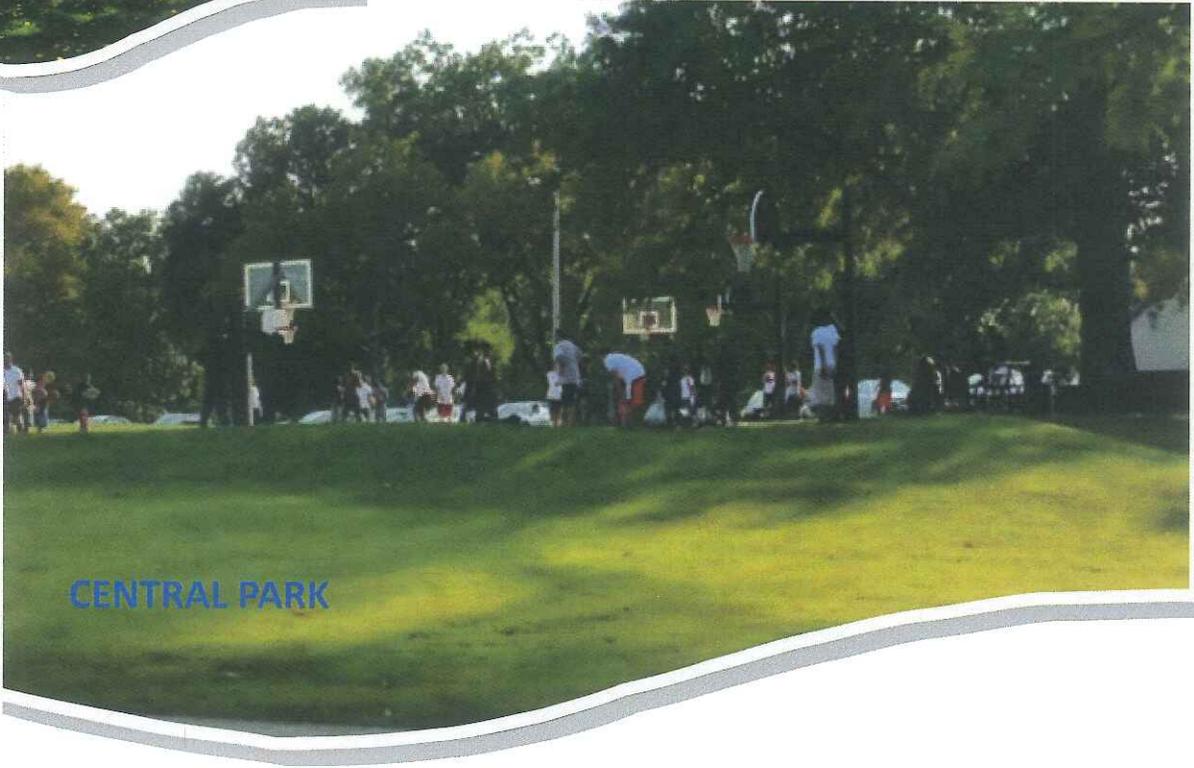




# 2017-2018 ANNUAL ACTION PLAN



CENTRAL PARK

## CITY OF LORAIN, OHIO DEPARTMENT OF BUILDING, HOUSING & PLANNING





# CITY OF LORAIN

## Department of Building, Housing & Planning

Kellie F. Glenn  
Interim Director

Richard Klinar  
Chief Building Official

Chase Ritenauer  
Mayor

August 15, 2017

Jorgelle Lawson, CPD Director  
U. S. Department of Housing and Urban Development  
Columbus Office-Region V (Ohio State Office)  
200 North High Street  
Columbus, Ohio 43215-2499

**Re: Non-State Certifications HOME and CDBG PY2017 projects /activities**

Dear Ms. Lawson:

The City of Lorain is submitting Non-state certifications for federal assistance for HOME and CDBG projects/activities, with original signatures through this correspondence of PY2017 funding.

If you have any questions or require additional information, please contact me at (440) 204-2087.

Sincerely,

Kellie F. Glenn, Director  
Department of Building, Housing, & Planning

cc: Jeff Idom, HUD Field Representative for the City of Lorain

Enclosures

**CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

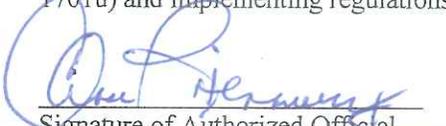
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official

8-15-17  
Date

Mayor of City of Lorain  
Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2017 - 2018 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

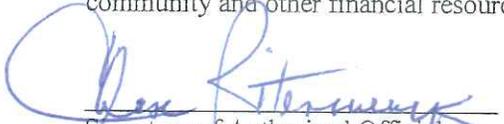
**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
Signature of Authorized Official

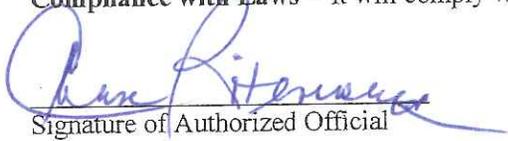
8-15-17  
Date

Mayor of City of Lorain  
Title

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature of Authorized Official

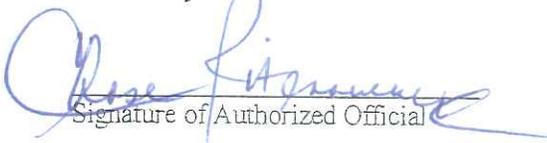
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Mayor of City of Lorain  
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The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
Signature of Authorized Official

8-15-17  
Date

Mayor of City of Lorain  
Title

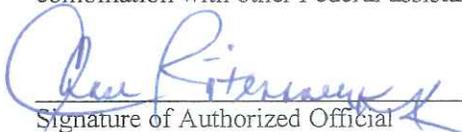
**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
Signature of Authorized Official

8-15-17  
Date

Mayor of City of Lorain  
Title

## **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for these individuals.

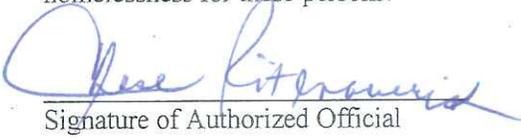
**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
Signature of Authorized Official

8-15-17  
Date

Mayor of City of Lorain  
Title

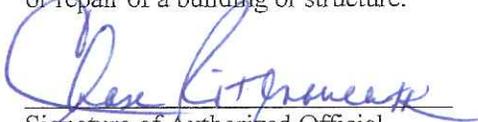
## Housing Opportunities for Persons With AIDS Certifications

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
Signature of Authorized Official

8-15-17  
Date

Mayor of City of Lorain  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

#### **Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
* 3. Date Received: _____	4. Applicant Identifier: City of Lorain	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: B-17-MC-39-0016	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
8. APPLICANT INFORMATION:		
* a. Legal Name: City of Lorain, OH		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 34-6001700	* c. Organizational DUNS: 7874171870000	
d. Address:		
* Street1: 200 West Erie Avenue	Street2: _____	
* City: Lorain	County/Parish: _____	
* State: OH: Ohio	Province: _____	
* Country: USA: UNITED STATES	* Zip / Postal Code: 44052-1606	
e. Organizational Unit:		
Department Name: Building, Housing & Planning	Division Name: _____	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Ms.	* First Name: Kellie	
Middle Name: _____	* Last Name: Glenn	
Suffix: _____	Title: Director	
Organizational Affiliation: _____		
* Telephone Number: 4402042087	Fax Number: 4402042080	
* Email: Kellie_Glenn@cityoflorain.org		

Application for Federal Assistance SF-424

\* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

\* 10. Name of Federal Agency:

U.S. Department of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

CDBG/Entitlement

\* 12. Funding Opportunity Number:

\* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

\* 15. Descriptive Title of Applicant's Project:

CDBG Program - continuation of the City of Lorain's programs, including housing rehabilitation, public facility improvements, public service, economic development, and neighborhood revitalization.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

\* a. Start Date:

\* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,115,031.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="771,000.00"/>
* g. TOTAL	<input type="text" value="1,886,031.00"/>

\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

- Yes  No

If "Yes", provide explanation and attach

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

Application for Federal Assistance SF-424

\* 1. Type of Submission:

- Preapplication
- Application
- Changed/Corrected Application

\* 2. Type of Application:

- New
- Continuation
- Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

City of Lorain

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M-17-MC-39-0220

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

\* a. Legal Name:

City of Lorain, OH

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

34-6001700

\* c. Organizational DUNS:

7874171870000

d. Address:

\* Street1:

200 West Erie Avenue

Street2:

\* City:

Lorain

County/Parish:

\* State:

OH: Ohio

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

44052-1606

e. Organizational Unit:

Department Name:

Building, Housing & Planning

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms.

\* First Name:

Kellie

Middle Name:

\* Last Name:

Glenn

Suffix:

Title:

Director

Organizational Affiliation:

\* Telephone Number:

4402042087

Fax Number:

4402042080

\* Email:

Kellie\_Glenn@cityoflorain.org

Application for Federal Assistance SF-424

\* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

\* 10. Name of Federal Agency:

U.S. Department of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME/Participating Jurisdiction

\* 12. Funding Opportunity Number:

\* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

\* 15. Descriptive Title of Applicant's Project:

HOME Program - continuation of the City of Loreain's programs, including housing rehabilitation, and neighborhood revitalization.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

\* a. Start Date:

\* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="252,133.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="200,000.00"/>
* g. TOTAL	<input type="text" value="452,133.00"/>

\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- a. This application was made available to the State under the Executive Order 12372 Process for review on
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

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- Yes  No

If "Yes", provide explanation and attach

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\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:  \* First Name:

Middle Name:

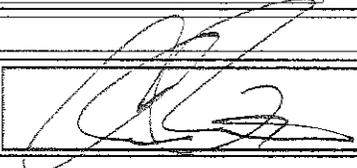
\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

# **PUBLIC MEETINGS**

**2015/2019 CONSOLIDATED PLAN - 2017/2018 ACTION PLAN**

**Notice of Plan Availability - Notice of Public Hearing**

Under Title I of the Housing and Community Development Act of 1974, as amended and the Cranston-Gonzalez National Affordable Housing Act of 1990, the City of Lorain, Ohio is required to prepare a plan that describes how the City will allocate Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds to meet the needs of low and moderate income persons in the City of Lorain.

To that end an Action Plan is completed annually to describe the activities that will be undertaken to address the needs identified in the Five-Year Consolidated Plan. It also serves as an application for CDBG and HOME funds. This Action Plan describes the activities that will take place during 2017-2018 Program Year.

**Notice of Plan Availability**

The City of Lorain has prepared its 2017-2018 Annual Action Plan. The plan will be made available to the public on July 3, 2017. This notice is being published to make citizens aware of the HUD issued waiver of the regulatory 30-day citizen participation public comment period for states and local jurisdictions, in favor of a minimum 14-calendar day comment period commencing on July 3, 2017 and will conclude on July 17, 2017. During this period copies of the Plan may be reviewed at the following locations:

- City of Lorain Main Library, 351 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055
- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052
- The City of Lorain website at [www.cityoflorain.org](http://www.cityoflorain.org)

**Inquiries and comments concerning the Consolidated Plan and Action Plan can be conveyed by contacting the City staff at:**

- Lorain Consolidated Plan Comments  
Department of Building, Housing, and Planning  
200 West Erie Avenue, 5th Floor, Lorain, OH 44052  
Telephone: (440) 204-2020 • Fax: (440) 204-2080  
[Kellie\\_glenn@cityoflorain.org](mailto:Kellie_glenn@cityoflorain.org)

**Notice of Public Hearing**

There will be a public hearing and adoption of the 2015-2019 Five-Year Consolidated Plan and 2017-2018 Annual Action Plan with the City of Lorain City Council, including the proposed use of funds on:

Monday, July 3, 2016, 5:00pm  
Lorain City Hall Building, Police Conference Room  
200 West Erie Avenue, Lorain, OH 44052

**Note:** The City Council Meeting will be at 6:00 p.m. in the City Council Chambers.

The City will provide technical assistance to citizens and group representative of persons that request such assistance. In addition, the City will make adequate provisions to assist non-English speaking residents in interpreting program details and provisions on a case-by-case basis, as well as provide auxiliary aides and services for individuals with disabilities. For requests for special accommodations please email or call Kellie Glenn, Interim Director of Building, Housing, and Planning, [kellie\\_glenn@cityoflorain.org](mailto:kellie_glenn@cityoflorain.org) or 440-204-2087. Requests for special accommodations must be made with reasonable advance notice.

**Summary of Plan**

The Action Plan includes an estimate of available resources from private and public sources to address identified needs, a description of the priorities and specific objectives to be addressed in this program year, a summary of the eligible programs or project that the City of Lorain will undertake to address the needs, and a description of geographic areas of the City in which assistance will be directed. Resources available for the 2017 Program Year are detailed below:

- Community Development Block Grant Program (CDBG)...\$1,115,031
- Home Investment Partnership Program...\$252,133
- 2017 Estimated Program Income (HOME/CDBG)...\$971,000
- Total 2017 Resources...\$2,338,164

**CDBG:**

- Administration...\$269,500
- Fair Housing...\$70,000
- Planning...\$10,000
- Code Enforcement...\$250,000
- Public Facilities Improvements...\$95,000
- Park & Rec. Facilities (Oakwood/Gen. Johnny Wilson, etc.)...\$360,000
- Street Improvement (Ward 6)...\$170,000
- Clearance/Demolition (Stoveworks, Motels, Hotwaters)...\$400,031
- Public Services (Legal Aide, Nord Center, Youth Employment, Get w/ the Program, United Way)...\$105,500
- Debt Services CIP...\$156,000
- CDBG Program Income...\$771,000
- Total CDBG Projects...\$1,886,031

**HOME:**

- Administration...\$45,133
- Homeowner Occupied Rehabilitation...\$407,000
- Total HOME Budget...\$452,133

# AFFIDAVIT OF PUBLICATION

The Morning Journal  
 1657 Broadway Avenue  
 Lorain, Ohio 44052 • (440) 245-6901

CITY OF LORAIN BUILDING, HOUSING  
 & PLANNING  
 200 WEST ERIE AVE,

STATE OF OHIO, LORAIN COUNTY, ss..

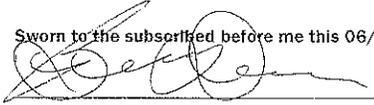
I, Jessie White of THE MORNING JOURNAL, (a newspaper printed in said County, and in general circulation therein and meeting the requirements of Section 7.12 of the Revised Code as amended, effective September 12, 1957.) being duly sworn, do upon oath, depose and say that the annexed advertisement was published in said newspaper.

**CITY OF LORAIN**

Published in the following edition(s):

The Morning Journal 06/29/17  
 morningjournal.com 06/29/17

Sworn to the subscribed before me this 06/29/17.



Notary Public, State of Ohio  
 Acting in Lorain County



Beverly Dever  
 Notary Public, STATE OF OHIO  
 My Commission Expires 1-15-19  
 Recorded in Lake County, Ohio

**Advertisement Information**

Client Id: 852868 Ad Id:  
 Class: 1201 PO:  
 Total Units: 198 Cost:  
 Sort Description: CITY OF LORAIN 2015/2019 CONSOLIDATED PLAN

**CITY OF LORAIN**  
**2015/2019 CONSOLIDATED PLAN / 2017/2018 ACTION PLAN**  
**Notice of Plan Availability - Notice of Public Hearing**

Under Title I of the Housing and Community Development Act of 1974, as amended and the Cranston-Gonzalez National Affordable Housing Act of 1990, the City of Lorain, Ohio is required to prepare a plan that describes how the City will allocate Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds to meet the needs of low and moderate income persons in the City of Lorain.

To that end, an Action Plan is completed annually to describe the activities that will be undertaken to address the needs identified in the Five-Year Consolidated Plan. It also serves as an application for CDBG and HOME funds. This Action Plan describes the activities that will take place during the 2017-2018 Program Year.

**Notice of Plan Availability**

The City of Lorain has prepared its 2017-2018 Annual Action Plan. The plan will be made available to the public on July 3, 2017. This notice is being published to make citizens aware of the HUD issued waiver of the regulatory 30-day citizen participation public comment period for states and local jurisdictions, in favor of a minimum 14-calendar day comment period commencing on July 3, 2017 and will conclude on July 17, 2017. During this period copies of the Plan may be reviewed at the following locations:

- City of Lorain Main Library, 351 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055
- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052

The City of Lorain website at [www.cityoflorain.org](http://www.cityoflorain.org) contains all comments concerning the Consolidated Plan and Action Plan can be conveyed by contacting the City staff at:

- Lorain Consolidated Plan Comments: Department of Building, Housing, and Planning, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052. Telephone: (440) 204-2020 • Fax: (440) 204-2080 • Kellie Glenn at [kellie\\_glenn@cityoflorain.org](mailto:kellie_glenn@cityoflorain.org)

**Notice of Public Hearing**

There will be a public hearing and adoption of the 2015-2019 Five-Year Consolidated Plan and 2017-2018 Annual Action Plan with the City of Lorain City Council, including the proposed use of funds on:

Monday, July 3, 2016, 5:00pm  
 Lorain City Hall Building, Police Conference Room  
 200 West Erie Avenue, Lorain, OH 44052

**Note:** The City Council Meeting will be at 6:00 p.m. in the City Council Chambers.

The City will provide technical assistance to citizens and group representative of persons that request such assistance. In addition, the City will make adequate provisions to assist non-English speaking residents in interpreting program details and provisions on a case-by-case basis, as well as provide auxiliary aides and services for individuals with disabilities. For requests for special accommodations please email or call Kellie Glenn, Interim Director of Building, Housing, and Planning, [kellie\\_glenn@cityoflorain.org](mailto:kellie_glenn@cityoflorain.org) or 440-204-2087. Requests for special accommodations must be made with reasonable advance notice.

**Summary of Plan**

The Action Plan includes an estimate of available resources from private and public sources to address identified needs; a description of the priorities and specific objectives to be addressed in this program year; a summary of the eligible programs or project that the City of Lorain will undertake to address the needs; and a description of geographic areas of the City in which assistance will be directed. Resources available for the 2017 Program Year are detailed below:

- Community Development Block Grant Program (CDBG)...\$1,115,031
- Home Investment Partnership Program...\$252,133
- 2017 Estimated Program Income (HOME/CDBG)...\$971,000

**Total 2017 Resources...\$2,338,164**

**CDBG:**

- Administration...\$269,500
- Fair Housing...\$70,000
- Planning...\$10,000
- Code Enforcement...\$250,000
- Public Facilities Improvements...\$95,000
- Park & Rec. Facilities (Oakwood/Gen. Johnny Wilson, etc.)...\$360,000
- Street Improvement (Ward 6)...\$170,000
- Clearance/Demolition (Stoveworks, Motels, Hotwaters)...\$400,031
- Public Services (Legal Aide, Nord Center, Youth Employment, Get w/ the Program, United Way)...\$105,500
- Debt Services/CIP...\$156,000
- CDBG Program Income...\$771,000

**Total CDBG Projects...\$1,886,031**

**HOME:**

- Administration...\$45,133
- Homeowner Occupied Rehabilitation...\$407,000

**Total HOME Budget...\$452,133**

1372799/June 29, 2017

## **Five Year Consolidated Plan (Year3) /Public Hearing (Citizen Participation)**

**Monday, July 3, 2017**

**5:00p.m.**

**Loran City Hall, Police Conference Room**

**200 West Erie Avenue, Lorain, OH 44052**

Meeting start 5:06pm

### Questions

- 1) **When did the digging at Oakwood Park begin? Have been around the area recently and haven't noticed any fresh dirt or dig sites.**
  - a. Was informed that the project was completed as of Friday (6/30/17), can confirm that digging did actually happen.
  
- 2) **What reason did United Way get \$20,000 of the budget?**
  - a. The \$20,000 that United Way are getting is not for the new offices that they are renovating on Broadway, it is to keep their services available to the public and Lorain City to help families who need financial help with issues such as utility bills. This is trying to create more financial stability in families within Lorain.
  
- 3) **Get with the Program has some financial involvement with the Boys and Girls Club, why is that?**
  - a. Using Boys and Girls Club, we have a way of funneling money to Get with the Program while feeling comfortable with whom we are giving the money to.
  
- 4) **What involvement with do the roof repairs for the Nord Center have to do with us (the City of Lorain)?**
  - a. The roof repairs will be specifically for 2 homes on Toledo Ave who house people in need of stability for reasons such as mental issues, rehabilitation after treatments, or a need to readjust to a home life after a period without it.
  
- 5) **Why wouldn't the fire equipment be paid for with the Safe For grant money (levy)?**
  - a. That money is specifically being used to create a new fire station. Building wasn't able to assist because there wasn't a need for a new fire station with the preexisting one still there.
  
- 6) **If we have the money to make things happen within Lorain why aren't we doing it? Why are we just sitting on it?**
  - a. Previously we would make promises about projects and would not keep them, now we are trying to do quick projects that are easily completed so we don't waste money and

still “upgrade” the city. There is also a lack of employees within the department to lead different projects and the starting of outsourcing bigger projects to outside sources may start to take place.

- 7) **What is the process for choosing which roads get repaired? There have been plenty of bad roads throughout all wards.**
  - a. The repair of bad roads comes from the grades on which they were rated, and the worst of the worst are being done first. After the worst get done then there will be a progression to get to the rest of them.
  
- 8) **When will buildings begin to be torn down? What is happening with the demolition board?**
  - a. The demolition board will meet either every week or every month and will review presentations to tear down the worst of the worst within the city first, and then slowly take down more after.
  
- 9) **Transferring money in the budget doesn't have to go through Council or a public hearing?**
  - a. It does go through a public hearing, but does not have to go to Council.

Meeting ends at 6:00pm

Five Year Consolidated Plan (Year 3)/ Citizen Participation Meeting

Sign-In Sheet

Monday, July 03, 2017

5:00-6:00 PM

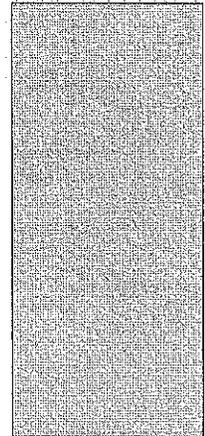
Lorain City Hall, Police Conference Room

200 West Erie Avenue, Lorain, OH 44052

Name and Organization – Print	Contact Information (Telephone Number)	Email Address	Address
Ange Arrazo			1853 E 30th
DENNIS FLORES	440 714 7810	dennisforlorain@gmail.com	212 W. 18th St
Pamela Carter		pam.carter@cityoflorain.com	
Jana Ruth Arredondo	440-246-6141	jrafa@roadrunner.com	607 Allison Ave
Mary Sprungowski	440-258-1302	mary.sprungowski@cityoflorain.org	2122 E. Skyline
<del>Mary Sprungowski</del>	440-516-2551	boel. [unclear]	607 Allison Ave
Jane Joto	440-787-5531	mexprincess@yahoo.com	1026 Lakewood Dr 44052

CITY OF LORAIN  
CONSOLIDATED PLAN  
THIRD YEAR (2017/2018)  
ACTION PLAN

2015/2016 - 2019/2020  
FEDERAL PROGRAMS



# CONSOLIDATED PLAN

- Consolidated Plan - The City's five-year Strategic Plan that governs the use of federal housing and community development funds for FY2015/2016 thru 2019/2020. This presentation's purpose is to present the Third Year Action Plan purposed budget for PY2017.

# CONSOLIDATED PLAN

- Consolidated Plan - Four main functions:
  - A planning document for the City of Lorain.
  - Serves as an application for federal funds under HUD's CDBG and HOME formula grant programs.
  - Identifies strategies for carrying out Community Development goals.
  - An action plan that provides a basis for assessing performance.

# CONSOLIDATED PLAN

- Components of the Consolidated Plan
  - Strategic Plan that sets Goals and Objectives for 2015/2016 thru 2019/2020
  - Update to the Citizen Participation Plan
  - Identification of needs and priorities throughout the City through data analysis and consultation with stakeholders

# CONSOLIDATED PLAN

- Components of the Consolidated Plan (cont'd)
  - Housing Assessment and Needs
  - Homeless Assessment and Needs
  - Community Development Assessment and Needs
  - Special Needs Assessment and Needs

# ACTION PLAN

- Action Plan – The City's annual one year plan that describes specifically how federal funds will be spent over the course of the upcoming program year.
- Projects geared to accomplish the goals stated in the Consolidated Plan.
- Funds that are encompassed in this plan are:
  - Community Development Block Grant (CDBG)
  - HOME Investment Partnerships (HOME)

# PROJECT ELIGIBILITY

- Activities Benefiting Low- and Moderate-Income Persons (Area/Client Based)
- Activities Which Aid in the Prevention or Elimination of Slums or Blight
- Activities Designed to Meet Community Development Needs Having a Particular Urgency

*(2015 Low/Mod = \$52,900 for 4 person family )*

# WHAT IS ELIGIBLE?

- Acquisition of real property
- Public improvements
- Public facility improvements
- Public service projects
- Code enforcement
- Home ownership
- Construction of housing
- Clearance
- Economic development activities
- Housing rehabilitation

# PROGRAMS

- **Community Development Block Grant (CDBG) Program**
- CDBG funds can be used for:
  - Infrastructure
  - Home Owner Rehabilitation
  - Public Facilities Improvements
  - Public Service Projects
  - Etc.
- PY2017, \$1,115,031 in CDBG funding will be allocated
- Funds are subject to a 15% Public Service Cap and 20% Administration Cap

# CDBG HIGHLIGHTS



PUMPER FIRE TRUCK WAS PURCHASED  
WITH  
CDBG FUNDS FOR \$350,000

# CDBG HIGHLIGHTS

Public Facilities Improvements:  
Central and Oakwood Parks ADA Accessible  
Pools \$5,396 (pictured is Central Park Pool)



Other projects:  
SplashPad was installed in October 2016  
Cost slightly over \$46,000.  
Oakwood Park had a UST removed for \$47,230.

# CODE ENFORCEMENT

- Here is a property located on 5<sup>th</sup> Street

BEFORE



AFTER



# PROGRAMS

- **HOME Investment Partnerships Program**
- City HOME funds can be used for
  - Down Payment Assistance
  - Home Owner Rehabilitation
  - Tenant-Based Rental Assistance
  - Multi-Family Housing construction/rehabilitation
- PY2017, \$252,133 in HOME funding will be allocated

# HOME HIGHLIGHTS



**BEFORE**



**AFTER**

# PROJECT SELECTION

- In order to meet timeliness requirements proposed project must:
  - Correct ownership of land
  - Correct zoning
  - Additional financing in place
  - Agency capacity
  - Clear and defined project narrative
  - Specified budget

# WHAT IS NOT ELIGIBLE?

**General Rule:** Any Activity that is not included is excluded

- Buildings or portions thereof, used for the general conduct of government. For example, the City Administration Building.
- General government expenses. Salaries for those not directly involved in programs.
- Political activities
- Purchase of equipment
- Operating and maintenance expenses
- Purchase of construction equipment
- New Housing Construction (CDBG only)

## AND MORE REQUIREMENTS...

- Environmental Review
- Davis-Bacon Labor Standards
- Equal Opportunity
- Drug Free Workplace
- Accessibility for disabled people
- Purchasing standards
- Lead Based Paint elimination
- Avoiding Conflicts of Interest

# PROPOSED PROGRAM/ ACTIVITIES FOR CITY OF LORAIN

## ❖ CDBG Funded Potential Activities:

- Park and Recreational Facilities
- Code Enforcement
- Street Improvements
- Planning
- Public Facilities Improvement
- Public Service
- Clearance/Demolition

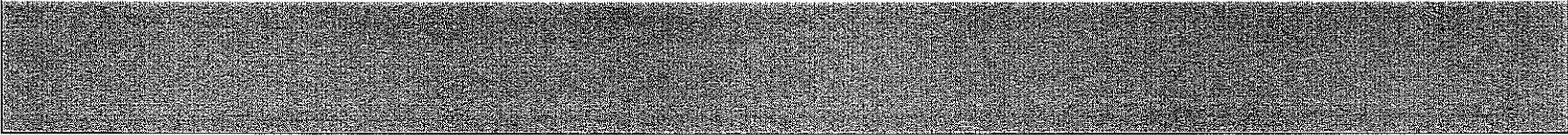
## ❖ HOME Funded Potential Activities

- Home Owner Occupied Rehab

# SCHEDULE

Date	Purpose
February 13, 2017	Non-Profit Workshop
March 14*, and 21, 2017	Public Participation Meetings
May 30, 2017	Meeting with Mayor re: Budget
June 11-23, 2017	Completion of Action Plan Budget
July 3, 2017	Preliminary Third Year Action Plan Available for 14-Day Public Review
July 17, 2017	Public Review Period Ends; City Council Adoption
August 16, 2017	Deadline for Submission to HUD

# DISCUSSION



## CDBG PY2017

### Agenda for the Public Service and other eligible projects

1-3 p.m. 5<sup>th</sup> FL Training Room

Lorain Health and Dentistry

February 28, 2017

The purpose of this meeting today is to discuss the type of projects that are eligible for assistance with Community Development Block Grant (CDBG) funds.

HUD awards grants to entitlement community grantees to carry out a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and providing improved community facilities and services.

Entitlement communities develop their own programs and funding priorities.

#### **National Objectives:**

All projects must meet one of the following national objectives: assist low to moderate income individuals; meet an urgent need or eliminate slum and blight

Additional Notes: However, grantees must give maximum feasible priority to activities which benefit low- and moderate-income persons. A grantee may also carry out activities which aid in the prevention or elimination of slums or blight. Additionally, grantees may fund activities when the grantee certifies that the activities meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs. CDBG funds may not be used for activities which do not meet one of these national objectives.

#### **CDBG funds may be used for activities which include, but are not limited to:**

- Acquisition of real property
- Relocation and demolition
- Rehabilitation of residential and non-residential structures
- Construction of public facilities and improvements, such as water and sewer facilities, streets, neighborhood centers, and the conversion of school buildings for eligible purposes
- Public services, within certain limits
- Activities relating to energy conservation and renewable energy resources
- Provision of assistance to profit-motivated businesses to carry out economic development and job creation/retention activities

Each activity must meet one of the following national objectives for the program: benefit low- and moderate-income persons, prevention or elimination of slums or blight, or 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.

Some of the types of projects/activities funded with CDBG funds were:

Fair Housing

Code Enforcement

Planning: Oakwood Park Plan; and Comprehensive Land Use Plan/Zoning Ordinance Update

Public Facilities Improvement: CityView (playground equip.); Lakeview South (handicap sidewalks); Century Beach handicap restrooms and; Central Park (basketball nets; exercise foot saw)

*Emergency Home Repair (seniors 62 years older income less than 50% LMI completed deferred for 5 years) Maximum amount of assistance for everyone is \$5000. Those above 50% of median income will receive a 0% or 3% loan which is based upon their income level. No one's income can be above 80% of median income to receive assistance. All loans must be paid off within 5 years.*

Accessibility Program 62 years and over receive assistance with a grant; maximum assistance is \$1500. (Ramps; Grab bars; door widening; toilets; and assistance with technology devices. Grant funds can be used as match with other funding from the homeowner

Public Service Activities

Boys & Girls Basketball/Tennis Court Oakwood Club

Economic Development

Lorain Police Emergency Operations Center

Christ Lutheran Church Food Bank

Generally, the following types of activities are ineligible:

- Acquisition, construction, or reconstruction of buildings for the general conduct of government
- Political activities
- Certain income payments
- Construction of new housing (with some exceptions)

Go over application with the audience and take questions as you go over the process.

Also note the income limits for a household of 4 persons \$53,300 (80%); \$33,300 (50%); and \$24,300 (30%). The median income for Lorain County: which is part of the Cleveland-Elyria, OH Metropolitan Strategically Area (Cuyahoga, Lake, Lorain, Geauga, Medina counties respectively)?

\*\*\*\*\*When reapplying for additional funding the sub recipient must show an increase in services from pervious program years to justify additional funding for the same service as last year.

**City of Lorain  
Building, Housing, and Planning  
Citizen Participation Plan**

The City of Lorain seeks to encourage citizen participation in the planning and processing of the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs and other federal programs included under 24 CFR 91 as part of the Consolidated Plan. The City of Lorain further seeks to encourage citizen participation in the overall development of the Consolidation Plan, any amendments to the plan, and the performance report by annually carrying out the following activities:

Furnish citizens with information concerning the amount of assistance expected to be received and the range of activities that may be undertaken, including the amount that will benefit persons of very low-and low income and the plans to minimize displacement of persons and to assist any persons displaced;

Publish a summary of the proposed Consolidated Plan city-wide for comment on the city's website and Morning Journal and make copies of the proposed Consolidated Plan available for public review at the Lorain Public Library and the South Lorain Public Library in addition to the City of Lorain's website;

Notify the public of the availability of the Consolidated Plan as adopted, any amendments, and performance report, as these documents are developed, to afford citizens a reasonable opportunity to examine their contents:

Provide a period of not less than 30 days to receive comments from citizens on the Consolidated Plan, any amendments, or performance report that is to be submitted to the U. S. Department of Housing & Urban Development (HUD) before its submission;

Provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan as well as use of assistance under the programs covered within the Consolidated Plan during the preceding (5) five years;

Provide technical assistance to groups representative of persons of very low-and low-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the Consolidated Plan by conducting at least (1) one workshop to distribute funding applications and to educate such groups as to eligible activities and general requirements of the programs covered by the Consolidated Plan;

Hold at least two (2) two public hearings at different stages of the program year, including one public hearing before the proposed Consolidated Plan is published for comment, to obtain citizens' view on housing and community development needs, including priority non-housing community development needs, and to address the development of proposed activities and review of program performance;

Provide citizens with adequate advance notice of each hearing and advertising city-wide in the Morning Journal and City of Lorain's website with sufficient information published about the subject of the hearing to permit informed comments;

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Respond to written citizen complaints related to the Consolidated Plan, any amendments to the plan, or performance report within 15 working days, where practicable; and

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# **CDBG PY2017**

## **Agenda for the Public Service and other eligible projects**

**1-3 p.m. Police Conference Room**

**City of Lorain City Hall**

**February 28 , 2017**

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Lorain, OH 44052

**Public Notice  
Community Development  
Block Grant (CDBG)  
HOME Investment  
Partnership**

City of Lorain, Ohio  
Department of Building,  
Housing and Planning

The City of Lorain is seeking your participation in the development of the PY2017 Action Plan.

Each year grant funds are earmarked for projects deemed worthy by citizen input in Lorain. Please join us and let your voice be heard.

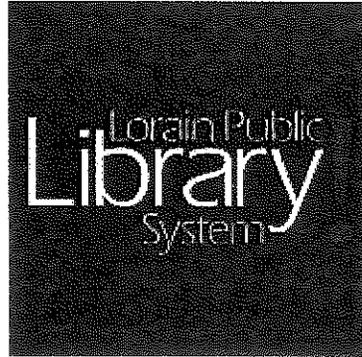
**Tuesday, March 14, 2017  
at 6:00pm to 7:00pm  
Washington Elementary  
School Gymnasium  
1025 West 23rd Street  
Lorain, Ohio 44052**

**(This meeting  
has been cancelled  
due to weather)**

C.T. 3/14/17  
20577980

### Food for Fines

Ingrid Rivera  
Lorain Public Library System

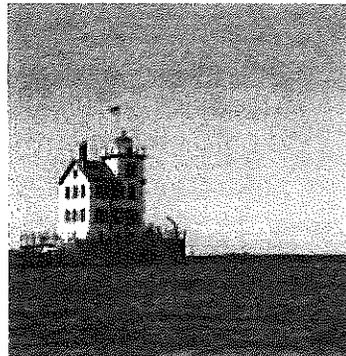


Recommend 5 Share

3/1 -- One in four children in Lorain County struggle with hunger. That is 22.5 percent of the population translating to over 15,000 children. [Full Story](#)

### CDBG Grant Application Meeting

Kellie F. Glenn  
Program Manager



Recommend 0 Share

2/24 -- [City of Lorain's \(Website | Profile\)](#) Department of Building, Housing, and Planning are now accepting applications for the City of Lorain's FY2017-2018 public service grant program. Funding is provided through Community Development Block Grant Program (CDBG) from the U.S. Department of Housing and Urban Development. [Full Story](#)

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# Lorain

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## Public Hearing for the City of Lorain Federal Programs Funding

City of Lorain

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June 29, 2017 -- Under Title I of the Housing and Community Development Act of 1974, as amended and the Cranston-Gonzalez National Affordable Housing Act of 1990, the City of Lorain, Ohio is required to prepare a plan that describes how the City will allocate Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds to meet the

needs of low and moderate income persons in the [City of Lorain](#) ([Website](#) | [Profile](#)).

To that end an Action Plan is completed annually to describe the activities that will be undertaken to address the needs identified in the Five-Year Consolidated Plan. It also serves as an application for CDBG and HOME funds. This Action Plan describes the activities that will take place during 2017-2018 Program Year.

### Notice of Plan Availability

The City of Lorain has prepared its 2017-2018 Annual Action Plan. The plan will be made available to the public on July 3, 2017. This notice is being published to make citizens aware of the HUD issued waiver of the regulatory 30-day citizen participation public comment period for states and local jurisdictions, in favor of a minimum 14-calendar day comment period commencing on July 3, 2017 and will conclude on July 17, 2017. During this period copies of the Plan may be reviewed at the following locations:

- City of Lorain Main Library, 351 W. Sixth Street, Lorain, OH 44052
- South Lorain Library, 2121 Homewood Drive, Lorain, OH 44055
- City Hall, Department of Building, Housing, and Planning, 200 West Erie Avenue, 5th Floor, Lorain, OH 44052
- The City of Lorain [website](#).

Inquiries and comments concerning the Consolidated Plan and Action Plan can be conveyed by contacting the City staff at:

[E-mail this to a friend](#)

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## VETERANS

If you were injured while on active duty or during training you may qualify for compensation due to a service connected injury.

For more information call The Lorain County Veterans Service Office to speak with one of our certified Service Officers.

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## Lorain Consolidated Plan Comments

Department of Building, Housing, and Planning

200 West Erie Avenue, 5th Floor

Lorain, OH 44052

Telephone: (440) 204-2020

Fax: (440) 204-2080

[Kellie\\_glenn@cityoflorain.org](mailto:Kellie_glenn@cityoflorain.org)**Notice of Public Hearing**

There will be a public hearing and adoption of the 2015-2019 Five-Year Consolidated Plan and 2017-2018 Annual Action Plan with the City of Lorain City Council, including the proposed use of funds on:

Monday, July 3, 2016, 5:00pm

Lorain City Hall Building

Police Conference Room

200 West Erie Avenue

Lorain, OH 44052

**Note:** The City Council Meeting will be at 6:00 p.m. in the City Council Chambers. The City will provide technical assistance to citizens and group representative of persons that request such assistance. In addition, the City will make adequate provisions to assist non-English speaking residents in interpreting program details and provisions on a case-by-case basis, as well as provide auxiliary aides and services for individuals with disabilities. For requests for special accommodations please email or call Kellie Glenn, Interim Director of Building, Housing, and Planning, [Kellie\\_glenn@cityoflorain.org](mailto:Kellie_glenn@cityoflorain.org) or 440-204-2087. Requests for special accommodations must be made with reasonable advance notice.

**Summary of Plan**

The Action Plan includes an estimate of available resources from private and public sources to address identified needs, a description of the priorities and specific objectives to be addressed in this program year, a summary of the eligible programs or project that the City of Lorain will undertake to address the needs, and a description of geographic areas of the City in which assistance will be directed. Resources available for the 2017 Program Year are detailed below:

Community Development Block Grant Program (CDBG): \$1,115,031

Home Investment Partnership Program: \$252,133

2017 Estimated Program Income (HOME/CDBG): \$971,000

Total 2017 Resources: \$2,338,164

**CDBG:**

Administration: \$269,500

Fair Housing: \$70,000

Planning: \$10,000

Code Enforcement: \$250,000

Public Facilities Improvements: \$95,000

Park &amp; Rec. Facilities (Oakwood/Gen. Johnny Wilson, etc.): \$360,000

Street Improvement (Ward 6): \$170,000

Clearance/Demolition (Stoveworks, Motels, Hotwaters): \$400,031

Public Services (Legal Aide, Nord Center, Youth Employment: \$105,500

Get w/ the Program, United Way) Debt Services CIP: \$156,000

CDBG Program Income: \$771,000

Total CDBG Projects: \$1,886,031

HOME:

Administration: \$45,133

Homeowner Occupied Rehabilitation: \$407,000

Total HOME Budget: \$452,133

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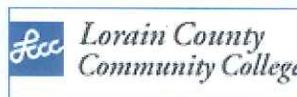
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**Programa de Fondos de Desarrollo Comunitario (CDBG)**  
**CASA Alianza de Inversión**

Ciudad de Lorain, Ohio  
 Departamento de la Construcción, la Vivienda y la Planificación

La Ciudad de Lorain está buscando su participación en el desarrollo del Plan de Acción Anual 2017.

Cada año los fondos son destinados a proyectos considerados apropiados para la opinión de los ciudadanos de Lorain. Por favor únase a nosotros y que su voz sea escuchada.

Mayo 14, 2017 de 6:00pm a 7:00pm  
 Washington Elementary  
 Gimnasio  
 1025 West 23<sup>rd</sup> Street  
 Lorain, Ohio 44052

Mayo 21, 2017 de 6:00pm a 7:00pm  
 Southview Middle School  
 La Sala  
 2321 Fairless Drive  
 Lorain, Ohio 44055

La Ciudad ofrecerá asistencia técnica a los ciudadanos y grupos representativos que soliciten ayuda en el desarrollo de las propuestas de solicitud financiera, en la revisión de las actividades del programa y los resultados del programa. Además, la Ciudad hará las disposiciones necesarias para ayudar a los residentes que hablan español en la interpretación de las oportunidades y disposiciones del programa dependiendo de cada caso; así como, proporcionar ayuda y servicios suplementarios para personas incapacitadas. Para las solicitudes especiales del cuarto, por favor envíe un correo electrónico o llame a Kellie F. Glenn, Program Manager I, la Vivienda y la Planificación, Kellie\_Glenn@cityoflorain.org o 440-204-2087. Las solicitudes especiales del cuarto deben hacerse con suficiente anticipación.

**Public Notice**  
**Community Development Block Grant (CDBG)**  
**HOME Investment Partnership**

City of Lorain, Ohio  
 Department of Building, Housing and Planning

The City of Lorain is seeking your participation in the development of the PY2017 Action Plan.

Each year grant funds are earmarked for projects deemed worthy by citizen input in Lorain. Please join us and let your voice be heard.

Tuesday, March 14, 2017 at 6:00pm to 7:00pm  
 Washington Elementary School  
 Gymnasium  
 1025 West 23<sup>rd</sup> Street  
 Lorain, Ohio 44052

Tuesday, March 21, 2017 at 6:00pm to 7:00pm  
 Southview Middle School  
 Auditorium  
 2321 Fairless Drive  
 Lorain, Ohio 44055

The City will provide technical assistance to citizens and groups representative of persons that request such assistance in developing funding request proposals and in the review of program activities and program performance. In addition, the City will make adequate provisions to assist non-English speaking residents in interpreting program opportunities and provisions on a case-by-case basis, as well as provide auxiliary aides and services for individuals with disabilities. For requests for special accommodations please email or call Kellie F. Glenn, Program Manager I, Building, Housing, and Planning, Kellie\_Glenn@cityoflorain.org or 440-204-2087. Requests for special accommodations must be made with reasonable advance notice.

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# **EXECUTIVE SUMMARY**

## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The City of Lorain, Ohio completed the planning process for the 2015/2016-2019/2020 Five-Year Consolidated Plan (Consolidated Plan) as required by the U.S. Department of Housing and Urban Development (HUD). The purpose of the Consolidated Plan is to identify goals, objectives and strategies for addressing housing and community development needs, including those of the homeless and other special needs populations. The Consolidated Plan guides the use of City resources to address these needs over a five-year period. In recent program years, the City received an annual allocation of approximately \$1.1 million Community Development Block Grant (CDBG) funds and \$400,000 in HOME Investment Partnerships Program funds. This amount totaled an average of approximately \$1.58 million per year over the previous five-years or a total of \$7.9 million.

#### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

In the previous years of the five year Consolidated Plan the city has completed park improvements throughout the city; demolished two motels in order to prevent imminent danger to area residents in the Erie Avenue area of the city. Additionally, the city has had success with the newly revamped Emergency Home Repair program which provides funding for code violations and ADA accessibility. The demand has become so great funding was exhausted prior to the end of year 2016.

This year the City of Lorain will concentrate on suitable living environments: continue the emergency home repair; downpayment assistance/financial literacy to increase homeownership within the city limits; rehabilitation of homeowner occupied homes; and addressing fair housing impediments. The city will continue to assist with public facilities improvements such as the necessity of improving Oakwood Park in South Lorain and the installation of ADA playground equipment in Campana Park as well as other smaller parks within in the city. Demolition will take place for Stoveworks which is an delapidated contaminated structure that is located in Central Lorain. There are two additional motels that need to demolished as well Parkview and Lake Motels.

Opportunities for local youth will be addressed by providing funding for youth employment program with the support of Lorain City Schools. The city will hire a full-time fair housing administrator in 2017 to address impediments to fair housing choice by doing random testing to ensure fair housing related concerns are being addressed.

The city will be providing more support to public service type activities: providing funding to Second Harvest to fight homelessness; Legal Aid Society of Greater Cleveland secures justice and resolves fundamental problems for those who are low income and vulnerable by providing high quality legal services and working for systemic solutions in Ashtabula, Cuyahoga, Geauga, Lake and Lorain Counties but funding will be provided specifically for City of Lorain residents. The city will continue to provide funding for the Tenant-based Rental Assistance program managed through El Centro Servico to area residents which is a tool to assist with the prevention of homelessness.

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

CDBG: Emergency Home Repair of 18 households since August of 2015 with the racial composition of caucasian, hispanic and african american households. There were 6 households assisted in late 2016. Two have been completed with four underway. Between the months of January and August a total of 8 low income households were assisted with emergency home repairs. There were 14 households assisted with emergency home repairs. The number decreased due to a free furnace repair/replacement program being made available to low income households through Columbia Gas. Also, many homeowners are behind in their taxes which disqualifies them for any assistance through the city's emergency home repair program. The City of Lorain anticipates an increase in emergency home repair request for 2017 due to the Lorain County Community Action Agency's continuous decrease in funding for emergency repairs.

The city's tenant base-rental assistance program is in its second consecutive year of it funding agreement. El Centro administers the program on behalf of the City of Lorain. There is a waiting list for families and individuals seeking rental assistance. Lorain has 35.9% of population with incomes below the poverty level therefore maining housing needs and other immeidate needs are very hard to manage. This program is funded solely with HOME funds. The program assisted 84 individuals. There were 19 families at risk of being homeless and 6 families that were homeless.

A downpayment assistance program will come to light in mid 2017 with a finacial literacy component attached to help those persons with credit issues be able to purchase a home within in a year or two. The city will providing assistance to at least two families at the start of the program. El Centro and Neighborhood Housing Services out of Cleveland has been working with families once a month regarding homeownership counseling. The program is designed to assist with credit issues, income, obstacles to home buying, goals and affordability concerns. There are currently 24 individuals

receiving assistance and two individuals will be ready to purchase homes within the next six months. The two individuals will benefit from the newly funded downpayment assistance program.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

During the planning process, the City conducted public meetings with citizens and stakeholders, meetings and consultation with Non-profit groups, 4 public meetings: two meetings concerning the action plan and one for substantial amendment for projects that will not move forward from previous years, and 1 public hearing with the City Council. The purpose of this process was to receive citizen input on the current housing and community development needs of the City.

The efforts that will be made for citizens to comment on the reports with reasonable notice are as follows: advertising a notice to the public within Lorain City hall, On LorainCounty.com (County website that includes all area political jurisdictions information) and the a locally circulating newspapers in addition to providing the CAPR report online (City of Lorain website) so the public has continuous access to the report. A timeline will be outlined for the public to make public comments. Additionally, there is a federal programs special committee that meets monthly in Council chambers to discuss project/activities/programs that federally funded.

Additionally, the citizen participation plan was updated in 2016 to make it more citizen participation friendly i.e. advertise on the City of Lorain website and Loraincounty.com. Also, providing notices in city hall.

#### **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

There will be at least four public meetings relating to the Action Plan. The first meeting the public rank projects/programs:

There are many issues that the public felt are important, there are a few items that were stressed throughout the meeting as being of the highest priority:

- Infrastructure improvements
- Job training and educational programs for youth and young adults (vocational)
- Blight elimination
- Housing rehabilitation and affordability
- Economic Development
- Park improvements and maintenance

Note: these are same comments since the first year action plan. Many of the above are being implements with the exception of Economic development. The economic development program is currently on hold due to the federal investigation regarding how loans funds were approved.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments received by the City of Lorain were considered and are, generally or specifically, addressed by the Strategic Plan and/or Annual Action Plan.

## **7. Summary**

The City of Lorain Building, Housing, & Planning staff is doing its best to implement programs/projects for the benefit of the majority of the residents within the City of Lorain specifically for the benefit of low to moderate income individuals. It is important to note the department has an ongoing problem with maintaining full-time staffing which limits its ability to successfully carry out programming. It is important to note the success of the Emergency Home Repair ; Tenant-base Rental Assistance, Demolish of two motels to reduce blight in the city; and the expansion of a food bank program at the Christ Evangelical Lutheran Church in South Lorain. Even though the staffing in the department is limited, the remaining staff will do to the best of its ability to carrying out outlining programs/projects which may have to be outsourced in order to adequately benefit the residents within the city.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	LORAIN	
CDBG Administrator		Department of Building, Housing and Planning
HOPWA Administrator		
HOME Administrator		Department of Building, Housing and Planning
HOPWA-C Administrator		

Table 1 – Responsible Agencies

**Narrative (optional)**

CDBG Administrator Kellie Glenn 200 West Erie Avenue, 5th Fl, Lorain, OH 44052 (440) 204-2087

**Consolidated Plan Public Contact Information**

Kellie Glenn, Program Manager I , Building, Housing, Planning Departemtn, 200 West Erie Avenue, 5th FL, Lorain, OH 44052 , (440) 204-2087

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))**

The City will execute this Consolidated Plan in harmony with public, private and nonprofit agencies. Nonprofit agencies may include, but are not limited to, service providers and community housing development organizations. Private sector partners may include, but are not limited to, local financial institutions, developers and local businesses. The City works closely with its partners to design programs that address identified needs.

Some of the partnerships that have been developed within the public, private and nonprofit agencies: El Centro Social Services which has a current contract with the City of Lorain to provide tenant-base rental assistance to low income families to prevent homelessness; the Legal Aide Society will provide legal services to City of Lorain Residents; working with Lorain City Schools to provide part-time summer employment with students who are currently enrolled in the school's Employability Program; and also partnering with Boys & Girls Club of Lorain County and a Program called "Get with the Program" to introduce area students in the city to STEM programs.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The City coordinated with the Lorain County Homeless Task Force and point-in-time (PIT) homeless counts. This consultation was pivotal in preparing the Needs Assessment and Strategic Plan components of the Consolidated Plan. In addition, through questionnaires, public meetings, and review of the most recent Public Housing Authority Plan, the Lorain Metropolitan Housing Authority also offered pivotal input in preparing the Needs Assessment and Strategic Plan components of the Consolidated Plan. Additionally, the city's fair housing administrator sits on the Lorain County Homeless Taskforce board to in order to assist with fair housing related needs of area agencies and their clients.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City of Lorain does not receive or administer an Emergency Shelter Grant (ESG). Consultation with the Continuum of Care (CoC) included email and phone discussions with the Lorain County Homeless Task Force, and public hearings. The Lorain County Homeless Task Force area's CoC, assists in the operation and administration of the region's Homeless Management Information System (HMIS).

In order to expand and improve the services offered to homeless individuals and families in Lorain, the City encourages local providers to seek funding opportunities at the Federal, State and local levels. If, during the upcoming year, additional funds for homeless assistance and prevention become available, the City will work cooperatively with eligible applicants to obtain such funding. Tough economic times has fostered an increase of at-risk homelessness among families above those normally served by programs in the Lorain County Continuum of Care (<50% area median income (AMI)). The City of Lorain has recently restructured its programs to complement the Continuum of Care programs for renters and will be implementing a Tenant Based Rental Assistance Program through the use of a qualified sub-recipient.

The city does not provide funding but the city's fair housing administrator sits on various boards in order to assist with fair housing related needs of residents and other agencies who provide housing assistance.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Lorain Metropolitan Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The anticipated outcomes are to hold public hearings, meetings and coordinate efforts to access public housing opportunities for low income residents.
2	Agency/Group/Organization	My Neighborhood Alliance - Haven Center
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Lorain's goal is to assist with homeless needs and develop a strategic plan to reduce homelessness.
3	Agency/Group/Organization	Boys & Girls Clubs of Lorain County
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Public service to youth and engage science, technology, engineering and math.

4	<b>Agency/Group/Organization</b>	Legal Aide Society of Cleveland
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Legal Aid will focus on matters of safety and health, economics and education, and housing
5	<b>Agency/Group/Organization</b>	El Centro de Servicios Sociales
	<b>Agency/Group/Organization Type</b>	Housing Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	public hearing, meetings relating to housing obtainment rather rental or purchase, financial literacy awareness, etc.

Identify any Agency Types not consulted and provide rationale for not consulting

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 – Other local / regional / federal planning efforts

**Narrative (optional)**

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

Public meetings were held in February with area not for profits organizations regarding potential funding that would be available for the new PY17 allocation. Applications were due back no later than March 31, 2017. The meeting was held February 28, 2017 at the Lorain Health & Dentistry. Additionally, the first public hearing to inform the public about possible funding regarding PY17 were held March 14 Washington Elementary School and March 21, 2017 at Southview Middle School.

A Substantial Amendment was held June 5, 2017 at City Hall in the Police Conference Room. The Second Public Hearing for PY2017 funding regarding detailed projects/activities will be held on July 3, 2017 at City Hall Police Conference Room. City Council will meet immediately following this meeting to decide on by PY2017 budget.

The meeting notifications were advertised in The Lorain Morning Journal (English), advertised in the predominately Hispanic newspaper (La Prensa Newspaper); notices placed in City Lorain City Hall and advertised on the City website.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Residents of Public and Assisted Housing	Attendance consist of Historic Society; political officials and general public both English and Spanish speaking	The direction for funding: infrastructure; public facilities improvements; economic development, housing improvements, etc.	Discussion concerning not being able to speak at City Council meetings. Public is only permitted to speak at council committee meetings which are topic specific.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
2	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>	<p>There were over thirty persons from Non-profit entities in attendances. Last year there were only five.</p>	<p>The comments received were mainly concerned with not having access to HUD funds via the City of Lorain in the past.</p>	<p>All comments were founded and received.</p>	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
3	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Substantial Amendment meeting to move funding in order to fund existing projects or new projects.		Non applicable	

Table 4 – Citizen Participation Outreach



## Expected Resources

### AP-15 Expected Resources – 91.220(c) (1, 2)

#### Introduction

The five year Consolidated Plan identifies the federal, state, local and private resources expected to be available for the City of Lorain to address priority needs and specific objectives identified in the Strategic Plan.

City of Lorain total allocation of \$1,115,031 in CDBG funding and \$252,133 in HOME funding for the 2017/2018 program year. Program income for CDBG and HOME is expected. CDBG funds will be used for housing and community development activities such as housing, code enforcement, demolition, parks and recreational facilities, public improvements, public services, and administration of the City's CDBG program HOME funds will be utilized for homeowner occupied rehabilitation activities; and lead safety measures.

#### Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,115,031	771,000	0	1,886,031	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	252,133	200,000	0	452,133	0	

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The City will look to leverage funds, if available, from State and Federal grants, City Departments (e.g. Public Works, Parks and Recreation), public or social service providers, or other sources against CDBG and HOME dollars. The City will look to leverage funds, if available, from Community Housing Development Organizations (CHDOs), Lorain Metropolitan Housing Authority (LMHA), or other agencies and programs against CDBG and HOME dollars. The City shall assure that the requirements as it relates to non-federal share will be utilized as referenced in 24 CFR 570.201 (3) (g), for any project in which CDBG funding is used as the non-federal match. In the future, the city will continue to aggressively pursue funding from private, public, and federal sources to complete both our economic and community development needs.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City may seek to utilize publically owned land and/or property in a combination of ways which includes, but is not limited to: business

expansion and attraction; new housing construction and rehabilitation; homelessness, and future CHDO development activities. Excess property shall be disposed of pursuant to local, state and federal laws, and income derived from related properties shall be returned to its appropriate funding source.

The City may seek to utilize publically owned land and/or property in a combination of ways which includes, but is not limited to: business expansion and attraction; new housing construction and rehabilitation; homelessness, and future CHDO development activities. Excess property shall be disposed of pursuant to local, state and federal laws, and income derived from related properties shall be returned to its appropriate funding source.

The City owns property in the Riverbend Commerce Park, located on the east side of the Black River, which could be developed for economic development and public facility purposes. This property is characterized by 176 acres and 20-25 development sites. Another 224 acres is proposed for recreational, green space and wetland development. All supporting infrastructure is complete. The plan is sell some of the acreage in this area within the coming months to pay off the debt the city owns to the federal government which will also increase economic development efforts.

## **Discussion**

City of Lorain's anticipated funding allocation from CDBG and HOME will address many of the City's goals, including housing, homelessness, non-homeless special needs, and community and economic development. The City is fortunate to have a network of public or social service providers and other City departments to help address these goals through financial leveraging, coordination and collaboration. Additionally, the city is funding at least five public service type projects from legal aide to youth employment programs.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing	2015	2019	Affordable Housing Public Housing	Ward 1 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI	Housing Rehabilitation Elimination of Slum and Blight Code Enforcement Affordable and Accessible Housing for Special Need Programs and services for low and moderate income Programs and services for special needs residents	CDBG: \$447,000 HOME: \$407,000	Homeowner Housing Rehabilitated: 18 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Homelessness	2015	2019	Homeless	Ward 2 LMI Ward 1 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI	Homeless Services and Prevention Fair Housing Education and Outreach Programs and services for low and moderate income Social Service Programs Programs and services for special needs residents	CDBG: \$107,000	Public service activities other than Low/Moderate Income Housing Benefit: 125 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Community and Economic Development	2015	2019	Non-Housing Community Development	Ward 2 LMI Ward 1 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI	Elimination of Slum and Blight Code Enforcement Public Facilities and Infrastructure Youth Programs and Services Programs and services for low and moderate income Social Service Programs	CDBG: \$1,886,031	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 10000 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 36000 Households Assisted Public service activities other than Low/Moderate Income Housing Benefit: 125 Persons Assisted Public service activities for Low/Moderate Income Housing Benefit: 75 Households Assisted Housing Code Enforcement/Foreclosed Property Care: 40000 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Non-Homeless Special Needs	2015	2019	Non-Homeless Special Needs	Ward 2 LMI Ward 1 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI	Affordable and Accessible Housing for Special Need Public Facilities and Infrastructure Youth Programs and Services Programs and services for low and moderate income Social Service Programs Programs and services for special needs residents	CDBG: \$160,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Program Administration	2015	2019	Administration/Planning	Ward 2 LMI Ward 1 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI		CDBG: \$277,500 HOME: \$45,133	

Table 6 – Goals Summary

### Goal Descriptions

1	Goal Name	Housing
	Goal Description	Improve the existing homeowner occupied housing stock by providing an Emergency Home Repair Program (CDBG); and beginning back the Homeowner occupied rehabilitation program (HOME). Both programs will assist with accessibility for disabled homeowners as well.
2	Goal Name	Homelessness
	Goal Description	Reduce homelessness in the City by providing fair housing education and providing CDBg funding for public service activities i.e. Legal Aide Society; United Way; The Nord Center -assist disabled and mentally challenged city residents; etc.
3	Goal Name	Community and Economic Development
	Goal Description	Elimination of Slum and Blight; Code Enforcment; Public Facilities Improvements; Youth Programs (Employment) and other programs and services for the low to moderate income individuals

4	Goal Name	Non-Homeless Special Needs
	Goal Description	Affordable and accessible housing for special needs; and youth programs and services i.e. youth employment program with the City of Lorain; Nord Center; and United Way; handicap playground equipment
5	Goal Name	Program Administration
	Goal Description	Administrative and Planning

Table 7 – Goal Descriptions

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):

NA

## AP-35 Projects – 91.220(d)

### Introduction

City of Lorain’s planned actions for the 2017/2018 Annual Action Plan are intended to support housing and community development for the City’s low- and moderate-income populations as well as the City’s homeless and special needs groups.

The City will continue to operate its CDBG and HOME programs through the Economic & Community Development Department, which will continue to provide funding for housing rehabilitation, ownership, and rental assistance/counseling in partnership with its sub-recipients. These actions will further the goal of improving the availability and accessibility of affordable housing in the City of Lorain.

As in the past, the City will continue to coordinate with public or social service providers to prevent homelessness and promote access to public services for special needs populations generally assumed to be low- and moderate-income. During the 2015/2016 program year, the City will fund activities that address the needs of the homeless and non-homeless special needs populations such as at-risk youth and seniors.

Planned community development activities include renovations parks and recreation, flood drainage, sidewalks, trees, and asbestos removal to enhance the living environment for people living in low- and moderate-income neighborhoods.

#	Project Name
1	Administration
2	Planning

Table 8 – Project Information

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

## Projects

### AP-38 Projects Summary

#### Project Summary Information

Table 9 – Project Summary

<b>1</b>	<b>Project Name</b>	Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Program Administration
	<b>Needs Addressed</b>	
	<b>Funding</b>	CDBG: \$267,500
	<b>Description</b>	Program Administration
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Salaries and Administration
<b>2</b>	<b>Project Name</b>	Planning
	<b>Target Area</b>	Ward 2 LMI Ward 1 LMI Ward 5 LMI Ward 6 LMI Ward 3 LMI

<b>Goals Supported</b>	Program Administration
<b>Needs Addressed</b>	
<b>Funding</b>	CDBG: \$10,000
<b>Description</b>	Planning for up and coming projects and programs/activities
<b>Target Date</b>	6/30/2018
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
<b>Location Description</b>	Citywide
<b>Planned Activities</b>	Planning and Zoning activities

## AP-50 Geographic Distribution – 91.220(f)

### Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

For the 2017/2018 Annual Action Plan, City of Lorain will direct assistance to low- and moderate-income areas of the City including, but not limited to, five (5) Target Areas. These Target Areas are City Council Wards 1, 2, 3, 5, and 6. Assistance will also be made available citywide to persons meeting the CDBG eligibility requirements for low- and moderate-income benefit.

The neighborhood boundaries of Ward 1 are portions of Lake Erie to the North; Pin Oak Drive to the East; the Black River to the South; and portions of Colorado Avenue and Black River West.

The neighborhood boundaries for the Ward 2 target area are: Lake Erie to the North; Maine Avenue to the East; W. 21st Street to the South; and portions of both Brownell and Oberlin Avenues to the West. Ward 2's LMI Census Tracts include the following: 222,223, 224, and 229.

The neighborhood boundaries for Ward 3 are as follows: W. 21st Street to the North; Reid Avenue to the East; W. 34th, W. 36th Streets and Tower Blvd. to South.

The neighborhood boundaries for Ward 5 are as follows: SR 611 to the north west of Broadway Ave; E 29th Street to the north east of Broadway Ave.; The City Boundary to the south; Reid Ave to the west north of W 34th Street; Broadway St to the west south of W 34th Street; Clinton Ave to the east south of E 38th St; Seneca Ave to the east south of E 31st St; Pearl Ave to the east south of E 30th St; Maple Rd to the east south of E29th St.

The neighborhood boundaries for Ward 6 are as follows: Black River to the north; the City boundary to the south and east; Clinton Ave to the west south of E 38th St; Seneca Ave to the west south of E 31st St; Pearl Ave to the west south of E 30th St; Maple Rd to the west south of E29th St.

### Geographic Distribution

Target Area	Percentage of Funds
Ward 2 LMI	20

Target Area	Percentage of Funds
Ward 1 LMI	20
Ward 5 LMI	20
Ward 6 LMI	20
Ward 3 LMI	20

Table 10 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

City of Lorain's rationale for allocating investments geographically is dependent upon the location of low- and moderate-income populations, which are most concentrated in Wards 1, 2, 3, 5, and 6.

The City of Lorain reviews statistical information on annual basis for all city neighborhoods that have been determined to have at least 65% of its population with low and moderate incomes (80% of the Area Median Income). Currently there are 22 Block Groups that meet or exceed these criteria in the City. These identified areas are situated predominately in Wards 1, 2, 3, 5, and 6. These same neighborhoods have the highest percentage of minority populations in the City. In addition, independent reports e.g. the Vacant Property Study show that these areas are locations of high property vacancies, blight, and code violations

### Discussion

City of Lorain has identified projects to implement the four goals of the Strategic Plan during the first year of the 2015-2019 Consolidated Plan. These projects benefit low- and moderate-income persons citywide and within the City's five (5) Target Areas: Ward 1, Ward 2, Ward 3, Ward 5, and Ward 6. Projects with citywide benefit include economic development, code enforcement, and the police emergency operations center as well as the City's administration of the CDBG and HOME programs.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

As stated previously, the City places a high priority on providing homeownership opportunity in the City of Lorain. This goal shall be addressed, in part, by local non-profit organizations that construct new, modestly priced, affordable houses, or repair existing houses for resale to lower-income, first-time homebuyers. In addition, the jurisdiction shall seek creative ways in which we can provide affordable housing opportunities and a means for obtaining such.

One Year Goals for the Number of Households to be Supported	
Homeless	10
Non-Homeless	35
Special-Needs	6
Total	51

**Table 11 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	2
Rehab of Existing Units	27
Acquisition of Existing Units	0
Total	29

**Table 12 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

Obtaining affordable housing through programs including but not limited to: First Time Homebuyer/Downpayment Assistance/financial literacy programs; and Owner-Occupied Rehabilitation assistance grants; Emergency Rehabilitation Grants, and city-owned homes available for purchase

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Lorain Metropolitan Housing Authority (LMHA) is the housing authority for Lorain County. Within the City of Lorain, the LMHA maintains and operates 862 public housing units. During the upcoming year, the LMHA estimates utilizing Comprehensive Grant Program funds to rehabilitate public housing developments located in the City of Lorain. In addition, the LMHA will likely assist over 500 low-income renter households through rehabilitation activities. Further, the LMHA has 24 scattered-site housing units in the City that benefit low-income households.

This section of the Annual Action Plan describes what actions the City of Lorain will take in the 2017/2018 program year to carry out the public housing portion of the Strategic Plan. Below, the City has identified the manner in which the 2017/2018 Annual Action Plan will address the needs of public housing during the program year.

### **Actions planned during the next year to address the needs to public housing**

As was noted in Section NA-35, the Lorain Metropolitan Housing Authority (LMHA) has been charged with the responsibility of the administration of housing programs for low-income persons. The operations of the LMHA are funded through annual appropriations provided by the U.S. Department of Housing and Urban Development (HUD).

LMHA lists the following as goals pertaining to both addressing the needs of public housing and improving the quality of affordable housing. The jurisdiction shall make a strong effort to work collaboratively with the local housing authority where feasible on these goals, and others throughout the coming years.

- Renovate and modernize public housing interiors, exteriors, common areas, sites/grounds and building systems utilizing Capital Funds and Operating Reserves, when possible;
- Strive to maintain High Performer status under PHAS and SEMAP;
- Continue to strictly enforce Housing Quality Standards (HQS) for landlords and restrict participations of landlords who are consistently in noncompliance with HQS;
- Through collaborations with the City of Lorain, apply for planning grants, such as the Choice Neighborhoods, to facilitate the housing authority's research into the feasibility of the redevelopment of Southside Gardens which is ongoing currently in 2017. The housing authority has developed sampled homes; and

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- Expand the supply of affordable housing in nontraditional areas by de-concentrating vouchers within areas of poverty and encouraging movement into neighborhoods of opportunity.

The LMHA has been committed to advocating for and providing affordable housing for eligible individuals and families, and continues to work closely with HUD, City of Lorain, and area agencies and organizations to address the needs for public housing. This will be an effort supported by the city's fair housing administrator and director.

**Actions to encourage public housing residents to become more involved in management and participate in homeownership**

LMHA intends to continue promoting several resident initiatives that are generally broken down into two phases. In the first phase, the LMHA provides training programs for family self-sufficiency (FSS) through educational entities or private sector companies that provide training. In addition, LMHA has an economic empowerment plan that includes workshops with banks and small business seminars for the residents. During the second phase, LMHA plans to offer resident training on HUD regulations through a tenant council. This activity broadens public housing residents' knowledge of their rights, knowledge, HUD's perspective on issues, and various resident initiatives that can be explored and implemented at various points in time.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The local PHA, Lorain Metropolitan Housing, is not troubled.

**Discussion**

Affordable housing needs are met by multiple stakeholders within City of Lorain. The LMHA is responsible for the administration of public housing in the City of Lorain and Lorain County and continues to work closely with HUD, City of Lorain, and area agencies and organizations to address mutual affordable housing goals.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

This section of the Annual Action Plan describes City of Lorain’s one-year goal and the specific actions steps it will undertake in the program year to carry out the homeless strategy identified in the Strategic Plan. Additionally, this section addresses any activities related to the supportive housing needs of non-homeless populations.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

A key component of the City’s homeless strategy is to support critical housing and service activities of the Lorain County Continuum of Care for the homeless. The City of Lorain participates with the Lorain County Continuum of Care Committee, a countywide consortium of homeless housing and service providers, city and county governments, agency representatives and the former homeless. The Committee’s goal is to establish a cooperative effort leading to the development of a continuum of housing and services for homeless persons. Unfortunately, the tenant based rental assistance program has been placed on hold per HUD due to compliance concerns. The city anticipated carrying out a program again with revisions in late 2018. In the meantime, the fair housing administrator will stay abreast of the homeless persons needs and provide outreach and informational sessions to landlords, individuals, social service agencies, and those at-risk of being homeless within the city.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The Haven Center, administered by Neighborhood Alliance, is a twenty-four hour, 365 day emergency shelter for men, women and children, is a 68 bed facility that provides case plans for clients that seeks to assist them with transitioning them into independent housing, and provides them with employment referrals; vocational rehabilitation; GED courses, tickets for public transit, and assistance with applying for affordable housing.

#### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The City, through the use of a qualified sub-recipient, shall provide a Tenant Based Rental

Assistance program that would provide a monthly rental subsidy for an eligible household for a specified period of time to enable the household to afford their housing. A tenant-based rental subsidy program would provide the subsidy on behalf of an eligible tenant to an approved landlord for an approved rental unit

which has an approved rent. This will occur again in late 2018

The Valor Home of Lorain County, located at 221 W. 21st Street shall seek to provide transitional housing for homeless veterans, within the City and throughout the County by providing drug and alcohol counseling, vocational training, and other services through programs from both Family and Community Services and the VA and Veterans Health Clinic.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

Another of the City's strategies for reducing homelessness is to support non-profit service providers that offer self-sufficiency training, medical care, mental health counseling, case management, and other activities to prevent homelessness.

The non-homeless special needs populations include the elderly, mentally ill, developmentally disabled, physically disabled, substance abusers, and persons with AIDS or related diseases. During the upcoming year, the City and other non-profits will provide various types of assistance, primarily through supportive services, to persons with special needs in the community. These agencies include, but are not

limited to: New Sunrise Properties; The Lorain County Board of Mental Retardation and Developmental Disabilities; Lorain County Urban League; and El Centro De Servicios Sociales to name a few.

Furthermore, the City will continue to work with homeless service providers and the Lorain County Homeless Task Force to implement a cohesive, community-wide discharge coordination policy that can be successfully implemented to ensure that persons being discharged from publicly funded agencies and institutions do not become homeless upon release

## Discussion

The City plans to allocate \$0 of the anticipated 2017/2017 CDBG award toward activities to reduce homelessness. But the City will continue to offer assistance, advice, and coordination with

agencies that provide day facilities, case management, job skills training, vocational tools and other homeless services. The city is offering funding to many public service type projects: Legal aide; United Way; Youth employment; The Nord Center; etc.

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family
Tenant-based rental assistance
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds
Total

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction**

This section of the Annual Action Plan summarizes actions City of Lorain will undertake during the program year to reduce barriers to affordable housing and influence whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include land use controls, zoning ordinances, building codes, and policies that affect the return on residential investment.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

City of Lorain has several strategies that it utilizes to remove or ameliorate the negative effects of public policies that are barriers to affordable housing. In general, City of Lorain will continue to work with nonprofit housing developers and providers to increase the amount of affordable housing. The City of Lorain has adopted the Ohio Board of Building Standards recommendation of the Ohio Building Codes (OBC), Ohio Mechanical Codes (OMC), and Ohio Plumbing Codes (OPC) and the International Building Code (ICC). These codes are designed to set forth minimum standards for health, safety, and welfare.

The City's building and zoning codes do not, in general, constitute barriers to affordable housing in Lorain. The City shall seek to update its zoning codes and land use plans, which are approaching thirty years of age.

### **Discussion**

The following is a summary of the City's past and current strategies to reduce barriers to affordable housing:

**Zoning Ordinance** – The City plans to complete a revised zoning code that better reflects the appropriate use of land and solves some of the problems of the old code; however, the code still needs to focus on housing-related issues such as the lack of multi-family zoning. The City hopes that the specificity of the revised code makes it easier for developers to utilize it.

**Lack of Quality Housing** – The City utilizes a multi-faceted approach to address this barrier, including the use of HOME and NSP funds to construct and rehab homes, reclaiming abandoned and nuisance properties through acquisition/demolition, stimulating private developers and other public resources to invest in inner-city communities and create mixed-income communities of choice, and continuing its Rehabilitation Program that allows persons to remain in their homes with the assistance of grant funds to replace roofs, windows and insulation. The city is going to be doing Emergency Home Repair with

additional funding and Homeowner Occupied Rehabilitation.

Lead-Based Paint – The City utilizes a multi-faceted approach to address this barrier, including a lead inspection and abatement program. A joint grant funding through Erie County regarding lead funding which includes Elyria and Lorain cities. Also, lead will be checked regarding all housing rehabilitation efforts.

Age and Condition of Housing Stock – The City utilizes a multi-faceted approach to address this barrier, including rehabilitation assistance with low and moderate income households, the elderly, disabled and families with children receiving priority funding, and marketing of homeownership programs to support housing choice.

Financing – The City administers a down payment assistance program through HOME funding to allow for lower monthly payments for homeownership.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

This section of the Annual Action Plan describes City of Lorain’s planned actions to carry out the following strategies outlined in the Strategic Plan:

- Foster and maintain affordable housing;
- Evaluate and reduce lead-based paint hazards;
- Reduce the number of poverty-level families;
- Develop institutional structure; and
- Enhance coordination.

In addition, the City has identified obstacles to meeting underserved needs and proposed actions to overcome those obstacles.

### **Actions planned to address obstacles to meeting underserved needs**

Consistent with the Five-Year Consolidated Plan’s Strategic Plan, City of Lorain will pursue the goal of promoting access to public services for special needs populations generally assumed to be low and moderate income, including, but not limited to, programs addressing youth and children, seniors/elderly and frail elderly, veterans and persons with mental, physical or developmental disabilities, alcohol or drug addiction, HIV/Aids or other special needs.

Note: the 2017/2018 Action Plan budget is supporting assistance to five public service type activities.

The City, through the Consolidated Plan, shall seek to target federal funds, and other available resources, to residents that have traditionally not been served, or are underserved by previous programs. A strong emphasis will be placed on the programmatic restructure that is not only compliant with changing rules and regulations, but make sense for today’s economic climate, and ever changing community structure.

### **Actions planned to foster and maintain affordable housing**

As stated in the Five-Year Consolidated Plan Strategic Plan the City places a high priority on providing homeownership opportunity in Lorain. This goal is addressed, in part, by local non-profit organizations that construct new, modestly priced, affordable houses, or repair existing houses for resale to lower-income, first-time homebuyers. Many of these non-profit organizations also provide down payment assistance to facilitate the purchase of the homes. The City places a high priority on both methods of expanding home ownership for lower-income households. Neighborhood Housing Services

of Greater Cleveland (NHS) will be a subrecipient to the city to provide down payment assist to area residents. Assisting with financial literacy education; down payment assistant and homebuyer training. For qualified applicants down payment assistance will be provided in an amount to exceed \$17,000 which the potential homeowner must provide at least 3% of the down payment and the city filling in the gap.

It is clear that the City's housing development plans should correlate with changing market conditions in the City of Lorain and the surrounding area. In order to insure that the low-mod income citizens of the community have access to affordable housing, the City will continue to meet with local and regional financial institutions (i.e. Lorain National Bank, First Merit Bank, Third Federal Savings) and national syndicators such as Fannie Mae, Freddie Mac and Local Initiatives Support Corp. (LISC), as well as with our local, State, and Federal non-profit partners, to explore their financial participation (TIF, Bond Financing, construction loans, etc.)

In July of 2017, Neighborhood Housing Services of Greater Cleveland (NHS) will be a subrecipient to the city to provide down payment assist to area residents. Assisting with financial literacy education; down payment assistant and homebuyer training. For qualified applicants down payment assistance will be provided in an amount to exceed \$17,000 which the potential homeowner must provide at least 3% of the down payment and the city filling in the gap.

Note: Emergency Home Repair and Homeowner Occupied Rehabilitation will support this effort as well to increase and maintain affordable housing.

### **Actions planned to reduce lead-based paint hazards**

With the conclusion of the Lead Hazard Control and Healthy Homes Grant from HUD, the City shall seek a larger, collaborative approach to addressing the issues of lead-based paint hazards in our jurisdictions homes. The City of Lorain; the Lorain Health Department; Lorain County; the City of Elyria; and Erie and Sandusky Counties shall seek to combine expertise and resources to address the lead-based paint hazards in a three county region. In addition, the City of Lorain's Health Department, through its

Childhood Lead Program, provides an environmental assessment of a home upon the referral of a physician which seeks to educate parents, coordinate the screening of children and inspect the residence to identify sources of lead exposure.

### **Actions planned to reduce the number of poverty-level families**

According to the 2009-2013 American Community Survey (ACS) estimates, 30.4% of people living in City of Lorain are below poverty level. The City of Lorain does not possess the capacity or manpower to

directly improve the poverty status of its citizens. However, the city supports county and state efforts to move low-income persons to economic self-sufficiency or to a maximum level of economic independency.

The strategy aims to help families that are currently dependent on public assistance achieve economic self-sufficiency. In instances where this may not be possible because of personal limitations, the goal is to enable them to achieve the maximum level of independence for which they are capable. The Ohio Department of Jobs and Family Services (ODJFS) (Lorain County) is the nexus of the County's welfare reform program and thus is the lead anti-poverty agency. ODJFS's mission is to maximize available community resources to support, encourage, and assist families and individuals in achieving their goals for self-sufficiency; to assist in elimination of barriers, and respond to ever changing needs in a progressive, caring and professional manner.

### **Actions planned to develop institutional structure**

City of Lorain has a strong Institutional Delivery System. A wide range of services are available in the community, including homelessness prevention services, street outreach, emergency shelter and transitional housing, and mental health services. These programs are provided by nonprofit organizations and Continuum of Care (CoC) member agencies.

The City has identified various entities from the public, nonprofit and private sectors that will be institutionally involved in the implementation of the Consolidated Plan. In order to improve the housing and community development delivery system in Lorain, better coordination between the public, nonprofit and private agencies will be required. The programs and services that exist and that are available to residents in Lorain are extensive and varied.

The State of Ohio operates many housing and community development programs that, for the most part, are available to the City of Lorain or nonprofit agencies serving low income persons in the City.

Over the next year, the City and all eligible entities in Lorain will work to maximize the funds available from the State of Ohio through the many programs available in order to increase the level of funding brought into the community.

Lorain County and the City of Lorain provide a wide range of housing and community development programs and services including data collection, planning, enforcement, financial management, legal knowledge of housing issues, and educational techniques as well as overall program development, administration and implementation.

The City of Lorain also operates an aggressive CDBG and EDA Title IX - funded business assistance loan program in order to stimulate the local economy by attracting businesses to Lorain, and ultimately creating jobs. Over the next year, the City expects to continue operating these programs as well as assisting with other affordable housing and economic development projects that may present themselves.

Local non-profit organizations offer housing and community development activities, which can be partially funded by the local CDBG and HOME programs offered by the city of Lorain and/or by Lorain County. In the future, all eligible non-profits will be encouraged to apply for funds, or serve as a subrecipient to avoid duplication of services, and offer their expertise where deemed appropriate.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

City of Lorain will continue to coordinate with the following agencies to develop an effective institutional structure and enhance inter-agency coordination. The Lorain Metropolitan Housing Authority (LMHA) maintains and operates hundreds of units of subsidized housing in Lorain County. Although funding for public housing authorities may be reduced, it is anticipated that LMHA will still be awarded a significant amount of Federal funds to provide housing-related activities, such as rental assistance, rehabilitation and new construction, for low-income persons in Lorain.

The local nonprofit organizations in Lorain, such as El Centro de Servicios Sociales, Lorain County Goodwill, Lorain County Habitat for Humanity, Lorain County Community Action Agency, the Lorain County Urban, and Neighborhood Alliance provide a number of affordable housing and supportive services. These organizations typically have a specific target population that they serve, and accordingly possess a level of knowledge and expertise that is invaluable. The continuation and expansion of such services by aggressively seeking additional funding will be encouraged over the next year. In addition, better coordination between these agencies and with the public and private sector organizations will continue to be a high priority.

### **Discussion**

The City's actions planned to address obstacles to meeting underserved needs include activities in support of special needs assistance for victims of domestic violence, at-risk families and youth, the disabled, elderly, those with mental health issues. Additionally, the City's actions to foster and maintain affordable housing include continued funding of programs and agencies that further the affordable housing goals of the City.

Lead-based paint will hazards will continue to be evaluated, environmental testing conducted, and educational materials made available to families at-risk of exposure. Institutional structure will continue to be developed through continued coordination with the Lorain County, the Homeless Task

Force, LMHA, and other State and local agencies. The City of Lorain will continue to foster inter-agency coordination with the public service agencies in the community.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

#### Introduction

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	971,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>971,000</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Other forms of investment not identified include but are not limited to private investments, LIHTCS, New Market Tax Credits, and foundation grants.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

HOME-assisted units must meet the minimum affordability period that relate to the HOME-assisted units according to the following table:

HOME Funds Provided: Less than \$15,000 (affordability period 5 years); \$15,000 to \$40,000 (affordability period 10 years) ; and Greater than \$40,000 (affordability period 15 years)

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

During the appropriate period recapture provisions established by the participating jurisdiction and determined by HUD are to be utilized to insure affordability

1. Maximum HOME rent limits are rescheduled on a periodic basis after HUD determines fair market rents and median incomes. Regardless of changes in fair market rents and in median income over time, the HOME rents for a project are not required to be lower than the HOME rent limits for the project in effect at the time of project commitment.

2. The Participating jurisdiction must provide project owners with information on updated HOME rent limits so that rents may be adjusted (not to exceed the maximum HOME rent limits in accord with the written agreement between PJ and the Subrecipient. The Subrecipient must provide the PJ annually with information on rents and occupancy of the HOME-Assisted units to demonstrate compliance with this section of the agreement.

3. Ensure that the housing will remain affordable, pursuant to deed restrictions, covenants running with the land, or other similar mechanisms to ensure affordability, to a reasonable range of low-income homebuyers. The affordability restrictions must terminate upon occurrence of any of the following termination events: Foreclosure, transfer in lieu of foreclosure or assignment of a FHA insured mortgage to HUD. The participation jurisdiction may use purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure or preserve affordability. The affordability restrictions shall be revived according to the original terms if, during

the original affordability period, the owner of record before the termination event, or any entity that includes the former owner or those with whom the former owner has or had family or business ties, obtains an ownership interest in the project or property.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

There are no plans for using HOME funds to refinance existing debt.

## Discussion

NA

# BUDGET

2017 Projects CDBG/HOME:

THIRD YEAR ACTION PLAN CDBG & HOME BUDGET:

**CDBG:**

**Revenue:**

Program Income: (Anticipated Income) from the following: \$ 771,000.00

These funds are Revolving Loan Programs/Point of Sale/ Vacant Property)  
CDBG Allocation (anticipated) \$ 1,115,031.00

Total Anticipated Revenue \$ 1,886,031.00

**Expenses:**

Administration: Salaries & Fringe Benefits \$ 267,500.00  
Planning \$ 10,000.00

**Public Service: Proposed**

Legal Aide \$ 10,000.00  
United Way \$ 20,000.00  
Get with the Program (STEM CAMP) \$ 13,500.00  
The Nord Center \$ 32,000.00  
Youth Employment Program with Lorain City Schools \$ 30,000.00

Fair Housing \$ 72,000.00

**Public Fac Improvement:**

Lorain City Fire Station Equipment: F150/Trailer (we can pay for half) \$ 20,000.00  
Impound Lot \$ 75,000.00

**Street Improvements:**

South Lorain: Gary/Homewood/East 41 Street (Ward 6) \$ 170,000.00

**Park and Recreational Facilities:**

General Johnny Wilson Park \$ 360,000.00  
Oakwood  
Handicap Accessible Playground Equipment in various parks

**Clearance/Demolition:**

Commerical/Motel Demoliton \$ 400,031.00  
Hotwaters  
Stoveworks

**Housing:**

Code Enforcement \$ 250,000.00

**Economic Development:**

Debt Service CIP \$ 156,000.00

Total Expenses 1,886,031

**HOME:**

**Revenue**

Program Income: Payments from HOME Loans (anticipated Income) \$ 200,000.00

Administration  
HOME Allocation (anticipated) \$ 252,133.00

Total Anticipated Revenue \$ 452,133.00

**Expenses:**

Administration \$ 45,133.00  
HomeOwner Occupied Rehabilitation \$ 407,000.00  
Total Expenses \$ 452,133.00

TOTAL BUDGET PY2017(CDBG/HOME) \$ 2,338,164.00

**CITIZEN  
PARTICIPATION  
PLAN**

# Five Year Consolidated Plan (Year 3)/ Citizen Participation Meeting

## Sign-In Sheet

Monday, July 03, 2017

5:00-6:00 PM

Lorain City Hall, Police Conference Room

200 West Erie Avenue, Lorain, OH 44052

Name and Organization – Print	Contact Information (Telephone Number)	Email Address	Address
Ange Arrigo			1853 E 30th
DENNIS FLORES	440 714 7810	dennisforlorain@gmail.com	212 W. 18th ST
Pamela Carder		pam_carder@cityoflorain.com	
Jayne Rubin Amadoro	440-246-6141	jruba@roadrunner.com	607 Allison Ave
Mary Sprungowski	440-258-1302	mary-sprungowski@cityoflorain.com	2122 E. Skyline
<del>Joel</del>	<del>440-516-2551</del>	<del>joel@...</del>	<del>607 Allison Ave</del>
Jenni Soto	440-787-5531	merprprincess@yahoo.com	1026 Lakeview Dr 44052

# Second Public Hearing for PY17 Allocation (CDBG/HOME)

Lorain City Hall, Police Training Room  
July 3<sup>rd</sup>, 2017

Meeting start 5:06pm

## Questions

- 1) **When did the digging at Oakwood Park begin? Have been around the area recently and haven't noticed any fresh dirt or dig sites.**
  - a. Was informed that the project was completed as of Friday (6/30/17), can confirm that digging did actually happen.
  
- 2) **What reason did United Way get \$20,000 of the budget?**
  - a. The \$20,000 that United Way are getting is not for the new offices that they are renovating on Broadway, it is to keep their services available to the public and Lorain City to help families who need financial help with issues such as utility bills. This is trying to create more financial stability in families within Lorain.
  
- 3) **Get with the Program has some financial involvement with the Boys and Girls Club, why is that?**
  - a. Using Boys and Girls Club, we have a way of funneling money to Get with the Program while feeling comfortable with whom we are giving the money to.
  
- 4) **What involvement with do the roof repairs for the Nord Center have to do with us (the City of Lorain)?**
  - a. The roof repairs will be specifically for 2 homes on Toledo Ave who house people in need of stability for reasons such as mental issues, rehabilitation after treatments, or a need to readjust to a home life after a period without it.
  
- 5) **Why wouldn't the fire equipment be paid for with the Safe For grant money (levy)?**
  - a. That money is specifically being used to create a new fire station. Building wasn't able to assist because there wasn't a need for a new fire station with the preexisting one still there.
  
- 6) **If we have the money to make things happen within Lorain why aren't we doing it? Why are we just sitting on it?**
  - a. Previously we would make promises about projects and would not keep them, now we are trying to do quick projects that are easily completed so we don't waste money and still "upgrade" the city. There is also a lack of employees within the department to lead different projects and the starting of outsourcing bigger projects to outside sources may start to take place.

- 7) **What is the process for choosing which roads get repaired? There have been plenty of bad roads throughout all wards.**
  - a. The repair of bad roads comes from the grades on which they were rated, and the worst of the worst are being done first. After the worst get done then there will be a progression to get to the rest of them.
  
- 8) **When will buildings begin to be torn down? What is happening with the demolition board?**
  - a. The demolition board will meet either every week or every month and will review presentations to tear down the worst of the worst within the city first, and then slowly take down more after.
  
- 9) **Transferring money in the budget doesn't have to go through Council or a public hearing?**
  - a. It does go through a public hearing, but does not have to go to Council.

Meeting ends at 6:00pm

# Sign-In Sheet

Tuesday, February 28, 2017

1-3 PM

1205 Broadway Avenue Lorain, OH 44052, Lorain County Health & Dentistry 5<sup>th</sup> FL Conference Room

Name/ Representing Organization - Print	Contact Information (Telephone Number/ Email Address)	Address
LORAIN Charlene CONNORS/ARTS COUNCIL	440-554-6792 CCONNORS@outlook.com	Lorain 737 BROADWAY LORAIN 44052
ANTONIO BARRIOS/ L.A.C.	(440) 320-0295 Lbarrio22@yahoo.com	737 Broadway ave. Lorain
Michael/Kearney New Sunrise Properties	440 453-9862 michael@newsunriseproperties.org	1100 N. Abbe Rd Elroy, OH
Betsey Kamm/ The Nord Center	(240) 204-4155 bkamm@no-dcenter.org	6140 S Broadway Lorain OH 44053
PETER OGBUJI	pogbuji@roadmicon	1922 Hamilton Ave, Lorain 44052
Ashley Hampton URGU	ashley.hampton@wvloraincounty.org	1815 N Ridge Rd Lorain 44055
Melanie Shakarian Legal A.J.	melanie.shakarian@las.clev.org	1530 W. R. Hill Rd, Lynn
Sarah Johnson - El Centro	sjohnson@lorainelcentro.org 440 277-8235	2800 Pearl Avenue Lorain, 44055
Jason Williams - Get with the Program	jason@gwtp.us	



# Sign-In Sheet

Tuesday, February 28, 2017

1-3 PM

1205 Broadway Avenue Lorain, OH 44052, Lorain County Health & Dentistry 5<sup>th</sup> FL Conference Room

Name/ Representing Organization – Print	Contact Information (Telephone Number/ Email Address)	Address
<del>Lucy Ketez</del>		
not in attendance Marija Georgievski	marijageorgievski@gmail.com	Lake Erie Landlord Assoc.
Lorraine Ritchie		
Connie Osborn	Neighborhood Alliance	

# Five Year Consolidated Plan/ Citizen Participation Meeting

## Sign-In Sheet

Tuesday, March 21, 2017

6:00-7:00 PM

Southview Middle School (Auditorium)

2321 Fairless Drive, Lorain, OH 44055

Name and Organization – Print	Contact Information (Telephone Number)	Email Address	Address
Kim Beres	440-522-8763	KIM.beres@mercy.com	4712 Charleston Lorain OH 44055
Tammy Ramirez	440-320-5194	ramirez.t@lorain.ohio.gov	939 Broadway 44001 com 46985 Cooper Forest
Sylvia DuVall	440-670-6027	duvall_sylvia@yahoo.com	1321 W. 5TH ST Lorain, OH 44052
GREG ARGENTI	(440) 429-0351	argenti4thward@yahoo.com	4232 WASHINGTON LORAIN, OH 44052
DENNIS FLORES	(440) 714-7810	dennisforlorain@gmail.com	212 W. 18TH ST
WARREN DANIELS SA DBA Plumbing	(440) 506-0129	Daniels + sons Plumbing@gmail.com	510 Georgetown Ave. Elyria





The City of Lorain is currently preparing its Annual Action Plan. This is year three of the plan that utilizes federal funds from the Department of Housing and Urban Development (HUD). The funding includes Community Development Block Grants (CDBG) and HOME Investment Partnership (HOME).

An important part of the plan is obtaining information from agencies and community residents to determine the needs and assets of the community. Please take a few minutes to fill out this survey to help the city prioritize use the future CDBG and HOME funding.

1. Public Facilities please rank each item based on its need, as you see it in the community:

	No Need	Low	Medium	High
Senior Citizen Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Youth Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Childcare Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks and Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Healthcare Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parking	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Shelters for Abused and Neglected Children	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Facilities for the Homeless	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comment:

Before using federal Dollars on P/R.  
look into. PARKLAND TRUST FUNDS —  
Per 3/6 city Council Meeting

2. Social and Public Service Needs please rank each item based on its need, as you see it in the community:

	No Need	Low	Medium	High
Senior Citizen Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Services for the Disabled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Youth Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Transportation Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <i>very</i>
Substance Abuse Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employment Training	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Crime Prevention & Awareness	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tenant/Landlord Counseling	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Health Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comment:				

*LCJHS  
let county  
state fund*

*what city  
need to do?*

*Are you talking  
access?*

3. Housing Needs Rank each item based on its need, as you see it in the community:

	No Need	Low	Medium	High
Homeownership Assistance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead-based Paint Testing and Abatement For Single Family Residential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Residential Historic Preservation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Multi-family Rehabilitation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Energy-Efficient Improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	No Need	Low	Medium	High
Rental Housing Subsidies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Residential Property Maintenance/ Code Enforcement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Improvements for Disabled Accessibility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Homeless Transitional Housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comment:

**4. What part of the City of Lorain do you currently reside? (Circle your response)**

East

West

Central

South

Other: \_\_\_\_\_

Comment:

**5. Which general area of the city do you feel is in the greatest need of improvements? (Circle your response). Explain why you selected your response.**

East

West

Central

South

Comment:

6. Please rank in order of the areas in which the city should focus improvement efforts: (1=Needs Most Improvement)

Public Facilities

Social and Public Service Needs

Housing

7. Do you feel recent Code Enforcement efforts have been successful? Please explain. (Circle your response)

Yes

No

Comment:

8. Please share any additional comments

**PLEASE RETURN THE QUESTIONNAIRE TO CITY STAFF AT THE CONCLUSION OF THE MEETING.**

**IF NOT RETURNED PRIOR TO THE COMPLETION OF THE MEETING, PLEASE MAIL/ DELIVER TO:**

**ATTN: KELLIE GLENN, PROGRAM MANAGER I, CITY OF LORAIN,  
DEPARTMENT OF BUILDING, HOUSING, & PLANNING**

**200 W. ERIE AVENUE, 5<sup>th</sup> FL**

**LORAIN, OHIO 44052**

**NO LATER THAN MARCH 31, 2017**



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An important part of the plan is obtaining information from agencies and community residents to determine the needs and assets of the community. Please take a few minutes to fill out this survey to help the city prioritize use the future CDBG and HOME funding.

1. Public Facilities please rank each item based on its need, as you see it in the community:

	No Need	Low	Medium	High
Senior Citizen Centers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Childcare Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks and Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Healthcare Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Community Centers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shelters for Abused and Neglected Children	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Facilities for the Homeless	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comment:

**2. Social and Public Service Needs please rank each item based on its need, as you see it in the community:**

	<u>No Need</u>	<u>Low</u>	<u>Medium</u>	<u>High</u>
Senior Citizen Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Services for the Disabled	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transportation Services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Substance Abuse Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Employment Training	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Crime Prevention & Awareness	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tenant/Landlord Counseling	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health Services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comment:

**3. Housing Needs Rank each item based on its need, as you see it in the community:**

	<u>No Need</u>	<u>Low</u>	<u>Medium</u>	<u>High</u>
Homeownership Assistance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead-based Paint Testing and Abatement For Single Family Residential	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Residential Historic Preservation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Multi-family Rehabilitation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Energy-Efficient Improvements	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	No Need	Low	Medium	High
Rental Housing Subsidies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Residential Property Maintenance/ Code Enforcement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improvements for Disabled Accessibility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homeless Transitional Housing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comment:

**4. What part of the City of Lorain do you currently reside? (Circle your response)**

East

West

Central

South

Other: \_\_\_\_\_

Comment:

**5. Which general area of the city do you feel is in the greatest need of improvements? (Circle your response). Explain why you selected your response.**

East

West

Central

South

Comment:

6. Please rank in order of the areas in which the city should focus improvement efforts: (1=Needs Most Improvement)

Public Facilities

Social and Public Service Needs

Housing

7. Do you feel recent Code Enforcement efforts have been successful? Please explain. (Circle your response)

Yes

No

Comment:

8. Please share any additional comments

*- Downtown needs focus. Need to remove 929 Broadway.  
~ \$50,000 to demolish  
Kohart bldg.*

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An important part of the plan is obtaining information from agencies and community residents to determine the needs and assets of the community. Please take a few minutes to fill out this survey to help the city prioritize use the future CDBG and HOME funding.

1. Public Facilities please rank each item based on its need, as you see it in the community:

	No Need	Low	Medium	High
Senior Citizen Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Youth Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Childcare Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks and Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Healthcare Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parking	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Community Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Shelters for Abused and Neglected Children	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Facilities for the Homeless	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comment:

**2. Social and Public Service Needs please rank each item based on its need, as you see it in the community:**

	<u>No Need</u>	<u>Low</u>	<u>Medium</u>	<u>High</u>
Senior Citizen Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Services for the Disabled	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Youth Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Transportation Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substance Abuse Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Employment Training	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Crime Prevention & Awareness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tenant/Landlord Counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Childcare	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Health Services	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comment:

**3. Housing Needs Rank each item based on its need, as you see it in the community:**

	<u>No Need</u>	<u>Low</u>	<u>Medium</u>	<u>High</u>
Homeownership Assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Lead-based Paint Testing and Abatement For Single Family Residential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Residential Historic Preservation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Multi-family Rehabilitation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Energy-Efficient Improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Need      Low      Medium      High

Rental Housing Subsidies                       

Residential Property Maintenance/  
Code Enforcement                       

Improvements for Disabled Accessibility                       

Homeless Transitional Housing                       

Comment:

4. What part of the City of Lorain do you currently reside? (Circle your response)

East

West

Central

South

Other: \_\_\_\_\_

Comment:

5. Which general area of the city do you feel is in the greatest need of improvements? (Circle your response). Explain why you selected your response.

East

West

Central

South

Comment:

6. Please rank in order of the areas in which the city should focus improvement efforts: (1=Needs Most Improvement)

Public Facilities 2

Social and Public Service Needs 3

Housing 1

7. Do you feel recent Code Enforcement efforts have been successful? Please explain. (Circle your response)

Yes

No

Comment:

8. Please share any additional comments

**PLEASE RETURN THE QUESTIONAIRE TO CITY STAFF AT THE CONCLUSION OF THE MEETING.**

**IF NOT RETURNED PRIOR TO THE COMPLETION OF THE MEETING, PLEASE MAIL/ DELIVER TO:**

**ATTN: KELLIE GLENN, PROGRAM MANAGER I, CITY OF LORAIN,  
DEPARTMENT OF BUILDING, HOUSING, & PLANNING**

**200 W. ERIE AVENUE, 5<sup>th</sup> FL**

**LORAIN, OHIO 44052**

**NO LATER THAN MARCH 31, 2017**



The City of Lorain is currently preparing its Annual Action Plan. This is year three of the plan that utilizes federal funds from the Department of Housing and Urban Development (HUD). The funding includes Community Development Block Grants (CDBG) and HOME Investment Partnership (HOME).

An important part of the plan is obtaining information from agencies and community residents to determine the needs and assets of the community. Please take a few minutes to fill out this survey to help the city prioritize use the future CDBG and HOME funding.

1. Public Facilities please rank each item based on its need, as you see it in the community:

	No Need	Low	Medium	High
Senior Citizen Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Youth Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Childcare Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks and Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Healthcare Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Community Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Shelters for Abused and Neglected Children	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Facilities for the Homeless	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comment:

We need to utilize MBE contractors in Business and Young minorities

**2. Social and Public Service Needs please rank each item based on its need, as you see it in the community:**

	<u>No Need</u>	<u>Low</u>	<u>Medium</u>	<u>High</u>
Senior Citizen Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Services for the Disabled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transportation Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Substance Abuse Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Employment Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Crime Prevention & Awareness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tenant/Landlord Counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comment:

**3. Housing Needs Rank each item based on its need, as you see it in the community:**

	<u>No Need</u>	<u>Low</u>	<u>Medium</u>	<u>High</u>
Homeownership Assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead-based Paint Testing and Abatement For Single Family Residential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Residential Historic Preservation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Multi-family Rehabilitation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Energy-Efficient Improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	No Need	Low	Medium	High
Rental Housing Subsidies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Residential Property Maintenance/ Code Enforcement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Improvements for Disabled Accessibility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Homeless Transitional Housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comment:

Utilize MBE in Business will SAVE money keep TAXES AND make city Better

4. What part of the City of Lorain do you currently reside? (Circle your response)

East

West

Central

South

Other: \_\_\_\_\_

Comment:

WORKING FOR people That have little or no money

5. Which general area of the city do you feel is in the greatest need of improvements? (Circle your response). Explain why you selected your response.

East

West

Central

South

Comment:

give Funds to Fix

6. Please rank in order of the areas in which the city should focus improvement efforts: (1=Needs Most Improvement)

Public Facilities

Social and Public Service Needs

Housing

7. Do you feel recent Code Enforcement efforts have been successful? Please explain. (Circle your response)

Yes

No

Comment:

8. Please share any additional comments

**PLEASE RETURN THE QUESTIONNAIRE TO CITY STAFF AT THE CONCLUSION OF THE MEETING.**

**IF NOT RETURNED PRIOR TO THE COMPLETION OF THE MEETING, PLEASE MAIL/ DELIVER TO:**

**ATTN: KELLIE GLENN, PROGRAM MANAGER I, CITY OF LORAIN,  
DEPARTMENT OF BUILDING, HOUSING, & PLANNING**

**200 W. ERIE AVENUE, 5<sup>th</sup> FL**

**LORAIN, OHIO 44052**

**NO LATER THAN MARCH 31, 2017**



The City of Lorain is currently preparing its Annual Action Plan. This is year three of the plan that utilizes federal funds from the Department of Housing and Urban Development (HUD). The funding includes Community Development Block Grants (CDBG) and HOME Investment Partnership (HOME).

An important part of the plan is obtaining information from agencies and community residents to determine the needs and assets of the community. Please take a few minutes to fill out this survey to help the city prioritize use the future CDBG and HOME funding.

1. Public Facilities please rank each item based on its need, as you see it in the community:

	No Need	Low	Medium	High
Senior Citizen Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks and Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Healthcare Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shelters for Abused and Neglected Children	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Facilities for the Homeless	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comment:

**2. Social and Public Service Needs please rank each item based on its need, as you see it in the community:**

	<u>No Need</u>	<u>Low</u>	<u>Medium</u>	<u>High</u>
Senior Citizen Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Services for the Disabled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Transportation Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Substance Abuse Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Employment Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Crime Prevention & Awareness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tenant/Landlord Counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comment:

**3. Housing Needs Rank each item based on its need, as you see it in the community:**

	<u>No Need</u>	<u>Low</u>	<u>Medium</u>	<u>High</u>
Homeownership Assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Lead-based Paint Testing and Abatement For Single Family Residential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Residential Historic Preservation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Multi-family Rehabilitation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Energy-Efficient Improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. Please rank in order of the areas in which the city should focus improvement efforts: (1=Needs Most Improvement)

Public Facilities

*Don't Know*

Social and Public Service Needs

Housing

7. Do you feel recent Code Enforcement efforts have been successful? Please explain. (Circle your response)

Yes

No

Comment:

8. Please share any additional comments

**PLEASE RETURN THE QUESTIONNAIRE TO CITY STAFF AT THE CONCLUSION OF THE MEETING.**

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**ATTN: KELLIE GLENN, PROGRAM MANAGER I, CITY OF LORAIN,  
DEPARTMENT OF BUILDING, HOUSING, & PLANNING**

**200 W. ERIE AVENUE, 5<sup>th</sup> FL**

**LORAIN, OHIO 44052**

**NO LATER THAN MARCH 31, 2017**

	No Need	Low	Medium	High
Rental Housing Subsidies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Residential Property Maintenance/ Code Enforcement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Improvements for Disabled Accessibility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homeless Transitional Housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comment:

**4. What part of the City of Lorain do you currently reside? (Circle your response)**

East

West

Central

South

Other: \_\_\_\_\_

Comment:

**5. Which general area of the city do you feel is in the greatest need of improvements? (Circle your response). Explain why you selected your response.**

East

West

Central

South

Comment:



The City of Lorain is currently preparing its Annual Action Plan. This is year three of the plan that utilizes federal funds from the Department of Housing and Urban Development (HUD). The funding includes Community Development Block Grants (CDBG) and HOME Investment Partnership (HOME).

An important part of the plan is obtaining information from agencies and community residents to determine the needs and assets of the community. Please take a few minutes to fill out this survey to help the city prioritize use the future CDBG and HOME funding.

1. Public Facilities please rank each item based on its need, as you see it in the community:

	No Need	Low	Medium	High
Senior Citizen Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parks and Recreation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Healthcare Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Parking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community Centers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shelters for Abused and Neglected Children	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Facilities for the Homeless	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comment:

**2. Social and Public Service Needs please rank each item based on its need, as you see it in the community:**

	<u>No Need</u>	<u>Low</u>	<u>Medium</u>	<u>High</u>
Senior Citizen Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Services for the Disabled	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transportation Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Substance Abuse Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Employment Training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Crime Prevention & Awareness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tenant/Landlord Counseling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health Services	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comment:

**3. Housing Needs Rank each item based on its need, as you see it in the community:**

	<u>No Need</u>	<u>Low</u>	<u>Medium</u>	<u>High</u>
Homeownership Assistance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead-based Paint Testing and Abatement for Single Family Residential	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Residential Historic Preservation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Multi-family Rehabilitation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Energy-Efficient Improvements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

No Need      Low      Medium      High

Rental Housing Subsidies                       

Residential Property Maintenance/  
Code Enforcement                       

Improvements for Disabled Accessibility                       

Homeless Transitional Housing                       

Comment:

**4. What part of the City of Lorain do you currently reside? (Circle your response)**

East

West

Central

South

Other: \_\_\_\_\_

Comment:

**5. Which general area of the city do you feel is in the greatest need of improvements? (Circle your response). Explain why you selected your response.**

East

West

Central

South

Comment:

**6. Please rank in order of the areas in which the city should focus improvement efforts: (1=Needs Most Improvement)**

Public Facilities

Social and Public Service Needs

Housing

**7. Do you feel recent Code Enforcement efforts have been successful? Please explain. (Circle your response)**

Yes

No

Comment:

**8. Please share any additional comments**

**PLEASE RETURN THE QUESTIONNAIRE TO CITY STAFF AT THE CONCLUSION OF THE MEETING.**

**IF NOT RETURNED AT THE MEETING, PLEASE MAIL/ DELIVER TO:**

**ATTN: KELLIE GLENN, PROGRAM MANAGER I, CITY OF LORAIN,  
DEPARTMENT OF BUILDING, HOUSING, & PLANNING  
200 W. ERIE AVENUE, 5<sup>th</sup> FL  
LORAIN, OHIO 44052**

**NO LATER THAN MARCH 31, 2017**

DATE Received by BHP: \_\_\_\_\_

**CITY OF LORAIN COMMUNITY DEVELOPMENT BLOCK  
GRANT ALLOCATION GRANT  
FUNDING REQUEST **CDBG PY2017****

Application must be received prior to **3:00 p.m. Friday, March 31, 2017**, at the City of Lorain Building, Housing, and Planning Department: 200 West Erie Avenue, 5<sup>th</sup> Floor, Lorain, OH 44052

- A. The proposed activity must be able to be completed in its **entirety** by December 31, 2017.
- B. All non-residential construction and improvements **must** meet or exceed City of Lorain Building Codes.
- C. Detailed cost estimates **must** be submitted and itemized, signed, and provided by a qualified third party source (i.e. engineer, architect, county engineer, etc.)
- D. Cost estimates for all construction projects **must** include federal prevailing wages.
- E. Chip and seal or gravel-base road improvements are not eligible.
- F. Requests for fire protection equipment must be discussed prior to submission of this request.
- G. Only the City of Lorain may enter into contracts for your project.
- H. If you are committing other funds to the project and/or if other sources of funds are included in this project; copies of letters, resolutions, ordinances and other documentation committing these funds must be submitted at time of this request.
- I. If improvements are being mandated to meet state or local requirements, attach letter(s) from agency(s) requiring improvements.
- J. Organizations (other than local governments) must submit a copy of their constitution and by-laws.
- K. City of Lorain will verify that all projects are located in a low-and moderate-income (LMI) service area via HUD guidelines.

**COMPLETED THE FOLLOWING:**

**APPLICANT INFORMATION:**

Applicant: \_\_\_\_\_ Phone No. \_\_\_\_\_

Address: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Phone No. \_\_\_\_\_

Address: \_\_\_\_\_

DATE Received by BHP: \_\_\_\_\_

Note: Are you a public service group or non-profit entity? YES \_\_ NO \_\_

If yes, you must attach a copy of your constitution and by-laws)

**L. PROJECT INFORMATION:**

Describe project activity and outcome in detail. (Photographs and blueprints/drawings must be included, use additional sheets if needed)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Who provided the project cost estimate? (THIS MUST BE A THIRD PARTY ESTIMATE)

Name: \_\_\_\_\_ Telephone No. \_\_\_\_\_

Address: \_\_\_\_\_

Labor (must use federal prevailing wages) \$ \_\_\_\_\_

Materials \$ \_\_\_\_\_

Engineering \$ \_\_\_\_\_

Total Cost of Project \$ \_\_\_\_\_

**Note: Attach a copy of the cost estimate; see items C & D above.**

CDBG money requested: \$ \_\_\_\_\_

If you are not applying for the total cost of the project, what is the source of the remainder of the funds?

<u>Source</u>	<u>Amount</u>
1. _____	\$ _____
2. _____	\$ _____
3. _____	\$ _____

(List others if necessary)

DATE Received by BHP: \_\_\_\_\_

Note: Commitment letters from the sources listed above must be attached (see item H above)

Will City of Lorain of employees perform any work? YES NO

If YES, will the employees be paid from the CDBG grant? YES NO

Describe the work to be performed by the City of Lorain employees: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**M. PROJECT BENEFIT INFORMATION:**

What is the exact location of the project? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

How many households are in the service area? \_\_\_\_\_

Who will benefit from this project? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Have you completed an income survey? YES \_\_\_ NO \_\_\_

What date were the households surveyed: \_\_\_\_\_

- 1. Number of households surveyed? \_\_\_\_\_
- 2. Number of low-moderate income households \_\_\_\_\_
- 3. % of low-moderate income households (line 2 divided by line 1) \_\_\_\_\_
- 4. Number of persons in households surveyed \_\_\_\_\_

If no income survey has been completed what is the % of low-moderate income households in the service area? \_\_\_\_\_

**N. SITE INFORMATION:**

Does your project affect a historical property or historic district? YES \_ NO \_

IF YES, EXPLAIN: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Is your project located in a floodplain? YES \_\_\_ NO \_\_\_

DATE Received by BHP: \_\_\_\_\_

Will any access fees be charged? (i.e. sewer or water line hook-up, membership fees, entrance fees, etc.) YES \_\_\_ NO \_\_\_

Is this property occupied? YES\_\_\_ NO\_\_\_

If yes, explain: \_\_\_\_\_

Will you need to acquire easements or property to complete this project? YES \_\_\_ NO\_\_\_

If yes, explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title Date

**If you have any questions, please contact  
Kellie F. Glenn, Program Manager I  
City of Lorain Department of Building, Housing, and Planning  
200 West Erie Avenue, 5<sup>th</sup> FL  
Lorain, OH 44052  
Telephone Number: 440-204-2087  
Kellie\_glenn@cityoflorain.org**

DATE Received by BHP: \_\_\_\_\_

**CITY OF LORAIN COMMUNITY DEVELOPMENT BLOCK  
GRANT ALLOCATION GRANT  
FUNDING REQUEST CDBG PY2017**

**Application must be received prior to 4:00 p.m. Friday, March 31, 2017, at the City of Lorain Building, Housing, and Planning Department: 200 West Erie Avenue, 5<sup>th</sup> Floor, Lorain, OH 44052**

- A. The proposed activity must be able to be completed in its **entirety** by December 31, 2018.
- B. All non-residential construction and improvements **must** meet or exceed City of Lorain Building Codes.
- C. Detailed cost estimates **must** be submitted and itemized, signed, and provided by a qualified third party source (i.e. engineer, architect, county engineer, etc.)
- D. Cost estimates for all construction projects **must** include federal prevailing wages.
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- F. Requests for fire protection equipment must be discussed prior to submission of this request.
- G. Only the City of Lorain may enter into contracts for your project.
- H. If you are committing other funds to the project and/or if other sources of funds are included in this project; copies of letters, resolutions, ordinances and other documentation committing these funds must be submitted at time of this request.
- I. If improvements are being mandated to meet state or local requirements, attach letter(s) from agency(s) requiring improvements.
- J. Organizations (other than local governments) must submit a copy of their constitution and by-laws.
- K. City of Lorain will verify that all projects are located in a low-and moderate-income (LMI) service area via HUD guidelines.

**COMPLETED THE FOLLOWING:**

**APPLICANT INFORMATION:**

Applicant: \_\_\_\_\_ Phone No. \_\_\_\_\_

Address: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Phone No. \_\_\_\_\_

Address: \_\_\_\_\_

DATE Received by BHP: \_\_\_\_\_

Note: Are you a public service group or non-profit entity? YES \_\_\_ NO \_\_\_

If yes, you must attach a copy of your constitution and by-laws)

L. PROJECT INFORMATION:

Describe project activity and outcome in detail. (Photographs and blueprints/drawings must be included, use additional sheets if needed)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Who provided the project cost estimate? (THIS MUST BE A THIRD PARTY ESTIMATE)

Name: \_\_\_\_\_ Telephone No. \_\_\_\_\_

Address: \_\_\_\_\_

Labor (must use federal prevailing wages) \$ \_\_\_\_\_

Materials \$ \_\_\_\_\_

Engineering \$ \_\_\_\_\_

Total Cost of Project \$ \_\_\_\_\_

Note: Attach a copy of the cost estimate; see items C & D above.

CDBG money requested: \$ \_\_\_\_\_

If you are not applying for the total cost of the project, what is the source of the remainder of the funds?

<u>Source</u>	<u>Amount</u>
1. _____	\$ _____
2. _____	\$ _____
3. _____	\$ _____

(List others if necessary)

DATE Received by BHP: \_\_\_\_\_

Note: Commitment letters from the sources listed above must be attached (see item H above)

Will City of Lorain of employees perform any work? YES NO

If YES, will the employees be paid from the CDBG grant? YES NO

Describe the work to be performed by the City of Lorain employees: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**M. PROJECT BENEFIT INFORMATION:**

What is the exact location of the project? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

How many households are in the service area? \_\_\_\_\_

Who will benefit from this project? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Have you completed an income survey? YES \_\_\_ NO \_\_\_

What date were the households surveyed: \_\_\_\_\_

- 1. Number of households surveyed? \_\_\_\_\_
- 2. Number of low-moderate income households \_\_\_\_\_
- 3. % of low-moderate income households (line 2 divided by line 1) \_\_\_\_\_
- 4. Number of persons in households surveyed \_\_\_\_\_

If no income survey has been completed what is the % of low-moderate income households in the service area? \_\_\_\_\_

**N. SITE INFORMATION:**

Does your project affect a historical property or historic district? YES \_ NO \_

IF YES, EXPLAIN: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Is your project located in a floodplain? YES \_\_\_ NO \_\_\_

DATE Received by BHP: \_\_\_\_\_

Will any access fees be charged? (i.e. sewer or water line hook-up, membership fees, entrance fees, etc.) YES \_\_\_ NO \_\_\_

Is this property occupied? YES \_\_\_ NO \_\_\_

If yes, explain: \_\_\_\_\_

Will you need to acquire easements or property to complete this project? YES \_\_\_ NO \_\_\_

If yes, explain: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Signature

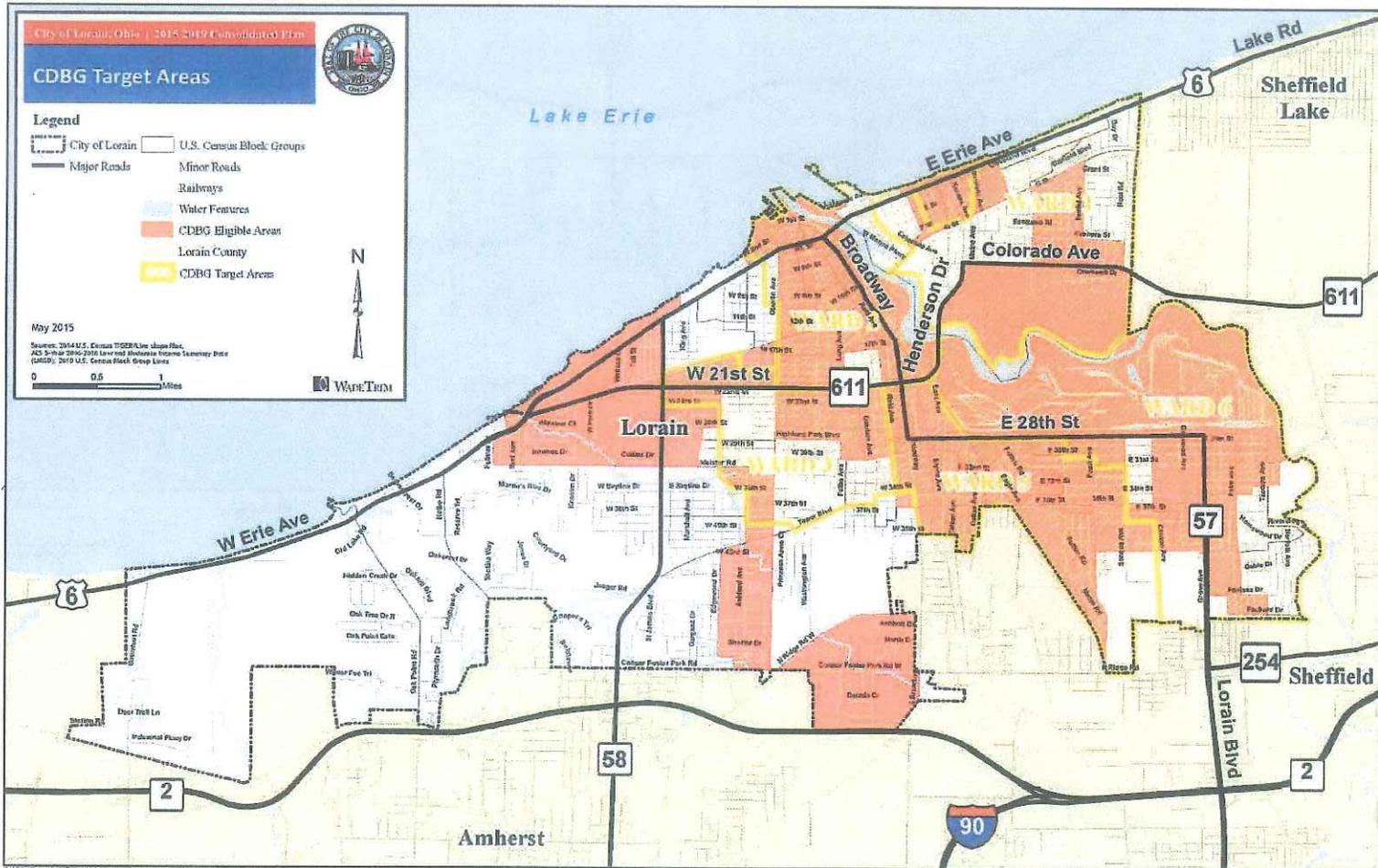
\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title Date

**If you have any questions, please contact  
Kellie F. Glenn, Program Manager I  
City of Lorain Department of Building, Housing, and Planning  
200 West Erie Avenue, 5<sup>th</sup> FL  
Lorain, OH 44052  
Telephone Number: 440-204-2087  
Kellie\_glenn@cityoflorain.org**

**MAPS**

MAP 2





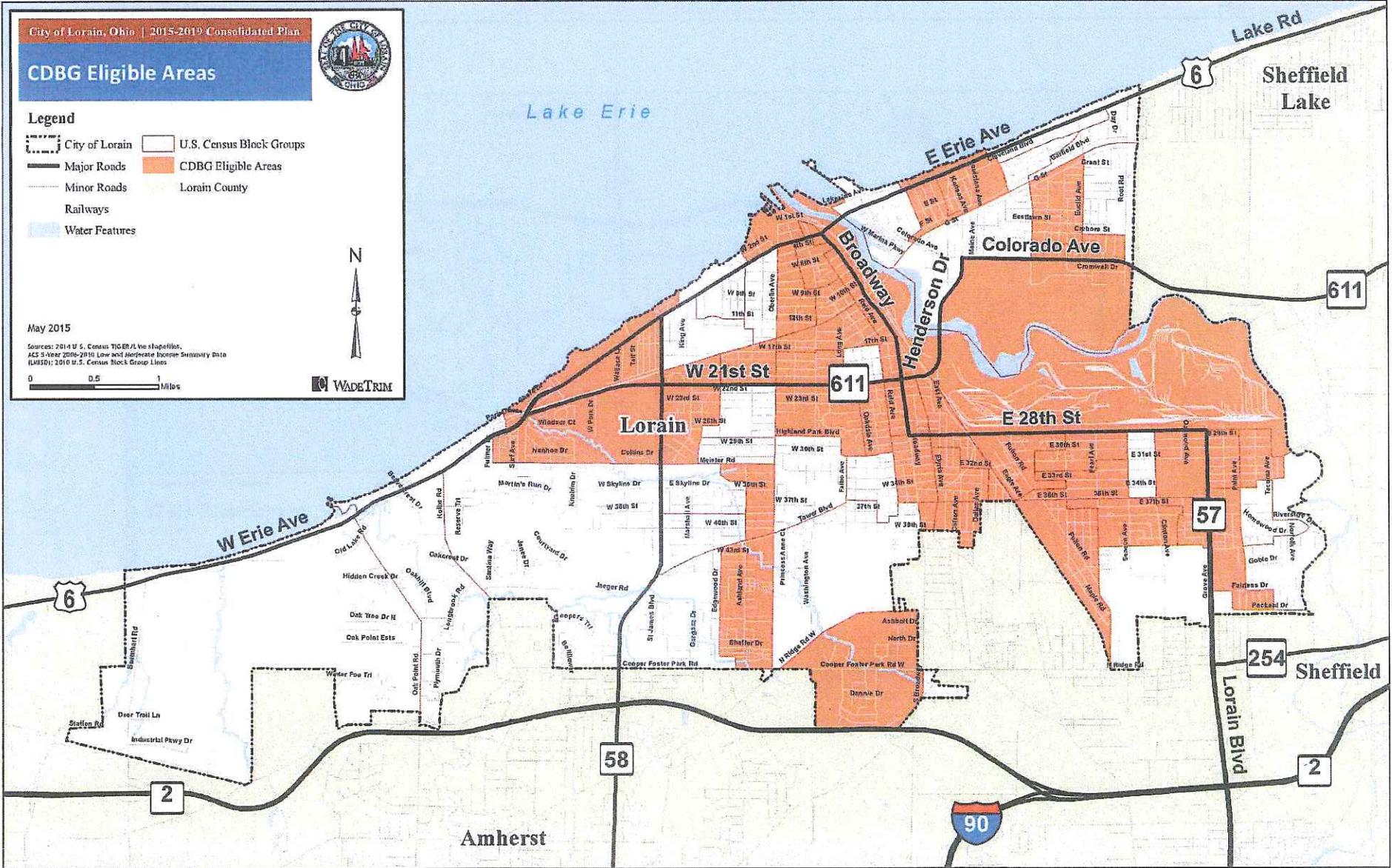
### CDBG Eligible Areas

#### Legend

- City of Lorain
- U.S. Census Block Groups
- Major Roads
- CDBG Eligible Areas
- Minor Roads
- Lorain County
- Railways
- Water Features

May 2015

Sources: 2014 U.S. Census TIGER/Line Shapefiles, ACS 5-Year 2006-2010 Low and Moderate Income Summary Data (LMI5D); 2010 U.S. Census Block Group Lines



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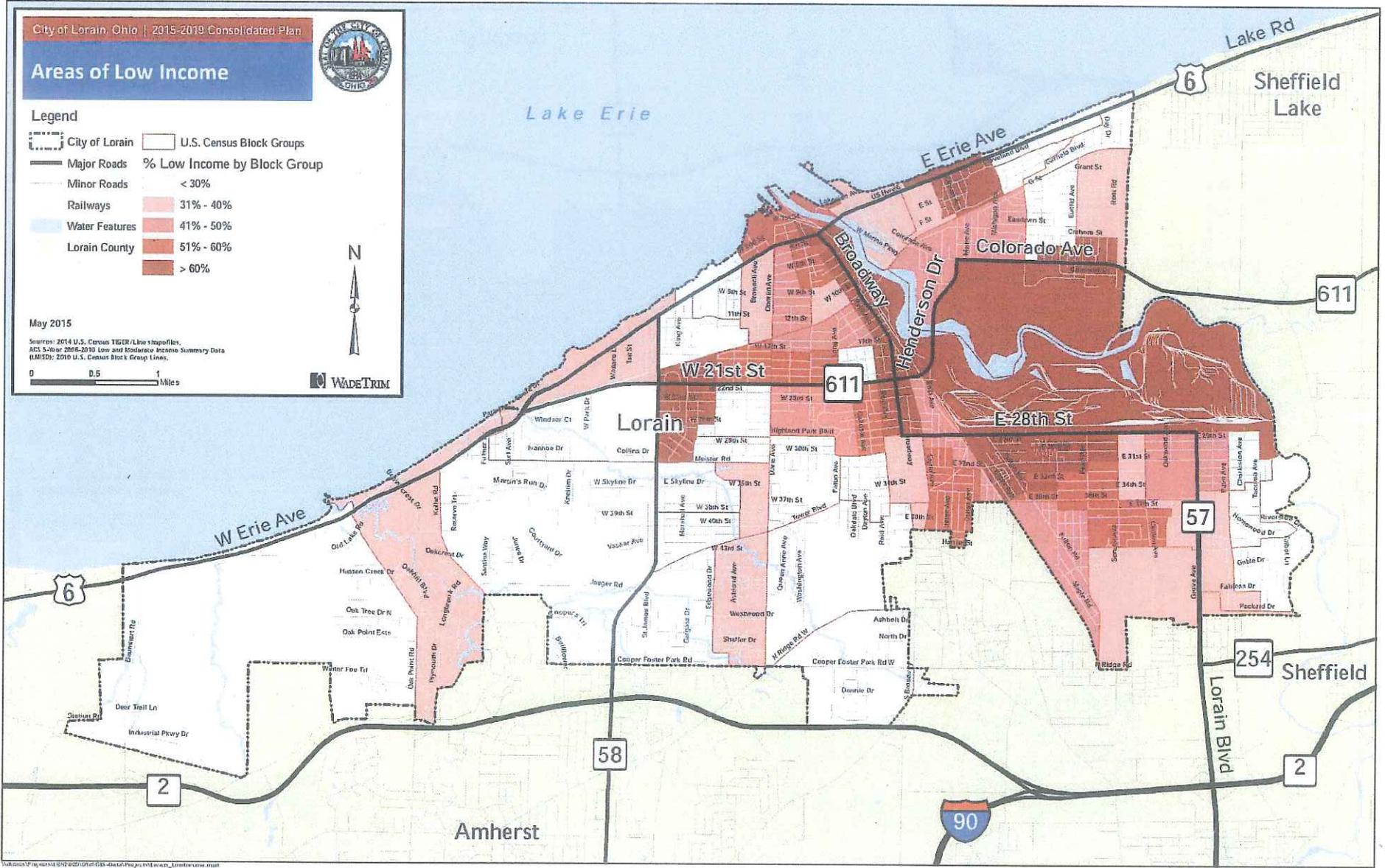
### Areas of Low Income

#### Legend

- City of Lorain
  - U.S. Census Block Groups
  - Major Roads
  - Minor Roads
  - Railways
  - Water Features
  - Lorain County
- | % Low Income by Block Group |           |
|-----------------------------|-----------|
|                             | < 30%     |
|                             | 31% - 40% |
|                             | 41% - 50% |
|                             | 51% - 60% |
|                             | > 60%     |

May 2015

Sources: 2014 U.S. Census TIGER/Line shapefiles, ACS 5-Year 2008-2010 Low and Moderate Income Summary Data (LMI5D); 2010 U.S. Census Block Group Lines.



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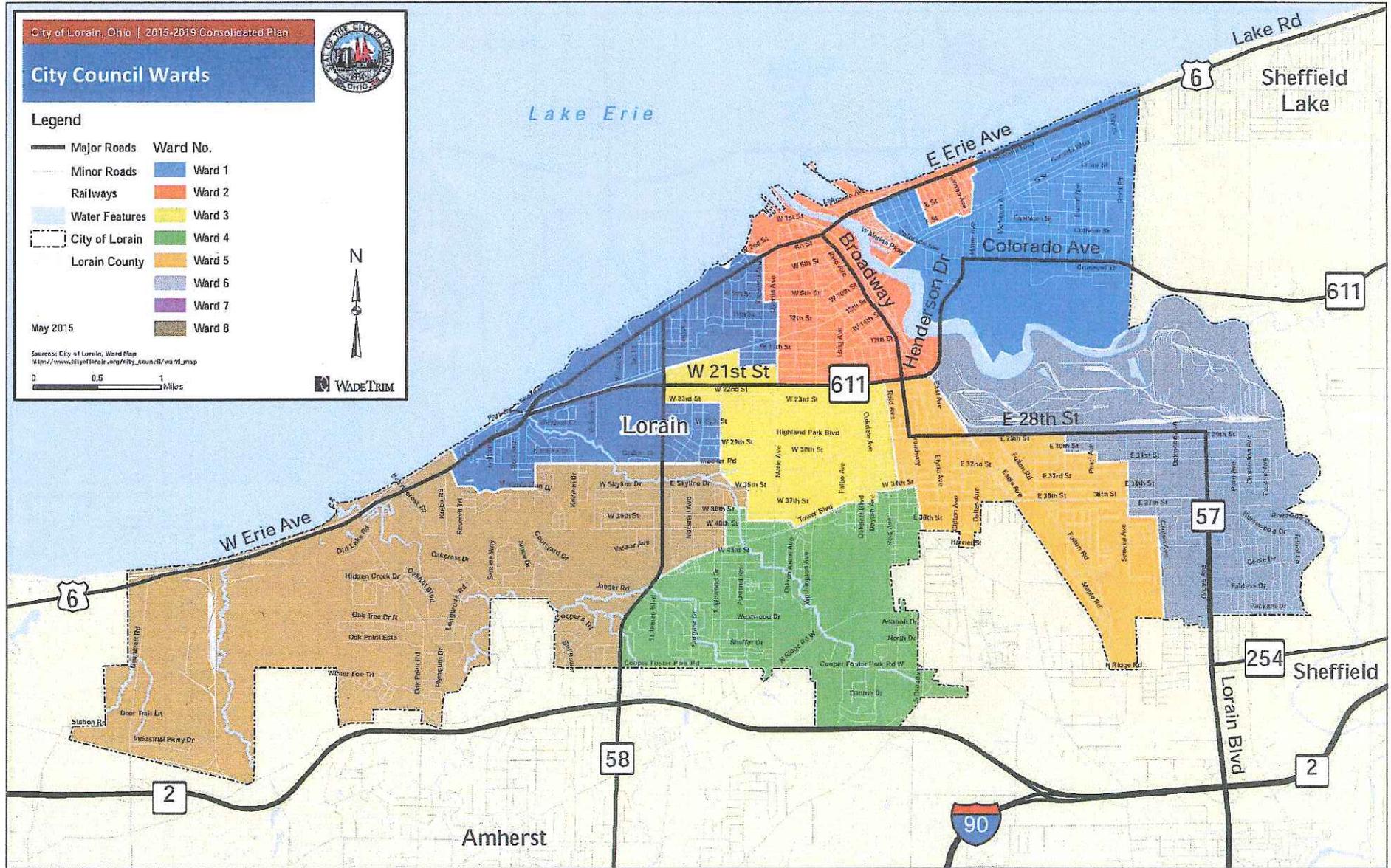
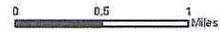


### City Council Wards

#### Legend

- Major Roads
  - Minor Roads
  - Railways
  - Water Features
  - City of Lorain
  - Lorain County
- | Ward No. |
|----------|
| Ward 1   |
| Ward 2   |
| Ward 3   |
| Ward 4   |
| Ward 5   |
| Ward 6   |
| Ward 7   |
| Ward 8   |

May 2015  
Source: City of Lorain, Ward Map  
[http://www.cityoflorain.org/city\\_council/ward\\_map](http://www.cityoflorain.org/city_council/ward_map)





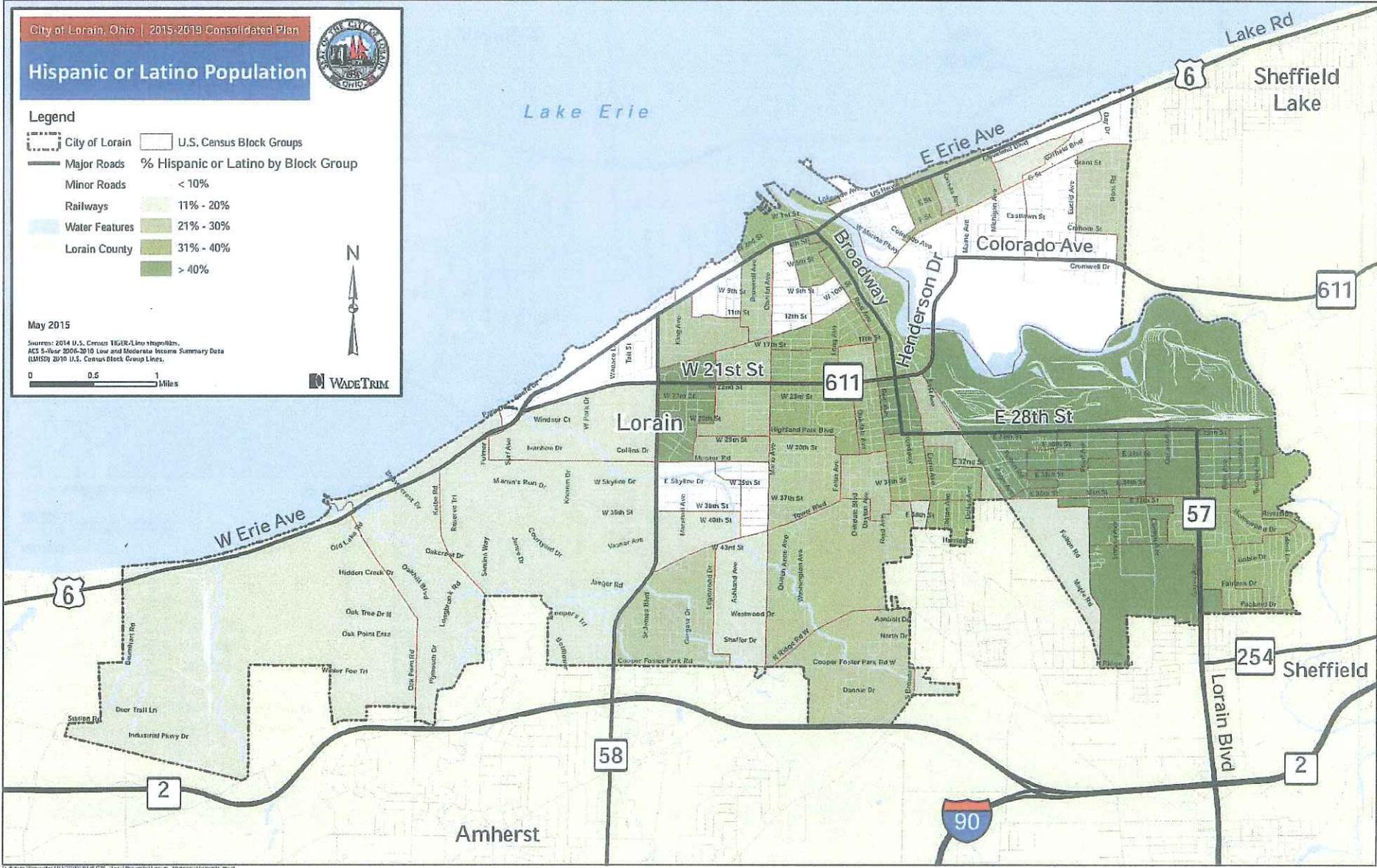
# Hispanic or Latino Population

## Legend

- City of Lorain
  - U.S. Census Block Groups
  - Major Roads
  - Minor Roads
  - Railways
  - Water Features
  - Lorain County
- | % Hispanic or Latino by Block Group |           |
|-------------------------------------|-----------|
|                                     | < 10%     |
|                                     | 11% - 20% |
|                                     | 21% - 30% |
|                                     | 31% - 40% |
|                                     | > 40%     |

May 2015

Source: 2014 U.S. Census TIGER/Line shapefiles, ACS 5-Year 2008-2010 Low and Moderate Income Summary Data (GIS) 2010 U.S. Census Block Group Lines.



Map Data Provided by ESRI, GIS Data Provided by Lorain, Minority Hispanic, 2014



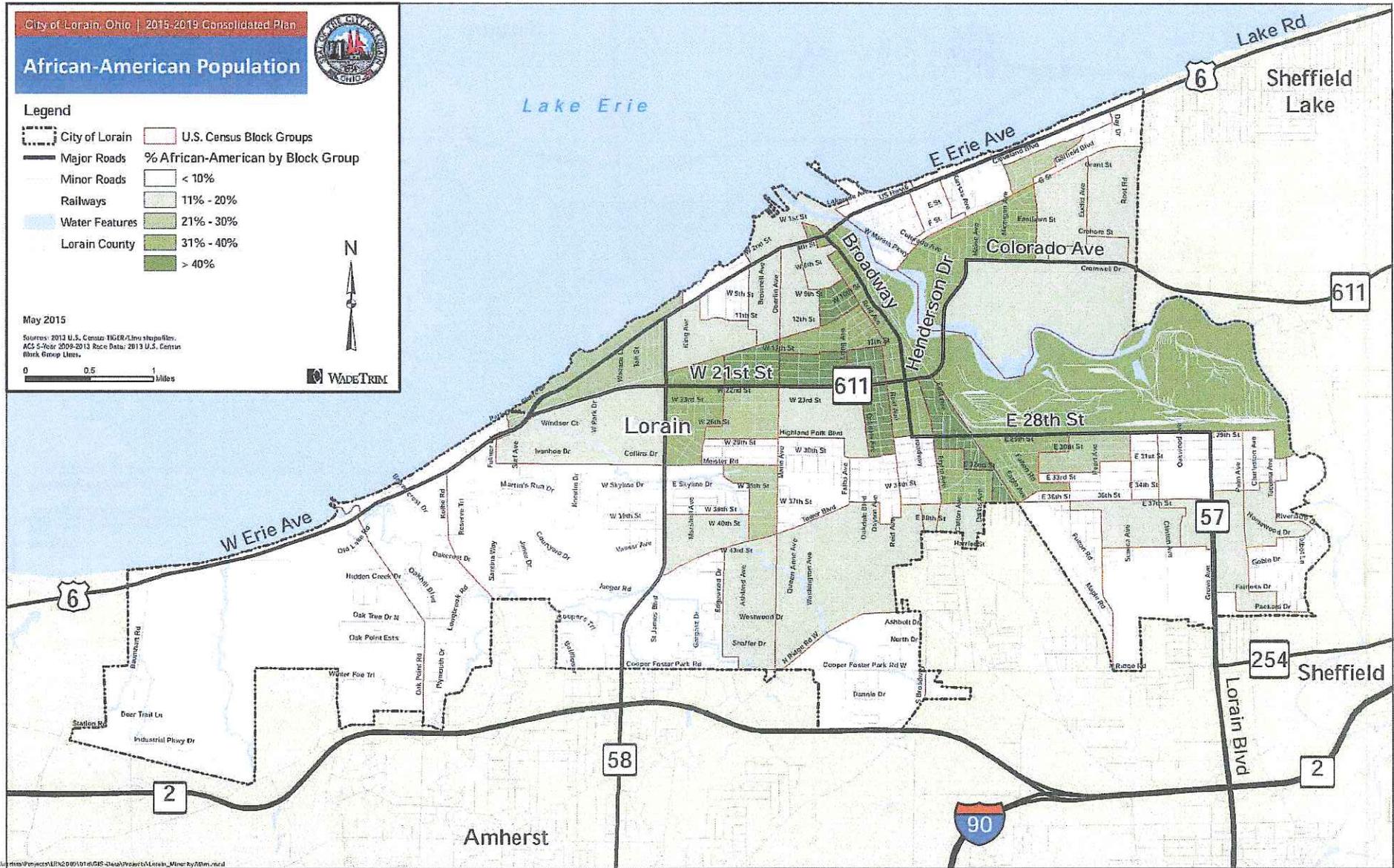
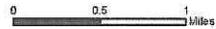
# African-American Population

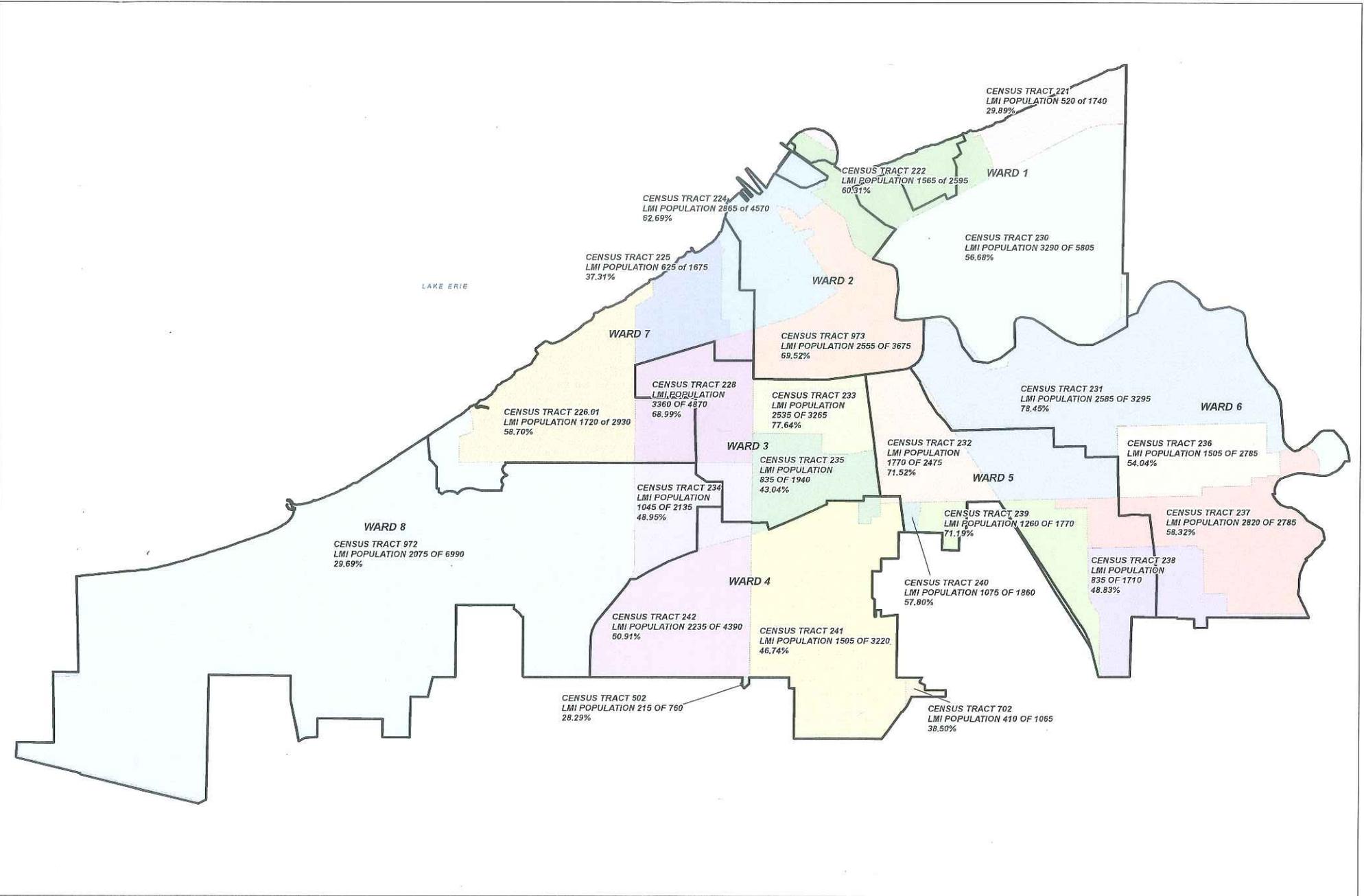
## Legend

- City of Lorain
- U.S. Census Block Groups
- Major Roads
- Minor Roads
- Railways
- Water Features
- Lorain County
- % African-American by Block Group
- < 10%
- 11% - 20%
- 21% - 30%
- 31% - 40%
- > 40%

May 2015

Sources: 2013 U.S. Census; TIGER/Line shapefiles; ACS 5-Year 2009-2013 Race Data; 2013 U.S. Census Block Group Lines.







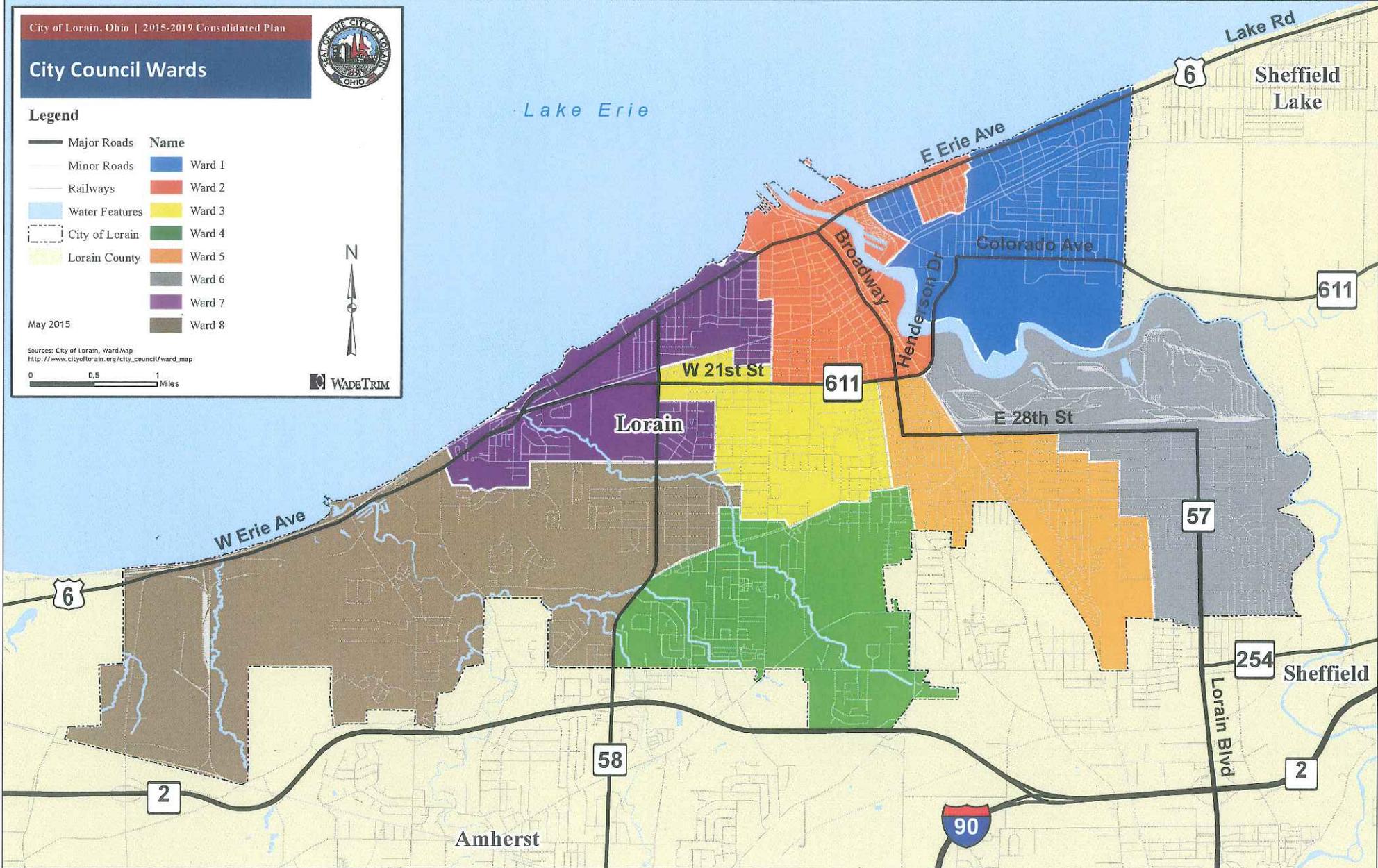
# City Council Wards

## Legend

Major Roads	Name
	Ward 1
	Ward 2
	Ward 3
	Ward 4
	Ward 5
	Ward 6
	Ward 7
	Ward 8

May 2015

Sources: City of Lorain, Ward Map  
[http://www.cityoflorain.org/city\\_council/ward\\_map](http://www.cityoflorain.org/city_council/ward_map)



**FAIR  
HOUSING  
UPDATE**

TO: Kellie Glenn  
From: Maria Sosa  
Date: August 7, 2017

RE: Fair Housing

### **FAIR HOUSING REPORT**

During 2015 and 2016 many steps were taken to provide guidance and administer policies that are helping to ensure that every resident of the City of Lorain has an equal and fair access to housing opportunists. Additionally, as a recipient of federal funds, the City took various affirmative steps in order to overcome housing discrimination, address impediments to fair housing, and provide its residents with more knowledge regarding fair housing laws.

#### **Procedure and Complaint Form**

In particular, following the guidance of the City's Fair Housing Ordinance, a procedure for complaints was established. Now, the Fair Housing Administrator is able to screen potential complaints from residents, conduct investigations, initiate conciliation, and assist if a hearing is necessary.

As one of the first steps in implementing an effective procedure for complaints, a Fair Housing Complaint Form was created. The Complaint form was created with the objective of obtaining all necessary and pertinent information that would help in an investigation. This form is available online, on the City's Website, hard copies are available throughout City Hall, and is periodically distributed to local organizations and libraries. Typically, the Fair Housing Administrator first interviews potential claimants in order to determine if the situation warrants further action and the full completion of a Fair Housing Complaint form.

It was important to create a Bilingual form due to the City's current population. Although the City's population as a whole has declined since the 1970's, the Hispanic population has steadily increased since that time. Additionally, over 15% of the population speaks Spanish primarily at home in the City of Lorain. This is crucial as it relates to Fair Housing since it has been found by many courts that a person's language is so closely intertwined with his or her national origin, that language-based discrimination is effectively a proxy for national origin discrimination. Moreover, people with Limited English Proficiency may have more of a difficulty accessing Fair Housing choices. For this reason under Title VI of the Civil Rights Act of 1964, jurisdictions, such as the City of Lorain, are required to "take affirmative steps to provide 'meaningful opportunity' for limited English proficient individuals to participate in its programs and activities..."<sup>1</sup> The availability of a Bilingual Fair Housing Complaint form and the accessibility of a fully Bilingual Fair Housing Administrator, helps to satisfy this requirement regarding Limited English Proficiency individuals, in terms of Fair Housing matters for the City.

### **Complaints**

Numerous calls are received on a weekly basis from residents who are seeking answers and solutions to their landlord/tenant concerns, fair housing issues, and general housing issues. Landlord/tenant issue calls are usually referred to entities that deal with those issues, such as Legal Aid among others. In occasions, guidance and moderate mediation has been offered regarding these issues. If the call is in reference to a fair housing issue, further investigation is immediately initiated.

The City of Lorain received a Fair Housing Complaint during 2015. This was the first internally processed complaint since the enactment of the Fair Housing Ordinance in 1977. The basis of the complaint was alleged familial status and sex (gender) discrimination. Upon conciliation all issues were resolved favorably and the file closed.

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<sup>1</sup> DOH Policy Guidance on the Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons with Limited English Proficiency, 65 Fed. Reg. 50124 (Aug. 16, 2000).

## **Community Outreach and Involvement**

### **Fair Housing Poster Contest**

In order to involve kids and the community in general, a Fair Housing Poster Contest was conducted during 2016. The Poster Contest was opened to all students' residents of the City of Lorain grades 4<sup>th</sup> to 8<sup>th</sup> grade.

The Fair Housing Poster Contest gave the opportunity to students to develop their own work of art using the theme "Fair Housing Choice for Everyone." The Mayor and members of Council recognized the winner during the first City Council Meeting in April. Additionally, the winner's poster was displayed as part of a Fair Housing Billboard in various locations throughout the City.

This Contest was done in collaboration with the Lorain City School. For that reason, all Lorain City School students 4<sup>th</sup> to 8<sup>th</sup> grade received a copy of the Content's flyer to take home. This helped with not only obtaining maximum participation but also it was a good tool to use in order to spread Fair Housing awareness to parents and family members as well.

Due to these Billboards the number of calls regarding housing questions and concerns in general increased. The use of Fair Housing Billboards through the City, using the artwork from the Fair Housing Poster Winner, overall increased awareness of local Fair Housing resources available within the City of Lorain.

### **Fair Housing Conference**

During April of 2015, a Fair Housing Conference took place in the City of Lorain. This Conference was done in collaboration with the City of Elyria Fair Housing Board, Lorain County Fair Housing Board, and the City of Oberlin. The conference was held at the Amy Levin Conference Center and it was free to the public.

The themes that were discussed this year included: Understanding the Fair Housing Act, Protections as a Tenant or Landlord, The importance of Credit Scores, and information on how to file a Discrimination Complaint or Charge.

### **Collaboration with the Lorain Metropolitan Housing Authority (LMHA)**

Several collaborations have taken place with LMHA. One of them included Fair Housing training, conducted for LMHA employees. This training was provided to LMHA employees as part of their annual requirements. Calls are also periodically referred by LMHA regarding Fair Housing concerns. Additionally, the Fair Housing Administrator was one of the speakers at a Pre-purchase Homeownership class conducted by LMHA.

Moreover, upon the review of LMHA's Annual Plan it was discovered that their definition of familiar status did not comply with current Fair Housing Standards. As part of their Annual Plan revision for 2016, the definition of familiar status was amended and updated to more closely mirror the definition used by the Federal Fair Housing Act and the City of Lorain's Fair Housing Codified Ordinance Chapter 136.

### **The Nord Center**

As part of another collaboration with agencies throughout the community, training was conducted for the staff at the Nord Center that dealt directly with clients. This was important since Disability is the number one most common basis for housing discrimination, according to HUD's national statistics. Since the training several referrals and calls have been received due to this training.

### **Faith Based Organizations**

As part of community outreach opportunities, the Fair Housing Administrator participated in a Christmas Meal and Pantry at Mission Cristiana El Faro Disciples of Christ in Lorain. During that event items donated from the Department of Building, Housing, and Planning were also distributed.

## **Homeless Task Force**

As part of the City's commitment to help with homeless issues, the Fair Housing Administrator attends the monthly meetings of the Lorain County Task Force for the Homeless as part of the general membership. Through this participation, fair housing and information in general is shared with other participating agencies. Additionally, the City's Fair Housing Administrator has been able to participate in events such as the Lorain County Homeless Stand Down for the last two consecutive years that is organized by the Homeless Task Force.

## **Webinars and Trainings**

The following are webinars and webcasts attended:

- "Expanding Opportunity: HUD's Affirmative Further Fair Housing Regulation" – Webinar, August 18, 2015 by HUD and the National Fair Housing Alliance.
- "Steering, Schools and Segregation: Real Estate Sales Discrimination in the U.S. " – Webinar, September 15, 2015 by the National Fair Housing Alliance.
- "The Administration's New Fair Housing rule & Healthy Housing: Connections & Opportunities" – Webinar, September 2015 by the National Fair Housing Alliance.
- "HUD at 50: History in the Making" – Webcast, September 17, 2015 by HUD.
- "Fair Lending and Affirmatively Furthering Fair Housing: Ensuring Access to Credit in the Fair Housing Planning Process" – Webinar, September 21, 2015 by the National Fair Housing Alliance.
- "Fair Housing Accessibility Design and Construction Training" – Training at Ohio State University, July 11, 2017.

### **Advertising Screening**

Local newspapers and Internet ads are periodically reviewed and screened. This is with the purpose of identifying words or terms that might violate Fair Housing laws. If a violation is found, the advertiser will be contacted and ordered to rectify the working.

### **Flyers and Information Distributed**

Flyers and information in general has been distributed throughout the community with information regarding Fair Housing laws and available resources.

### **Testers Program**

A Fair Housing Testing Program was developed and will be implemented in the City of Lorain. Testing is a useful tool that helps underscore housing discrimination in violation of Fair Housing laws. Essentially testing is a simulated housing transition designed to obtain evidence of any differential treatment based on an individual's protected class status, under Fair Housing laws. During 2017 testers will be selected and trained. At the end of a few testing cycles, the City will have tangible data that will help identify and address potential Fair Housing discrimination issues.

### **Repeal of "Nuisances" Ordinance**

As part of the Analysis of Impediments, City Ordinances are reviewed. Upon reviewing Codified Ordinance 162-13, which established Chapter 559 "Nuisances," it was determined that the Ordinance served as an impediment Fair Housing. There types of ordinances expose victims of domestic violence by "double victimization." Additionally, nuisance ordinances tend to have a greater impact on protected groups that tend to experience higher rates of domestic violence. On March 7<sup>th</sup>, 2016 the "Nuisances" Ordinance was repealed.

### **Accessibility Program**

An accessibility program was initiated during 2015. The Home Accessibility Program provides a one-time grant in the amount of \$1,500 for accommodations such as ramps, grab bars, door widening, adjusting levels doors/faucets, assisted technology devices and toilets. This Accessibility is administered in-house.

### **Down Payment Assistance**

The City of Lorain's Down Payment Assistance Loan Program will initiate during 2017. The Neighborhood Housing Service of Greater Cleveland Inc. with a maximum qualifying amount of \$17,000 will administer the program. As part of the Agreement homebuyer training and financial literacy training will also be provided.

### **Lead Program**

In order to help address adequate housing, a Lead Program will also start during 2017. The program will provide services to identify and control lead-based paint hazards in eligible privately owned housing for owner-occupants.

### **Legal Services**

The Fair Housing Administrator will continue to refer individuals in need to legal assistance that qualify for legal aid services. As part of an a recent Agreement within the City of Lorain and Legal Aid of Cleveland, low income residents will be able to obtain greater access to legal services. These legal services will be mainly in terms of landlord-tenant issues.

## **Analysis of Impediments**

An Analysis of Impediments for 2015-2019 is being created. A draft of the City of Lorain's Analysis has been completed by August, 2017 and a final draft will be submitted September, 2017.

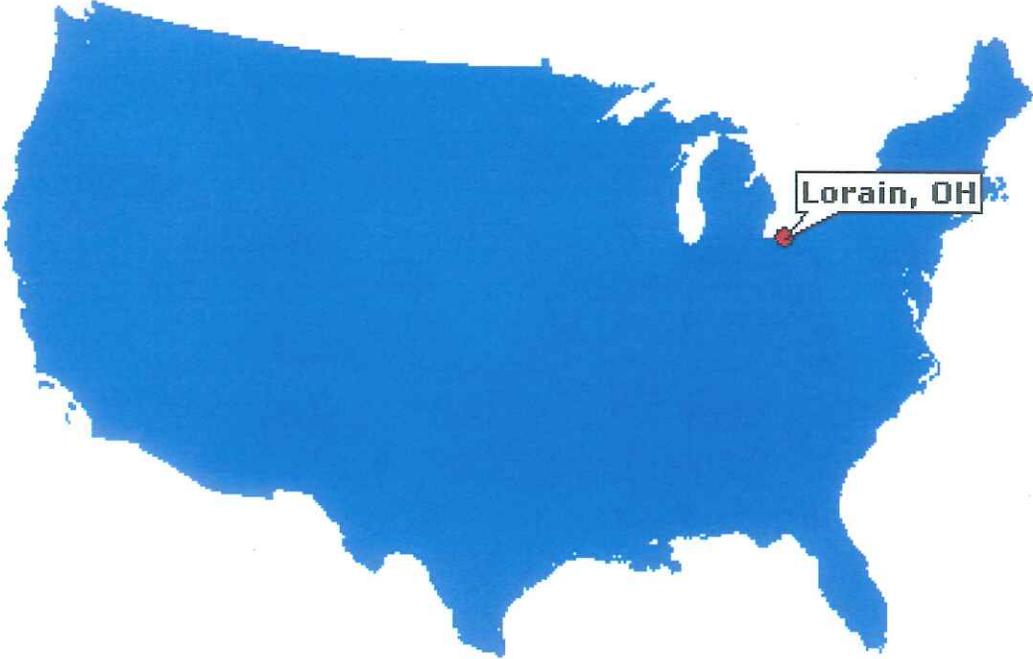
# CITY OF LORAIN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



## 2015-2019

The City of Lorain is committed to affirmatively furthering fair housing. As a recipient of federal funds, the City is required to conduct an analysis of impediments to fair housing choice and then take steps to overcome the identified impediments. This Analysis of Impediments to Fair Housing Choice satisfies this requirement and provides the City of Lorain guidance to overcome barriers to full and equal access to housing choice.

*"Fair Housing  
Choice for  
Everyone"*



COVER SHEET

1. Submission date: August, 2017
2. Submitter name: Maria Sosa
3. Jurisdiction: City of Lorain
4. Submitter contact information:
  - a. Name: Maria Sosa
  - b. Title: Fair Housing Administrator
  - c. Department: Building, Housing and Planning
  - d. Street Address: 200 West Erie Avenue
  - e. City: Lorain
  - f. State: Ohio
  - g. Zip Code: 44052
5. Period cover by this analysis: 20015 - 2019

## I. INTRODUCTION

The City of Lorain is dedicated to ensuring that individuals' choice, and not discrimination, determines where people live within the City of Lorain. Studies indicate that housing location plays a significant role in enabling people access to educational, economic, employment, and social opportunities.<sup>1</sup> Moreover, obtaining fair, non-discriminatory, access to housing and exercising housing choice is part of the civil rights granted to all persons in the United States by different federal, state, and local laws. These rights are further emphasized through executive orders, program rules, and various regulations. This **Analysis of Impediments to Fair Housing Choice (AI)** provides the City of Lorain with a roadmap that enables the City to identify and work towards overcoming any current barriers to fair housing choice.

### A. PURPOSE OF ANALYSIS

As a cornerstone principle the United States is committed to offer full and equal access to housing choice for all. Federally, Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act<sup>2</sup>, as amended, ensures protection of housing opportunity by prohibiting discrimination in the housing sector on the basis of *race, color, religion, sex, national origin, familial status, and disability*. The federal Fair Housing Act of 1968 was amended in 1988 to include familial status and disability as additional protected classes. The Amendments of 1988 also provides for stiffer penalties and established an administrative enforcement mechanism for the federal Fair Housing Act.

The United States Department of Housing and Urban Development (**HUD**) is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws within the housing sector.

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<sup>1</sup> Goering, J., Kamely, A., and Richardson, T. "Recent research on racial segregation and poverty concentration in public housing in the United States." *Urban Affairs Review* 32.5 (1997): 723-745.; Ellen, I.G., and Turner, M.A. "Does neighborhood matter? Assessing recent evidence." *Housing policy debate* 8.4 (1997): 833-866.; Mayer, C.J. "Does location matter?" *New England Economic Review* Special issue (1996): 26.; Chetty, Raj, C., Hendren, N., Katz, Lawrence. "The Effect of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *Harvard University and NBER* May 2015:NBER Working Paper No. 21156

<sup>2</sup> 42 U.S.C. 3601 note.

The federal Fair Housing Act, Section 808(e)(5), requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner Affirmatively Furthering Fair Housing (AFFH)<sup>3</sup>. This duty of AFFH is also required of state and local jurisdictions recipients of federal funds.

### **Courts**

The courts have said that when looking at the duty to AFFH:

*"... every court that has considered the question has held or stated that Title VIII imposes upon HUD an obligation to do more than simply refrain from discriminating ... This broader goal [of truly open housing choice] ... reflects the desire to have HUD use its grant programs to assist in ending discrimination and segregation, to the point where the supply of genuinely open housing increases."*<sup>4</sup>

In the 1972 Supreme Court case, *Trafficante v. Metropolitan Life Insurance Company*<sup>5</sup>, the Court quoted the Act's co-sponsor, Senator Walter F. Mondale, in noting that the Fair Housing Act was enacted by Congress to replace the racially or ethnically concentrated areas that were once called "ghettos" with "truly integrated and balanced living patterns."<sup>6</sup> Most recently in 2015, in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*<sup>7</sup>, the Supreme Court once again acknowledged the importance of the federal Fair Housing Act in moving towards a more integrated society.

### **Congress**

Congress has stated that the principal objective of AFFH is to improve housing opportunity for all residents of the United States, particularly members of disadvantage minorities, on a nondiscriminatory basis.<sup>8</sup> Additionally, Congress has repeatedly reinforced the duty to AFFH by requiring that HUD program participants certify that they will Affirmatively Further Fair Housing as a condition of receiving Federal Funds.<sup>9</sup>

<sup>3</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning: Historical Overview, Page 13)*. March 1996.

<sup>4</sup> *NAACP v. Sec'y of Housing and Urban Development*, 817 F.2d 149, 155 (1<sup>st</sup> Cir. 1987).

<sup>5</sup> 4096 U.S. 205, 211 (1972)

<sup>6</sup> U.S. Department of Housing and Urban Development. AFFH Rule Guidebook: Version 1 (p. 3-4). Dec. 31, 2015.

<sup>7</sup> 576 U.S. \_ (2015)

<sup>8</sup> Congress reiterated this affirmative obligation as part of the 1990 National Affordable Housing Act.

<sup>9</sup> 42 U.S.C. §§ 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), 1437C-1(d)(16)

## HUD

HUD, as part of its new guidance, indicates that Affirmatively Furthering Fair Housing Choice is to comply with “the 1968 Fair Housing Act’s obligation of state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing [choice], regardless of their race, color, national origin, religion, sex, disability or familial status.”<sup>10</sup>

Moreover, under the **new 2015 AFFH Rule** HUD defines the duty as:

*“Affirmatively furthering fair housing means taking proactive steps beyond simply combating discrimination to foster more inclusive communities and access to community assets for all persons protected by the Fair Housing Act. More specifically, it means taking steps proactively to address significant disparities in access to community assets, to overcome segregated living patterns and support and promote integrated communities, to end racially and ethnically concentrated areas of poverty, and to foster and maintain compliance with civil rights and fair housing laws. For participants subject to this subpart, these ends will be accomplished primarily by making investments with federal and other resources, instituting strategies, or taking other actions that address or mitigate fair housing issues identified in an assessment of fair housing (AFH) and promoting fair housing choice for all consistent with the policies of the Fair Housing Act.”<sup>11</sup>*

### Fair housing choice encompasses:<sup>12</sup>

- (1) **Actual choice**, which means the existence of realistic housing options;
- (2) **Protected choice**, which means housing that can be accessed without discrimination; and
- (3) **Enabled choice**, which means realistic access to sufficient information regarding options so that any choice is informed. For persons with disabilities, fair housing choice and access to opportunity include accessible housing and housing in the most integrated setting appropriate to an individual’s needs as required under law, including disability-related services that an individual needs to live in such housing.

<sup>10</sup> U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 136-110. July 19, 2013.

<sup>11</sup> 78 C.F.R. No. 139 §5.152

<sup>12</sup> 24 C.F.R. § 5.152

Additionally, although the actual duty to AFFH has never been defined statutorily, HUD's "Fair Housing Planning Guide" shares the following requirements:<sup>13</sup>

- *Jurisdictions must conduct an analysis to identify impediments to fair housing choice within the jurisdiction;*
- *Appropriate actions must be taken to overcome the effects of any impediments identified in the analysis; and*
- *Jurisdictions must maintain records reflecting the analysis and actions taken in this regard.*

### ***Duty to Affirmatively Furthering Fair Housing***

Entitlement Communities, jurisdictions receiving financial assistance from HUD, such as the City of Lorain, are required by Section 104(b)(2) of the Housing and Community Development Act<sup>14</sup> of 1974, as amended, and Section 105(b)(3) of the National Affordable Housing Act<sup>15</sup> (NAHA) of 1990 to certify that they will Affirmatively Further Fair Housing. Specific programs that give rise to this requirement for the City are the Community Development Block Grants<sup>16</sup> (CDBG), the HOME Investment Partnership Program (HOME), and the Neighborhood Stabilization Program (NSP).<sup>17</sup>

### ***Public and Private Obligation***

Although the AFFH obligation arises in connection with the receipt of federal funding, the obligation is not restricted to the design and operation of programs funded with funds provided by HUD only. The obligation to AFFH extends to all housing and housing-related activities in the grantee's jurisdictional area, whether publicly or privately funded.<sup>18</sup> For this purpose, the duty to guard against "private discrimination" refers to discrimination in the private housing market which may include, but is not limited to, discrimination by landlords, property managers, home sellers, real estate agents, lenders, homeowners' associations, and condominium boards.

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<sup>13</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1* (Chapter 1: *Fair Housing Planning: Historical Overview*, Page 14). March 1996.

<sup>14</sup> 12 U.S.C. § 1706e.

<sup>15</sup> 42 U.S.C. §12703.

<sup>16</sup> The Community Development Block Grant program was authorized under the Housing and Community Development Act of 1974.

<sup>17</sup> For a complete list see: U.S. Department of Housing and Urban Development, Community Development Block Grant Entitlement Communities Grants, [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/.communitydevelopment/programs/entitlement](http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/.communitydevelopment/programs/entitlement).

<sup>18</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1* (Chapter 1: *Fair Housing Planning: Historical Overview*, Page 1-3). March 1996. HUD Fair Housing Planning Guide Vol. 1 at 1-3.

***What is An Analysis of Impediments?***

An Analysis of Impediments to Fair Housing Choice is a fair housing study, required of Entitlement Communities such as the City of Lorain. HUD's goal is to expand mobility and widen a person's freedom of housing choice. With this in mind, an AI compiles a variety of real estate data, housing conditions, and other information, which can help in determining if patterns of discrimination or lack of choice impact particular communities. This AI conducted for the City of Lorain looks at neighborhood opportunities from a social, economic and housing perspective.

***What are Impediments to Fair Housing Choice?***

The federal Fair Housing Act, its amendments, and ensuing case law, as well as various executive orders, program rules and other laws and regulations have defined actions which are considered to be impediments to an individual or households from obtaining their fair housing rights and fair housing choice.

According to HUD,

*Impediments to fair housing choice are defined as any action, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status, or national origin.*<sup>19</sup>

**Impediments to fair housing choice include actions that:**<sup>20</sup>

- 1. *Constitute violations, or potential violations, of the Fair Housing Act.***
- 2. *Are counterproductive to fair housing choice, such as:***
  - a. Community resistance when minorities, persons with disabilities and/or low-income persons first move into white and/or moderate to high-income areas.***
  - b. Community resistance to the siting of housing facilities for persons with disabilities because of the persons who will occupy the housing.***
- 3. *Have the effect of restricting housing opportunity on the basis of race, color, religion, sex, disability, familial status, or national origin.***

<sup>19</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1* (Chapter 2: Preparing for Fair Housing Planning, p.26) March 1996.

<sup>20</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1* (Chapter 2: Preparing for Fair Housing Planning, p.2-17) March 1996.

An Analysis of Impediments to Fair Housing Choice reviews those impediments to fair housing in the public and private sector, and should include the following requirements:<sup>21</sup>

- *A comprehensive review of a States or Entitlement Jurisdiction's laws, regulations, and administrative policies, procedures, and practices.*
- *An assessment of how those laws, etc. affect the location, availability, and accessibility of housing.*
- *An assessment of conditions, both public and private, affecting fair housing choice for all protected classes.*
- *An assessment of the availability of affordable, accessible housing in a range of unit sizes.*

As required, this report satisfies the City of Lorain's duty to complete an AI under HUD's current requirements and satisfies the future Analysis of Fair Housing (AFH) requirements, under the new 2015 AFFH Rule.<sup>22</sup>

Also as required, this AI provides action steps and recommendations to help overcome impediments found within the City of Lorain, consistent with HUD's recommendations.<sup>23</sup> Additionally, the action steps and recommendations will be reviewed and prioritized yearly, during the five year expand (2015 to 2019) that this AI covers.

This AI is being utilized as guidance for the City's expenditure of federal funds, alongside the City of Lorain's most recent Five-Year Consolidated Plan and Annual Action Plan Program.<sup>24</sup>

Finally, a "Yearly Summary Supplement" will be crated from this AI highlighting the City's accomplishment which satisfies the performance report required under HUD's Consolidated Plan regulations yearly.<sup>25</sup>

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<sup>21</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1* (Chapter 2: Preparing for Fair Housing Planning, p.25) March 1996.

<sup>22</sup> 78 C.F.R. No. 139 §5.152

<sup>23</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1* (Chapter 2: Preparing for Fair Housing Planning) March 1996.

<sup>24</sup> City of Lorain Five-Year Consolidated Plan 2015/2016-2019/2020 & Annual Action Plan Program Year 2015-2016.

<sup>25</sup> See, *Fair Housing Planning Guide: Volume 1* (Chapter 2: Preparing for Fair Housing Planning) March 1996.

## B. METHODOLOGY

The City of Lorain Department of Building, Housing and Planning - Fair Housing Administrator, carried out this Analysis of Impediments to Fair Housing Choice for the City of Lorain.

The primary guidance for developing this Analysis of Impediments was obtained from HUD's Fair Housing Planning Guide of 1996. It is recognized that since that time, HUD's approach to fair housing has evolved. Moreover, a new rule titled "Affirmatively Further Fair Housing Rule" was released in 2015. Since the details and requirements under the new rule are still under development and are not yet mandatory, this AI uses the Fair Housing Planning Guide as an underpinning resource. However, guidance and elements from the new rule were used whenever possible.

Numerous other resources that were reviewed and used in order to complete this AI, including but not limited to the:

- U.S. Census
- American Community Survey
- 2015-2020 Consolidated Plan and Annual Action Plan Program Year 2015/2016

Additionally, the input of residents, various community organization members and leaders was also utilized.

## II. FAIR HOUSING LAWS

An overview of Fair Housing laws is important to understand the duty to AFFH. In each jurisdiction whether particular Fair Housing laws apply in a situation, depends on the:

- Person
- Property
- Behavior

### Is the Person covered?

A person is covered if they are part of a “*protected class*.” A group sharing particular protected characteristics is part of a protected class as specified by a jurisdiction.

### Is the Property covered?

Fair housing laws apply to the occupancy, sale, rental, insuring, or financing of nearly all forms of residential housing. Specific exemptions, if any, are explained in the following sections.

### Is the Behavior covered?

Behavior is covered if it results in either differential treatment or a disparate impact on members of a protected class.

**Differential Treatment** = the negative treatment of a person because of his or her membership in a protected class.

**Differential Impact** = this occurs when a policy or system has a negative effect on members on a protected class, regardless of the intent.

Fair Housing laws exist at the federal, state and in some local level jurisdictions. The federal Fair Housing Act offers federal protection against housing discrimination. Ohio law, under the **Ohio Revised Code 4112.02** expands this protection including two additional protected classes (“*ancestry*” and “*military status*”), and the *City of Lorain, Fair Housing Ordinance 147-08 – Chapter 136*, offer even broader protection than the federal Fair Housing Act by including six additional protected classes (“*ancestry*,” “*sex orientation*,” “*age*,” “*ethnic group*,” “*Vietnam-era or disabled veteran status*,” and “*marital status*”).

The table below summarizes the protected classes under the different applicable jurisdictions for this AI. Additional information is provided for each applicable jurisdiction in the following sub-sections, including enforcement and respective complaint processes.

### Protected Classes

	FEDERAL	STATE	CITY OF LORAIN
Protected Class	42 U.S.C. § 3601	O.R.C. § 4112.02	Fair Housing Ordinance 147-08 Chapter 136
RACE	X	X	X
COLOR	X	X	X
NATIONAL ORIGIN	X	X	X
RELIGION	X	X	X
SEX (GENDER)	X	X	X
FAMILIAL STATUS	X	X	X
DISABILITY (HANDICAP)	X	X	X
MILITARY STATUS		X	
ANCESTRY		X	X
SEX ORIENTATION			X
AGE			X
ETHNIC GROUP			X
VIETNAM-ERA OR DISABLED VETERAN STATUS			X
MARITAL STATUS			X
SOURCE OF INCOME			

#### A. Federal Law

The Civil Rights Act of 1964 (Title VI) was passed, in an effort to prevent further discrimination in the United States. This law prohibits discrimination and the segregation of any place of public accommodation and within federally assisted programs, on the basis of *race*, *color* or *national origin*. Additionally, it authorizes withholding of federal funding from states and local grantees engaging in discriminatory activities and practices. However, this law does not address housing and discrimination issues specifically.

Due to persistent issues of discrimination in the housing sector, Congress passed the Civil Rights Act of 1968, commonly known as Title VIII – The Fair Housing Act, in order to address specific fair housing issues. The Fair Housing Amendments Act of 1988 expanded the protection of the Fair Housing Act of 1968 by adding *handicapped* and *familial status* to the list of protected classes. As part of the 1988 amendments, the power to enforce the Fair Housing Act also increased with stiffer penalties and the establishment of an administrative enforcement mechanism. Moreover, the Americans with Disabilities Act of 1990 added additional protections for persons with disabilities under the Fair Housing Act.

Currently, the federal Fair Housing Act, as amended, prohibits discrimination in the sale, rental and financing of dwellings, and in other public or private housing-related transactions, based on:

- ❖ *Race*
- ❖ *Color*
- ❖ *National Origin*
- ❖ *Religion*
- ❖ *Sex*
- ❖ *Familial Status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people in the process of securing legal custody of children under the age of 18)*
- ❖ *Disability (Handicap)*

Therefore, any person that belongs to any of the “protected classes” above is covered under the federal Fair Housing Act.

#### **Covered Properties**<sup>26</sup>

Under the federal Fair Housing Act most housing properties are covered. In some circumstances, the federal Fair Housing Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy of members. Whereas it is important to mention that the same exceptions might not apply to some states and local jurisdictions. In fact, most of these exceptions do not apply in the State of Ohio and the City of Lorain.

<sup>26</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Equal Opportunity for All (p. 1). 2011.

**Prohibited Behavior**<sup>27</sup>

In the **sale and rental of housing**: No one may engage in any of the following behaviors based on race, color, religion, sex, disability, familial status, or national origin:

- ❖ Refuse to rent or sell housing
- ❖ Refuse to negotiate for housing
- ❖ Make housing unavailable
- ❖ Otherwise deny a dwelling
- ❖ Set different terms, conditions or privileges for sale or rental of a dwelling
- ❖ Provide different housing services or facilities
- ❖ Falsely deny that housing is available for inspection, sale or rental
- ❖ For profit, persuade, or try to persuade homeowners to sell or rent dwellings by suggesting that people of a particular race, etc., have moved, or are about to move into the neighborhood (blockbusting) or
- ❖ Deny any person access to, membership or participation in, any organization, facility or service (such as a multiple listing service) related to the sale or rental of dwellings, or discrimination against any person in the terms or conditions of such access, membership or participation.

In **mortgage lending**: No one may take any of the following actions based on race, color, religion, sex, disability, familial status, or national origin:

- ❖ Refuse to make a mortgage loan
- ❖ Refuse to provide information regarding loans
- ❖ Impose different terms or conditions on a loan, such as differential interest rates, points, or fees
- ❖ Discriminate in appraising property
- ❖ Refuse to purchase a loan or
- ❖ Set different terms or conditions for purchasing a loan

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<sup>27</sup> U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. Fair Housing Equal Opportunity for All (p. 1- 6). 2011

In addition, the following behavior is prohibited under the Fair Housing Act:

- ❖ Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise the right
- ❖ Make, print, or publish any statement, in connection with the sale or rental of a dwelling, which indicates a preference, limitation, or discrimination based on race, color, religion, sex, disability, familial status, or national origin  
(This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the federal Fair Housing Act.)
- ❖ Refuse to provide homeowners insurance coverage for a dwelling because of the race, color, religion, sex, disability, familial status, or national origin of the owner and/or occupants of a dwelling
- ❖ Discriminate in the terms or conditions of homeowners insurance coverage because of the race, color, religion, sex, disability, familial status, or national origin of the owner and/or occupants of a dwelling
- ❖ Discriminate in the terms or conditions of homeowners insurance coverage because of the race, color, religion, sex, disability, familial status, or national origin of the owner and/or occupants of a dwelling
- ❖ Refuse to provide available information on the full range of homeowners insurance coverage options available because of the race, etc. of the owner and/or occupants of a dwelling
- ❖ Make print or publish any statement, in connection with the provision of homeowners' insurance coverage, that indicates a preference, limitation or discrimination based on race, color, religion, sex, disability, familial status, or national origin.

#### **Additional Protection for Persons with Disability**

"Disability" is defined as:

- ❖ Having a physical or mental impairment (including hearing, mobility and visual impairments, cancer, chronic mental illness, HIV/AIDS, or mental retardation) that substantially limits one or more major life activities
- ❖ A record of such an impairment or
- ❖ Being regarded as having such impairment.

For a person with a disability a housing provider may not:

- Refuse to let that person make reasonable modifications to their dwelling or common use areas, at their own expense, if it may be necessary for full use of the housing. (Where reasonable, a landlord may permit changes only if the person agrees to restore the property to its original condition when they leave.)

- Refuse to make reasonable accommodations in rules, policies, practices or services if it may be necessary for that person to use the housing on an equal basis with nondisabled persons.

**Example:** A building with a “no pets” policy must allow a visually impaired tenant to keep a guide dog.

**Example:** An apartment complex that offers tenant’s ample, unassigned parking must honor a request from a mobility-impaired tenant for a reserved space near that person’s apartment if it may be necessary to assure access to that person’s apartment.

However, the Fair Housing Act does not protect a person who is a direct threat to the health or safety of others or who currently uses illegal drugs.

#### **Accessibility Requirements for New Multifamily Buildings:**

In buildings with four or more units that were first occupied after March 13, 1991, and that have an elevator:

- ❖ Public and common use areas must be accessible to persons with disabilities
- ❖ All doors and hallways must be wide enough for wheelchair
- ❖ All units must have:
  - An accessible route into and through the unit
  - Accessible light switches, electric outlets, thermostats and other environmental controls
  - Reinforced bathroom walls to allow later installation of grab bar and
  - Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and was first occupied after March 13, 1991, these standards apply to ground floor units only.

These accessibility requirements for new multifamily buildings do not replace more stringent accessibility standards required under State or local law.

**Familial Status<sup>28</sup>**

The Fair Housing Act makes it unlawful to discriminate against a person whose household includes one or more children who are under 18 years of age. *Familial status* protection covers households in which one or more minor children live with:

- A parent;
- A person who has legal custody (including guardianship) of a minor child or children; or
- The designee of a parent or legal custodian, with the written permission of the parent or legal custodian.

Familial status protection also extends to pregnant women and any person in the process of securing legal custody of a minor child (including adoptive or foster parents).

**Familial Status Exemption:  
“Housing for Older Persons”**

The Fair Housing Act specifically exempts some senior housing facilities and communities from liability for *familial status* discrimination. Exempt senior housing facilities or communities, can lawfully refuse to sell or rent dwellings to families with minor children. In order to qualify for the “housing for older persons” exemption, a facility or community must prove that its housing is:

- Provided under any State or Federal program that HUD has determined to be specifically designed and operated to assist elderly persons (as defined in the State or Federal program); or
- Intended for, and solely occupied by persons 62 years of age or older; or
- Intended and operated for occupancy by persons 55 years of age or older.

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<sup>28</sup> 42 U.S.C. § 3602 (k)

In order to qualify for the “55 or older” housing exemption, a facility or community must satisfy each of the following requirements:

- at least 80 percent of the units must have at least one occupant who is 55 years of age or older; and
- the facility or community must publish and adhere to policies and procedures that demonstrated the intent to operate as “55 or older” housing; and
- the facility or community must comply with HUD’s regulatory requirements for age verification of residents.

**The “housing for older persons” exemption does not protect senior housing facilities or communities from liability for housing discrimination based on race, color, religion, sex, disability or national origin.**

Additionally, federally subsidized housing providers are never permitted to exclude children from their housing. As stated in the Federal Register:

*“... no public housing development funded by HUD may exclude families with children, even if at least 80% of the units are occupied by at least one person who is 55 years of age or older.”<sup>29</sup>*

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<sup>29</sup> 64 Fed. Reg. 16327 (April 2, 1999).

**LGBT Community**<sup>30</sup>

The federal Fair Housing Act does not specifically include sexual orientation and gender identity as prohibited bases. However, a lesbian, gay, bisexual, or transgender (LGBT) person's experience with sexual orientation or gender identity housing discrimination may still be covered by the federal Fair Housing Act under certain circumstances.

Additionally, housing providers that receive HUD funding, have loans insured by the Federal Housing Administration (FHA), as well as lenders insured by FHA, may be subject to HUD program regulations intended to ensure equal access of LGBT persons. Related to this matter, HUD published its final administrative rule regarding equal access to housing in all HUD programs regardless of sexual orientation or gender identity, effective February 2012.<sup>31</sup>

**Examples of Prohibited Scenarios:**<sup>32</sup>

- A gay man is evicted because his landlord believes he will infect other tenants with HIV/AIDS. That situation may constitute illegal discrimination under the Act because the man is perceived to have a disability, HIV/AIDS.<sup>33</sup>
- A property manager refuses to rent an apartment to a prospective tenant who is transgender. If the housing denial is because of the prospective tenant's non-conformity with gender stereotypes, it may constitute illegal discrimination on the basis of sex under the federal Fair Housing Act.
- An underwriter for an FHA insured loan is reviewing an application where two male incomes are being used as the basis for the applicants' credit worthiness. The underwriter assumes the applicants are a gay couple and, as a result, denies the application despite the applicants' credentials. This scenario may violate HUD's regulations, which prohibit FHA-insured lenders from taking actual or perceived sexual orientation into consideration in determining adequacy of an applicant's income.

<sup>30</sup> [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp).

<sup>31</sup> Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity, 77 C.F.R. No. 23 (2012).

<sup>32</sup> [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/LGBT\\_Housing\\_Discrimination](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/LGBT_Housing_Discrimination).

<sup>33</sup> HIV/AIDS is protected under the Fair Housing Act as a disability. For a full discussion see: <http://blog.hud.gov/index.php/2015/04/07/housing-discrimination-hiv-aids-illegal/>.

**Complaint Process**

A complaint under the federal Fair Housing Act may be file online, by mail, via telephone, or by visiting HUD. Individuals can also choose to file a federal fair housing complaint through any of HUD's regional offices.<sup>34</sup> After HUD receives a Fair Housing complaint, an intake specialist contacts the complainant for an interview and collection of facts about the alleged discrimination. However, if after a thorough investigation, HUD finds no reasonable cause to believe that housing discrimination has occurred or is about to occur, HUD will issue a determination of "no reasonable cause" and close the case. If the complaint is not successfully mediated and the investigation produces reasonable cause to believe that discrimination has occurred or is about to occur, HUD will issue a determination of "reasonable cause" and charge the respondent with violating the law. HUD will then schedule a hearing before a HUD Administrative Law Judge. It is important to mention that at any point, either party may elect to terminate the administrative proceeding by electing to have the matter litigated in federal court.<sup>35</sup>

**Contact Information for Federal Complaints:****Address: Headquarters**

U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street S.W., Washington, DC 20410

**Local Office (Region V)**

U.S. Department of Housing and Urban Development  
Cleveland Field Office  
US Bank Centre Building  
1350 Euclid Avenue, Suite 500  
Cleveland, OH 44115-1815

**Telephone:** U.S. Department of Housing and Urban Development  
Fair Housing Complaint Hotline 1-800-669-9777

**Website:** [http://portal.hud.gov/portal/page/HUD/topics/housing\\_discrimination](http://portal.hud.gov/portal/page/HUD/topics/housing_discrimination)

<sup>34</sup> [http://portal.hud.gov/hudportal/HUD?src=/topics/housing\\_discrimination](http://portal.hud.gov/hudportal/HUD?src=/topics/housing_discrimination).

<sup>35</sup> [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/fair\\_housing\\_equal\\_opp/complaint-process](http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/complaint-process)

**Chronological Summary of Important Federal Constitutional  
Acts, Legislation and Executive Orders:**

1797	<b>U.S. Constitution (Article 1, Section 2)</b>	For purpose of representation, slaves are counted as three-fifths of a person.
1791	<b>Bill of Rights (First 10 Amendments)</b>	Fifth Amendment guarantees right to "due process."
1865	<b>13<sup>th</sup> Amendment</b>	Slavery is abolished and Congress given power to enact appropriate legislation to enforce this Article.
1866	<b>Civil Rights Act of 1866 (42 U.S.C. 1982)</b>	Enacted under authority of the 13 <sup>th</sup> Amendment, this Act guarantees all real and personal property rights for all U.S. citizens regardless of race.
1868	<b>14<sup>th</sup> Amendment</b>	This Amendment along with the 5 <sup>th</sup> Amendment prohibits government discrimination.
1962	<b>Executive Order 11063</b>	Directs all federal agencies to take all actions necessary to prevent discrimination because race, color, creed or national origin. More specifically, prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.
1964	<b>Civil Rights Act of 1964 (Title VI)</b>	Prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal funds.
1965	<b>Executive Order 11246</b>	This executive order, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

1968	<b>Fair Housing Act (Title VIII)</b>	<ol style="list-style-type: none"> <li>1) Outlaws private discrimination in housing, including refusal to rent or sell.</li> <li>2) Also outlaws private discrimination in advertising, terms of sale or rental, blockbusting, and use of real estate services.</li> <li>3) Exemption for individual owners of single-family home (where no real estate broker is used) if owner does not own more than three such homes.</li> <li>4) Exemption for housing operations by qualifying religious groups or private clubs.</li> </ol>
1968	<b>Architectural Barriers Act</b>	Requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.
1972	<b>Education Amendment (Title IX)</b>	Prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.
1973	<b>Rehabilitation Act (Section 504)</b>	Prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance, including housing.
1974	<b>Equal Credit Opportunity Act (ECOA)</b>	Prohibits credit discrimination in housing, based upon race, color, religion, national origin, sex, marital status or age.
1974	<b>Housing and Community Development Act of 1974</b>	<ol style="list-style-type: none"> <li>1) Expands Fair Housing Act to include prohibition of sex discrimination in housing.</li> <li>2) Creates "Section 8" programs.</li> <li>3) Establishes Block Grant program and Urban Development Action Grant program.</li> </ol>
1975	<b>The Age Discrimination Act</b>	Prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.
1980	<b>Executive Order 12259</b>	Expands protection to include sex-based discrimination and grants HUD additional authority to issue additional regulations.

1988	<b>Fair Housing Amendments</b>	<ol style="list-style-type: none"> <li>1) Broadens Title VIII to include protected classes of <i>handicapped</i> persons and <i>familial status</i> (with exception of older person housing).</li> <li>2) Mandates handicapped accessibility requirements for new multi-family properties, and permits handicapped tenants to modify existing housing (at tenant's expense).</li> <li>3) Increases civil and administrative enforcement relating to potential damages and attorney's fees.</li> </ol>
1990	<b>Americans with Disabilities Act</b>	Further prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodation, commercial facilities, and transportation.
1994	<b>Executive Order 12892</b>	Requires federal agencies to affirmatively further fair housing as part of their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort.
1994	<b>Executive Order 12898</b>	Requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.
2000	<b>Executive Order 13166</b>	Eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.
2001	<b>Executive Order 13217</b>	Requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.
2013	<b>Violence Against Women Reauthorization Act of 2013 (VAWA 2013)</b>	Expands HUD's authority to protect survivors of domestic and dating violence, stalking, and sexual assault who are residing in housing assisted by HUD.

## B. State Law

Ohio's state law governing fair housing is substantially equivalent to federal Fair Housing laws. When HUD determines that state or local laws are substantially equivalent it means that those laws provide substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. The law in Ohio in addition to being substantially equivalent actually offers broader protection than the federal Fair Housing Act. The **Ohio Revised Code 4112.02(H)** expands federal protection by also prohibiting discrimination based on "*ancestry*" and "*military status*." Additionally, Ohio law offers greater protection covering more housing types. Unlike federal law, exclusions under Ohio law are very limited. For example, the "Mrs. Murphy" exemption (for an owner occupied building with no more than four families living independently of each other) and the exemption for the sale and rental of an owner's single-family home are not included under Ohio's Fair Housing law.<sup>36</sup>

### Enforcement

In Ohio, the Ohio Civil Rights Commission (OCRC) is the agency with the primary responsibility of handling fair housing discrimination complaints.<sup>37</sup> Ohio is one of the states with the longest civil rights enforcement mechanism in the country, starting with the enactment of the Ohio Public Accommodations Law of 1884 and the creation of the Ohio Civil Rights Commission (OCRC).

The Ohio Civil Rights Commission was established as a result of the Ohio Civil Rights Act, signed into law in 1959. Originally named the Ohio's Fair Employment Practices Commission, in 1961 it was renamed the Ohio Civil Rights Commission. The Ohio legislature has granted authority to the OCRC to study, advise and issue statements regarding all civil rights related matters of the State. The primary goal of the OCRC is to eliminate discrimination, including housing discrimination, throughout the State of Ohio.

### Complaint Process

An individual may file a charge of discrimination with the Ohio Civil Rights Commission by visiting an office in person or online. Once a charge of discrimination is received, the case is assigned to a Civil Rights Field Investigator. Voluntary mediation is first attempted but if mediation is not successful or one of the party declines to participate, a full investigation is conducted. Based on the conclusion of the investigation, the OCRC

<sup>36</sup> <http://hud.gov/offices/ftheo/library/fhsymposium.pdf>.

<sup>37</sup> <http://crc.ohio.gov> ; See also <http://portal.hud.gov/hudportal/HUD?src=/states/ohio/working/localpo/ftheo>.

will issue a written recommendation as to whether there is a violation of Ohio's Laws against discrimination followed by any other necessary action.<sup>38</sup>

**Contact Information for State Complaints:**

Ohio Civil Rights Commission  
1-888-278-7101  
www.crc.ohio.gov

**Chronological Summary of Ohio Laws Against Discrimination:**<sup>39</sup>

**July 29, 1959**

Enactment of Ohio's Fair Employment Practices Law prohibiting discrimination by reason of race, color, religion, national origin or ancestry. The Ohio Civil Rights Commission was established by the Ohio Legislature as the State Agency responsible for enforcing laws against discrimination.

**October 24, 1961**

Enactment of law prohibiting discrimination in places of public accommodation.

**October 30, 1965**

Enactment of law prohibiting discrimination in housing - limited to commercial housing. This designation excluded all residences designed for two families or less which were occupied by owner.

**November 12, 1969**

Law amended and broadened to include all housing types.

**December 19, 1973**

Enactment of law prohibiting discrimination by reason of sex.

**January 14, 1976**

Enactment of law prohibiting discrimination in credit transactions.

**July 23, 1976**

Enactment of law prohibiting discrimination by reason of disability.

<sup>38</sup> <http://crc.ohio.gov/FilingaCharge/WhatHappensNext.aspx>

<sup>39</sup> Ohio State Legal Services Association. *History of Fair Housing in Ohio*. Ohio Development Services Agency, 1999. Web.

**August 18, 1976**

Enactment of law prohibiting age discrimination in credit transactions.

**November 13, 1979**

Law prohibiting discrimination by reason of age broadened.

**July 26, 1984**

Enactment of law prohibiting discrimination by institutions of higher education by reason of handicap.

**September 28, 1987**

Housing discrimination law amended and broadened.

**May 31, 1990**

Age law amended to read 40 and above.

**June 30, 1992**

Housing law amended to add *familial status* as a protected class to bringing state law conforming to federal Fair Housing Act. State law also amended to bring it into conformity with 1990 Americans with Disabilities Act.

**December 16, 1999**

H.B. 264 changes the word "*handicap*" to "*disability*" throughout the Ohio Revised Code. Currently, the term handicap is defined as a physical or mental impairment that substantially limits one or more major life activities, including the functions of caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

**May 17, 2007**

Governor Ted Strickland signed Executive Order 2007-10S establishing a policy against discrimination based on sexual orientation or gender identity by the State of Ohio Cabinet agencies, Boards, or Commissions in making the following employment-related decisions: hiring, layoff, termination, transfer, promotions, demotions, rate of compensation, or eligibility for in-service training programs.

**March 24, 2008**

The "Ohio Veterans Package (Sub. H.B. 372) was signed. "*Military status*" is added to the list of protected classes under R.C. 4112.02. The Act defines "*military status*" as a "*service in the uniformed services,*" including voluntary or involuntary service in the U.S. armed force, full-time National Guard duty, and duty or training for the State of Ohio.

### C. City of Lorain: Fair Housing Laws

The City of Lorain enacted its Fair Housing Ordinance in 1977.<sup>40</sup> That ordinance was most recently amended in 2008 and 2013, in order to become equivalent to the federal Fair Housing Act. Currently, the City of Lorain Fair Housing law offers greater protection than the federal Fair Housing Act.

#### City of Lorain Fair Housing Ordinance

The City of Lorain, **Fair Housing Ordinance – Chapter 136**, offers broader protection than the federal Fair Housing Act by including additional protected classes. The current ordinance prohibits discrimination in the sale or rental of housing, brokerage services or financing, based on an individual's *race, sex, color, religion, national origin, disability, and familial status*, in addition to *marital status, ethnic group, ancestry, sex orientation, age, and Vietnam-era or disabled or disabled veteran status*.

#### Fair Housing Board

The City's Fair Housing Ordinance established a Fair Housing Board. The Fair Housing Board is composed of volunteer members, appointed by the City of Lorain's Mayor. The Fair Housing Board has the responsibility to administer the provisions of the City's Ordinance and to adjudicate complaints alleging violations under the Ordinance. Previously, the Fair Housing Board has subcontracted with other agencies in order to provide fair housing services. Subcontracted agencies have conducted various Fair Housing activities but those agencies lacked the capacity to process Fair Housing Complaints directly under the City's Ordinance. For this reason, the Fair Housing Board has not held any administrative hearing since the enactment of the Ordinance. In order to have the capability of processing complaints and increase compliance within the duty to Affirmatively Furthering Fair Housing, the City added the position of a Fair Housing Administrator as part of the City of Lorain's Building Housing & Planning Department as of 2015.<sup>41</sup> The appointed Fair Housing Administrator is responsible for receiving and processing complaints on behalf of the Fair Housing Board. Additionally, the Fair Housing Administrator, among other duties, conducts community outreach events and educational activities.

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<sup>40</sup> Chapter 136

<sup>41</sup> City of Lorain Codified Ordinance No. 45-15. Passed 4/20/2015.

### Complaint Process

The following is a summary of the discriminatory complaint process, for any person alleging a violation under the City's **Fair Housing Ordinance - Sections 136.06 to 136.13**:

- The City's Fair Housing Complaint form must be completed and submitted, within one year of the alleged violation, to the Fair Housing Board or to the Fair Housing Administrator, in order to initiate the discriminatory complaint process.
- Upon the filing of a complaint, the Fair Housing Administrator will acknowledge the receipt of the complaint and serve notice of time limits, along with notice of procedural rights and obligations to all parties within 10 days. The respondent has the right to answer the complaint within 10 days of receipt.
- An investigation, primarily conducted by the Administrator, will commence within 30 days after the complaint has been received.
- Conciliation will be attempted beginning with the receipt of the complaint. If conciliation, through conference, conciliation, or persuasion fails and the investigation concludes, then a determination of reasonable grounds will be completed by the Administrator.
- Before the investigation is complete an informal conciliation may be reached.
- After the conclusion of the investigation if it is determined that there are reasonable grounds, the Administrator shall issue a charge and forward the complaint to the Fair Housing Board for a hearing. If there are no reasonable grounds, a notice of dismissal will be issued to all parties within five days.
- A request for reconsideration of a dismissal may be made within 14 days of receipt of the dismissal.
- If an agreement is reached after the investigation is completed, the terms of the conciliation agreement will be reduced to writing and incorporated into a consent agreement signed by the parties.
- If a charge is issued, either party, in lieu of participating in the administrative hearing process by the Fair Housing Board, may elect to have the case heard as part of a civil action. Such civil action shall be maintained on behalf of the aggrieved person at the expense of the City. Such election must be made within 20 days after the receipt of the charge.
- Prior to the conclusion of a hearing, the parties may request the Board to issue subpoenas for individuals or documents. The parties may appear before the Board in person or by duly authorized representative. Also, the parties

have the right to present witness and to cross-examine witnesses.

Additionally, all testimony and evidence shall be given under oath or by affirmation as part of the hearing process.

- If after a hearing, the Board finds an unlawful practice, it may: (1) order the respondent to permit the complainant such rights or privileges as that were allegedly violated (2) order respondent to perform an affirmative act that would otherwise have been performed had the complainant not been discriminated against (3) issue a cease and desist order, or take any other remedial action, as deemed appropriate, according but not limited to Section 136.12.
- At any time the Board may grant injunctive relief.
- Additionally, if the respondent fails to comply with any orders of the Board, or an investigation and a hearing finds a Fair Housing violation, the case and/or complaint may be transferred to the Director of Law, by the Board, so that a complaint is filed with the court of competent jurisdiction.
- Upon a final determination, a complainant has the right to seek any remedy to which he or she might otherwise be entitled and may file a complaint with any other agency or court of law.
- A final administrative adverse disposition by the Board may be appealed pursuant the Ohio Revised Code Chapter 2506 or in such other forum or court of competent jurisdiction as provided by law.

### **Complaints Filed in the City of Lorain**

Since the City of Lorain now has the capability of processing and investigating complaints under the City's Ordinance, due to the added Fair Housing Administrator position, the first Fair Housing Complaint was filed during 2015. This was the first internally processed complaint since the enactment of the City's Fair Housing Ordinance in 1977. The basis of the complaint was alleged *familial status* and *sex* (gender) discrimination. Upon conciliation, all issued were resolved favorably and the file was closed.

**Complaints Filed with HUD**

The following table illustrates all complaints filed federally with HUD's Office of Fair Housing & Equal Opportunity by residents of the City of Lorain between January, 2004 and July, 2014.

City of Lorain Complaints Filed 2004-2014

HUD FILE NUMBER	HUD DATE FILED	ISSUES DESCRIPTION	BASIS	STATUS
05-04-0547-8	1/14/2004	- Discriminatory refusal to rent - Discrimination in terms/conditions/privileges relating to rental	Race	No Cause
05-04-1521-8	5/28/2004	- Discriminatory acts under Section 818 (coercion, etc.)	Race	Administrative Closure
05-04-1057-8	5/21/2004	- Failure to permit reasonable modification	Disability	Conciliated
05-04-1268-8	9/2/2004	- Discriminatory refusal to rent	Race	Withdrawn with Resolution
05-05-0021-8	10/14/2004	- Discrimination in services and facilities relating to sale	Disability	Conciliated
05-05-0579-8	12/9/2004	- Discriminatory refusal to rent - Discriminatory acts under Section 818 (coercion, etc.)	Familial Status	Administrative Closure
05-05-0582-8	12/16/2004	- Discriminatory refusal to rent	Race	No Cause
05-05-0521-8	2/1/2005	- Discriminatory refusal to rent	Retaliation	Conciliated
05-05-0461-8	2/8/2005	- Discrimination in terms/conditions/privileges relating to rental - Discriminatory acts under 818 (coercion, etc.)	Race, Disability, Religion	No Cause
05-05-0675-8	3/2/2005	- Discriminatory acts under Section 818 (coercion, etc.)	Retaliation	Conciliated
05-05-0676-8	3/3/2005	- Discriminatory refusal to rent	Race	No Cause

05-05-0873-8	4/27/2005	- Discriminatory acts under Section 818 (coercion, etc.)	National Origin	Administrative Closure
05-05-1436-8	7/29/2005	- Failure to make reasonable accommodation	Disability	Withdrawn with Resolution
05-06-0122-8	10/12/2005	- Discriminatory acts under Section 818 (coercion, etc.)	Retaliation	No Cause
05-06-0816-8	2/23/2006	- Failure to make reasonable accommodation	Disability	Administrative Closure
05-06-0682-8	3/1/2006	- Discriminatory financing	Race	No Cause
05-06-1143-8	4/24/006	- Discriminatory terms, conditions, privileges, or services and facilities - Discrimination in terms/conditions/privileges relating to rental	Race, Religion, Retaliation	No Cause
05-06-1144-8	4/24/2006	- Discriminatory refusal to negotiate for rental - Other discriminatory acts	Race, Color Retaliation	No Cause
05-06-1930-8	8/15/2006	- Discriminatory refusal to rent - Discriminatory terms, conditions, privileges, or services and facilities	Race, Familial Status, National Origin, Sex, Color, Retaliation	No Cause
05-08-0438-8	1/18/2008	- Discriminatory refusal to rent and negotiate for rental	Race	No Cause
05-08-0348-8	12/14/2007	- Discriminatory refusal to rent	Sex	Conciliated
05-08-1184-8	4/28/2008	- Discriminatory refusal to negotiate for sale	Race, National Origin, Sex	No Cause
05-08-1196-8	4/28/2008	- Discrimination in terms/privileges relating to sale	Race, National Origin, Sex	No Cause
05-09-0480-8	12/8/2008	- Discrimination in terms/conditions/privileges relating to rental	Sex, Retaliation	Conciliated

05-09-1689-8	8/18/2009	- Discriminatory advertising, statements and notices - Discrimination in terms/conditions/privileges relating to rental - Failure to make reasonable accommodation	Disability	Withdrawn with Resolution
05-10-0481-8	1/8/2010	- Discriminatory refusal to rent	Race, Disability, Retaliation	No Cause
05-09-0480-8	12/8/2008	- Discrimination in terms/conditions/privileges relating to rental	Sex, Retaliation	Conciliated
05-09-1689-8	8/18/2009	- Discriminatory advertising, statements and notices - Discrimination in terms/conditions/privileges relating to rental - Failure to make reasonable accommodation	Disability	Withdrawn with Resolution
05-10-0481-8	1/8/2010	- Discriminatory refusal to rent	Race, Disability, Retaliation	No Cause
05-09-0480-8	12/8/2008	- Discrimination in terms/conditions/privileges relating to rental	Sex, Retaliation	Conciliated
05-09-1689-8	8/18/2009	- Discriminatory advertising, statements and notices - Discrimination in terms/conditions/privileges relating to rental - Failure to make reasonable accommodation	Disability	Withdrawn with Resolution
05-10-0481-8	1/8/2010	- Discriminatory refusal to rent	Race, Disability, Retaliation	No Cause

05-09-0480-8	12/8/2008	- Discrimination in terms/conditions/privileges relating to rental	Sex, Retaliation	Conciliated
05-09-1689-8	8/18/2009	- Discriminatory advertising, statements and notices - Discrimination in terms/conditions/privileges relating to rental - Failure to make reasonable accommodation	Disability	Withdrawn with Resolution
05-10-0481-8	1/8/2010	- Discriminatory refusal to rent	Race, Disability, Retaliation	No Cause
05-10-1158-8	6/2/2010	- Otherwise deny or make housing unavailable	National Origin	N Cause
05-10-1465-8	7/22/2010	- Discriminatory refusal to rent	Race, Sex	Administrative Closure
05-11-0898-8	10/26/2010	- Discriminatory terms, conditions, privileges, or services and facilities	Sex, Retaliation	No Cause
05-11-1618-8	8/19/2011	- Failure to make reasonable accommodation	Disability	Withdrawn with Resolution
05-12-0888-8	5/24/2012	- Discriminatory advertisement	Familial Status	Conciliated
05-10-1158-8	6/2/2010	- Otherwise deny or make housing unavailable	National Origin	No Cause
05-10-1465-8	7/22/2010	- Discriminatory refusal to rent	Race, Sex	Administrative Closure
05/11/0898-8	10/26/2010	- Discriminatory terms, conditions, privileges, or services and facilities	Sex, Retaliation	No Cause

## Outreach and Education

In order to continue furthering fair housing more effectively, instead of contracting out an internal position of a Fair Housing Administrator was created. The primary purpose of the Fair Housing Administrator is to work with the City's Fair Housing Board, enforce the City's Fair Housing Ordinance and conduct activities that would create awareness regarding Fair Housing laws.

During the past year, some of the actions by the City's Fair Housing Administrator in order to continue affirmatively furthering fair housing include:

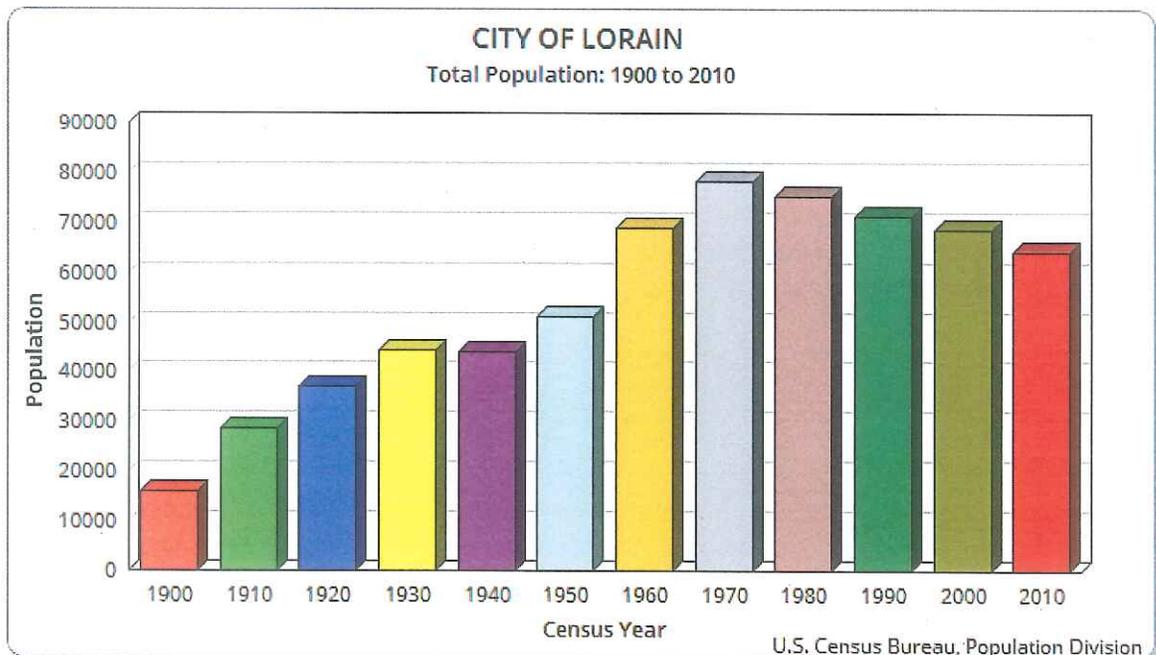
- The creation of a Bilingual, English and Spanish, Fair Housing Complaint Form.
- Employee training at local community organizations, on fair housing laws.
- The distribution of literature, flyers, and the Fair Housing Complaint Form to local libraries and organizations.
- Screening local newspapers and Internet advertisement periodically to ensure compliance with Fair Housing federal, state and local laws.
- A free Fair Housing Conference, during the Fair Housing Month of April.
- Attending and guiding individuals that have called or came to City Hall seeking assistance regarding Fair Housing or housing in general.
- Conducting a Fair Housing Poster Contest, in which students 4<sup>th</sup> to 8<sup>th</sup> grade that live in the City participated, with the winning student being recognized by the City and artwork used as part of a Fair Housing Billboard.
- The use several Billboards through the City, using the artwork of the Fair Housing Poster Winner, in order to create awareness of local Fair Housing resources available within the City.
- Processing the City's first Fair Housing Complaint filed internally, which was handled successful through mediation.
- Reviewing and successfully influencing the Lorain Metropolitan Housing Authority into updating their definition of "family" and other terms, in order to comply and mirror fair housing laws.
- Being able to assist people seeking assistance in Spanish or that preferred Spanish, as a fully Bilingual Fair Housing Administrator.
- Working towards completing a new Analysis of Impediments to Fair Housing Choice for the City of Lorain.

III. JURISDICTIONAL BACKGROUND DATA

The history of the City of Lorain can be traced back to the early part of the 19<sup>th</sup> century. The City of Lorain is situated on Lake Erie at the mouth of Black River, in Lorain County. Originally, the City was established as a trading post in 1807 known as Canesadooharie. Later the name was changed to Charlestown, and the City became known as Lorain in 1874. During the City’s early existence it was known as a small finishing and boating community. The coming of the railroad spurred economic development and population expansion in 1872, which was followed by the production of steel beginning in 1894. Following the first and second world wars, the minority population in the City expanded considerable because of the availability of manufacturing jobs. During and after the Second World War the availability of manufacturing jobs increased greatly, which African-Americans and Hispanic/Latinos to relocate to Lorain for employment.

Population

The population of the City of Lorain had a steady population growth from the 1940’s through the 1970’s. The City has since that time had a small population decline continuing through present.



## City of Lorain: Total Population 1900 to 2010

1900	1910	1920	1930	1940	1950	1960	1970	1980	1990	2000	2010
16,028	28,883	37,295	44,512	44,125	51,202	68,932	78,185	75,416	71,245	68,652	64,097

As of 2014, the City was home to a population of 63,776. According to the Census data, the City is expected to continue slightly losing population

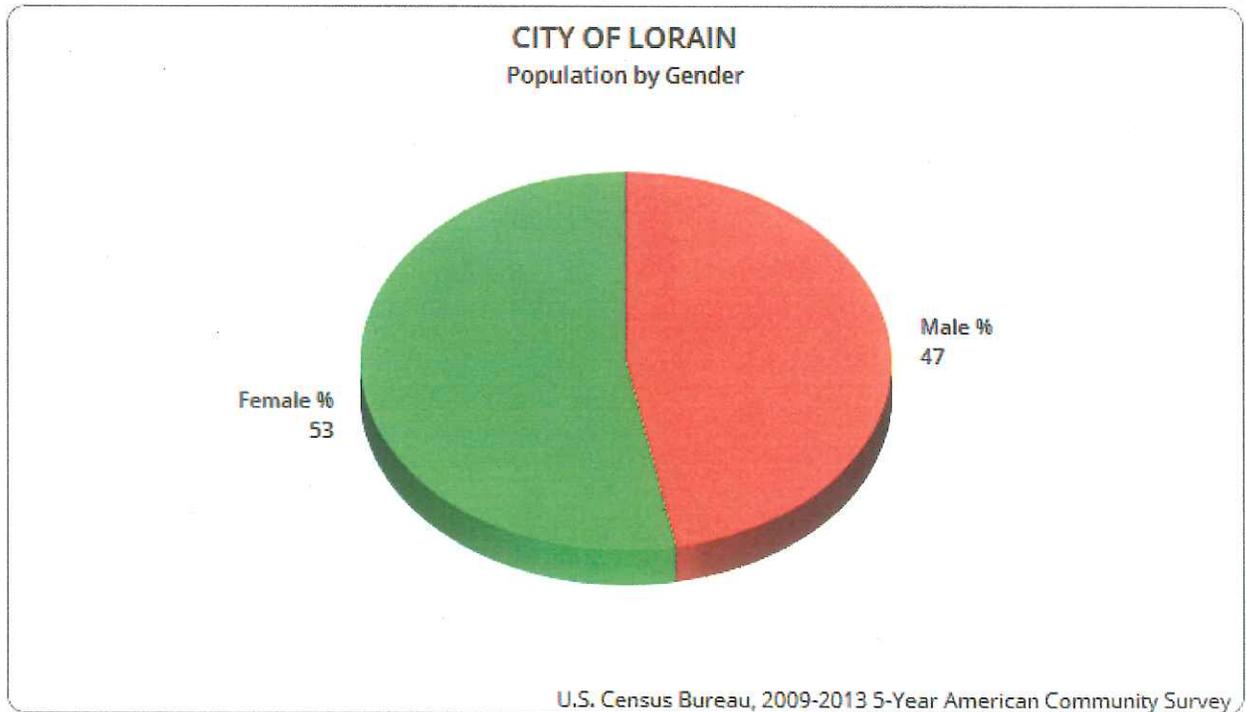
## Annual Estimates of Resident Population: April 1, 2010 to July 1, 2014

	2010 Census	Population Estimates:	(as of July 1)			
	<i>April 1</i>	2010	2011	2012	2013	2014
City of Lorain, OH	64,097	64,081	63,968	63,778	63,748	63,776

The City’s population is 53% female and 47% male. According to the Census this ratio has remained relatively steady over the past most recent years.

Population by Gender

	Male	Female
City of Lorain	29,965	34,052



People with Disabilities constitute 19.2% of the City's population. There are various disability types but the most common is ambulatory difficulty with 10.4% of the population.<sup>42</sup> The second highest is cognitive difficulty at 8.84% of all disabilities, which may have implications for the need for supportive housing.

City of Lorain: Disability by Type

Disability Type	#	%
Hearing Difficulty	2,945	4.98
Vision Difficulty	2,185	3.70
Cognitive Difficulty	5,224	8.84
Ambulatory Difficulty	6,144	10.4
Self-Care Difficulty	1,975	3.34
Independent Living Difficulty	4,144	7.01

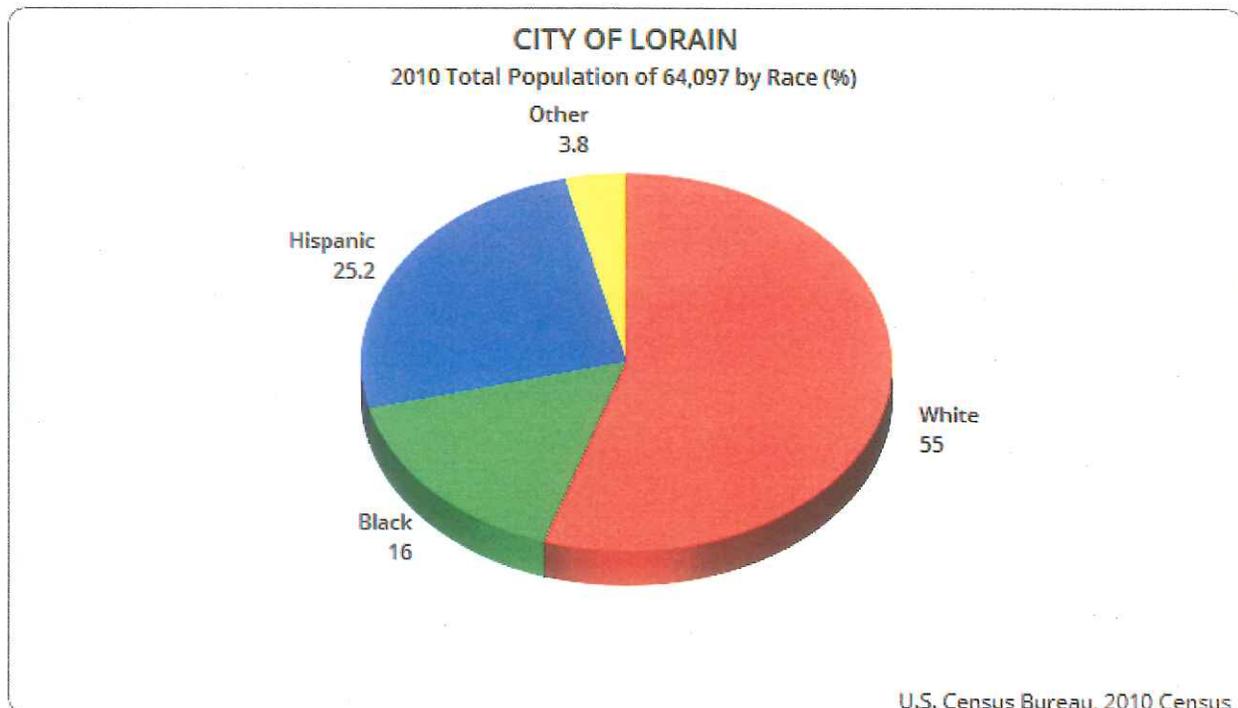
Source: Decennial Census, ACS

<sup>42</sup> U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates.

The City of Lorain has historically had a larger minority population than the rest of Lorain County. Its residents and local community sometimes call Lorain the “International City” because it is a City with lots of different ethnic cultures and groups.

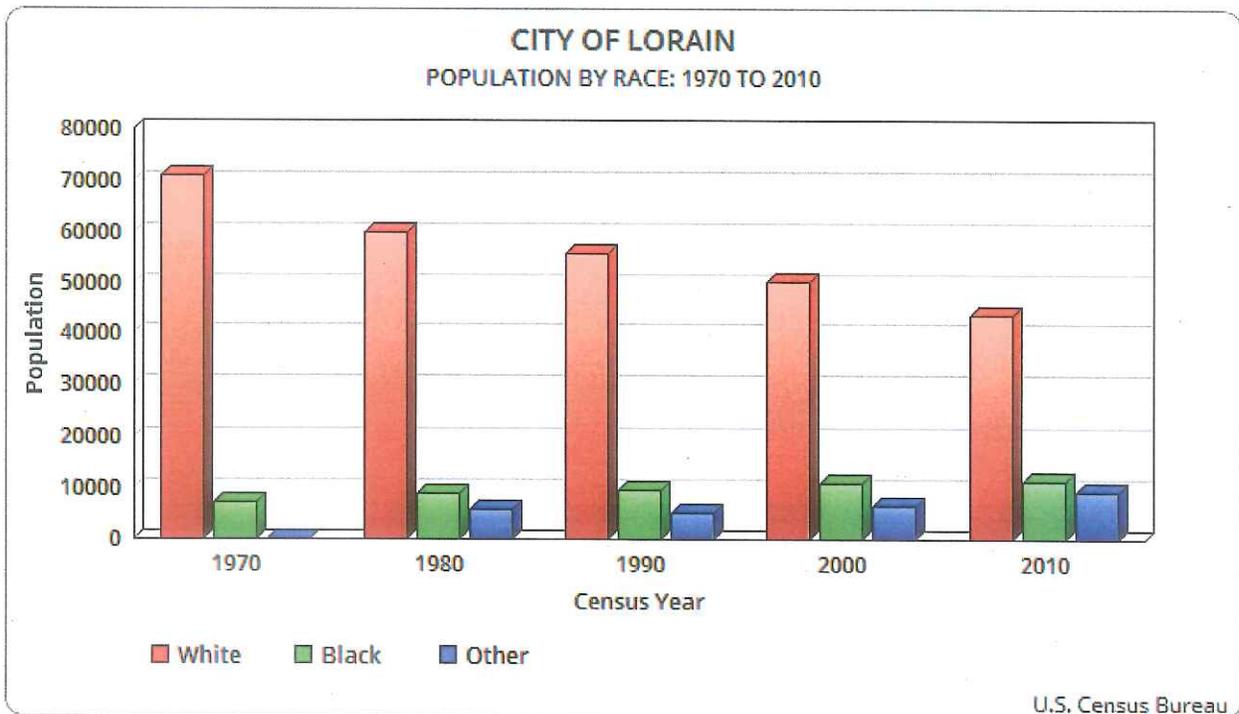
Demographics: Race/Ethnicity

Race/Ethnicity	Lorain, OH	
	#	%
White, Non-Hispanic	35,269	55.00
Black, Non-Hispanic	10,269	16.00
Hispanic	16,177	25.20
Asian, Non-Hispanic	206	.30
Other, Non-Hispanic	2,176	3.50

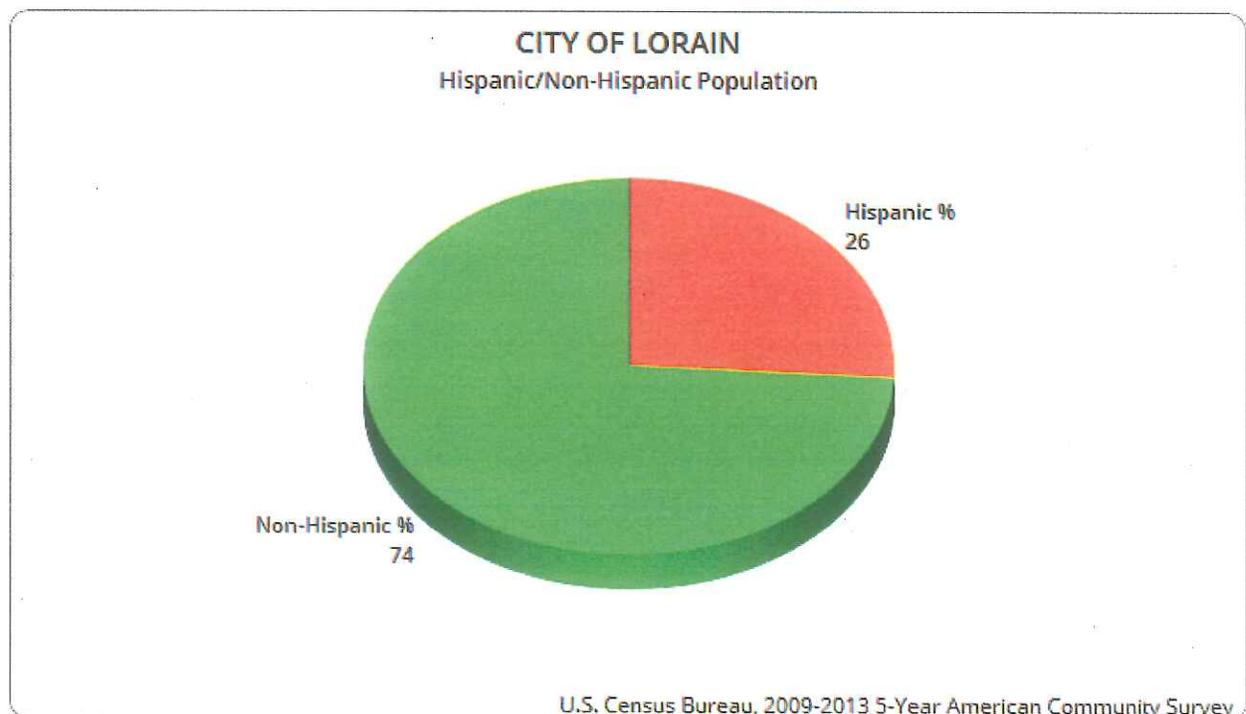
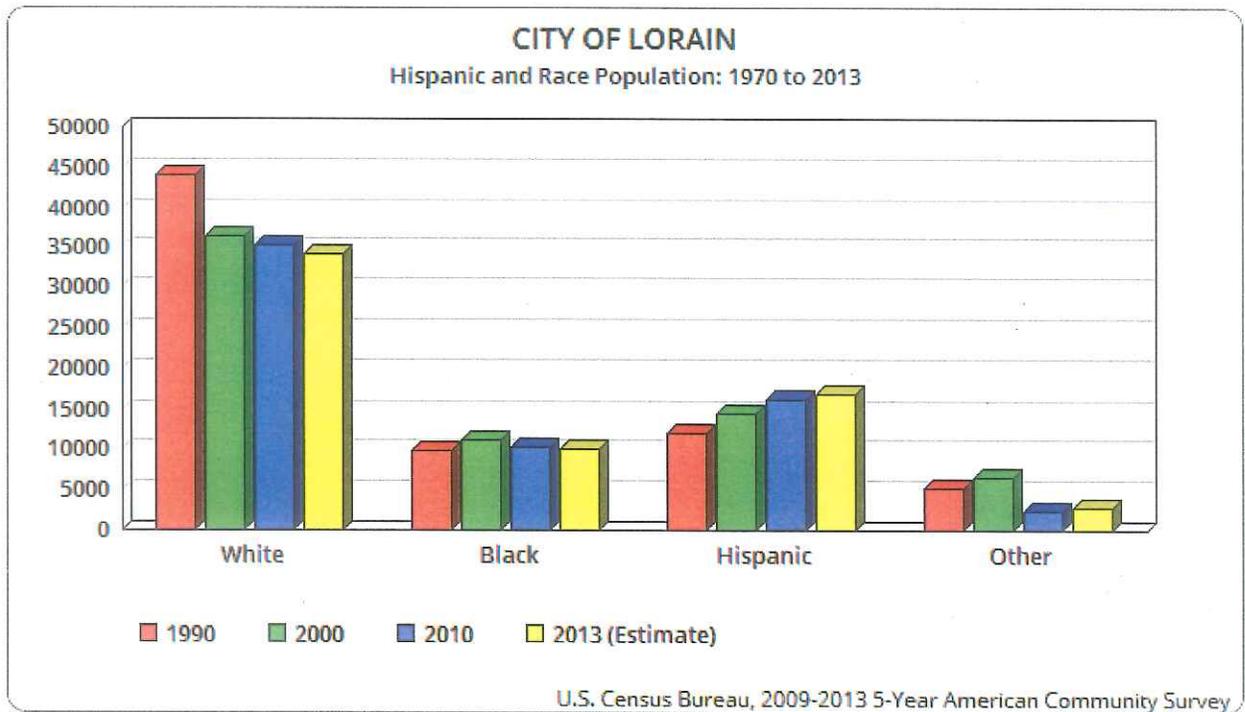


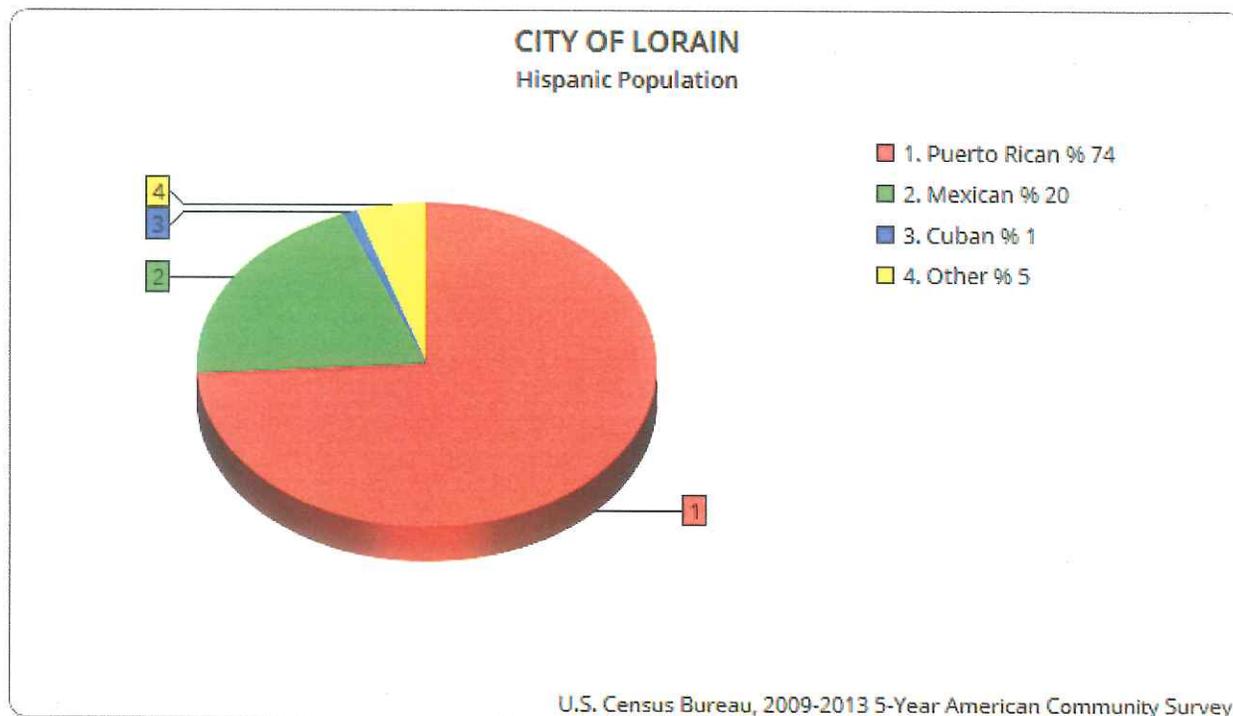
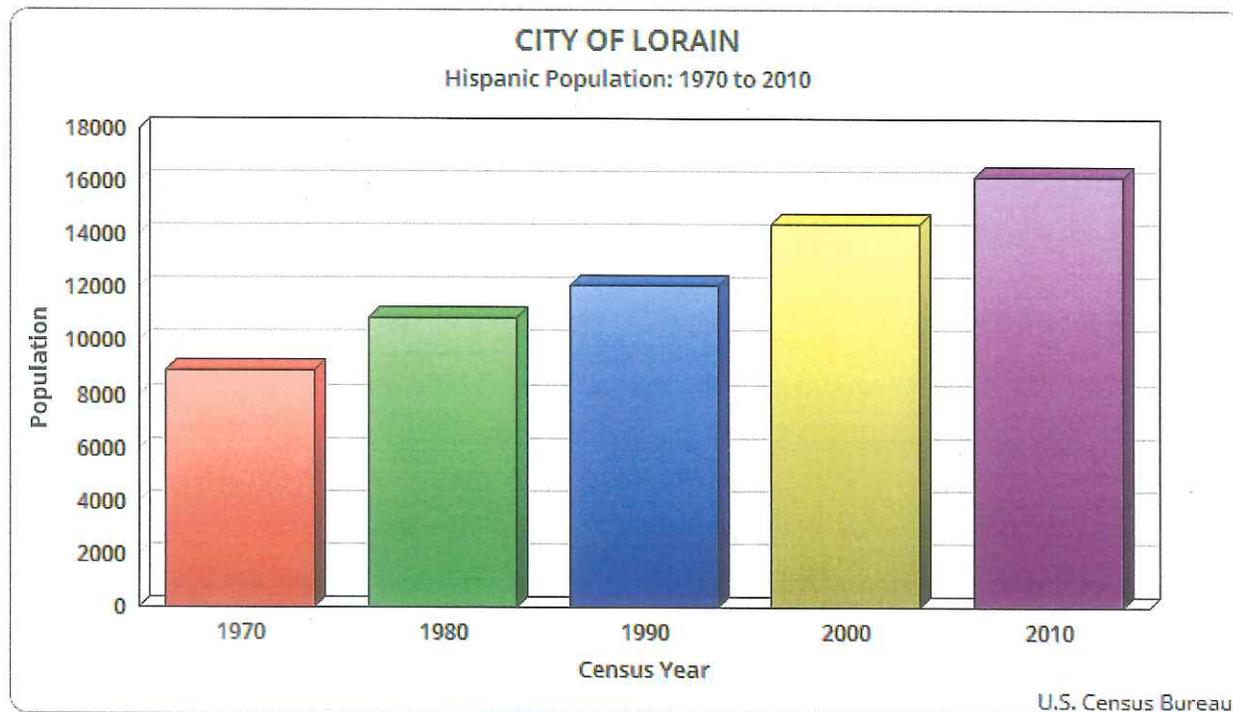
In terms of racial and ethnic percentage the greatest increase is credited to the “other race” population. The “other race” option encompasses individuals who do not identify solely within any of the listed race options. Respondents reporting entries such as multiracial, mixed, interracial, or a Hispanic or Latino group (for example, Mexican, Puerto Rican, Cuban, or Spanish) in response to the race question are included in this category.

The City of Lorain has the largest African American population of the rest of Lorain County. Additionally, the City of Lorain has the largest Puerto Rican population between New York and Chicago.

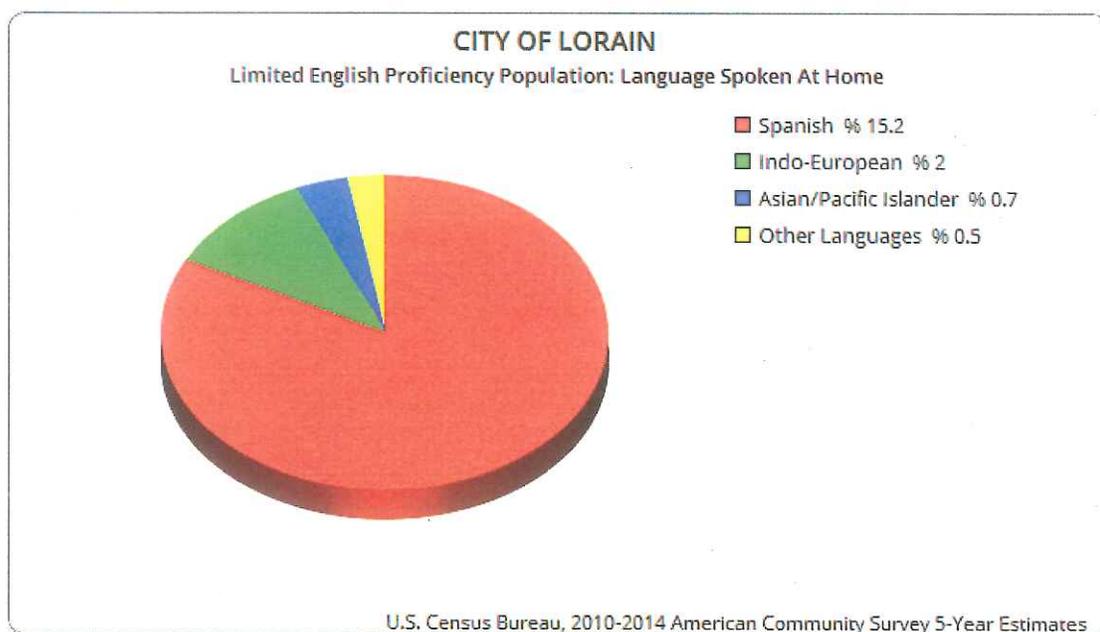
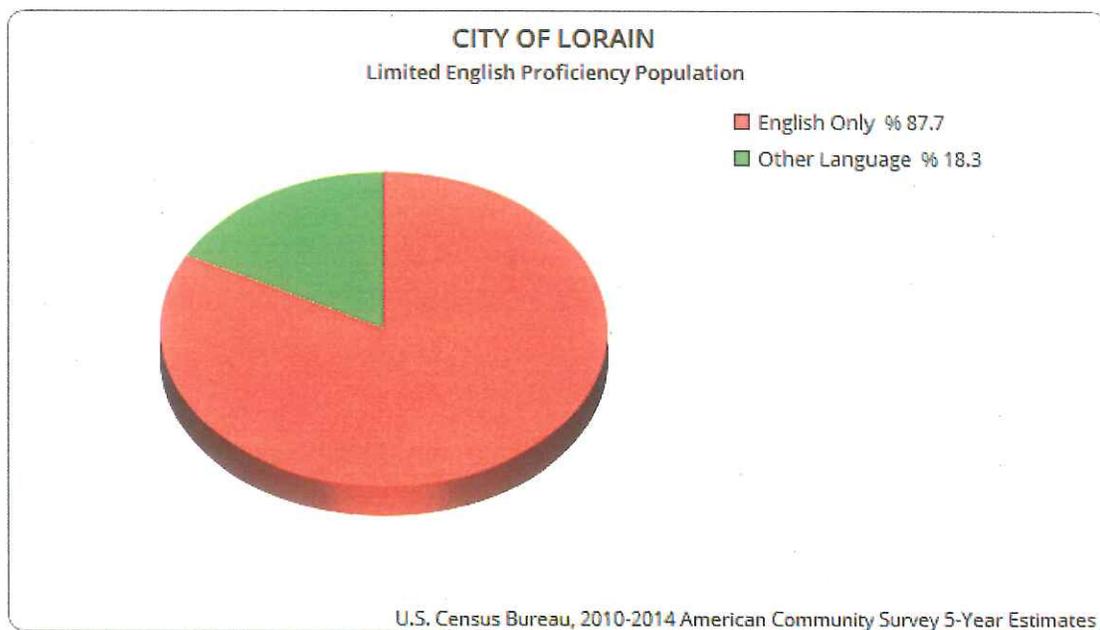


The Hispanic population in the City of Lorain has consistently increased since the 1970's.





The limited English proficiency population of the City of Lorain is 18.3%. Spanish is by far the language most spoken at home for those with limited English proficiency with 15.2% of the population speaking Spanish at home.



The following table illustrates the different ancestry percentages in the City of Lorain.

City of Lorain: Ancestry

ANCESTRY	Percentage
American	5.4%
Arab	0.4%
Czech	0.3%
Danish	0.1%
Dutch	0.7%
English	6.4%
French (except Basque)	1.1%
French Canadian	0.2%
German	14.1%
Greek	0.8%
Hungarian	4.2%
Irish	11.8%
Italian	8.3%
Lithuanian	0.3%
Norwegian	0.1%
Polish	6.9%
Portuguese	0.1%
Russian	0.6%
Scotch-Irish	0.5%
Scottish	1.2%
Slovak	2.6%
Subsaharan African	0.9%
Swedish	0.3%
Swiss	0.2%
Ukrainian	0.7%
Welsh	0.4%
West Indian (excluding Hispanics)	0.2%

Source: U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates

#### IV. FAIR HOUSING Current and Emerging Problems

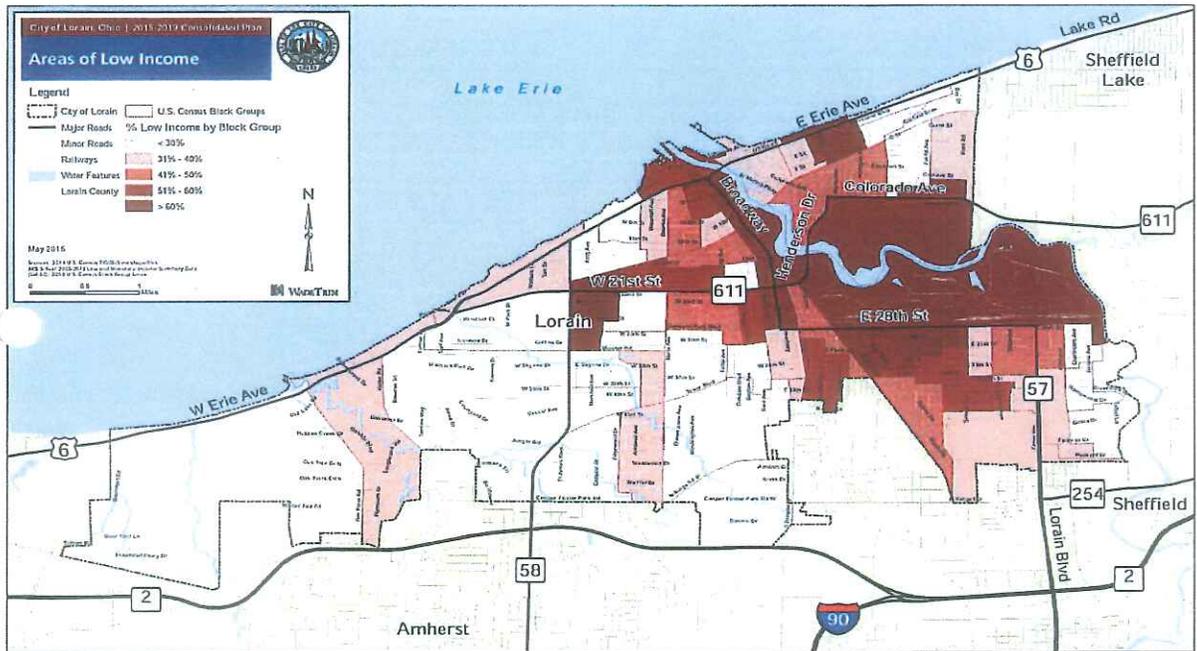
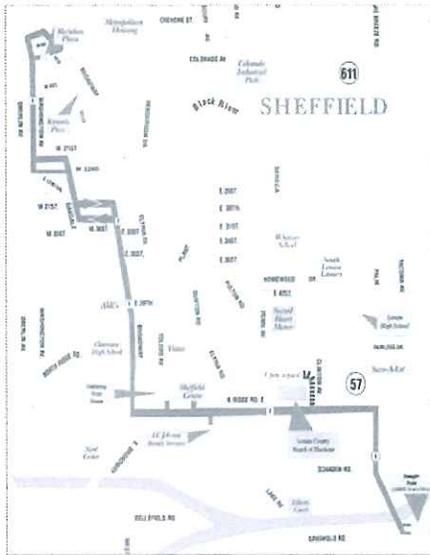
##### A. Transportation

Transportation is important in relation to housing choice since it often influences where people can or cannot live. Additionally, the availability of varied transportation routes and options is essential to furthering fair housing within a jurisdiction. The issue at hand regarding the connection between transportation and fair housing choice focuses on the ease with which residents that live in lower-income or minority-concentrated areas can travel back and forth between work and home, and the availability of different transportation options that citizens of these neighborhoods may have to travel to other areas of the City of Lorain, or other areas in general, as needed. When transportation routes do not connect concentrated areas of lower-income or minority households to commercial areas, then a majority of lower-income or minority residents are limited to where they may shop for goods or services, attend school, or where they can seek employment.

The availability of public transportation plays a vital role in increasing access to the supply of affordable housing to groups in need and others protected by Fair Housing laws. When residents have access to an effective public transportation system, they are able to easily travel between home and work or other destinations without having to add personal vehicle expenses to their household budget, which is a particularly advantage to low- and moderate income households.

Currently, the Lorain County Transit provides public transportation services to the City of Lorain. However, there are only two routes in the City as illustrated below. The two available routes are very limited, making them inaccessible and not a reliable source of transportation, for many residents in need of public transportation. Moreover, the current routes are extremely limited in relation to the City's low-income and minority-concentrated areas as the map below shows.

Lorain Route 1 and 2<sup>43</sup>



<sup>43</sup> Lorain County, "Fixed Bus Route Information from the Lorain County Transit," [www.loraincounty.us](http://www.loraincounty.us). Retrieved from: <http://www.loraincounty.us/commissioners-departments/transit/lct-bus-routes>



According to the most recent American Community Survey, the mean travel time for people in the City of Lorain is 23.5 minutes.<sup>44</sup> Moreover, out of the 24,547 workers 16 years of age or over 23,266 (95%) drove alone or carpooled as of the latest Survey. Therefore, in the City of Lorain the vast majority of residents seem to require a car for work and most purposes.

Limited availability of public transportation severely affects low- and moderate-income people since they typically cannot afford to purchase and maintain a vehicle.<sup>45</sup> In addition to low- and moderate-income people, another group that tends to lack access to cars is people with disabilities. People with disabilities consistently indicate that lack of transportation is a major barrier to accomplishing tasks necessary to daily life.<sup>46</sup>

Moreover, according to WalkScore.com the City of Lorain is a “Car-Dependent City” with a Walk Score of 36 out of 100.<sup>47</sup> Walkscore.com is a website that allocates a walk score number to cities. This score is determined upon an analysis of how pedestrian-friendly an area is based on the proximity of many important amenities. For the City of Lorain the Downtown area is the most walk able area with a walk score of 39. In comparison, looking at a City with a robust public transportation system, the City of Cleveland has a walk able score of 59. Cleveland’s downtown area has a walk able score of 90 and Ohio City, one of its small neighborhoods, has a walk score of 78.

The low walkability score of the City of Lorain, along with the limited availability of public transportation, and current use of a car, indicates that low- and moderate-income residents, many of which are from minority populations, the disabled, and the elderly<sup>48</sup>, could benefit from expanded public transportation availability.

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<sup>44</sup> U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates.

<sup>45</sup> The Brookings Institute reports that nationally 27 percent of households with annual incomes below \$20,000 do not own a car. See Margy Waller, “High Cost or High Opportunity Cost? Transportation and Family Economic Success,” Brookings Institute, December 2005, 1, <http://www.brookings.edu/es/research/projects/wrb/publications/pb/pb35.pdf>.

<sup>46</sup> In a 2004 national poll a third of people with disabilities polled indicated access to transportation was an issue for them. See Institute of Medicine (US) Committee on Disability in America; Marilyn J. Field and Alan M. Jette, eds., *The Future of Disability in America*, Section G: Transportation Patterns and Problems of People with Disabilities, 1, (Washington, D.C.: National Academies Press (US), 2007), available from <http://www.ncbi.nlm.nih.gov/books/NBK11420/>.

<sup>47</sup> Walk Score, “Living in Lorain,” [walkscore.com](http://walkscore.com). Retrieved from: <https://www.walkscore.com/OH/Lorain>

<sup>48</sup> The American Association for Retired Persons estimates that 20% of people over 65 do not drive and that this number will increase as the size of this demographic increases. Sally Abrahms, *Improving Transportation Services*

## B. Limited English Proficiency

Language diversity and rights has been a prevalent theme throughout the history of the United States of America. Moreover, language access rights have been asserted by courts and through legislation since the beginning of this Country. In 1780, during colonial times, an English language law attempted to create an official academy to “purify, develop, and dictate usage of” English-only in reaction to the diversity of language among the population.<sup>49</sup> At the time, Congress ultimately refused to pass the law due to possible infringement upon private Citizens’ individual Constitutional rights and liberties. Additionally, in 1923 the Supreme Court held in *Meyer v. Nebraska* that language restrictions in education settings violated the Due Process Clause of the 14<sup>th</sup> Amendment.<sup>50</sup> In *Meyer*, a teacher had been charged with violating a Nebraska law restricting non-English languages as a medium of study by allowing a student to read the Bible in German.<sup>51</sup> The Supreme Court recognized Nebraska’s desire for all of its citizens to speak English, but held that “this cannot be coerced by methods which conflict with the Constitution.”<sup>52</sup> Ultimately, the Supreme Court affirmed that “[t]he protection of the Constitution extends to all, to those who speak other languages as well as to those born with English on the tongue.”<sup>53</sup>

Jurisdictions, such as the City of Lorain, have the responsibility of overcoming Limited English Proficiency (LEP). Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin. In *Lau v. Nichols*, U.S. 563 (1974) the Supreme Court interpreted Title VI’s prohibition on discrimination on the basis of national origin, as prohibiting conduct that has a disproportionate effect on Limited English Proficiency individuals. The Court determined that a person’s language is so closely intertwined with his or her national origin, that language-based discrimination is effectively a proxy for national origin discrimination. Agencies and jurisdictions receiving federal funding who fail “to take affirmative steps to provide ‘meaningful opportunity’ for limited English proficient individuals to participate in its programs and activities

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for Seniors, AARP, <http://www.aarp.org/home-family/getting-around/info-04-2013/senior-independent-living-public-transportation.html>.

<sup>49</sup> Aka, P.C., Deason, L.M., “Culturally Competent Public Services and English-Only Laws,” 53 How. L.J. 53, 73 (2009).

<sup>50</sup> 262 US 390 (1923)

<sup>51</sup> *Id.*

<sup>52</sup> *Id.*

<sup>53</sup> *Id.*

violates the recipient's obligations under Title VI and its regulations."<sup>54</sup> The requirement to provide meaningful access to LEP people is the result of both HUD guidance on this issue and the duty of all recipients of federal financial assistance to affirmatively further fair housing.

People with Limited English Proficiency may have difficulty accessing a fair housing choice. For that reason, Executive Order 13166 (E.O. 13166) was issued in 2000 which requires recipients of federal funding to "take reasonable steps to ensure meaningful access to their programs and activities, by LEP persons." E.O. 13166 sets out the obligations of federal agencies and recipients of federal financial assistance, under Title VI. Pursuant to E.O. 13166, and lays out some of the reasonable steps that must be taken in order to provide meaningful access to programs and services to LEP individuals.

In order to assist entities and jurisdictions receiving federal financial assistance, in determining how to provide meaningful access to programs and services to LEP individuals, particularly in terms of housing, HUD issued its "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons."<sup>55</sup> Through this guidance, HUD requires recipients of federal funds to analyze the needs of LEP individuals, develop a language access plan, and provide language assistance whenever necessary. Although, the guidance does not provide specific benchmarks or legal measures for compliance, it does require that recipients of federal funding provide meaningful access to LEP persons to critical services while not imposing undue burdens on small businesses, small local governments, or small nonprofits.

The City of Lorain, as illustrated previously, has a large non-English speaking population. Moreover, out of 18.3% of the population that speaks a language other than English at home 15.2% speak Spanish at home. Because the overwhelming majority of non-English speakers in the City of Lorain speak Spanish there is a clear need for a language access plan to be developed and implemented for Spanish-speakers.

As stated previously, a person's language is so closely intertwined with his or her national origin, that language-based discrimination is effectively a proxy for national origin discrimination. The requirement to provide meaningful access to LEP people is the

<sup>54</sup> DOH Policy Guidance on the Enforcement of Title VI of the Civil Rights Act of 1964 – National Origin Discrimination Against Persons with Limited English Proficiency, 65 Fed. Reg. 50124 (Aug. 16, 2000).

<sup>55</sup> 72 Fed. Reg. 2732 (January 22, 2007).

result of both HUD guidance on this issue and the duty all recipients of federal financial assistance have to Affirmatively Further Fair Housing. Therefore, to ensure that people with LEP have equal access to fair housing choices and opportunities, the City of Lorain must make language access a priority.

## C. Zoning and Planning

### *Rules and Regulations*

Rules and regulations regarding zoning and planning directly and indirectly shapes the character, composition, and quality of life within jurisdictions. Unfortunately, historically in this Country, decisions of legislative bodies and zoning regulations have often been used to promote housing segregation and discriminatory patterns.

Zoning is the process by which a municipality legally controls the use that may be made of land or property and the physical configuration of developments upon the tracks of land within the municipality. Zoning ordinances are adopted to divide the land into different districts, and to permit only certain uses within each zoning district. These districts frequently divide the municipality into four major areas: residential, commercial, industrial, and special. There might also be variations in permitted use, within each district. Additionally, the architectural design of buildings and the particular uses to which buildings within designated districts may be placed is also control by zoning ordinances.

Planning, generally, refers to the future physical development and overall programs for the total or a particular area within the jurisdiction. Therefore, planning may involve the consideration of all public improvements and services within an area. Since planning only involves proposals for future action it does not, generally, impose an immediate impermissible restriction. Finally, although the terms planning and zoning are not interchangeable, planning embraces zoning. For that reason, planning and zoning go hand and hand and a review of zoning regulations is important as it affects and influences the City of Lorain's planning process.

### *Sources of Zoning Regulatory Power*

Zoning is considered a matter of local concern and prerogative. Essentially, municipal agencies, boards, and commissions regulate local land use, subject to limitations set by the state legislation, and courts findings.

The derived zoning power of local jurisdictions, such as the City of Lorain, comes from the right of states to make laws governing safety, health, welfare, and morals as interpreted from the Tenth Amendment of the United States Constitution. This Amendment states, "The powers not delegated to the United States by the Constitution, nor prohibited by it to the states, are reserved to the States respectively, or to the people."

The local government has a lot of leverage on this area. As an example, practices such as "exclusionary zoning," which is known as the manipulation of land use by a local government to prevent households that are deem undesirable from setting up residence in the locality, have been recognized and continue to be in place. In fact, the courts have been reluctant to invalidate zoning regulations alleged to be exclusionary in effect. In *Euclid v. Ambler*, the Supreme Court ruled that the state, and as delegated police power to local municipalities could regulate land development through zoning ordinances in order to promote the general public interest. Therefore, when reviewing zoning regulations is important to be mindful that zoning ordinances should be enacted for the protection of public safety, welfare, health, and morals, reflecting proper use and exercise of local police power and not for impermissible or discriminatory purposes.

A review of zoning ordinances, as done by this Analysis is important because it could prevent potential problem for jurisdictions as related to fair housing laws. Although the federal Fair Housing Act "... does not preempt local zoning law, the Act applies to municipalities and other local government entities and prohibits them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against persons, including individuals with disabilities."<sup>56</sup>

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<sup>56</sup> Joint Statement of the Department of Justice and the Department of Housing and Urban Development, "Group Homes, Local Land Use, and the Fair Housing Act," page 1 (August 18, 1999).

**Under the Fair Housing Act it is unlawful:**

- To utilize land use policies or actions that treat groups of persons with disabilities less favorably than groups of non-disabled person. An example would be an ordinance prohibiting housing for persons with disabilities or a specific type of disability, such as mental illness, from locating in a particular area, while allowing other groups of un-related individuals to live together in that area.
- To take action against, or deny a permit, for a home because of the disability of individuals who live or would live there. An example would be denying a building permit for a home it was intended to provide housing for persons with mental retardation.
- To refuse to make reasonable accommodations in land use and zoning policies and procedures where such accommodations may be necessary to afford persons or groups of persons with disabilities an equal opportunity to use and enjoy housing.

It is important to mention that what constitutes a reasonable accommodation is a case-by-case determination. Not all requested modifications of rules or policies are reasonable. If a requested modification imposes an undue financial or administrative burden on a local government, or if a modification creates a fundamental alternation in a local government's land use and zoning scheme, it is not a "reasonable" accommodation.

HUD, Department of Justice, Private Litigation and Zoning Matters<sup>57</sup>

HUD has the power to receive and investigate complaints of discrimination, including complaints alleging local government discrimination in terms of the use of zoning powers. However, in matters involving zoning and land use, HUD does not issue a charge of discrimination. Instead, HUD refers matters it believes may be meritorious to the Department of Justice, which, in its discretion, may decide to bring suit against the respondent in such a case. The Department of Justice may also bring suit in a case that has not been the subject of a HUD complaint, or a close investigation by HUD, by exercising its independent power to initiate litigation alleging a “pattern or practice” of discrimination or a denial of rights to a group of persons which raises an issue of general public importance. Additionally, a decision by HUD or Department of Justice not to proceed with a zoning or land use alleged matter alleged violation does not foreclose private plaintiffs from pursuing a claim through litigation.

### ***Zoning and Protected Classes***

The Amendments to the federal Fair Housing Act of 1988, added two new protected classes, *familial status* and disability.

The 1988 Amendments actually codified the right of people with disabilities to enjoy their freedom of choice in terms of where they live by making their confinement to commercial and industrial districts illegal. Additionally, since some people with disabilities often to live in “group homes” a differential treatment of groups of unrelated people with disabilities living together under zoning regulations could violate fair housing laws protecting *familial status*.

*Familial status* laws at the federal, state, and local level are designed to prohibit discrimination in various ways in terms of zoning regulations. Families with children are protected as a class under *familial status*. Moreover, jurisdictions that define “family” in a restrictive way, focusing on relationships based on blood and marriage, may violate fair housing laws as well as constitutional rights to freedom of association, equal protection, and due process rights. Generally, restrictive definitions of “family” can have

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<sup>57</sup> Id.

a disparate impact based on race as well since African Americans and Hispanics are more likely to live with people they are not relate to.<sup>58</sup> Moreover, restrictive definitions of “family” with no provisions for group homes or that only allows for group homes as a conditional use in a zoning district, may limit housing choice for people with disabilities in violation of Fair Housing laws.

### ***Zoning Barriers to Affordable Housing***

Zoning regulations can affect the cost of developing housing, making it harder or easier to accommodate affordable housing.<sup>59</sup> Affordable housing in a diversity of locations, allows for the integration of communities.

Zoning regulations that bar or make the development of affordable housing more difficult or expensive have the potential of disproportionately negatively impacting members of protected classes.<sup>60</sup> Unfortunately, this effect is due to the fact that minorities in this Country are disproportionately low-income.

Impediments to affordable housing can result from a variety of land use regulations and rules, and some of the most frequently cited are:<sup>61</sup>

\* **Restrictions in Zoning Ordinance on Multifamily or Affordable Housing.** If affordable or multifamily family housing is either not permitted in a municipality or restricted to a handful of already densely developed zones, developers need to obtain a “Special Permit” in order to build new affordable housing and such permits are often denied.

\* **Large Lot Requirements.** Zoning ordinances usually prescribe the size of lots for different zones. The larger the lot the more expensive the development. When large minimum lot requirements apply to the entire municipality, the result can be that affordable housing becomes financially infeasible.

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<sup>58</sup> See, Rose M. Kreider and Diana B. Elliott, U.S. Census Bureau, “The Complex Living Arrangements of Children and Their Unmarried Parents,” Issued May 2009, p.4. Retrieved from <http://www.census.gov/population/www/socdemo/complex-abstact.pdf>.

<sup>59</sup> De Souza Griggs, X., ed., (2005) “The Geography of Opportunity: Race and Housing Choice in Metropolitan America,” Brookings Institute Press.

<sup>60</sup> Linowes, R., Allensworth, D.T., (1973) “The Politics of Land Use: Planning, Zoning, and the Private Developer,” New York: Praeger.

<sup>61</sup> Knaap, G., Meck, S., Moore, T., and Parker, R., (2007, July) “Zoning as a Barrier to Multifamily Housing Development,” American Planning Association, Planning Advisory Service Report Number 548.

\* **Low Density Requirements.** Ordinances can limit the number of units permitted per acre. If this number is set low in all areas of the municipality, for example no more than one or two units per acre, affordable housing throughout the municipality becomes financially infeasible.

\* **Other Land Use Requirements.** A range of other requirements can also inhibit the development of affordable housing. These include residency or employment preferences for affordable housing admission, onerous subdivision requirements, such as obligations for numerous parking spaces, sewer restrictions, and wetland limitations.

#### City of Lorain Planning and Zoning Code

Currently, the [Codified Ordinances of the City of Lorain – Part II – Planning and Zoning Code – April 1984](#) is the document that contains the City’s zoning regulations. Since the ordinance was enacted in 1984, it is important to mention that it predates the 1988 Fair Housing Amendments Act. Therefore, the City’s current planning and zoning code is currently outdated and does not conform to the federal Fair Housing Act as Amended in 1988. Below is a review of some of the key items.

#### *FAMILY*

Per Section 1221.20 of the Code, “family” is defined as follows:

#### **1221.20 FAMILY**

“Family” means one of more persons occupying the premises and living as a single housekeeping unit. (Ord. 186-85. Passed 12-16-85.)

The City’s definition of “Family” is very inclusive since it does not impose limits, such as blood or marriage relations. Restrictive definitions of “Family” segregate group home residency in fewer desirable commercial or mixed-use districts. The term “group home” refers to housing occupied by groups of unrelated individuals with disabilities.<sup>62</sup> However, the term “group homes” is within the

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<sup>62</sup> (memo dep. Justice)

definition of “Residential Social Service Facility” an issue that needs to be evaluated.

In isolation, the City’s definition of “Family” appears to allow for group home living arrangements within all Districts that permit single “family” dwellings. However, this is not the case since “group homes” are included within the definition of “Residential Social Service Facility” (section 1221.43).

*1221.43 RESIDENTIAL SOCIAL SERVICE FACILITY.*

“Residential social service facility” means a facility or home which provides resident services to a group or individuals of whom one or more are unrelated, and which may provide additional supervised programming services. Groups served may include the mentally retarded or handicapped, juvenile offenders, drug or alcohol offenders, releases from state institutions, or wards of the court or welfare system. The category includes, but is not limited to, facilities licensed, supervised, or sponsored by any political subdivision or judicial authority. The category includes, but is not limited to, facilities commonly referred to as “halfway houses” or “group homes”.

The definition of “group homes” within “Residential Social Services Facility” is in violation of Fair Housing laws. Although the definition used for “family” appears being open and allowing for even “group homes” placement in all single family districts the relegation of group homes to “Residential Social Service Facility” areas, in effect limit the placement of “group homes” to only District R-3, or only any other with permission from the Board (1131.01).

## V. Impediments to Fair Housing

The following impediments to fair housing in the City of Lorain were identified through this Analysis of Impediments:

### 1. Lack of access to public transportation.

Meaningful steps should be taken in order to improve the availability of public transportation. Currently, the areas severely affected are those with a low and moderate-income population in addition to a disabled population. The current type, frequency and reliability of public transportation lacks adequacy and should be improved. Additionally, new and alternative ways should be created in order to increase access to employment, financial services, and food among others.

### 2. Language access barrier for people with Limited English Proficiency.

The City should implement a Language Access Plan in order to address language access barriers. With a Hispanic population of over 26% and 15.2% of the population speaking Spanish at home, access to Spanish speakers should be a priority. A Language Access Plan should concentrate in the availability of information and general access to Spanish speakers to all resources.

### 3. Outdated Planning and Zoning Code.

The City of Lorain's Planning and Zoning Code was adopted in 1984, which predates the 1988 Fair Housing Act Amendments. The current planning and zoning code does not conform to the federal Fair Housing Act. A complete review and updates as necessary are needed in order to meet compliance requirements.

### 4. Lack of Fair Housing Data.

The City of Lorain has a large minority population. Some neighborhoods have a larger concentration of different minority populations than others. Although some of the residents in these neighborhoods feel a strong sense of community the City needs data in order to determine if any discriminatory practices are present within the City. The implementation of a Testers Program will be ideal in identifying potential discriminatory practices.

### 5. Lack of Fair Housing Awareness.

Efforts to spread awareness regarding federal, state and local Fair Housing laws should continue.