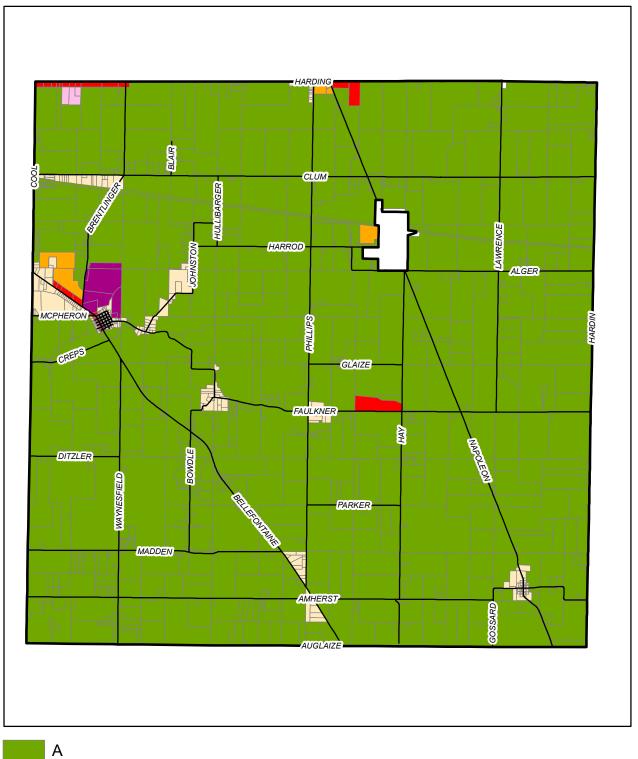


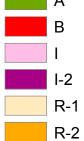


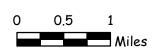




2019 Auglaize Township Zoing



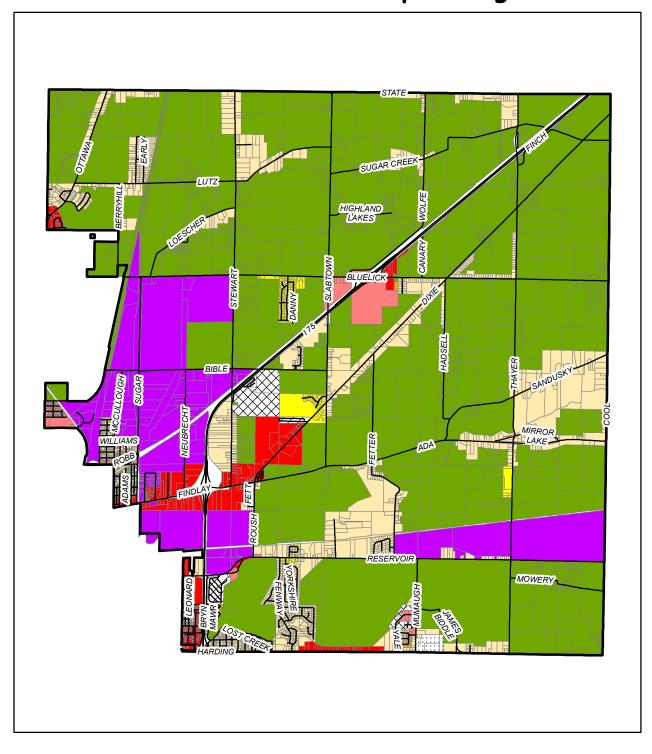


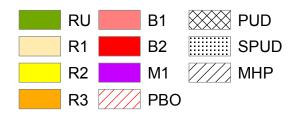


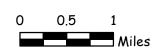




2019 Bath Township Zoning



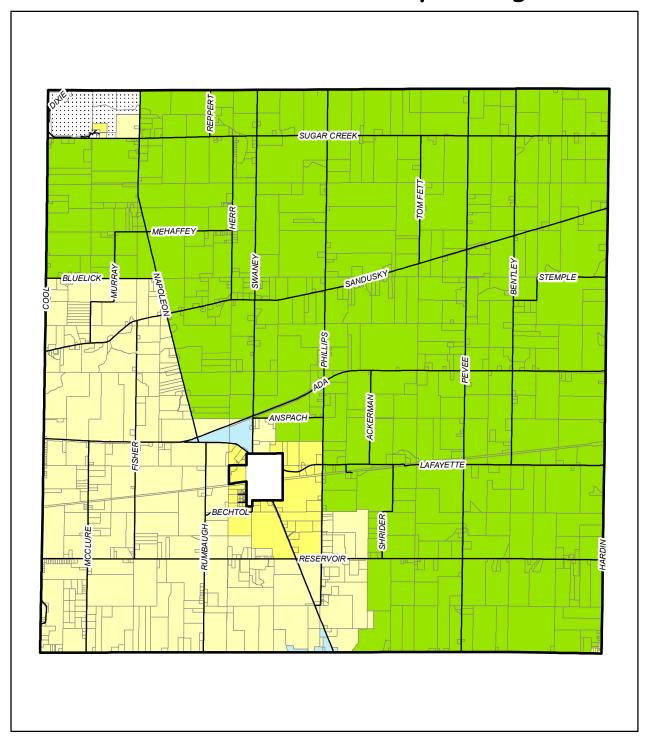


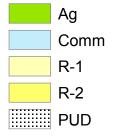






2019 Jackson Township Zoning



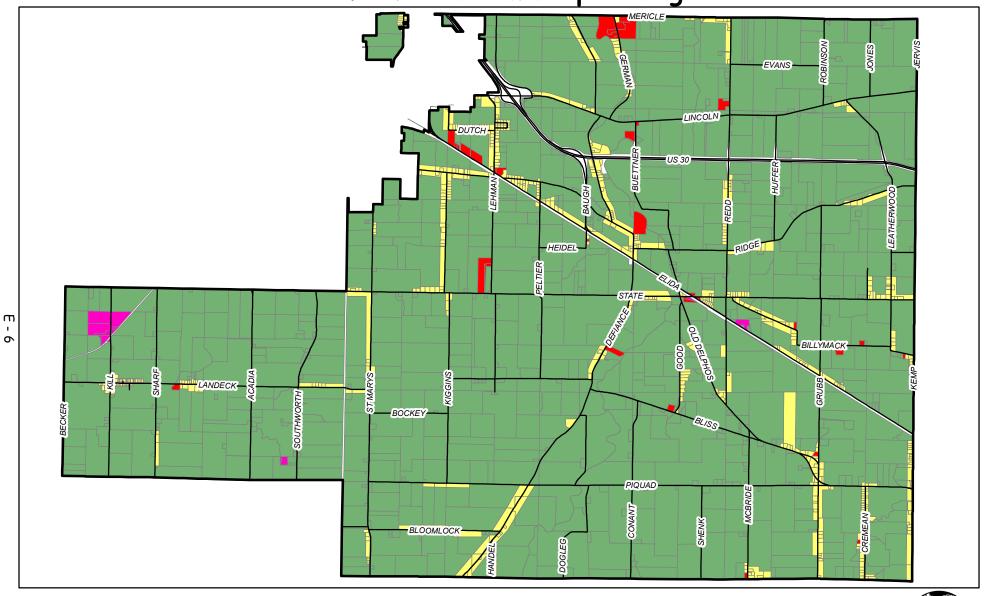








2019 Marion Township Zoning



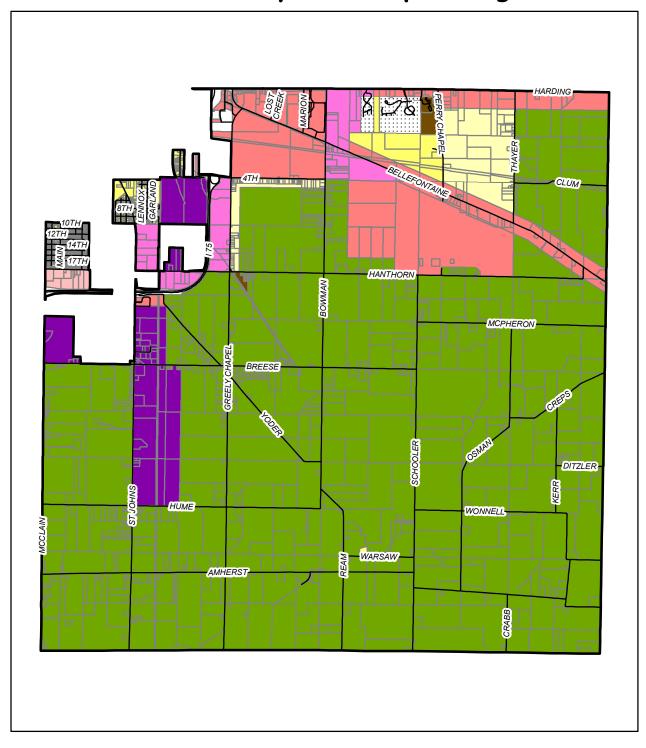


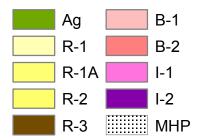


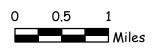




2019 Perry Township Zoning



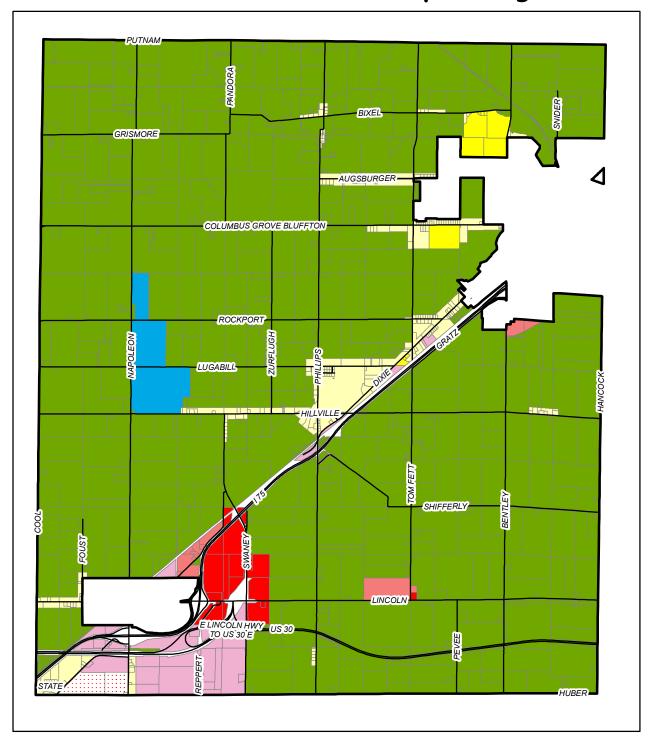




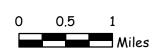




2019 Richland Township Zoning



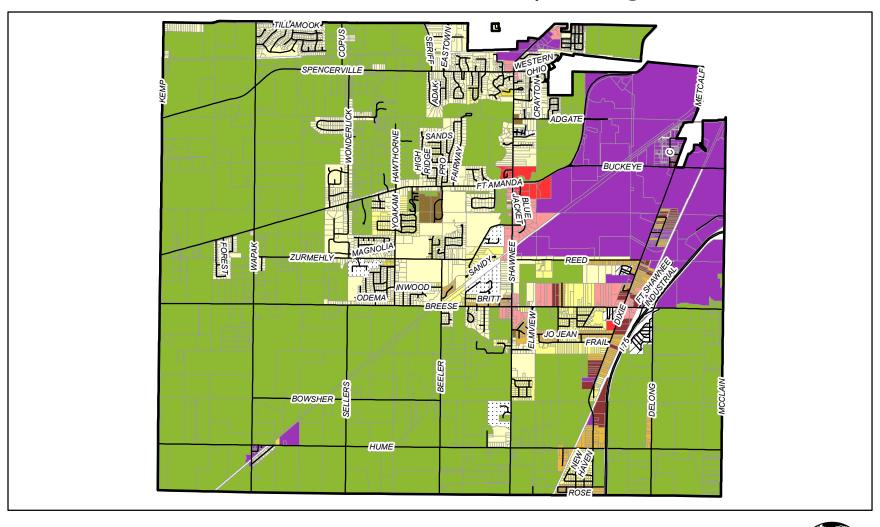




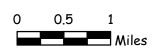




2019 Shawnee Township Zoning

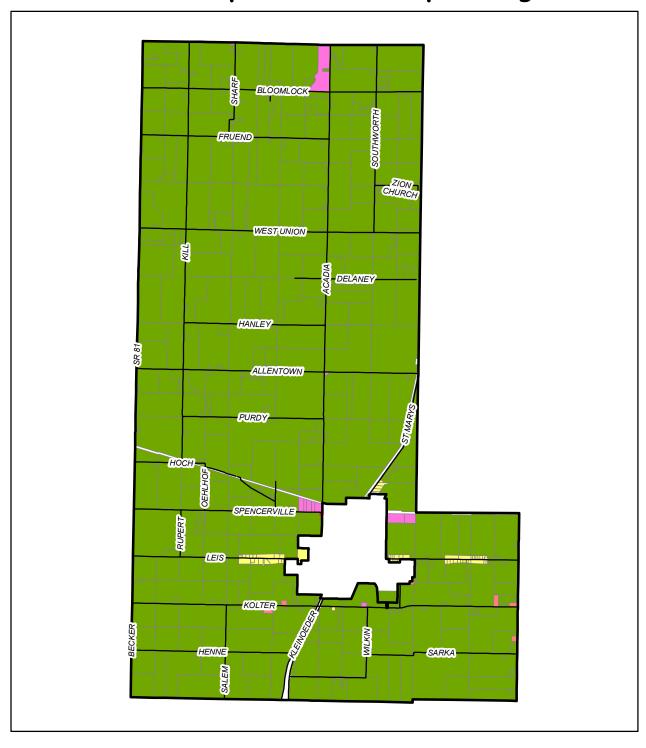




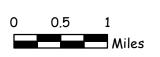




2019 Spencer Township Zoning



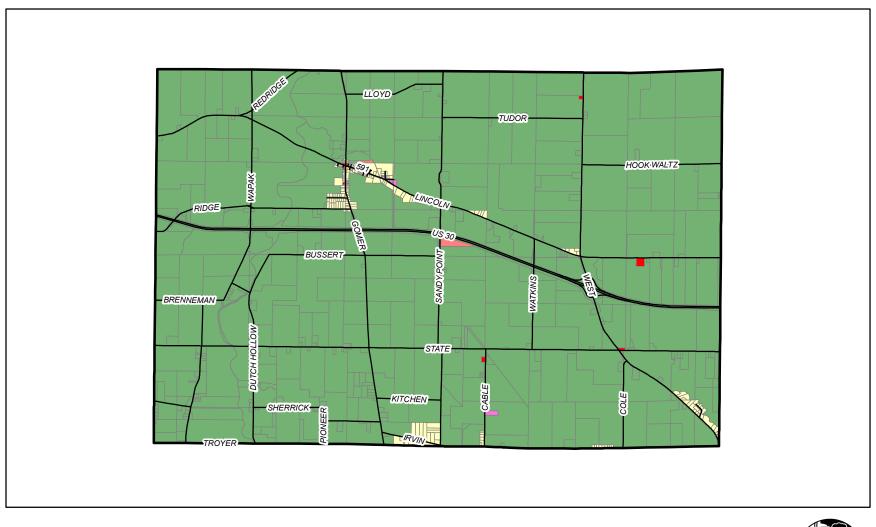




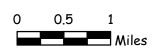




2019 Sugar Creek Township Zoning





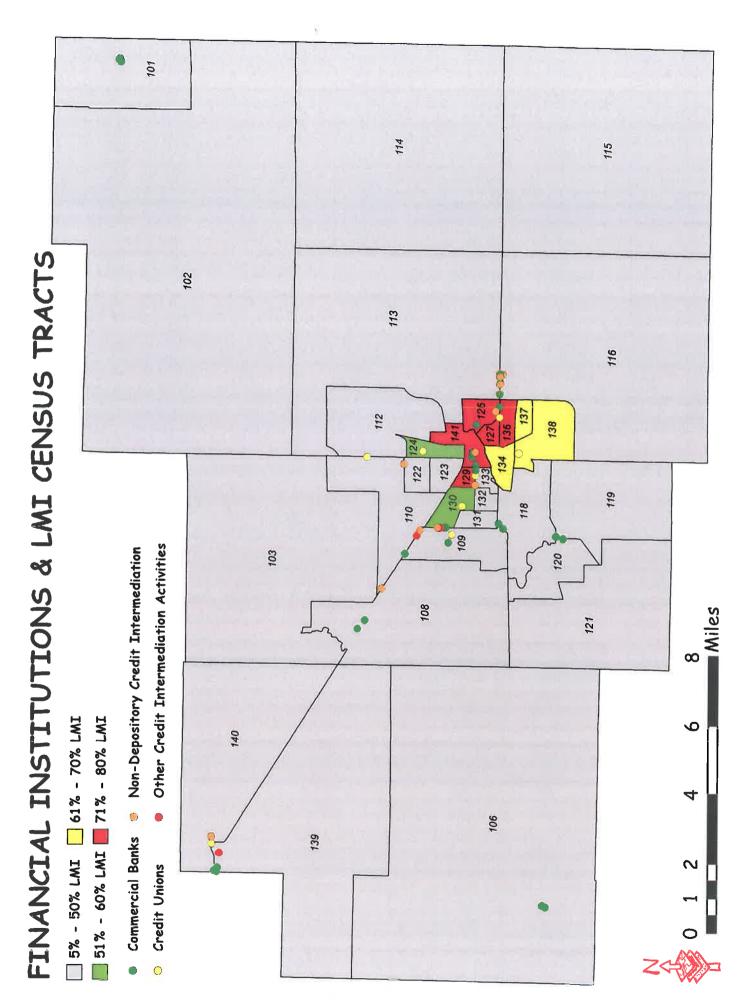


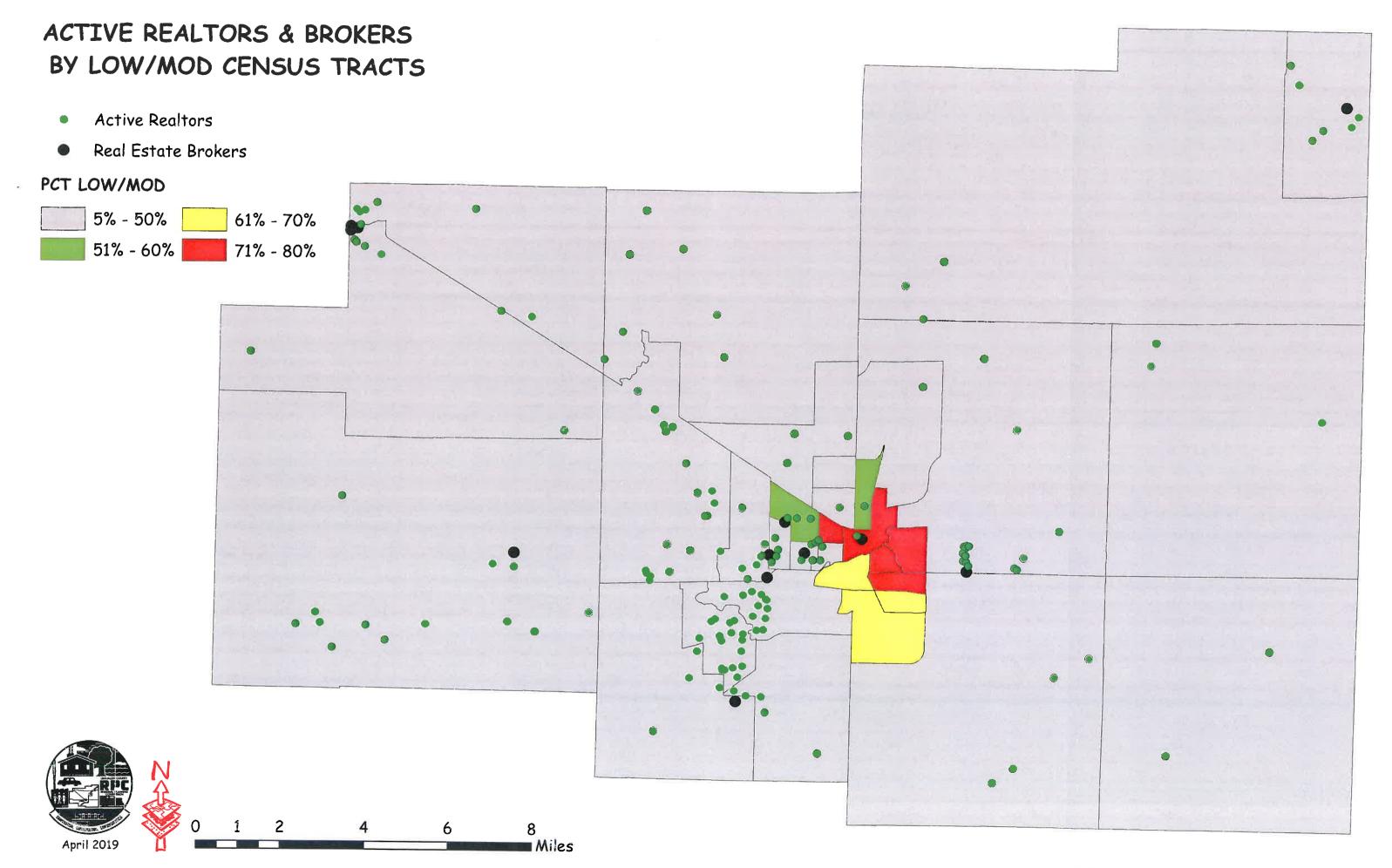


APPENDIX F:

Lending Institutions & Realtors

TABLE F-1 LENDING INSTITUTIONS BY CENSUS TRACT							
Census Tract	Bank	Credit Union	Cash Advance/ Loan Service				
101	3						
106	2						
108	2						
109	4	1	4				
110		2	2				
113	1						
116	2		3				
118	1						
119	2						
120							
124		1					
125							
126	2	1	1				
129		1					
130	1	1	1				
133	1		2				
136							
137							
138		1					
139	3	1	1				
140	1		1				
141	3		2				

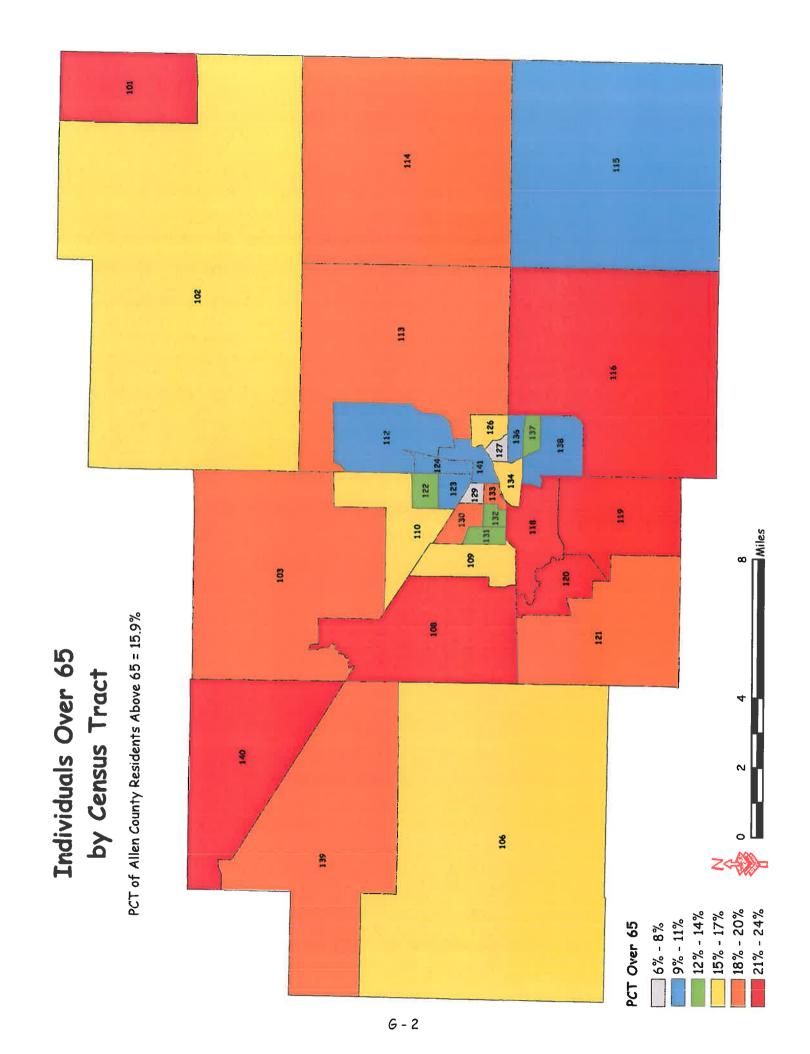




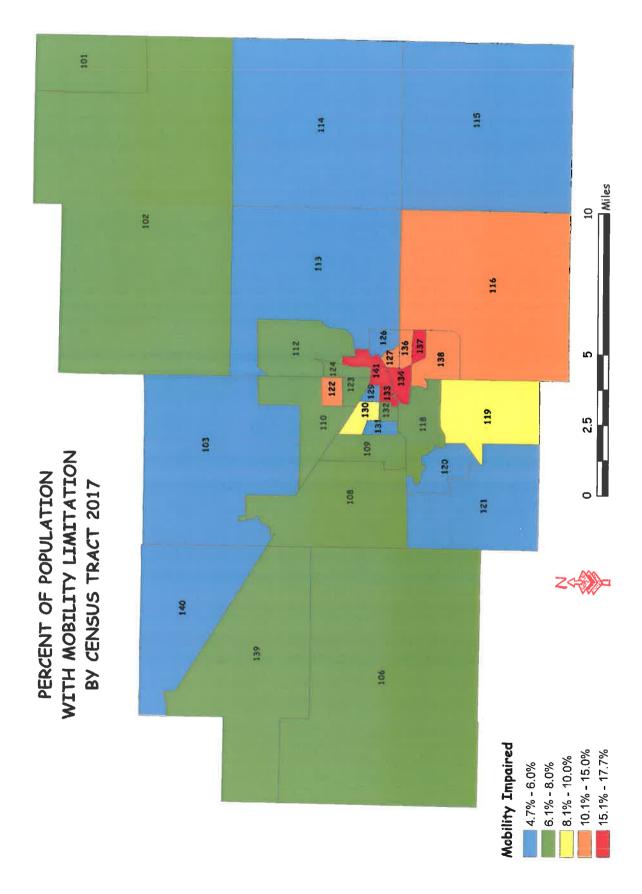
APPENDIX G:

Demographics & Housing

131 132 133 Miles PCT of Total Minorities in Allen County = 18.7% Minority Population by Census Tract 11% - 15% 16% - 20% 21% - 30% 31% - 50% 1% - 5% 6% - 10% PCT Minority G - 1

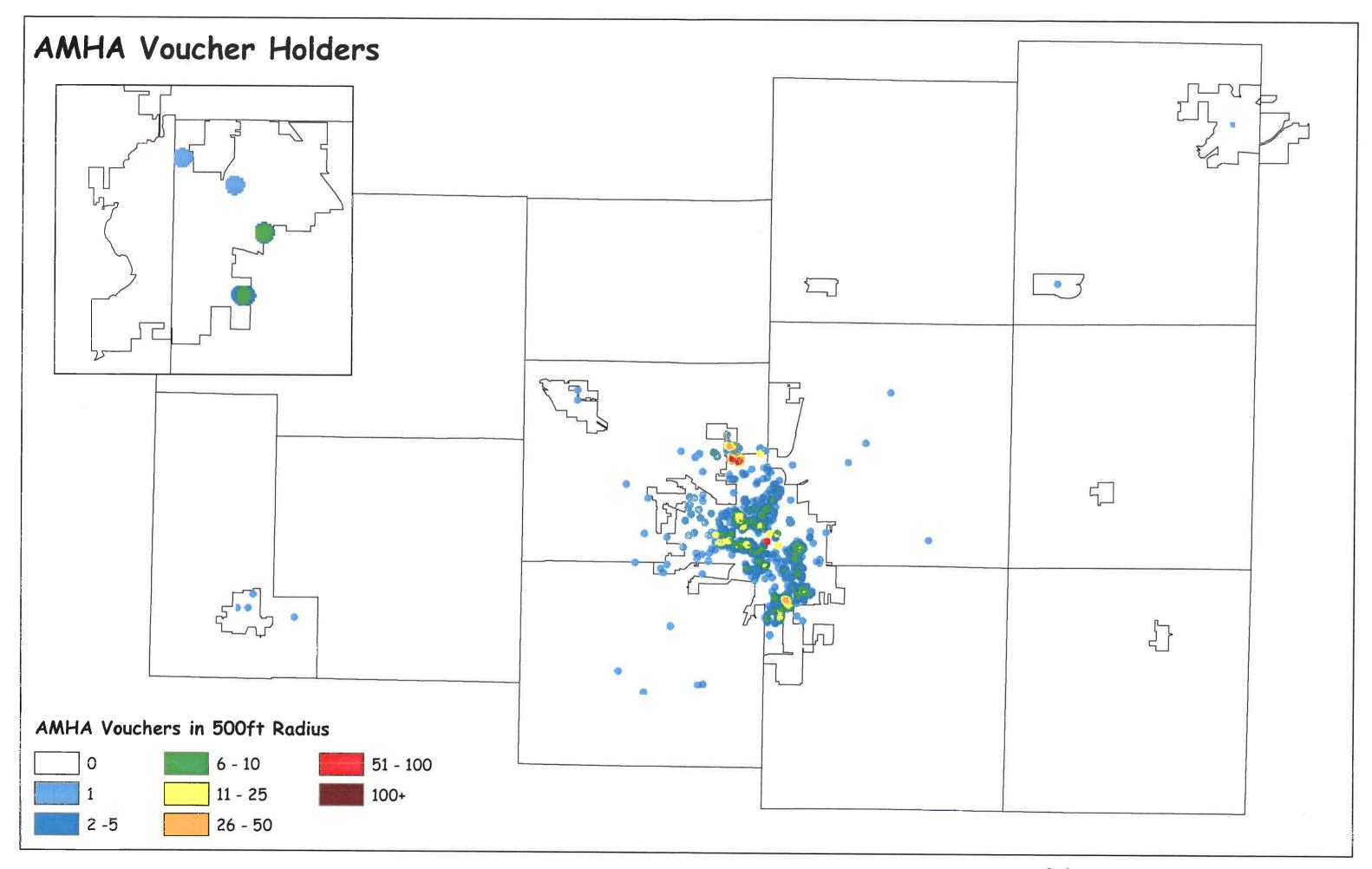


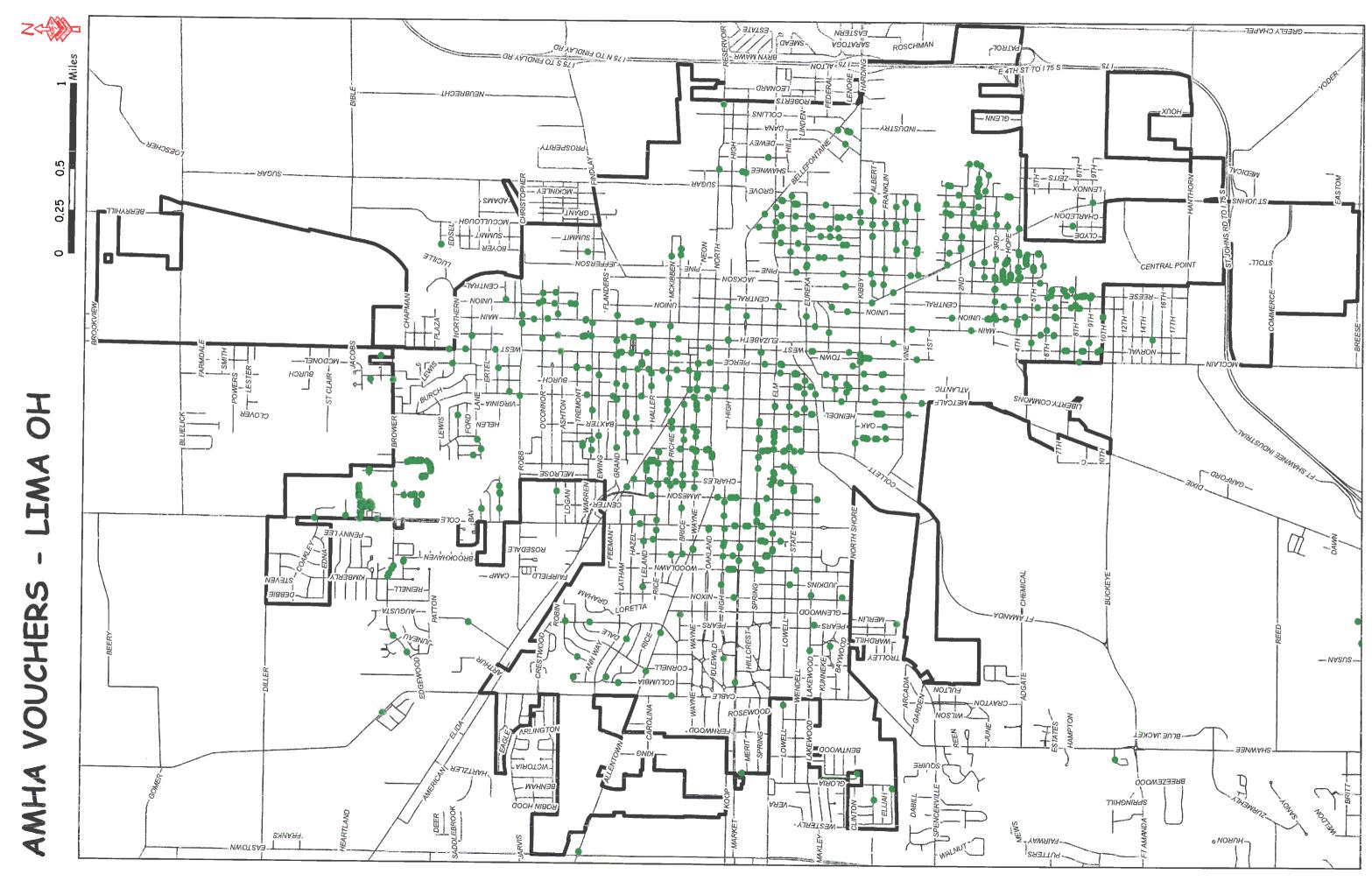




131 132 L Miles PCT of Allen County Residents in Poverty = 15.0%Individuals in Poverty by Census Tract 0% - 5% 6% - 10% 11% - 15% 16% - 20% 21% - 30% 31% - 50% PCT in Poverty G - 4

B Miles Total Allen County Household w/ No Vehicle = 3,500 PCT of Allen County Households w/ No Vehicle = 8.7% Households With No Vehicle by Census Tract Households w/ No Vehicle 21% - 30% 1% - 5% 6% - 10% 11% - 20% 31% - 40% %0





APPENDIX H:

Adoptive Procedures

County Commissioner's Office Allen County, Ohio June 27, 2019 Resolution #557-19

Re: BOARD OF ALLEN COUNTY COMMISSIONERS ACCEPTS THE 2019 SUBSTANTIAL RE-EVALUATION & UPDATE OF THE ANALYSIS OF IMPEDIMENTS: AFFIRMATIVELY FURTHERING FAIR HOUSING CHOICE

The Board of County Commissioners of Allen County, Ohio, met in regular session on the 27th of June, 2019 with the following members present: Greg Sneary, Jay Begg and Cory Noonan.

Commissioner ______ moved for the adoption of the following:

RESOLUTION

WHEREAS, recipients of funding from the United States Department of Housing & Urban Development are required to comply with the rules of the Consolidated Plan as published in the Federal Register (24 CFR 91.225), that requires local funding recipients to certify that they are affirmatively furthering fair housing opportunities through the completion of an Analysis of Impediments to Fair Housing Choice and undertaking appropriate actions to overcome the impacts and effects of identified impediments to housing choice and are maintaining records reflecting the analysis of impediments and requisite actions taken thereafter; and,

WHEREAS, in conjunction with the city of Delphos and City of Lima, Allen County has engaged the Lima-Allen County Regional Planning Commission (LACRPC) to undertake an evaluation and prepare an updated Analysis of Impediments to Fair Housing Choice for the Allen County community; and,

WHEREAS, a DRAFT document entitled An Analysis of Impediments: Affirmatively Furthering Fair Housing Choice - Substantial Re-Evaluation & Update was developed, reviewed and made available to the general public in written and electronic formats by the LACRPC; and,

WHEREAS, after public review on June 27, 2019, the document was finalized and the LACRPC recommended formal approval of the document entitled "An Analysis of Impediments: Affirmatively Furthering Fair Housing Choice Substantial Re-Evaluation & Update"; and,

WHEREAS, after review and in a public meeting the Board of Commissioners of Allen County deems the LACRPC recommendation to be in order and wishes to accept same, now therefore

BE IT RESOLVED THAT THE BOARD OF COUNTY COMMISSIONERS, ALLEN COUNTY, OHIO, hereby accepts the 2019 An Analysis of Impediments: Affirmatively Furthering Fair Housing Choice Substantial Re-Evaluation & Update on behalf of the community.

Commissioner Speary, Seconded the resolution and upon the roll being called, the vote resulted as follows: Commissioner Speary, Commissioner Begg, Commissioner Noonan,

Adopted this 27th Day of June, 2019

BOARD OF COUNTY COMMISSIONERS ALLEN COUNTY, OHIO

Greg Śneary

Jay Begg

Susan Wildermuth, Asst. Clerk of Board

Cory Noonan

Introduced by Councilor
Seconded by NEVYOV

FormApproved Director of Law
PUBLICATION: Thereby certify that Res. No. was published in
a summary manner according to law in the Lima News on

Dana Addis, Clerk

A RESOLUTION ACCEPTING THE 2019 SUBSTANTIAL RE-EVALUATION & UPDATE OF THE COMMUNITY'S ANALYSIS OF IMPEDIMENTS: AFFIRMATIVELY FURTHERING FAIR HOUSING CHOICE.

VOTE	15	1ST		2ND		3RD	
VOIE	Y	N	Υ	N	Y	N	
GORDON	V					6	
McLEAN	1/						
THOMPSON	1						
KREHER							
DIXON	1						
GLENN							
NEEPER							
NIXON							
TOTAL	0						

WHEREAS, recipients of funding from the United Stated Department of Housing & Urban Development are required to comply with the rules of the Consolidated Plan as published in the Federal Register (24 CFR 91.225) that requires local funding recipients to certify that they are affirmatively furthering fair housing opportunities through the completion of an Analysis of Impediments to Fair Housing Choice and undertaking appropriate actions to overcome the impacts and effects of identified impediments to housing choice and are maintaining records reflecting the analysis of impediments and requisite actions taken thereafter; and,

WHEREAS, the City of Lima in conjunction with Allen County and the City of Delphos has engaged the Lima-Allen County Regional Planning Commission (LACRPC) to undertake the preparation of a substantial re-evaluation & update of the community's Analysis of Impediments: Affirmatively Furthering Fair Housing Choice for Lima, Delphos, and Allen County; and,

WHEREAS, a draft document entitled An Analysis of Impediments: Affirmatively Furthering Fair Housing Choice Substantial Re-Evaluation & Update was developed, reviewed and made available to the general public in written and electronic formats by the LACRPC; and,

WHEREAS, after public review the document was finalized and the LACRPC recommended formal approval of the document entitled "Substantial Re-Evaluation & Update" of the Analysis of Impediments: Affirmatively Furthering Fair Housing Choice Substantial" dated June 2019; and,

WHEREAS, after review and in a public meeting the City of Lima accepted the document and deems the LACRPC recommendation to be in order and wishes to accept same; and,

WHEREAS, this Resolution is to demonstrate the City's desire to accept the document entitled "Substantial Re-Evaluation & Update of the Analysis of Impediments: Affirmatively Furthering Fair Housing Choice"; and that in order to preserve the public peace, property, health and safety of the community, and to provide for the effective operation of the municipal government, and by reason thereof, this resolution shall take effect immediately upon its passage: Now, Therefore,

BE IT RESOLVED BY THE COUNCIL OF THE CITY OF LIMA, ALLEN COUNTY, OHIO, A MAJORITY OF THE MEMBERS ELECTED THERETO CONCURRING:

Section 1. Lima City Council hereby accepts the 2019 Substantial Re-Evaluation & Update - Analysis of Impediments: Affirmatively Furthering Fair Housing Choice on behalf of the community.

Section 2. The clerk of Council is authorized to cause publication of this resolution in a summary manner as provided by City Charter.

Section 3. This Resolution shall take effect and be in force forthwith upon passage by an affirmative vote of a least two-thirds of the members to council at the first reading hereof. If it shall not so pass it shall take effect and be in force forthwith upon passage by an affirmative vote of at least two-thirds of the members elected to council at the second reading hereof. If it shall not so pass as second reading then it shall take effect and be in force forthwith upon passage by an affirmative vote of at least a majority of the members elected to council at the third reading hereof. Otherwise, it shall take effect and be in force from and after all the earliest period allowed by law.

Passed: Deptember 9, 2019

John G. Nixon, President

Approved: September 9, 2019

David J. Berg et Mayor

Dan Addis Clerk

APPENDIX I:

Signature Page

SIGNATURE SHEET

Public participation is a critical element of preparing any document related to fair housing planning (FHP). The Analysis of Impediments (AI) to Fair Housing Choice - a federally mandated report has evolved. Initially the AI looked to define an impediment to fair housing choice (FHC) as an action, or an inaction that restricts housing choice or that has the effect of restricting housing choice. Initially AIs were to develop a comprehensive review of:

- A comprehensive review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws, regulations, and practices affect the location, availability, and accessibility of housing;
- An assessment of conditions, both public and private, affecting fair housing choice for all
 protected classes. The protected classes under the Fair Housing Act are race, color,
 religion, sex, national origin, disability, and familial status (in other words, households with
 children); and.
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

The AI and its successor the Analysis of Impediments - Affirmatively Furthering Fair Housing - (AFH) ultimately set the tone and the need for FHP as well as the programs, services and actions to be undertaken by local governments and stakeholders to address FHC.

The AI-AFH was completed on behalf of the City of Delphos, City of Lima, and Allen County over a 6-month period. The completion of this assessment was made possible only with the support and cooperation of multiple agencies and offices including: Allen Metropolitan Housing Authority, Coleman Professional Services, West Ohio Community Action Partnership, Family Promise, Allen County Housing Consortium, Allen County Commissioners, Allen County Auditor's Office, Allen County Building Department, Allen County Engineer's Office, Allen County Sanitary Engineer's Office, Allen County Tax Map Office, Allen Water District, City of Lima Public Works Department, City of Lima Building & Zoning Office, City of Lima Community Development Office, City of Lima Police Department, and the City of Delphos Safety Services Office.

Early drafts of the AI evolved and were refined based on various data items identified as necessary; this refined data was provided by the aforementioned offices/agencies. The early drafts were submitted through the internal committee structure of the Regional Planning Commission, which is comprised of delegates of all 20 political subdivisions in Allen County and more than 36 local nonprofits, environmental groups, social service agencies, neighborhood associations and faith-based groups. The Final Draft was formerly introduced across the political spectrum after its adoption by the Regional Planning Commission.

This signature page is part of the analysis. This page contains the signature of individuals that participated in the analysis process with the authority to assure that the grantees and the authors - Regional Planning Commission - worked to meet the requirements to Affirmatively Further Fair Housing. The names and signatures appearing on the following page bear testament to the extent of actions identified in Section 5 of this report - taken on behalf of furthering Fair Housing Choice in Allen County, Ohio communities.

The Chief Elected Official	
John	6-27-19
Jay Begg, President Allen County Commissioners	Date
Program Administrators (e.g. CDBG, CHIP, and NSP)	
19/100	6/27/19
Susan Crotty, Community Development Director	Date
City of Lima	6/28/19
Shane Coleman, Safety Service Director	Date
City of Delphos	
Shellen	20 June 2019
Thomas M. Mazur, Executive Director	Date
Lima-Allen County Regional Planning Commission	
The chairpersons of the fair housing committee, citizen advisory	group, etc.
The chairpersons of the fair housing committee, citizen advisory	
The chairpersons of the fair housing committee, citizen advisory Mitchell Kingsley, Chair	group, etc. 6-20-19 Date
Mitchell Kingsley, Chair	<u>6-20-19</u> Date
Mitchell Kingsley, Chair Community Development Committee Run Thoma	6-20-19 Date
Mitchell Kingsley, Chair Community Development Committee Russ Thomas, Chair	<u>6-20-19</u> Date
Mitchell Kingsley, Chair Community Development Committee Run Thoma	6-20-19 Date
Mitchell Kingsley, Chair Community Development Committee Russ Thomas, Chair	Date 6-20-19 Date and other publicly assisted
Mitchell Kingsley, Chair Community Development Committee Russ Thomas, Chair Allen County Housing Consortium Housing program administrators responsible for public housing programs operated by the grantee or public agencies in the grant	Date 6-20-19 Date and other publicly assisted
Mitchell Kingsley, Chair Community Development Committee Russ Thomas, Chair Allen County Housing Consortium Housing program administrators responsible for public housing programs operated by the grantee or public agencies in the grant Jackie Fox, Cha/President	Date 6-20-19 Date and other publicly assisted
Mitchell Kingsley, Chair Community Development Committee Russ Thomas, Chair Allen County Housing Consortium Housing program administrators responsible for public housing programs operated by the grantee or public agencies in the grant West Central Ohio Community Action Partnership	Date 6-20-19 Date and other publicly assisted
Mitchell Kingsley, Chair Community Development Committee Russ Thomas, Chair Allen County Housing Consortium Housing program administrators responsible for public housing programs operated by the grantee or public agencies in the grant Jackie Fox, Cha/President	Date 6-20-19 Date and other publicly assisted

President of the Board of Lima-Allen County Regional Planning	Commission
Worden Ci Pol	6-27-19
Doug Post, President Lima-Allen County Regional Planning	Date
Commission Board	