

City of Lorain, Ohio Status of Impediments to Fair Housing, 2025-2029

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Report by Fourth Economy



This report was prepared by Fourth Economy in collaboration with the City of Lorain and its Department of Building, Housing and Planning. Fourth Economy is a national community and economic development consulting firm. Powered by a vision for an economy that serves the people, our approach is centered on principles of competitiveness, equity, and resilience. We partner with communities and organizations, public and private, who are ready for change to equip them with tools and innovative solutions to build better communities and stronger economies. www.fourtheconomy.com • engage@fourtheconomy.com

EXECUTIVE SUMMARY

Background

As an entitlement community under the US Department of Housing and Urban Development (HUD)'s Community Development Block Grant (CDBG) program, the City of Lorain is eligible to receive CDBG funds to assist in furthering HUD's national objectives.

As part of meeting eligibility requirements to receive CDBG funding, HUD entitlement communities must assess the extent to which Fair Housing is furthered and/or impeded in the community. According to HUD, the Fair Housing Act prohibits discrimination in housing because of race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, or disability.¹

The goal of the Analysis of Impediments to Fair Housing is to enable the City to understand the status of Fair Housing in its jurisdiction, and to identify action steps which can be taken to Affirmatively Further Fair Housing. This report includes a background section with data analysis to help to illuminate the status of fair housing in the City; an assessment of fair housing impediments and actions since the last Analysis of Impediments to Fair Housing report; and recommendations and action steps to Affirmatively Further Fair Housing in the city of Lorain.

¹ [Housing Discrimination Under the Fair Housing Act | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](https://www.hud.gov/program_offices/commdev/fair_housing_act_implementation/)

Identified Impediments to Fair Housing, and Recommended Action Steps, 2025-2029

Identified impediments to fair housing include: public transportation and mobility, zoning and land usage, environmental health, fair housing awareness and enforcement, limited city staff capacity, and public resistance to development of supportive housing and transit projects.

Public Transportation & Mobility

Public transportation in Lorain is severely limited, posing a significant barrier to fair housing. The city's fixed route transit options are insufficient, with bus routes running only every 2 hours from Monday to Friday from 5:30am to 6:30pm. This infrequent service makes it challenging for residents to access job centers, amenities and essential services (including grocery stores and health care) in other parts of the city or county. These transit limitations force many residents to heavily rely on personal vehicles or alternative transportation options, which can be cost-prohibitive to low-income residents.

Recommended Action Steps: To address these issues, the city should identify opportunities to sustain ViaLC, the on-demand public transit service pilot program, could be a valuable initiative for Lorain as it could address mobility issues, improve access to housing opportunities, or enhance the overall quality of life for Lorain residents. The city should evaluate the pilot's outcomes, identify funding sources, and explore partnerships to ensure its long-term viability and potential expansion. Additionally, the City should continue to elevate solutions such as NOACA's Vanpool Program to provide major employers with cost-sharing arrangements to ensure 'last-mile' rides.

Zoning and Land Usage

The city's zoning and land use regulations pose several impediments to fair housing. For example, restrictions in residential areas, such as R1-A, -B, and -C zones, limit the establishment of group homes for unrelated individuals. Similarly, in R3 high-density districts, only single-family attached or multi-family dwellings are permitted, preventing the construction of affordable single-family detached homes in areas with high amounts of vacant properties. Additionally, zoning limitations on accessory dwelling units (ADUs) hinder intergenerational housing options, particularly affecting seniors who wish to age in place. These zoning restrictions limit housing diversity and flexibility, potentially excluding certain groups from specific neighborhoods.

Recommended Action Steps: To address these issues, the city should consider revising its zoning code to allow for more flexible housing options, including permitting group homes in the R1 zone and relaxing restrictions on ADUs to promote intergenerational living.

Environmental Health

Environmental issues may pose challenges to fair housing in Lorain, particularly in areas closest to industrial zones. The proximity of residential areas to industrial sites, especially in South Lorain, raises concerns about the health and safety of residents. The ongoing need for brownfield remediation may complicate housing development and disproportionately affect low-income residents.

Recommended Action Steps: To assuage these concerns, the city should review its planning and zoning code to ensure sufficient buffer zones between industrial and residential properties is an important step in promoting healthy living environments. Adequate separation between these land uses can mitigate potential negative impacts such as noise, air pollution, and safety concerns on residential areas. This review process should involve assessing current zoning regulations, identifying areas where industrial and residential zones are in close proximity, and developing strategies to create or enhance buffer zones. Implementing these changes can improve the overall quality of life for residents.

Fair Housing Awareness & Enforcement

Improved education and outreach efforts are needed to ensure residents are aware of their rights and the available channels for reporting discrimination, particularly related to race and national origin. This may be done by training nonprofit and faith-based service providers on fair housing rights and responsibilities.

Recommended Action Steps: By educating these organizations about what constitutes fair housing violations and the proper channels for seeking redress, the city can empower a wider network of advocates to support vulnerable populations. In addition to service providers, similar training should be provided to landlords, real estate agents, and property managers on fair housing laws and best practices.

Limited City Staff Capacity

Due to staffing constraints, the City lacks the administrative and technical capacity to advance larger and more costly efforts.

Recommended Action Steps: To augment its low capacity, it is crucial for the city to closely align its efforts with and support the county's strategic plan, particularly in areas related to housing and transit. By coordinating with the county, the city can leverage collective resources, reduce administrative burdens, and optimize investments to address complex housing challenges more effectively. In addition, the City should seek continued training and capacity-building opportunities related to fair housing. By maintaining a regular training cadence, new City staff will continue to be apprised of relevant fair housing laws, best practices, and being equipped to proactively

respond to community needs within its purview. This will become more important if there are significant changes at the federal level.

Limited Affordable Housing Options

There continues to be a shortage of high-quality affordable housing within the City of Lorain.

Recommended Action Steps: To address this, the city should continue to prioritize support to the preservation and development of Low-Income Housing Tax Credit (LIHTC) housing as a means of expanding affordable housing options for residents, specifically low-income families, seniors, and individuals with disabilities. In addition to LIHTC housing units, the City should create or partner with an existing Community Development Corporation to serve as a nonprofit housing developer. This partner should meet the requirements of a [Community Housing Development Organizations](#) (CHDO) per the [CHDO 2024 Guidelines](#). This will open up funding from the Ohio Finance Agency HOME program and other sources.

Public Resistance to Development of Supportive Housing & Transit Projects

Resistance to supportive housing and transit-oriented projects poses a significant impediment to fair housing in the city of Lorain.

Recommended Action Steps: To address this, the city should work with the community to identify the criteria for siting housing. The city could implement a comprehensive community engagement strategy for future initiatives including early and transparent communication about proposed projects, education on the benefits of supportive housing and transit-oriented development, and meaningful dialogue with residents to address their concerns. By highlighting the positive impacts and addressing community concerns proactively, the City can help to bolster community support for initiatives that advance equitable access to quality housing for all residents.

BACKGROUND DATA

This section includes analysis of demographic and socioeconomic data (population, households, income and poverty, housing profile), an identification of the dynamics of housing and job access (housing, employment, and transportation access and connectivity), housing conditions (housing problems), and capital access (financing and foreclosures). This analysis is key to understanding the background context of impediments to fair housing within the City of Lorain.

Specific sections of this analysis within this report include:

- Population and Demographics
- Households
- Income and Poverty
- Housing
- Mortgage Financing and Foreclosures
- Housing problems and severe housing problems
- Employment and Transportation Access and Connectivity

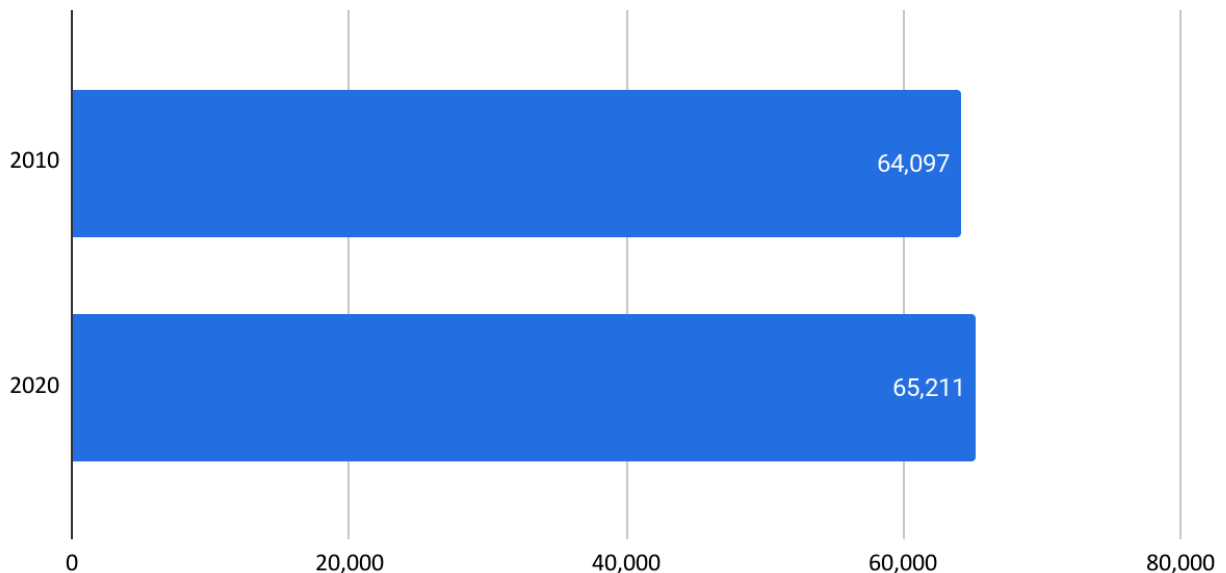
Population and Demographics

Population

Lorain's population has grown 2% over the past decade (64,097 to 65,211) compared to 4% for the county (301,356 to 312,964) and 2% for the state (11,536,504 to 11,799,448). In 2022, Lorain reached 26,876 households, an increase of 1,540 households since 2017, but it only added 962 housing units.² Like many communities across the country, Lorain is experiencing a constrained housing market as demand continues to outpace supply.

Population by Geography

City of Lorain



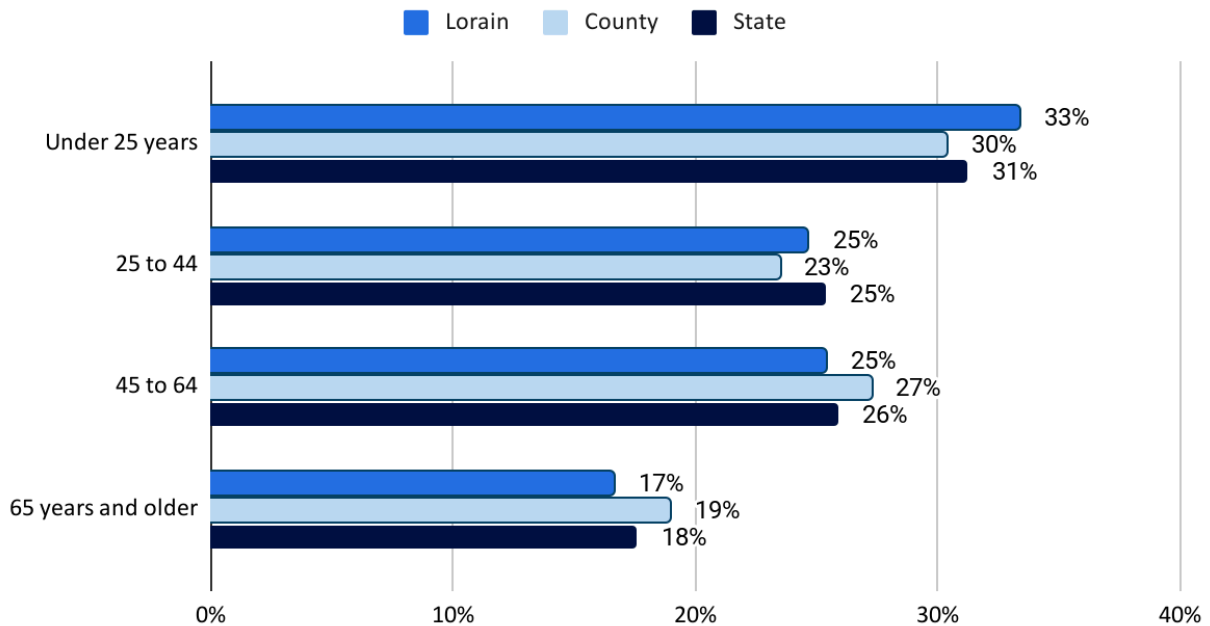
Source: Fourth Economy Analysis of U.S. Census Data, 2020

² Fourth Economy Analysis of U.S. Census Data, 2010 to 2020 and 2018-2022 Census American Community Survey, 5-Year Estimates, 2018-2022.

Population by Age

The city of Lorain is younger and lower income compared to the county and state. A third of Lorain's population is under 25 years old, a slightly higher share than for the county (30%) or state (31%). Lorain also has a slightly smaller share of residents aged 65 and older compared to the county or state (17% versus 19% and 18%, respectively).³

Age Distribution



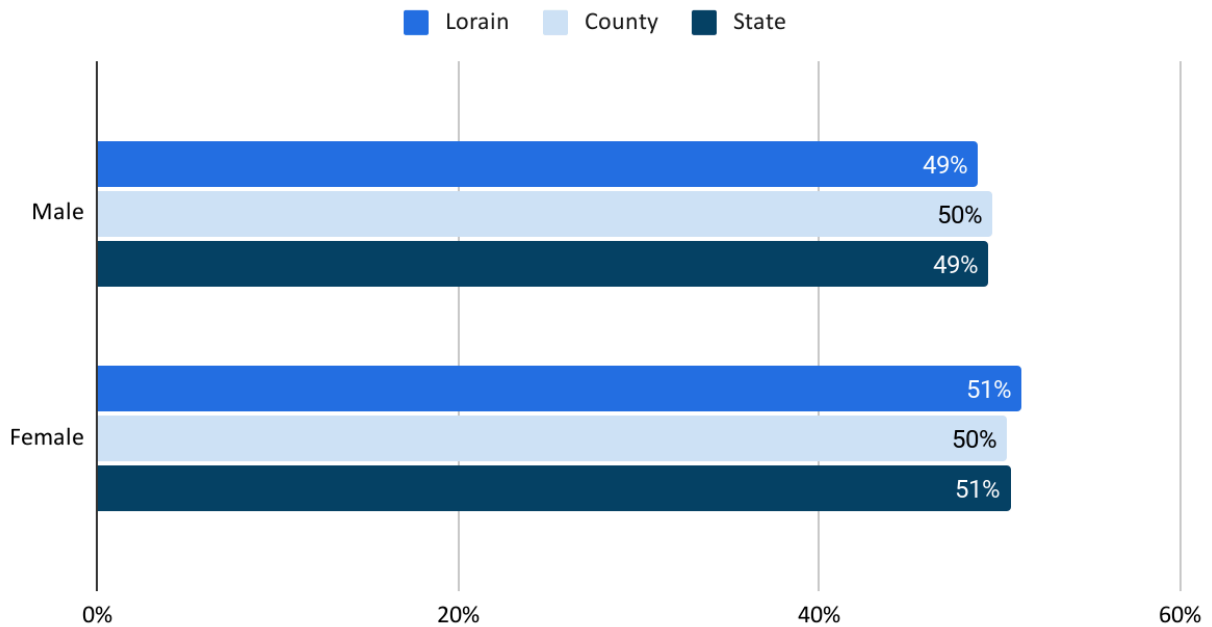
Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

³ Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022.

Population by Gender

Lorain has slightly more females than males, with a split that is 51% female (33,383) and 29% male (31,755).

Population by Gender

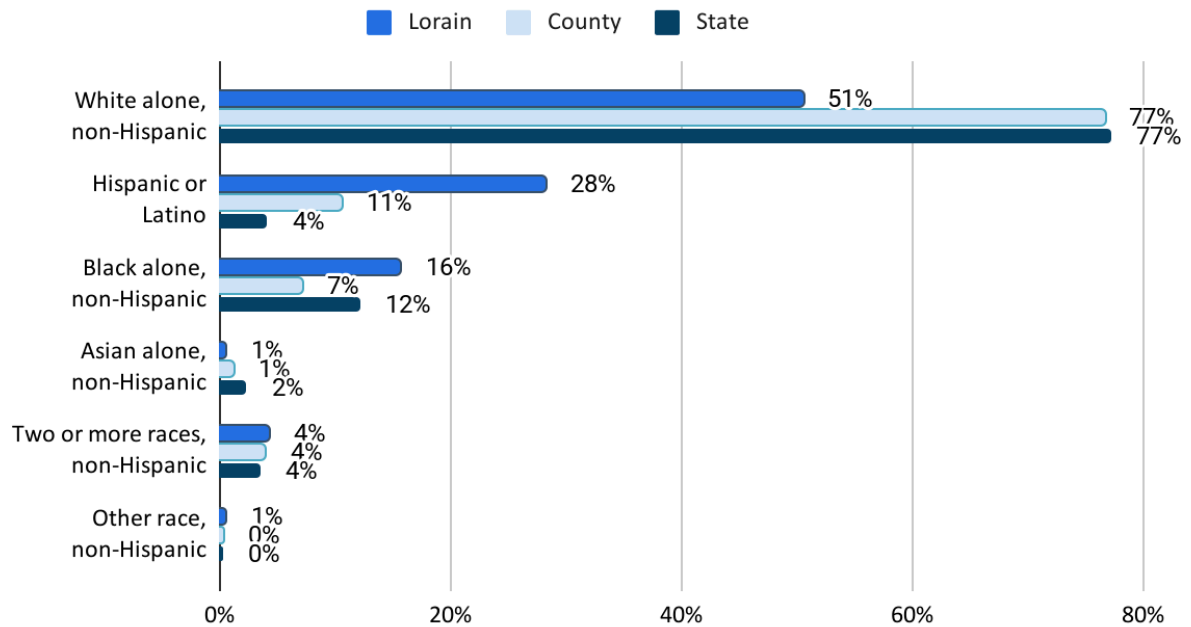


Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

Population by Race and Ethnicity

Lorain's population is significantly more diverse than either the county or the state, with nearly a third of its population Hispanic or Latino and 16% Black.⁴

Population by Race and Ethnicity



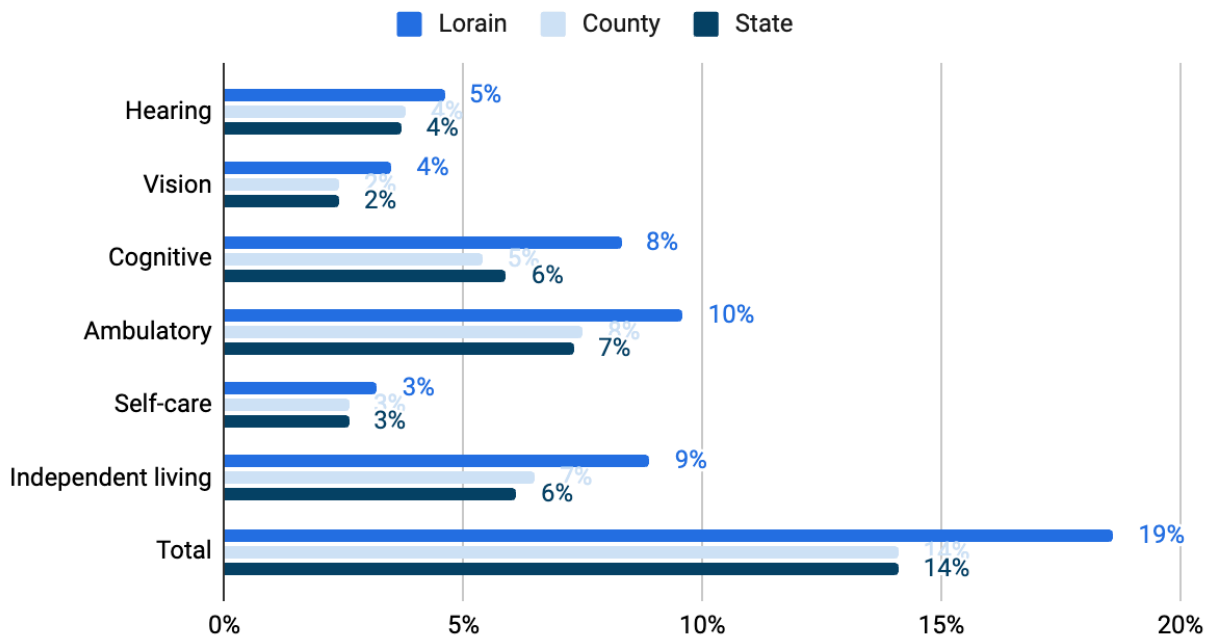
Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

⁴ Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022.

Population by Disability

19% of Lorain residents (12,063) have a disability, higher than for either the county or the state (both 14%). Among all residents, 10% (5,767) have an ambulatory difficulty, followed by 9% (4,339) with an independent living difficulty.

Population by Disability

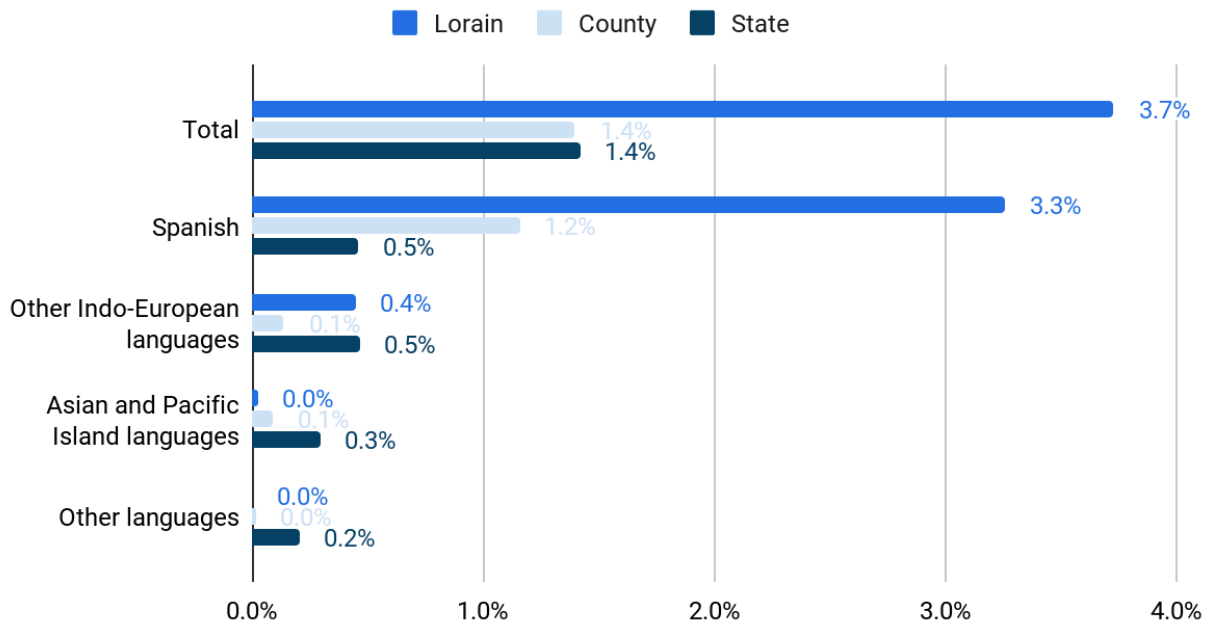


Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

Population by Limited English Proficiency

3.7% of Lorain's population (1,002) can be described as a limited English-speaking household, higher than for the county or state (both 1.4%). Of this group, the greatest share (3.3% of the total population, or 876 households) speak Spanish.

Population by Limited English Proficiency



Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

Population by Protected Classes

The Fair Housing Act prohibits discrimination in housing because of race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, or disability.⁵ Under HUD's criteria, protected classes can also include senior citizens and persons with limited English proficiency. A summary of these protected classes as they exist in the City of Lorain are outlined below.

Of the 64,497 residents in Lorain, 16% (10,560) are seniors aged 65 or older; 19% (12,063) are persons with a disability; and 6% (3,628) speak English with limited proficiency. Other protected classes present in Lorain include the population disaggregated by race and ethnicity - African American residents (4,422, or 7% of the population), Native American residents (90 residents, or 0.1% of the population), and Hispanic or Latino residents (3,628, or 6% of the population).

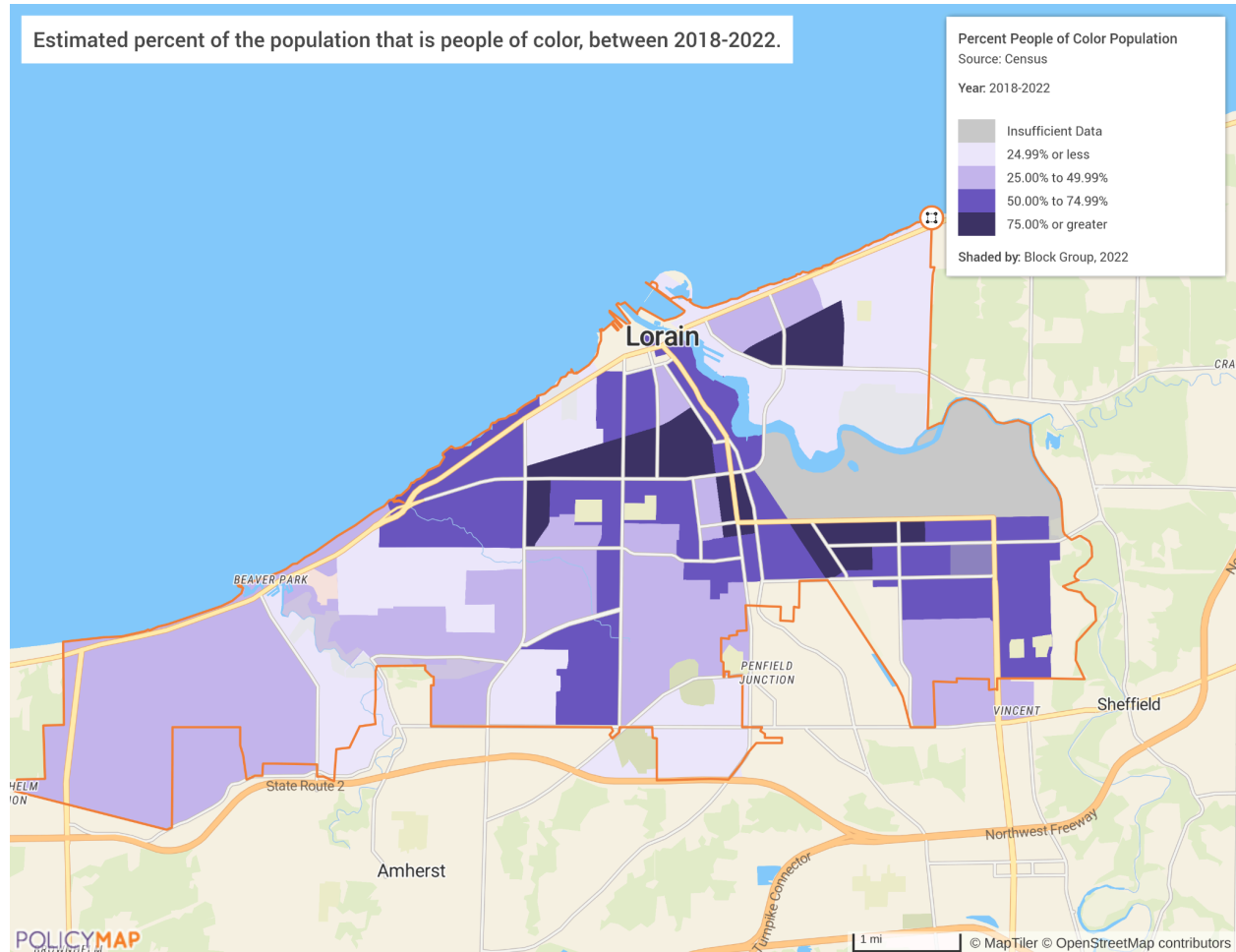
All	64,497	
Seniors 65+	10,560	16%
Persons with a Disability	12,063	19%
African-Americans	4,422	7%
Native Americans	90	0.1%
Hispanic	6,579	10%
Limited English Proficiency	3,628	6%

Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

⁵ [Housing Discrimination Under the Fair Housing Act | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](https://www.hud.gov/section8/faq-fair-housing-act)

Non-White Population by Block Group

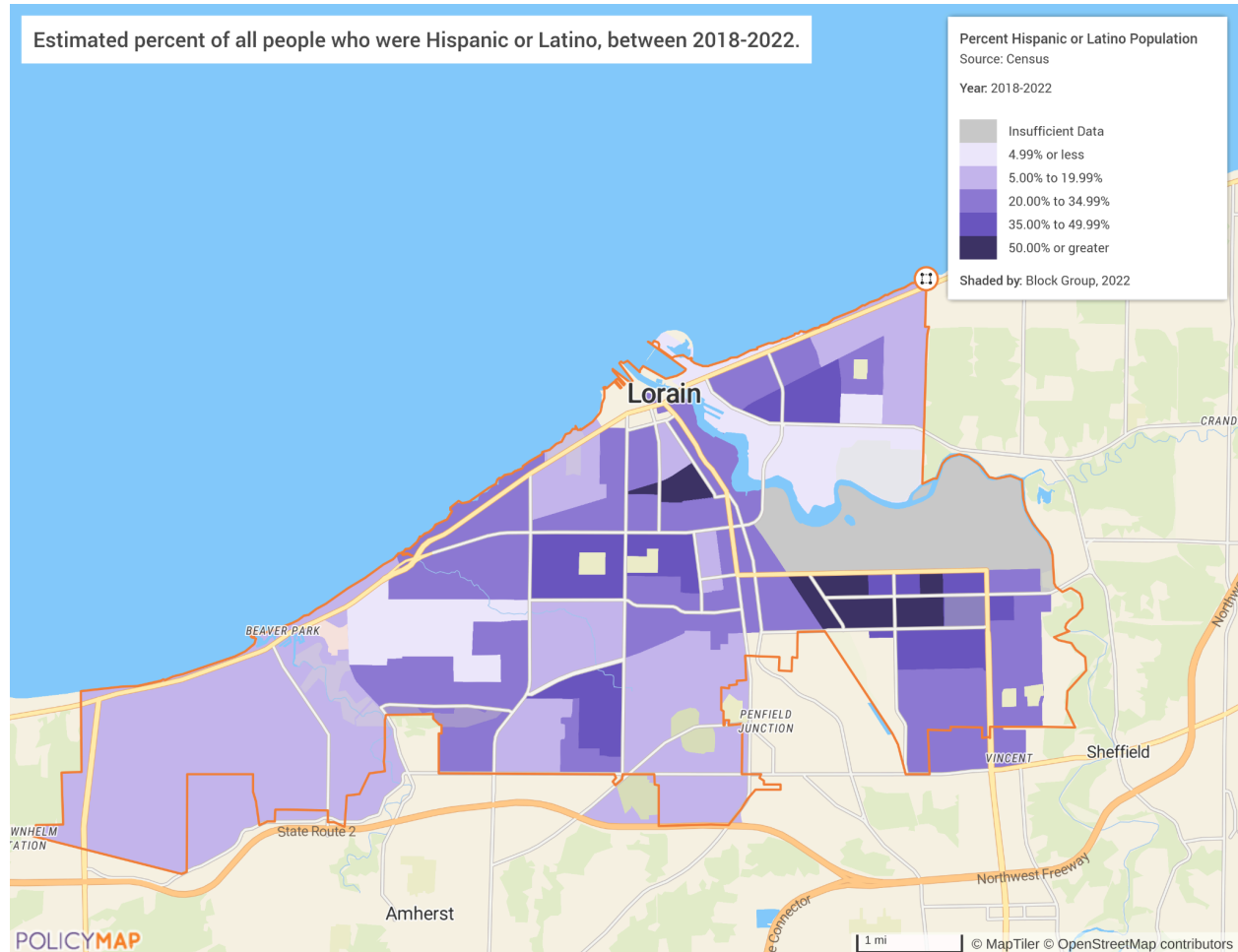
Block groups where 75% or more of the population is non-white tend to be concentrated in 8 block groups in the center and southeast of the city.



Source: PolicyMap Census American Community Survey, 5-Year Estimates, 2018-2022

Hispanic or Latino Population by Block Group

Block groups where 50% or more of the population is Hispanic or Latino tend to be concentrated in 4 block groups in the center and southeast of the city.



Source: PolicyMap Census American Community Survey, 5-Year Estimates, 2018-2022

Households

Households by Type

In Lorain, owner households make up 55% of the City's 26,876 households, while there are 12,072 renter households. There are more family owner households than nonfamily owner households, while the share of family versus nonfamily renter households are split at 50% of each. Single-parent households with children under 18 make up 5% of owner households and 25% of renter households.

	Owner + Renter		Owner		Renter	
Total	Number	Percentage	Number	Percentage	Number	Percentage
All Households	26,876	100%	14,804	55%	12,072	45%
Family	15,084	56%	8,993	61%	6,091	50%
<i>Married-couple</i>	8,438	31%	6,460	44%	1,978	16%
With own children under 18	2,951	11%	2,040	14%	911	8%
No own children under 18	5,487	20%	4,420	30%	1,067	9%
<i>Other family</i>	6,646	25%	2,533	17%	4,113	34%
Male householder, no wife present	1487	6%	701	5%	786	7%
With own children under 18	614	2%	160	1%	454	4%
No own children under 18	873	3%	541	4%	332	3%
Female householder, no husband present	5,159	19%	1,832	12%	3,327	28%
With own children under 18	3232	12%	648	4%	2,584	21%
No own children under 18	1,927	7%	1,184	8%	743	6%
Nonfamily	11,792	44%	5,811	39%	5,981	50%

Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

Households by Size

The largest proportion of households in Lorain are 1 or 2-person households, representing 38% and 28% of all households, respectively. There are more 1-person households that are renters (41%) than for owner households (35%), and more 2-person households that are owners (32%) than for renter households (22%). A little under one-fifth of households have 4 or more members (19%).

	Owner + Renter		Owner		Renter	
Type	Number	Percentage	Number	Percentage	Number	Percentage
All Households	26,876	100%	14,804	55%	12,072	45%
1-person	10,145	38%	5,228	35%	4,917	41%
2-person	7,430	28%	4,714	32%	2,716	22%
3-person	4,395	16%	2,608	18%	1,787	15%
4-person	2,596	10%	1,163	8%	1,433	12%
5-person	1,548	6%	708	5%	840	7%
6-person	419	2%	275	2%	144	1%
7-or-more person	343	1%	108	1%	235	2%

Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

Households by Race and Ethnicity

The majority of Lorain's households, 65%, are led by a householder who is white alone. 16% of Lorain households are led by a householder who is Black or African American alone. 24% of households are led by a householder who is Hispanic or Latino.

Race/Ethnicity	Number	Percentage
All Households	26,876	100%
Householder who is White alone	17,467	65%
Householder who is Black or African American alone	4,422	16%
Householder who is Asian alone	152	1%
Householder who is American Indian and Alaska Native alone	90	0%
All Other	4,745	18%
Householder who is Hispanic or Latino	6,579	24%
Householder who is not Hispanic or Latino	20,297	76%

Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

Households and Disability Status

A third of households in Lorain (33%) have 1 or more persons with a disability.

	Number	Percentage
All Households	26,876	100%
Households with 1 or more persons with a disability	8,775	33%
Households with no persons with a disability	18,101	67%

Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

Households by Age of members

26% of households in Lorain are led by a senior 65 years or older, while 28% of households have related children under 18 in their household. More than two-thirds of households (69%) are led by an individual aged 25 to 64, indicating someone of working age.

	Owner + Renter		Owner		Renter	
Age Factors	Number	Percentage	Number	Percentage	Number	Percentage
All Households	26,876	100%	14,804	100%	12,072	100%
Senior (65+) head of household	7,009	26%	5,066	34%	1,943	16%
With related children under 18	7,410	28%	3,165	21%	4,245	35%
Workforce-age (25-64) householder	18,616	69%	9,447	64%	9,169	76%

Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

Households by Limited English Proficiency

Approximately 1,000 households (4%) in Lorain have members that are limited English-speaking.

	All Households		Limited English Speaking Households	
	Number	Percentage	Number	Percentage
All Households	26,876	100%	1,002	4%
Spanish speaking	4,267	16%	876	21%
Other Indo-European Languages	476	2%	120	25%
Asian and Pacific Island	27	0.1%	6	22%
Other Languages	83	0.3%	0	0%

Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

Income and Poverty

Area Median Income (AMI) Income Limits

For Lorain, owner housing ranges in affordability from \$81,000 at the lower estimate for the lowest AMI band to \$350,000 for the upper estimate for the highest AMI band.⁶ For renter housing, affordability ranges from \$780 a month to \$2,430 a month.

County Area Median Income (AMI) Income Limits						
		1 Person	4 People	Owner Value (Low Estimate)	Owner Value (High Estimate)	Monthly Rent
	30% AMI	\$20,450	\$31,200	\$81,000	\$112,000	\$780
	50% AMI	\$34,050	\$48,600	\$126,000	\$175,000	\$1,220
	80% AMI	\$54,450	\$77,750	\$202,000	\$280,000	\$1,940
	100% AMI	\$68,050	\$97,200	\$253,000	\$350,000	\$2,430

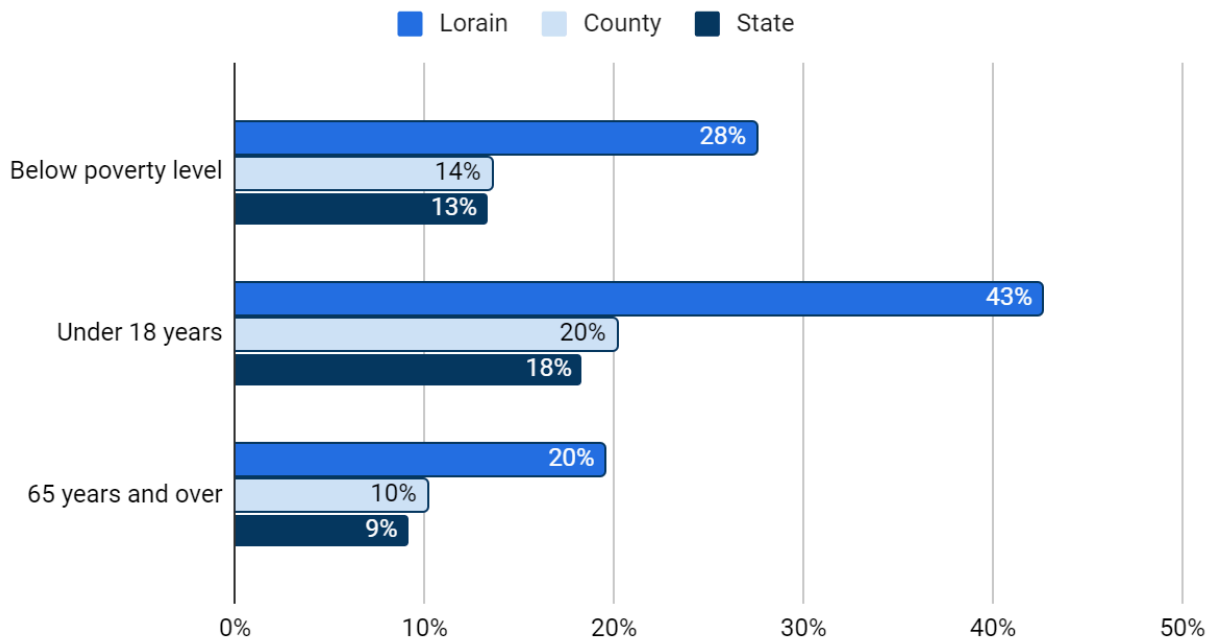
Source: Fourth Economy Analysis of HUD FY 2024 Income Limits

⁶ Fourth Economy Analysis of HUD FY 2024 Income Limits

Poverty

28% of Lorains' population is below the poverty level, including 43% of those under 18 years old and 20% of those 65 and older.⁷ This is significantly higher than for either the county or the state.

Poverty Rates

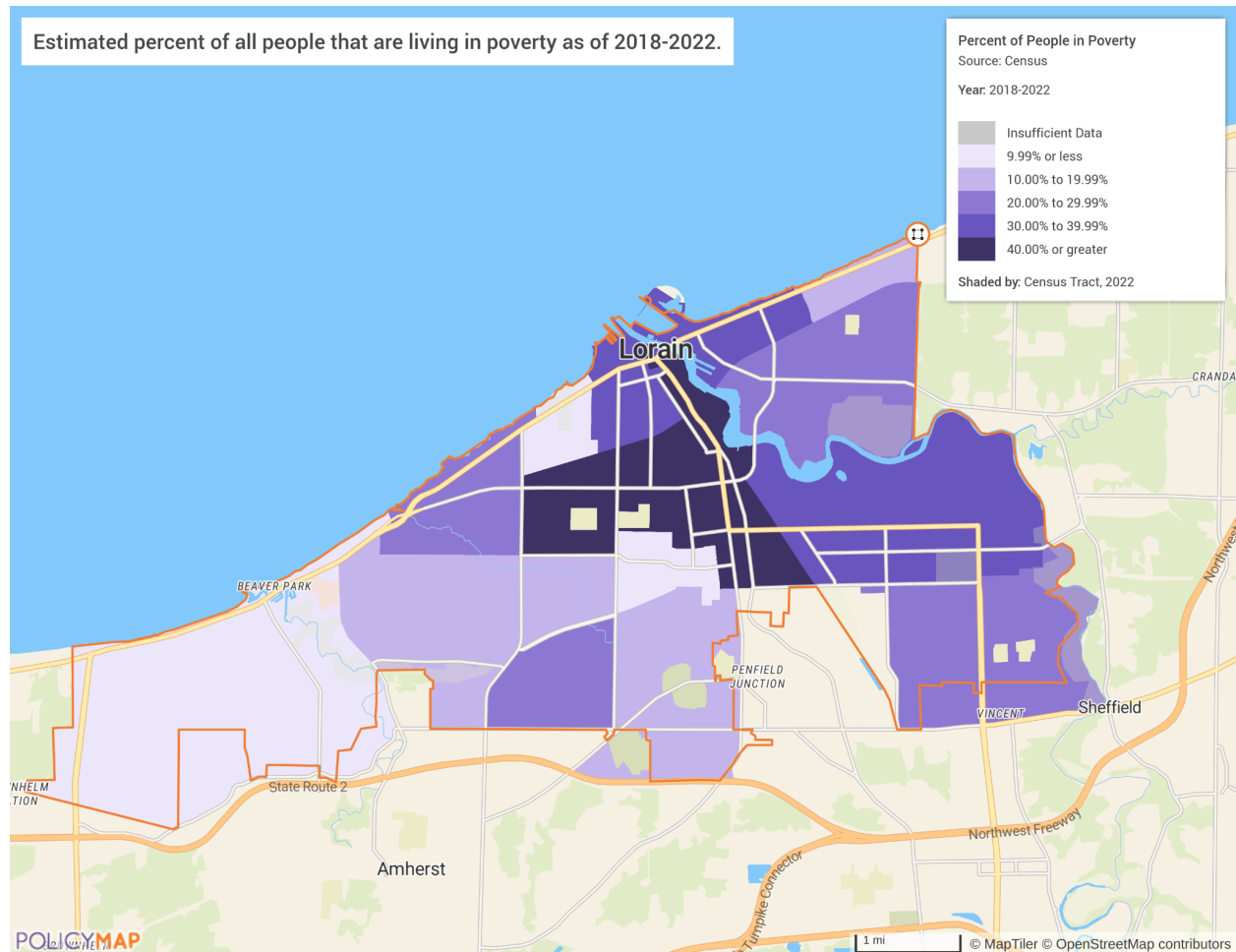


Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

⁷ Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022

Population Below Poverty by Census Tract

4 census tracts in Lorain have a population where 40% of residents are living in poverty. These tracts are concentrated in the center of the city.

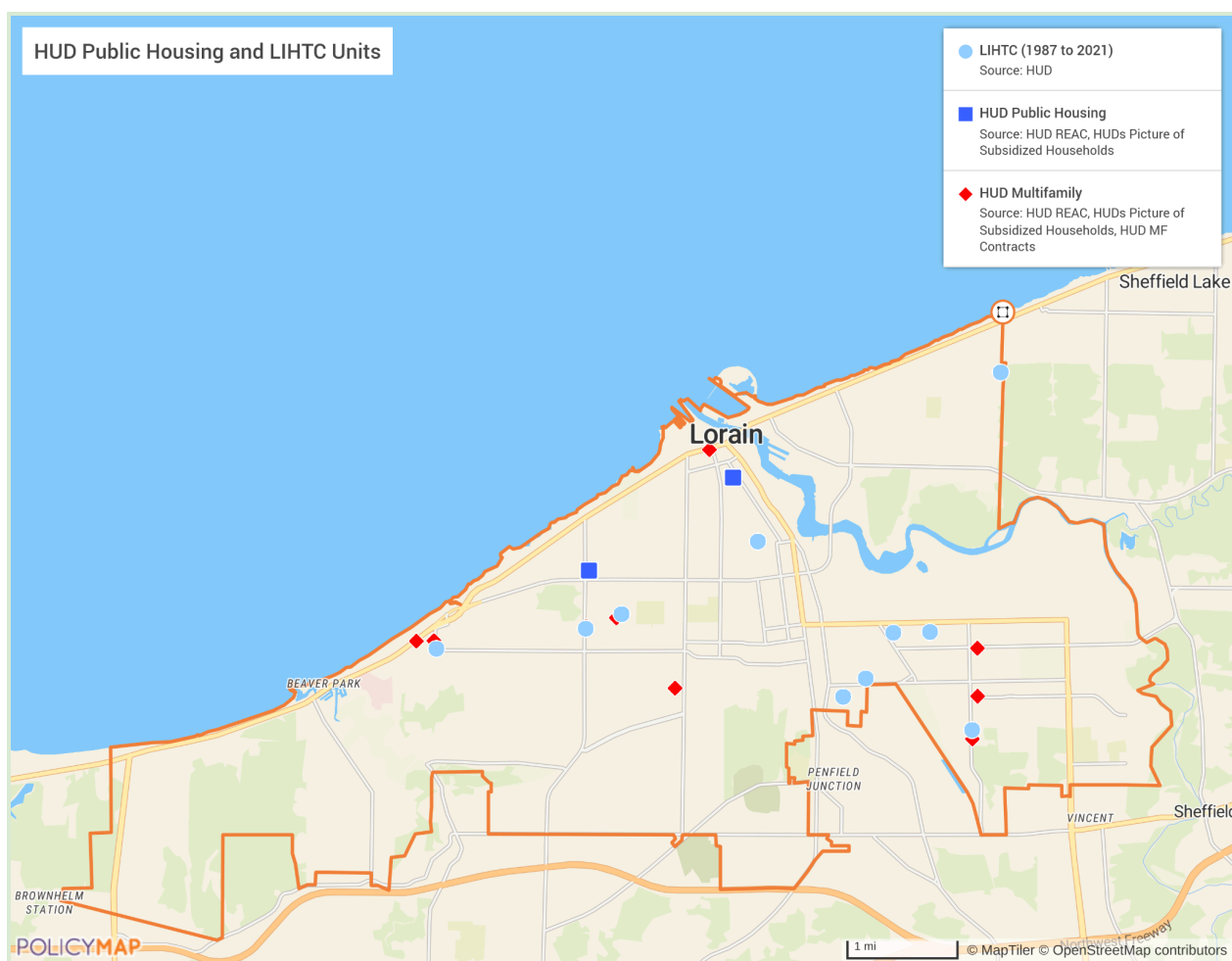


Source: PolicyMap Census American Community Survey, 5-Year Estimates, 2018-2022

Housing

Location of LIHTC and Section 8 Housing, Mapped

Most subsidized housing in the city is HUD multifamily housing, of which there are 10 locations.⁸ There are 721 total subsidized units with 918 total residents in HUD multifamily housing in Lorain. There are also 2 HUD public housing complexes in Lorain with 755 total units and a physical inspection score of 73 and 91, respectively. These complexes see an average household rental contribution of \$223 per month from residents. Within Lorain's 10 LIHTC complexes there are 515 total units, of which 98% are low income units. The 30 year point for these units came in 2023 for the oldest complex and will come in 2042 for the newest.

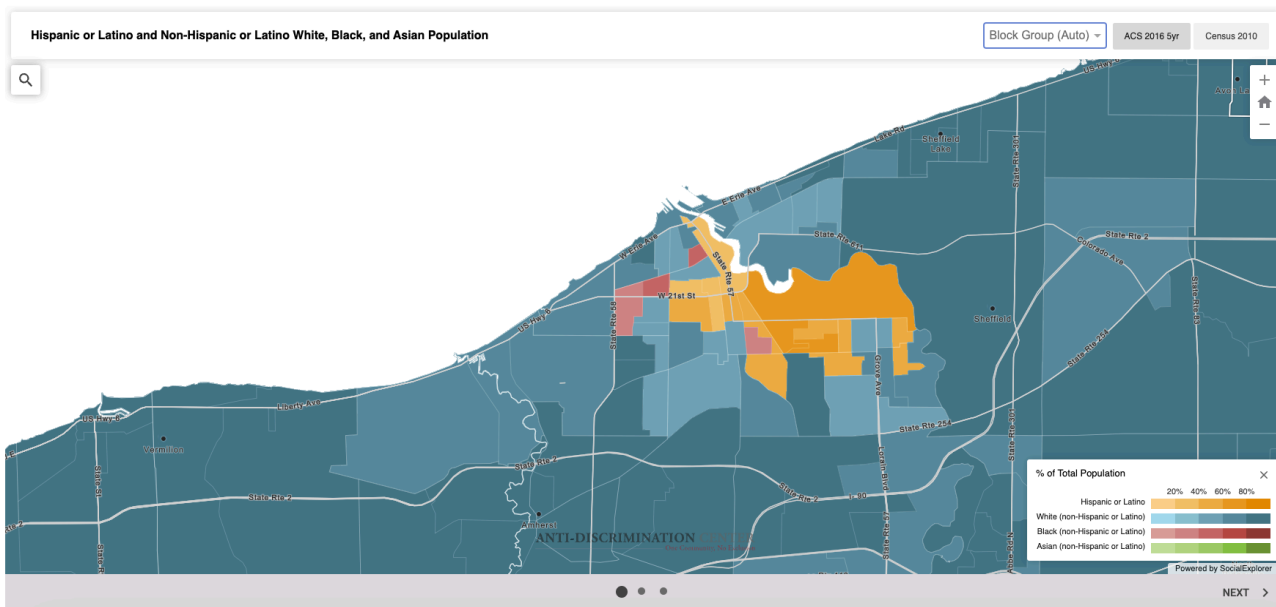


Source: PolicyMap HUD Public Housing and LIHTC Units

⁸ Fourth Economy Analysis of PolicyMap | HUD, 2023

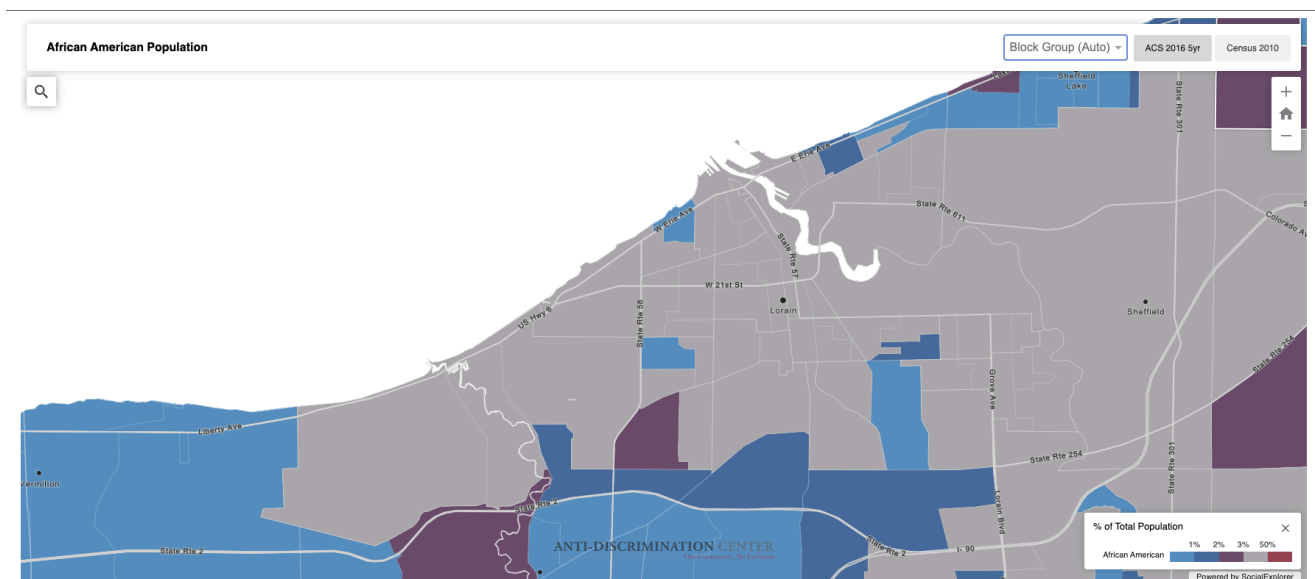
Residential Segregation, Mapped

The Anti-Discrimination Center's online mapping tool reveals census tracts where residential segregation by race and ethnicity exists in Lorain. This is especially true for the Hispanic or Latino population, where certain block groups in the city range from 40% to 80% Hispanic or Latino. The occurrence of residential segregation by race and ethnicity is seen in more detail below.



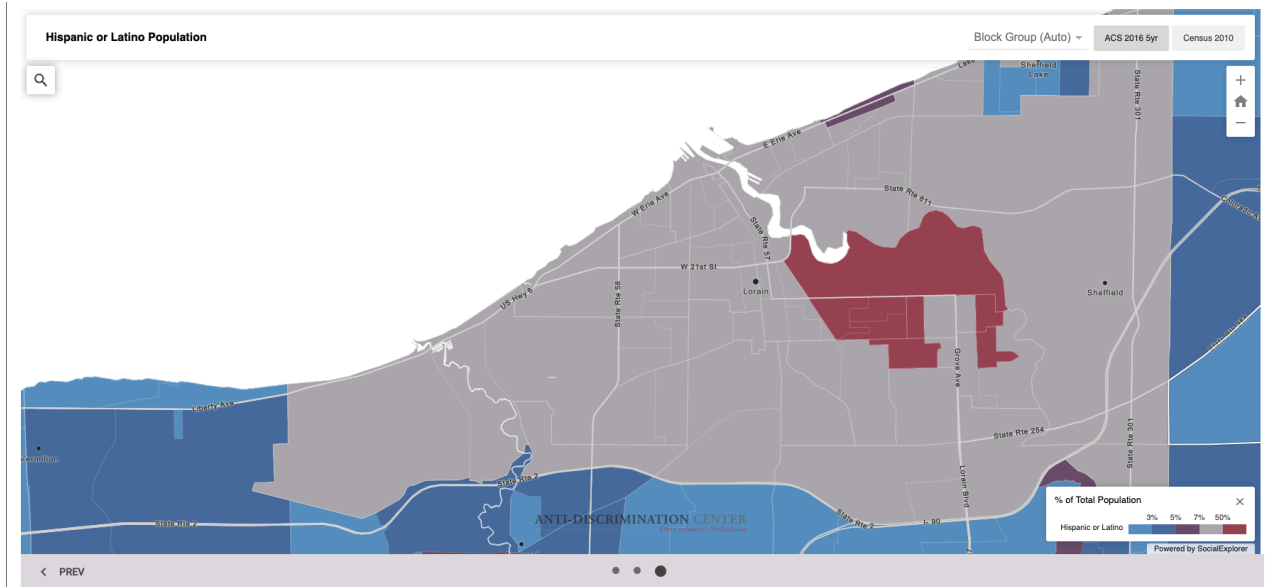
Source: [Segregated, really segregated, or ultra-segregated? | Anti-Discrimination Center](#)

Black Population



Source: [Segregated, really segregated, or ultra-segregated? | Anti-Discrimination Center](#)

Hispanic or Latino Population



Source: [Segregated, really segregated, or ultra-segregated? | Anti-Discrimination Center](#)

Historic Impact of Redlining

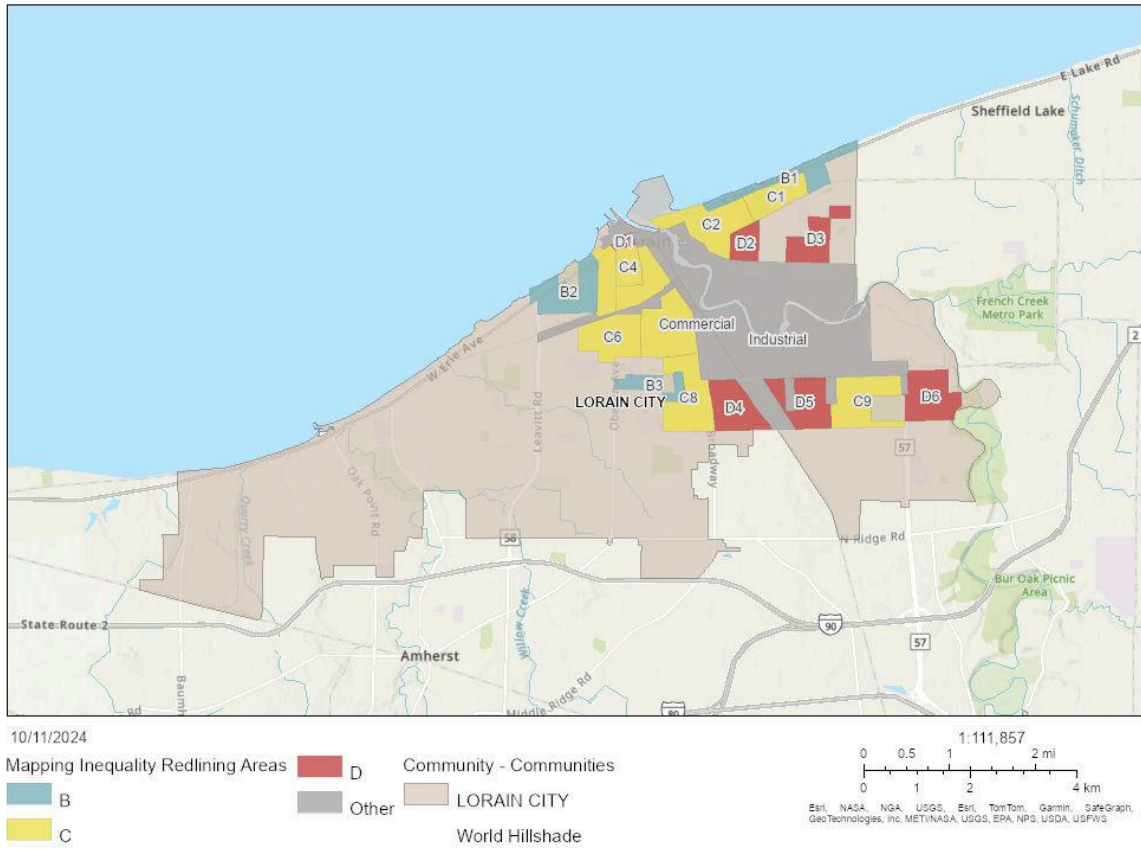
In the wake of the Great Depression, the U.S. Government issued federally-insured mortgages through homeownership programs designed to increase homeownership and support the larger economy.⁹ To assess the loan worthiness of America's neighborhoods, the Home Owners' Loan Corporation (HOLC), an agency of the federal government, graded the "residential security" of areas based on their perceived riskiness for banks and lenders.¹⁰ HOLC created maps for cities that graded neighborhoods on an A through D scale, with A neighborhoods deemed "best" for mortgage lenders and shaded green and D neighborhoods deemed "hazardous" to lenders and shaded red. These grades were paired with an area description that described the houses, sales and rental history, and demographic characteristics of the residents. The result of this grading process was that African American neighborhoods, and to a lesser extent those with immigrants or Jewish residents, were deemed a financial risk to lenders and excluded from the ability to obtain a loan and own a home. These "redlined" communities minimized the long-term accumulation of wealth through homeownership for African American and other minority communities, and contributed to residential segregation and economic disinvestment that is still evident today.

Crucially, no neighborhoods in the HOLC map from 1937 for the City of Lorain shown in the map below are given an "A" grade, but rather range from B to D; this is largely due to the poverty of its residents and the mixed racial make-up of Lorain's working class neighborhoods. A 1939 real estate analysis of the city by the Works Project Administration found that 32% of residential neighborhoods in the city are described as "definitely declining" and 11% to 60% of residences within one to two blocks of heavy industry, of which 37% of land was identified as industrial.

⁹ [redlining | Wex | US Law | LII / Legal Information Institute.](#)

¹⁰ [Mapping Inequality](#)

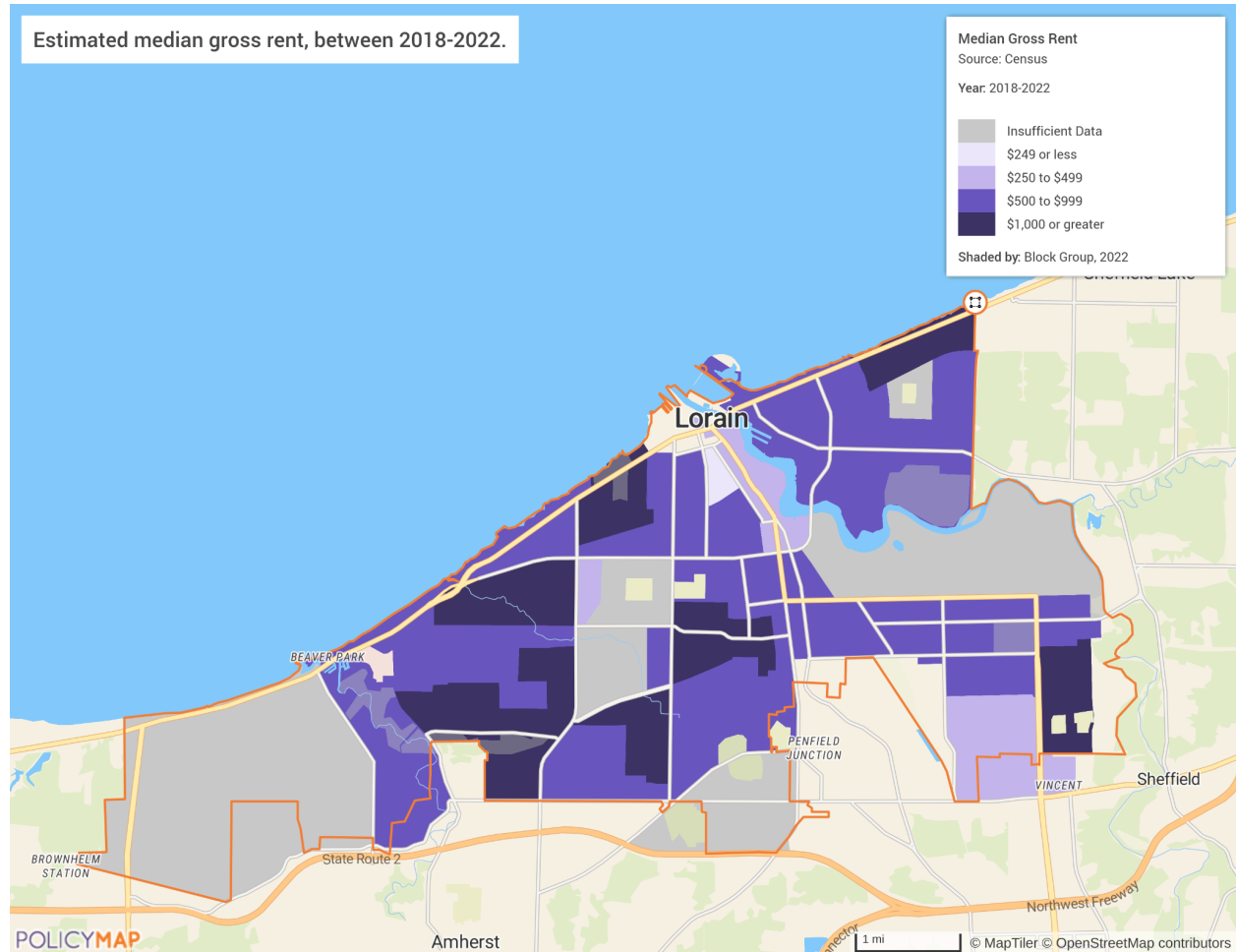
Lorain City, Historic Redlining



Source: Fourth Economy Analysis of [Mapping Inequality](#)

Median Gross Rent by Block Group

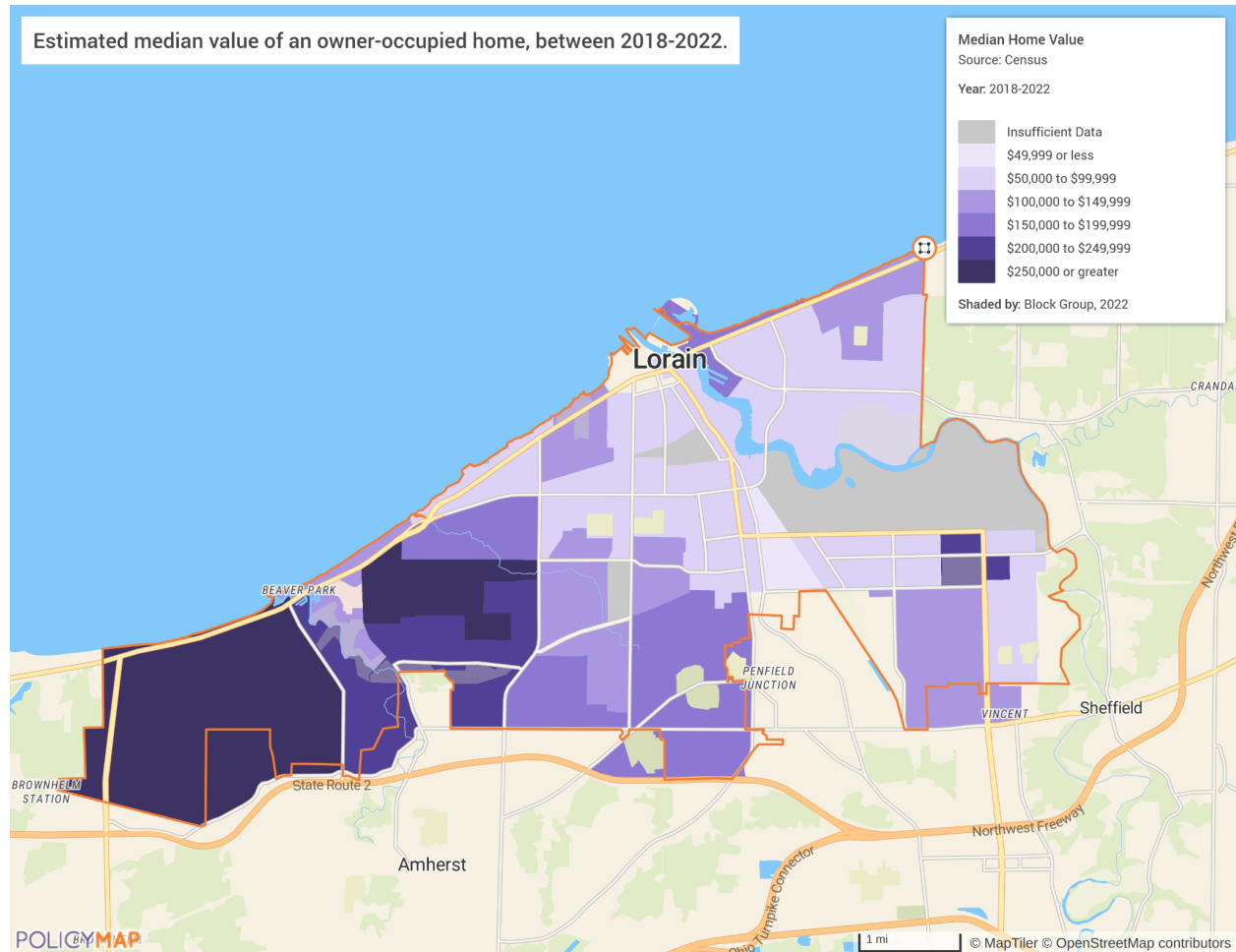
Rent in the city tends to be \$832, although this ranges from below \$500 to above \$1,000 in various parts of Lorain.



Source: PolicyMap Census American Community Survey, 5-Year Estimates, 2018-2022

Median Home Value by Block Group

Home values in Lorain tend to be highest in the southwest block groups of the city at a value of \$250,000 or greater, while block groups in the center of the city have the lowest median values (below \$100,000).



Source: PolicyMap Census American Community Survey, 5-Year Estimates, 2018-2022

Mortgage Financing and Foreclosures

Home Mortgage Originations

The Home Mortgage Disclosure Act (HMDA) requires that financial institutions disclose data about the home loans that are originated by potential home buyers and the end result of those loans, whether they were approved, approved but not accepted, denied, withdrawn, or closed for incompleteness. Because mortgage lending has historically been a main way in which people experience housing discrimination, analysis of HMDA data is a way that communities can determine if lenders are serving the specific housing needs of their residents. The table below shows data for the City of Lorain from 2019-2023, the most recent dataset available.

Race	Number of Applications	Percentage of Loans Originated	Percentage of Applications Approved but not Accepted	Percentage of Applications Denied	Percentage of Applications Withdrawn by Applicant	Percentage of Files Closed for Incompleteness
Native American	63	49%	5%	27%	13%	6%
Asian	93	48%	3%	16%	20%	12%
Black	895	51%	3%	27%	14%	5%
White	7,055	62%	2%	19%	13%	4%
Other	124	60%	2%	21%	10%	8%
Total	10,066	59%	2%	20%	14%	4%
Hispanic or Latino	1,729	60%	2%	20%	14%	4%

Source: Home Mortgage Disclosure Act (HMDA) data, 2019-2023

During this period, Black applicants were approved at a rate (51%) lower than White (62%) applicants, and Asian applicants were approved at the lowest rate (48%). Black and Native American applicants had the highest denial rates (27%), while Asian applicants saw the lowest denial rate at 16%. This pattern underscores the continued presence of systemic bias in mortgage lending, as well as potential disparities in financial literacy and reduced opportunity for communities of color.

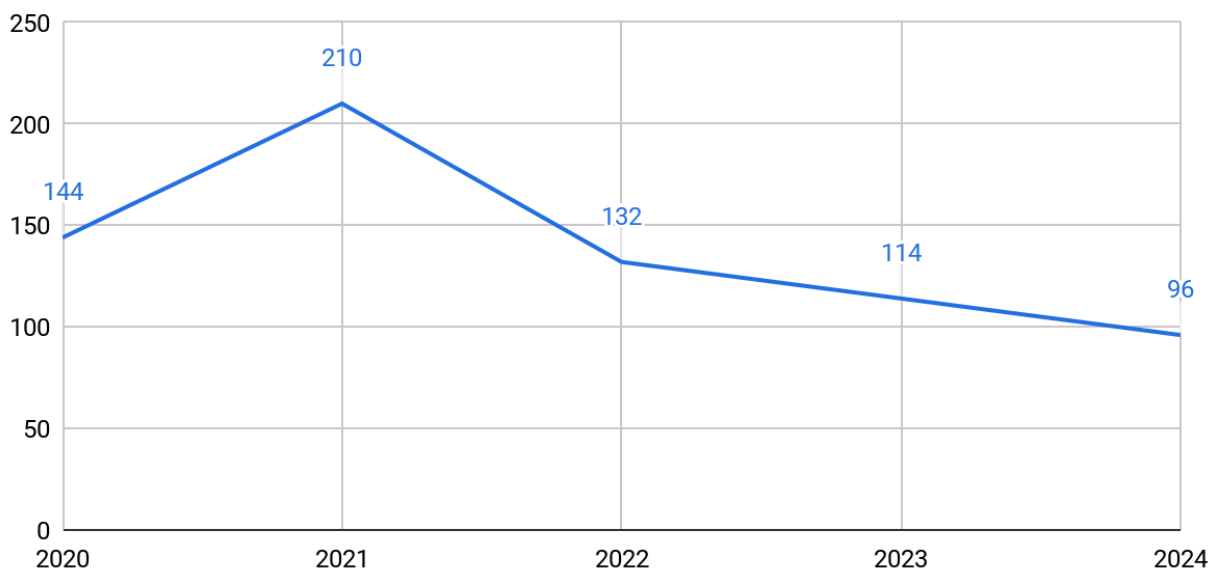
Foreclosures

Home foreclosures can be a way to understand housing affordability for homeowners over time, and overall wealth building for a community. Foreclosures can also impact neighboring properties, bringing down their sales value. According to data from the Lorain County Sheriff's Office, as of October 16, 2024 there had been 659 foreclosures in the City of Lorain since January 1, 2020. Foreclosures peaked in 2021 at 210, at the height of the COVID-19 pandemic.

This report does not include foreclosures that were dismissed and never issued to the Sheriff's Office, in addition to foreclosure reports that were issued to a private selling officer as the Sheriff's Office does not track those sales.

Foreclosure Filings by Year

City of Lorain



Source: Lorain County Sheriff's Department, 2020-2024

By comparison, there were 1,688 bank foreclosures and 899 tax foreclosures county-wide for the same period for a total of 2,587 foreclosures.¹¹ The City of Lorain comprises 25% of these foreclosures.

¹¹ [Lorain County Court Of Common Pleas | Docket Sheet](#)

Housing problems and severe housing problems

Housing Problems Defined

HUD defines “housing problems” in four main ways: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened. Here, overcrowding means more than 1 person per room in a household, while cost burden refers to situations in which monthly housing costs (including utilities) exceed 30% of monthly income.

Housing Problems for All Households

In Lorain, 8,560 of 26,110 households have 1 or more of the housing problems listed above. This represents a third of all households.

	Has 1 or more of the 4 housing unit problems (lacks kitchen or plumbing, more than 1 person per room, or cost burden greater than 30%)	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Grand Total
All	8,560	17,550	26,110
American Indian or Alaska Native alone, non-Hispanic	33	65	98
Asian alone, non-Hispanic	55	170	225
Black or African-American alone, non-Hispanic	1,629	2,280	3,909
Hispanic, any race	2,495	4,230	6,725
Pacific Islander alone, non-Hispanic	10	25	35
White alone, non-Hispanic	4,160	10,335	14,495

Source: Fourth Economy Analysis of HUD Comprehensive Housing Affordability Strategy, 2016-2020

Housing Problems for Households 0-30% of AMI

Among households making 0-30% of AMI, 70% of households suffer from 1 or more housing problems. These are concentrated among White households (50% of households at this income level) and, to a lesser extent, Hispanic or Latino households (28% of households at this income level).

Race/ethnicity	has 1 or more of the 4 housing unit problems (lacks kitchen or plumbing, more than 1 person per room, or cost burden greater than 30%)	has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Grand Total
All	4,820	2,025	6,845
American Indian or Alaska Native alone, non-Hispanic	4	65	69
Asian alone, non-Hispanic	10	10	20
Black or African-American alone, non-Hispanic	895	580	1,475
Hispanic, any race	1,350	485	1,835
Pacific Islander alone, non-Hispanic	10	0	10
White alone, non-Hispanic	2,430	785	3,215

Source: Fourth Economy Analysis of HUD Comprehensive Housing Affordability Strategy, 2016-2020

Housing Problems for Households 30-50% of AMI

Race/ethnicity	Has 1 or more of the 4 housing unit problems (lacks kitchen or plumbing, more than 1 person per room, or cost burden greater than 30%)	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Grand Total
All	2,560	1,395	3,955
American Indian or Alaska Native alone, non-Hispanic	29	0	29
Asian alone, non-Hispanic	45	0	45
Black or African-American alone, non-Hispanic	555	115	670
Hispanic, any race	775	385	1,160
Pacific Islander alone, non-Hispanic	0	0	0
White alone, non-Hispanic	1,095	890	1,985

Source: Fourth Economy Analysis of HUD Comprehensive Housing Affordability Strategy, 2016-2020

Housing Problems for Households 50-80% of AMI

Race/ethnicity	Has 1 or more of the 4 housing unit problems (lacks kitchen or plumbing, more than 1 person per room, or cost burden greater than 30%)	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Grand Total
All	865	4,040	4,905
American Indian or Alaska Native alone, non-Hispanic	0	0	0
Asian alone, non-Hispanic	0	35	35
Black or African-American alone, non-Hispanic	175	455	630
Hispanic, any race	230	1,065	1,295
Pacific Islander alone, non-Hispanic	0	0	0
White alone, non-Hispanic	460	2,440	2,900

Source: Fourth Economy Analysis of HUD Comprehensive Housing Affordability Strategy, 2016-2020

Housing Problems for Households 80-100% of AMI

Race/ethnicity	Has 1 or more of the 4 housing unit problems (lacks kitchen or plumbing, more than 1 person per room, or cost burden greater than 30%)	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Grand Total
All	230	2,680	2,910
American Indian or Alaska Native alone, non-Hispanic	0	0	0
Asian alone, non-Hispanic	0	0	0
Black or African-American alone, non-Hispanic	0	255	255
Hispanic, any race	140	785	925
Pacific Islander alone, non-Hispanic	0	25	25
White alone, non-Hispanic	90	1,510	1,600

Source: Fourth Economy Analysis of HUD Comprehensive Housing Affordability Strategy, 2016-2020

Housing Problems for Households 100%+ of AMI

Race/ethnicity	Has 1 or more of the 4 housing unit problems (lacks kitchen or plumbing, more than 1 person per room, or cost burden greater than 30%)	Has none of the 4 housing problems OR cost burden not computed, none of the other 3 housing problems	Grand Total
All	315	10,090	10,405
American Indian or Alaska Native alone, non-Hispanic	0	0	0
Asian alone, non-Hispanic	0	125	125
Black or African-American alone, non-Hispanic	4	1,130	1,134
Hispanic, any race	140	2,295	2,435
Pacific Islander alone, non-Hispanic	0	25	25
White alone, non-Hispanic	175	6,220	6,395

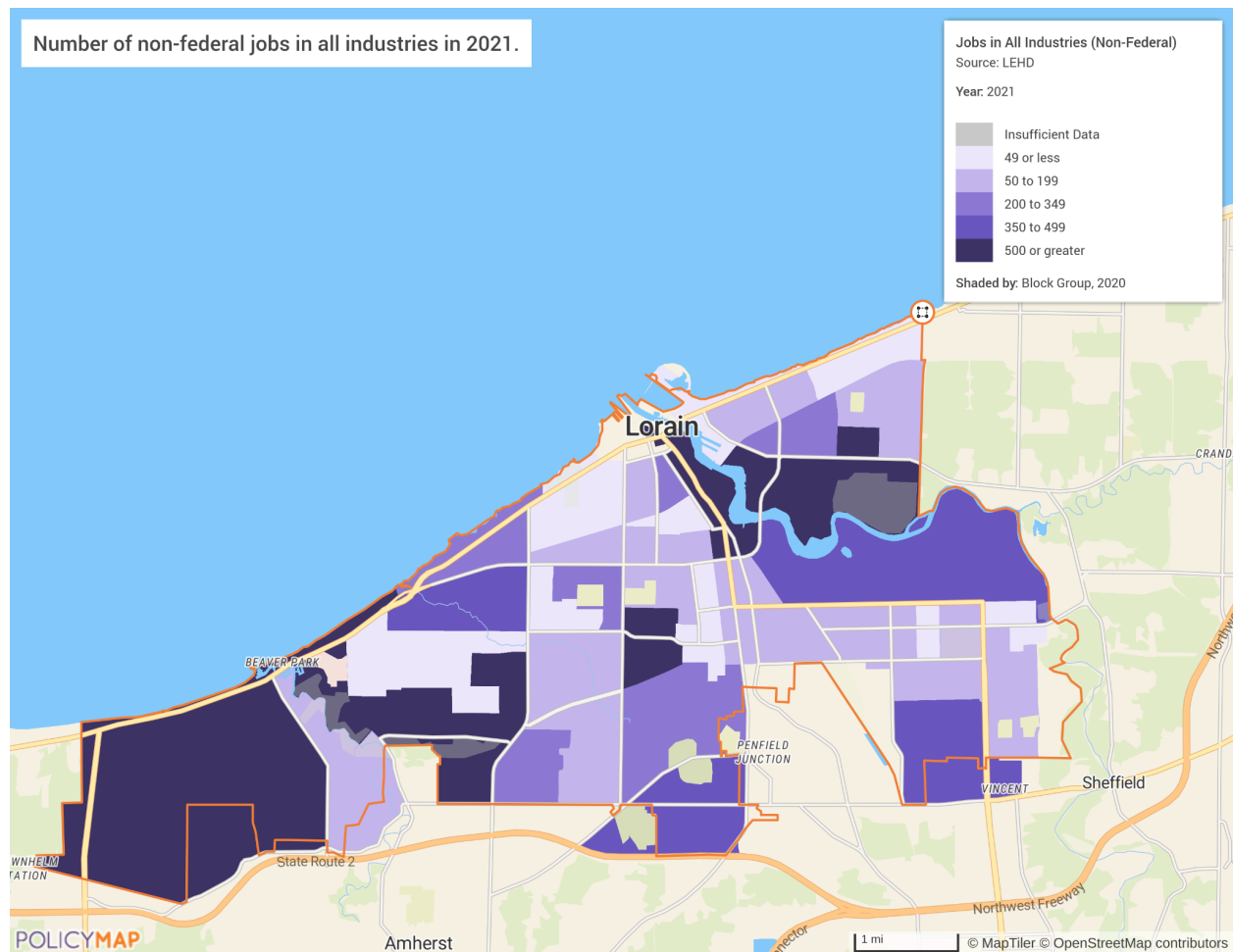
Source: Fourth Economy Analysis of HUD Comprehensive Housing Affordability Strategy, 2016-2020

The share of households with one or more housing problems present declines as the household income indicated by the AMI band increases. As shown in the charts above, 2,560 of 3,955 households (65%) in the 30-50% of AMI band have 1 or more housing problems; this is true for 865 of 4,905 households (18%) in the 50-80% of AMI; 230 of 2,910 (8%) in the 80-110% of AMI; and 215 of 10,405 (3%) households making 100%+ of AMI.

Employment and Transportation Access and Connectivity

Jobs by Block Group

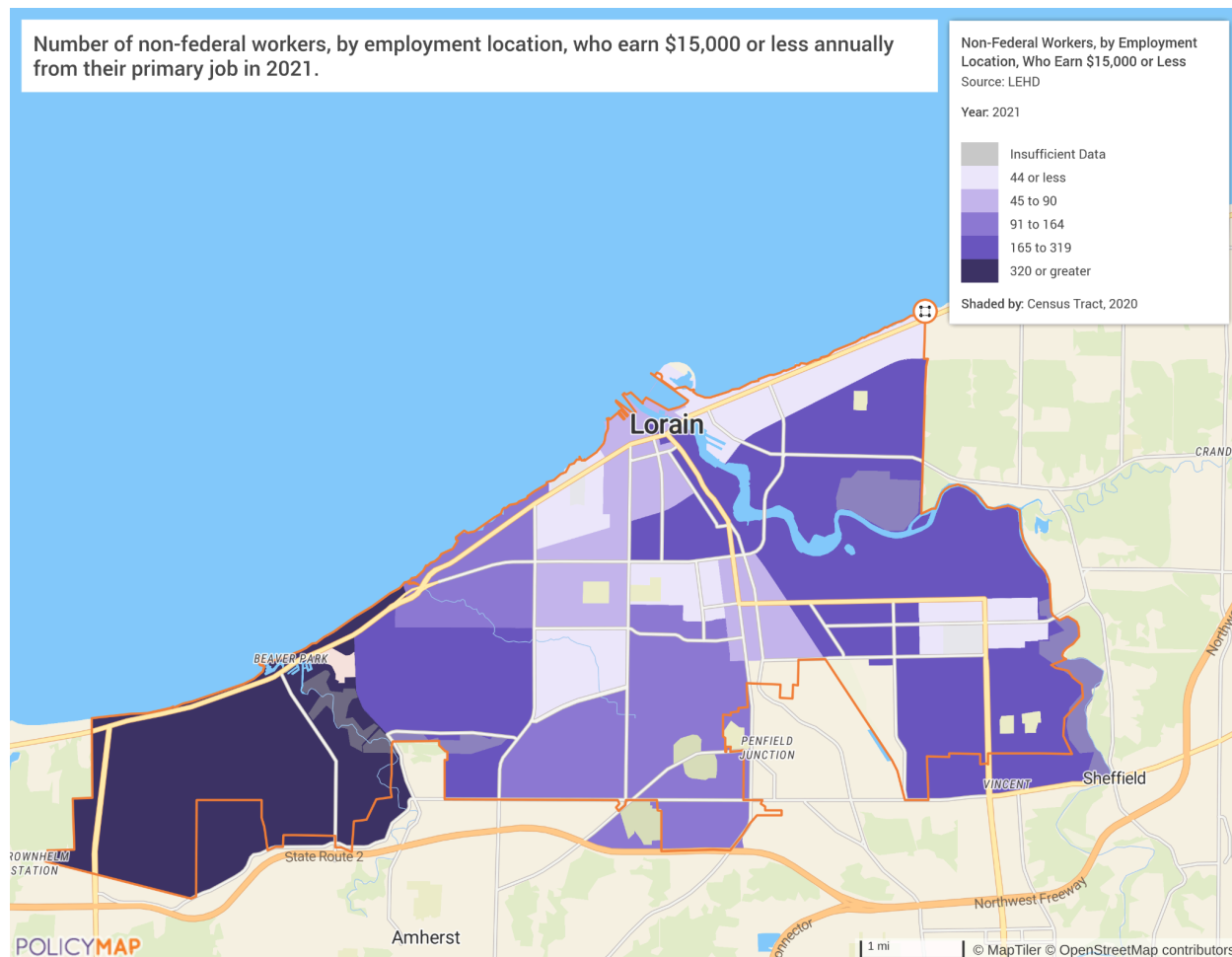
The greatest number of jobs in Lorain are concentrated in a block group in the west of the city with more than 500 jobs; in all, there were 13,048 jobs in the city in 2021.



Source: PolicyMap, Census Longitudinal Employer-Household Dynamics, 2021

Jobs Paying \$15,000 or Less by Block Group

Likewise, the jobs that pay \$15,000 or less are concentrated in the same block group in the west of the city; there are 2,380 jobs in Lorain that pay their workers this amount annually.



Source: PolicyMap, Census Longitudinal Employer-Household Dynamics, 2021

Travel Time to Work

The Census American Community Survey asks questions about where people work, how they get there, when they leave home, and how long it takes to create statistics about commuting, or a person's journey to work. The question the American Community Survey asks around travel time to work is: "How many minutes did it usually take this person to get from home to work LAST WEEK?"

More than half of Lorain residents have a commute time between 10 and 30 minutes; this is similar to the commute time for the county and state (51% and 55%, respectively with a travel to work in this range).

	Lorain		County		State	
	Number	Percent	Number	Percent	Number	Percent
Total	25,233	100%	132,314	100%	5,031,783	100%
Less than 10 minutes	3,298	13%	18,474	14%	731,027	15%
10 to 29 minutes	13,892	55%	67,308	51%	2,761,576	55%
30 to 59 minutes	6,779	27%	39,377	30%	1,278,182	25%

Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022 [Table B08012: Sex of Workers by Travel Time to Work](#)

More information about Commuting / Journey to Work questions found within the Census American Community Survey can be found at:

<https://www.census.gov/acs/www/about/why-we-ask-each-question/commuting/>

Household Access to a Vehicle

The Census American Community Survey asks questions about the vehicles available to each household to create statistics about vehicle access. The question the American Community Survey asks around household access to a vehicle is: "How many automobiles, vans, and trucks of one-ton capacity or less are kept at home for use by members of this household?"

Nearly half of Lorain residents have 2 or more vehicles to them, lower than compared to the county (60%) or the state (59%). 2,171 residents (8%) have no vehicle available to them.

	Lorain		County		State	
	Number	Percent	Number	Percent	Number	Percent
No vehicle available	2,171	8%	7,046	6%	356,115	7%
1 vehicle available	11,751	44%	42,830	34%	1,601,805	33%
2 or more vehicles available	12,954	48%	74,634	60%	2,831,488	59%

Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022 [Table DP04: Selected Housing Characteristics](#)

More information about Vehicles Available questions found within the Census American Community Survey can be found at:

<https://www.census.gov/acs/www/about/why-we-ask-each-question/vehicles/>

Means of Transportation to Work

The Census American Community Survey asks questions about where people work, how they get there, when they leave home, and how long it takes to create statistics about commuting, or a person's journey to work. The question the American Community Survey asks around the means of transportation to work is: "How did this person usually get to work LAST WEEK?"

92% of Lorain residents drove alone (79%) or carpoolled (13%) to work, higher than for the county (88%) or state (86%). Only 4% of residents work from home, lower compared to the county (8%) or state (10%).

	Lorain		County		State	
	Number	Percent	Number	Percent	Number	Percent
Car, truck, or van	24,242	92%	127,155	88%	4,780,275	86%
<i>Drove alone</i>	20,928	79%	115,436	80%	4,355,391	78%
<i>Carpooled</i>	3,314	13%	11,719	8%	424,884	8%
Public transportation (excluding taxicab)	168	1%	673	0%	67,044	1%
Bicycle	0	0%	226	0%	15,206	0%
Walked	172	1%	2,380	2%	113,183	2%
Taxicab, motorcycle, or other means	651	2%	1,880	1%	56,075	1%
Worked from home	1,122	4%	12,096	8%	547,505	10%

Source: Fourth Economy Analysis of Census American Community Survey, 5-Year Estimates, 2018-2022, [Table B08301: Means of Transportation to Work](#).

Note that this data covers the time period of 2018-2022. The COVID-19 pandemic posed challenges to collecting American Community Survey data in 2020 and, as a result, the ACS experienced high rates of non-response. Additionally, rates of work from home nationally have fluctuated in recent years, with higher rates of work from home in 2020 and 2021, lowering in more recent surveys. For more information, see:

<https://www2.census.gov/programs-surveys/commuting/guidance/acs-1yr/Mean-public-worked-from-home.pdf>

More information about Commuting / Journey to Work questions found within the Census American Community Survey can be found at:

<https://www.census.gov/acs/www/about/why-we-ask-each-question/commuting/>

REVIEW OF 2020-2024 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

This section reviews prior Fair Housing documents and summarizes the findings of those reports, recommended actions, and actions taken. This process involved interviews with city staff and partners who have been responsible for advancing the goals and actions articulated in the previous Fair Housing plan.

Specific topics for this piece of the report include:

- Review of prior Impediments
- Recommended Actions
- Actions taken

Impediments Identified, 2020-2024

The City of Lorain's most recent Analysis of Impediments to Fair Housing published on July 21, 2020 indicated the following impediments:

1. Limited Access to Public Transportation: In many neighborhoods across the City of Lorain, low-income neighborhoods and residents without access to a vehicle are limited in their access to school, community amenities, jobs, and other essential services.
2. Source of Income Discrimination: This policy limits housing choice for individuals and families utilizing Housing Choice Vouchers, thereby preventing them from living in neighborhoods of choice.
3. Limited Availability of Affordable Housing: Despite strides made by the city, there continued to be a need for affordable housing in locations throughout the city.
4. Insufficient Fair Housing Data Collection: Improved data would deepen the City's understanding of fair housing needs and enhance their ability to address them.
5. Poor Housing Conditions & Blight: Lower income neighborhoods have been hardest hit by absentee landlords, housing abandonment, property disrepair, and deferred maintenance.
6. Low Awareness of Fair Housing Laws: Many residents were unfamiliar with fair housing laws and were not confident that their reports would be addressed if they experienced housing discrimination.
7. Insufficient City Staff Capacity: At the time of the previous plan, the City recently engaged a Fair Housing Coordinator and was in the process of recruiting and hiring a new director for the Building, Housing, and Planning Department.

Recommended Actions, 2020-2024

In accordance with the impediments identified in the previous analysis, the following recommendations were made:

1. Increase Access to Public Transportation for all, with particular attention given to low-income neighborhoods, as well as senior citizens and persons with disabilities.
2. Amend Fair Housing Ordinance to prohibit source of income discrimination.
3. Increase Affordable Housing Options by working with LIHTC developers to encourage the development of decent, affordable housing across the city.
4. Housing Rehabilitation & Blight Removal to improve the quality of available housing across the city.
5. Improve Fair Housing Data Collection including fair housing testing and adding data sources such as scans of housing-related advertisements and review of benchmark data sources such as the Mortgage Act data source.
6. Awareness-Raising & Fair Housing Education so that residents know fair housing laws and are enabled to take action if they experience housing discrimination.
7. Augment City Staff Capacity through hiring and onboarding additional staff members and training them on fair housing laws and best practices.

Actions Taken, 2020-2024

In response to the aforementioned recommendations, the following actions have been undertaken by the City of Lorain:

Improved Access to Public Transportation: Several efforts have been made to improve access to public transportation for the residents of Lorain, Ohio. First, a one-year microtransit pilot program, dubbed ViaLC, launched on July 15, 2024 to provide on-demand public transit service with Lorain being one of two service zones. The service aims to expand access to efficient, flexible, and affordable transportation for residents by augmenting existing fixed-route buses operated by Lorain County Transit. Within the first two months of its launch, ViaLC completed over 10,000 rides to more than 2,400 account users, including rides for essential tasks such as work commute and trips to the grocery store. Usage rates and other key findings from this pilot will be used to inform the development of additional fixed routes circulators being planned by LCT for 2027.

Additionally, the City participated in the MOVE Lorain County workforce transportation pilot during the period of January 1, 2022 to September 30, 2022. The pilot was a joint effort between Lorain County, United Way of Greater Lorain County, and employers Avient Corporation and Thogus Products. During this time, vehicles contracted through LifeCare Ambulance and Safe & Reliable Transportation ran on three shifts seven days per week facilitating taking riders from the city of Lorain (-and Elyria-) to their respective employers in Avon Lake. Efforts were made to continue and scale this pilot program upon its completion, but were unsuccessful due to funding constraints.

Major employers and their employees in and around the city of Lorain continue to have access to similar services made available through the Northeast Ohio Areawide Coordinating Agency's (NOACA) Vanpool Program in partnership with Commute with Enterprise. Through this ongoing program, 5-15 employees of a company receive access to a van and split the cost for transportation, with a 50-80% subsidy offered by NOACA. Through a complementary program, Emergency Ride Home Guaranteed, employees may also receive emergency transportation when needed, such as circumstances where they stay late at work, need to pick up a child, or are sick at work. Through this program, NOACA reimburses up to 80% of transportation costs (including bus tickets, Uber, Lyft, or taxi fare). This reimbursement may be used up to four times per year and up to \$60 per trip.

Fair Housing Ordinance: On April 1, 2024, the city of Lorain, Ohio passed an amendment to its ordinances prohibiting discrimination based on a person's source of income. This legislation aimed to protect renters and ensure that individuals could not be denied housing based on their income status, such as housing vouchers or public assistance.

Increased Affordable Housing Options: Since the finalization of the previous study, the city has committed to the development of more affordable housing options. First, the City of Lorain along with Lorain Metropolitan Housing Authority (LMHA) was awarded a \$500,000 Choice Neighborhood Planning Grant from the U.S. Department of Housing and Urban Development (HUD) on December 22, 2022. Since then, efforts have been underway to redevelop and revitalize Southside Gardens and the surrounding community. Specifically, this plan aims to replace distressed public housing with high-quality mixed income housing, create opportunities for public and private investments to offer important amenities and assets to the community, and improve outcomes for residents in areas such as income, employment, health, and education. The project is projected to reach completion within 5-7 years.

In addition, the City has supported housing projects advanced by CHN Housing Partners and their respective development partners hoping to utilize Low-Income Housing Tax Credits (LIHTC). These have included:

- (2022) Updating and modernization of Southern Heights Preservation apartment buildings, which contain approximately sixty-three (63) affordable housing units;
- (2022) Rehabilitation of eleven (11) Sunrise Neighborhood Living Permanent Supportive Housing properties, some of which are located in the city of Lorain, to include the improved energy efficiency, accessibility, which will be made available to households earning less than 30% AMI; and
- (2023) Updating and modernizing of Sunrise Homes apartment buildings which comprise thirty-five (35) units of housing within the city of Lorain.

Housing Rehabilitation & Blight Removal: The City has also pursued brownfield remediation efforts at the former Stove Works, St. Joseph's Hospital, and Pellet Terminal sites, receiving \$4.8 million, \$6.5 million, and \$4 million respectively, for clean up and redevelopment. There are

ongoing discussions about pursuing similar remediation efforts at the site of the former Republic Steel mill.

Awareness-Raising & Fair Housing Education: Since 2022, the City has contracted with the Fair Housing Center for Rights and Research to provide fair housing services and support to residents. A core focus of their efforts have been on awareness-raising, with advertisement via radio, tv, social media, and billboards to inform residents of their rights and opportunities for redress related to fair housing. The Center is open to residents who want to enquire about possible discriminatory experiences they have had, with intake counselors available to provide information and referrals to suitable services. All resources and services are provided in English and Spanish.

City Staff & Capacity: In addition to the services provided to the community, the Fair Housing Center for Rights and Research has also provided capacity building training to the city of Lorain's Fair Housing Board as well as the staff of the Building, Housing, and Planning Department. Training topics have included the history of racial zoning, disparities, and redlining in Lorain; the early history of fair housing in the United States; applicable fair housing laws; protected classes; criteria for fair housing violation; and available options for redress.

Fair Housing Data Collection: The City of Lorain, through its contract with Fair Housing Center for Rights and Research, also completed fair housing testing between May 2023 and March 2024 to ensure landlords' and property managers' compliance with fair housing laws.

IMPEDIMENTS TO FAIR HOUSING, 2025-2029

This section presents the current status of fair housing complaints and citizen participation. It then presents identified impediments to fair housing in the City of Lorain, in light of the data analysis and community input, and review of the past plan and actions taken. Specific topics for this piece of the project include:

- Fair Housing Complaints
- Citizen Participation
- Fair Housing and the Comprehensive Plan
- Fair Housing and Source of Income Discrimination
- Fair Housing and the Lorain Metropolitan Housing Agency (LMHA) Planning
- Identified Impediments to Fair Housing, and Recommended Action Steps, 2025-2029

Fair Housing Complaints

A review of Fair Housing Complaints for the County of Lorain from January 1, 2019 to June 30, 2024 reveals that 46 complaints were received within the City for that period. All of these complaints were received for rental units.

Fair Housing Complaints affected 46 households representing 77 residents, 31 of which were children. 35 of the 46 complainants were female. African Americans represented 16 of the complaints were African American, 19 were White, and 6 were Latinx/Hispanic.

The Fair Housing Act prohibits discrimination in housing because of race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, or disability. Some complaints had multiple reasons, with the greatest share of complaints were experienced on account of disability. The reasons for complaints were as follows:

- Race: 13
- Color: 0
- National Origin: 0
- Sex: 5
- Familial Status: 5
- Disability: 30
- Age: 1
- Criminal History: 3
- Retaliation: 3
- Other: 1

ID #	Intake Date	Protected Basis	Respondent 1	Property Address
2640	2/16/21	Disability - Physical	LMHA - Lorain Metropolitan Housing Authority	
2723	5/19/21	Familial status	Caraballo Kathryn	3011 Leavitt Road
2831	8/12/21	Race - Black or African American	Twin Wells Mobile Home Park	3948 Reid Avenue, Lot 9
2871	9/17/21	Sex Disability - Physical	JDL Diversified LLC	1634 Euclid Avenue
2891	10/1/21	Familial status Criminal history Race - Black or African American	Twin Wells Mobile Home Park	3946 Reid Ave
2998	12/8/21	Criminal history Disability - Mental	Oak Hills West LLC	4749 Oak Point Rd
3063	2/8/22	Retaliation Disability - Both physical & mental	Millennia Housing Management	5009 West Erie Avenue, Apt. 2
3180	4/21/22	Race - Black or African American Vietnam/Disabled Veteran Status Disability - Physical	Ohio Project, LLC	712 E. Erie Avenue, Unit A
3186	5/2/22	Unknown	Millennia Housing Management	500 West Erie Ave., \$104
3239	6/10/22	Sex Race - Black or African American	Whitestone Investments LLC	1200 Tower Boulevard
3245	6/14/22	Sex Race - Black or African American	Realtywise Real Estate Services	1200 Tower Boulevard
3250	6/22/22	Disability - Mental	Sweda Property Management Group	2733 West Erie Avenue
3293	7/21/22	Criminal history	United Property Management	300 Washington Ave.
3334	8/10/22	Disability - Physical	Showe Management Corp	3530 Pin Oak Dr., Apt. B
3339	8/12/22	Disability - Physical	J&S Management	3014 Fulmer Dr., Apt. 37
3340	8/12/22	Disability - Physical Sex - Sexual harassment	J&S Management	3014 Fulmer Dr., Apt. 37
3378	9/7/22	Disability - Both physical & mental	Millennia Housing Management	Westlake Gardens Apartments
3386	9/9/22	Race Sex Race - Black or African American	Lorain Metropolitan Housing Authority	4163 Goldenrod Ln.
3434	9/30/22	Race - Black or African American	Showe Management Corp	3501 Pin Oak Dr.
3469	10/20/22	Race - White	Twin Wells Mobile Home Park	3946 Reid Ave., Lot D-7
3477	10/24/22	Race - Black or African American Disability - Both physical & mental	Millennia Housing Management	500 West Erie Ave., Unit 104

3497	11/2/22	Race - Black or African American	Twin Wells Mobile Home Park	3948 Reid Avenue, Lot 9
3502	11/8/22	Disability - Physical	Wallick Communities	420 West 15th Street
3508	11/14/22	Disability - Both physical & mental		E. 21st St. & Broadway
3515	11/14/22	Disability - Mental	Sandstone Realty	2104 Tower Blvd., # 203
3517	11/15/22	Disability - Physical	Wallick Communities	420 West 15th Street Apartment 313
3575	12/19/22	Disability - Physical	Echko, Patricia	4950 Toledo Avenue
3637	1/26/23	Disability - Both physical & mental	LMHA - Lorain Metropolitan Housing Authority	
3728	3/17/23	Race - Black or African American		1560 1/2 Broadway
3774	4/11/23	Disability - Physical	J&S Management	3014 Fulmer Dr., Apt. 37
3948	7/25/23	Race - Black or African American Disability - Physical	Clover Group	5401 N Pointe Pkwy, #120
3961	7/31/23	Disability - Physical	Clover Group	5401 N Pointe Pkwy #140
3966	8/2/23	Disability - Physical	Clover Group	5401 N Pointe Pkwy.
4005	8/23/23	Disability - Physical	LMHA - Lorain Metropolitan Housing Authority	310 W 7th St., Apt. 1115
4006	8/23/23	Disability - Physical	Millennia Housing Management	5009 W. Erie Avenue, Apt. 2
4028	9/14/23	Familial status Disability - Mental	Rem Commercial Property Management	4004 W Erie Ave Apt 8
4037	9/16/23	Disability - Mental		
4062	9/26/23	Familial status	English Lakes Condo Association	
4103	10/10/23	Retaliation Disability - Physical	Keith Todd, LLC	2501 E. 31st St.
4254	1/10/24	Retaliation	Keith Todd, LLC	2501 E. 31st St.
4320	2/19/24	Disability - Physical	Rowland Enterprises	3910 W. Erie Ave. Apt. A15
4322	2/20/24	Age Familial status	Bennett-Calabrese, Debra	2854 Cromwell Drive
4345	3/1/24	Disability - Physical	Rowland Enterprises	3910 W Erie Ave. Apt B9
4386	3/19/24	Race - Black or African American	The Village Life	3600 Jaeger Rd. Apt. 6307
4461	4/25/24	Disability - Physical	Rowland Enterprises	3910 W. Erie Ave. Apt. A15
4504	5/24/24	Disability - Mental	Rowland Enterprises	3910 W. Erie Ave. Apt. A15

Source: Fair Housing Center for Rights & Research

Citizen Participation

The content outlined within this Analysis of Impediments to Fair Housing were compiled with input from following community members. Input was first solicited via individual interviews with key stakeholders to identify actions taken on the recommendations proposed in the previous Analysis, as well as gather their perceptions of ongoing priorities advancing fair housing within the City of Lorain, Ohio. Key findings from a corresponding city-wide resident survey completed for the development of the City of Lorain's 5-Year Comprehensive Housing Strategy were also incorporated. The final draft of the recommendations were provided to the City of Lorain's Building, Housing, and Planning Department and the City of Lorain's Fair Housing Board for their review prior to ratification.

Below is a comprehensive list of community partners that were engaged in the development of this Analysis:

- City of Lorain Building, Housing, and Planning Department
- City of Lorain Planning and Zoning Administrator
- City of Lorain Safety Service Department
- City of Lorain Fair Housing Board
- CHN Housing Partners
- Fair Housing Center for Rights and Research
- Lorain County Transit
- Lorain County Workforce Development Agency
- United Way of Greater Lorain County Mobility Management

Fair Housing and the Comprehensive Plan

The Status of Impediments to Fair Housing serves as a companion piece to the Comprehensive Housing Strategy. That work provides essential data and insights into the local housing market and broader economic conditions within the City of Lorain, and supports the City of Lorain's 5-Year Consolidated Plan for the U.S. Department of Housing and Urban Development (HUD) for the next 5 years. The 5-Year Consolidated Plan serves as a strategic roadmap for identifying and implementing housing, economic, and community development needs within the city

The previous Comprehensive Plan, completed in 2017, identified stabilizing neighborhoods as a priority for the City. All of the recommendations found in the Status of Impediments to Fair Housing will continue to help to improve housing choice for all residents of the City, including protected classes, especially in predominantly Black and Hispanic neighborhoods.

Fair Housing and Source of Income Discrimination

According to listings found on AffordableHousing.com, there are 72 rentals located in the City of Lorain where the filtered listing indicates that the property owner has experience with the Section 8 / Housing Choice Voucher Program.¹² 9 listings specifically mention Housing Choice Vouchers in the description, and 19 listings specifically mention Section 8 in the description. In 2002, 45% listings were advertised as accepting Housing Choice Vouchers (52 or 115). Source of income discrimination appears to be an ongoing concern that may require Fair Housing testing.

Fair Housing and the Lorain Metropolitan Housing Agency (LMHA) Planning

The most recent completed LMHA Annual Plan is for 2023.¹³ There are three areas of LMHA planning that intersect with Fair Housing: 1) policies related to Fair Housing specifically; 2) determination of eligibility of persons for LMHA programs including public housing, Housing Choice Vouchers, and others; and 3) decisions on locations of new LMHA housing.

The LMHA's Admissions and Continued Occupation Policy for Public Housing (ACOP), last updated in July of 2021 covers Fair Housing policy and eligibility requirements.¹⁴ The third relates to long term capital decisions made by LMHA regarding new housing and where it is located, but at this time the supply and location of LMHA housing has remained fixed.

Policies relating to Fair Housing specifically are located in the eligibility policies for LMHA's housing programs. They address LMHA's fair housing obligations for non-discrimination under federal regulations; providing reasonable accommodations to persons with disabilities; and meeting the public housing needs of eligible persons who have limited English proficiency.

Policies related to eligibility are also located in the eligibility policies. They particularly pertain to the definition of family:

Family as defined by HUD, includes but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status, a single person, who may be

¹² [Lorain, OH Rentals | AffordableHousing.com](https://www.affordablehousing.com/lorain-oh-rentals). Accessed October 29, 2024.

¹³ For the current plan, See Lorain Metropolitan Housing Authority, Annual Plan, 2023, accessed here: [http://www.lmha.org/_CE/pagecontent/Documents/Annual%20Plan/LMHA%202023%20Annual%20Plan%20Final%20\(1\).pdf](http://www.lmha.org/_CE/pagecontent/Documents/Annual%20Plan/LMHA%202023%20Annual%20Plan%20Final%20(1).pdf)

¹⁴ See the Lorain Metropolitan Housing Authority Policy Page, accessed here: <http://www.lmha.org/about-lmha/lmha-policies/>. For the Public Housing Admissions and Continued Occupation Policy (ACOP), updated July 2021, access here: http://www.lmha.org/_CE/pagecontent/Documents/ACOP%207.01.2021%20LMHA.pdf

an elderly person, disabled person, near-elderly person, or any other single person; or a group of persons residing together. Such group includes, but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a tenant family. The LMHA has the discretion to determine if any other group of persons qualifies as a family. LMHA has updated their familial status definition to be very broad, essentially defining a family to be any group of persons who effectively operate as a household.¹⁵

LMHA's mission is to provide safe, decent, affordable housing for persons of low-income in Lorain County. Housing affordability is a primary housing problem in Lorain. LMHA's housing programs are tailored to address affordability for general populations, elderly persons, and persons with disabilities. None of LMHA's owned-and-managed properties are substandard, as defined by HUD. LMHA is working towards implementing its Master Plans to redevelop Southside Gardens (Lorain) and replace functionally obsolete structures with new, quality affordable housing that is attainable to those with low income.¹⁶

¹⁵ See page 3-3 of the Public Housing Admissions and Continued Occupation Policy (ACOP), updated July 2021, access here:

http://www.lmha.org/_CE/pagecontent/Documents/ACOP%207.01.2021%20LMHA.pdf.

¹⁶ See LMHA 2023 Annual Plan, link above.