

2019 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The City of Fairborn, Ohio
The City of Xenia, Ohio
Greene County, Ohio

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1. Introduction

A. Introduction to the Analysis of Impediments

The Cities of Fairborn and Xenia and Greene County have collaborated and prepared a joint Analysis of Impediments to Fair Housing Choice to satisfy requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. As HUD entitlement community, Fairborn must comply with HUD rules and regulations designed to uphold the Housing and Community Development Act of 1974, as amended. Xenia and Greene County receive their funds from the State of Ohio and are required to demonstrate compliance with the same AI requirement. As a result, these three communities are charged with the responsibility of conducting their CDBG programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, including units of local government, which receive federal funds through the County and Cities.

Entitlement communities receiving CDBG funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice.

The Analysis of Impediments to Fair Housing Choice (AI) is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

B. Fair Housing Choice

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials and private citizens must embrace if equality of opportunity is to become a reality.

Under federal law, fair housing choice is defined as the ability of persons, regardless of race, color, religion, sex, disability, familial status, or national origin, of similar income levels to have available to them the same housing choices. In addition, the Ohio Fair Housing Law prohibits discrimination based on ancestry and military status. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This Analysis encompasses the following five areas related to fair housing choice:

- The sale or rental of dwellings (public and private)
- The provision of financing assistance for dwellings
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing
- The administrative policies concerning community development and housing activities, and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development (HUD)

regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e., the CDBG program regulations).

As recipients of federal or state CDBG funds, the three jurisdictions have specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the jurisdictions' initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working toward its elimination
- Promoting fair housing choice for all people
- Providing racially and ethnically inclusive patterns of housing occupancy
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities, and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This Analysis will:

- Evaluate population, household, income and housing characteristics by protected classes in each of the jurisdictions
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice, where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

HUD defines an impediment to fair housing choice as any actions, 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.

This Analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The elected governmental body is expected to review and approve the Analysis and use it for direction, leadership, and resources for future fair housing planning.

The Analysis will serve as a "point-in-time" baseline against which future progress in terms of implementing fair housing initiatives will be evaluated and recorded.

2. Demographic Information

A. Demographic Profile

i. Population Trends

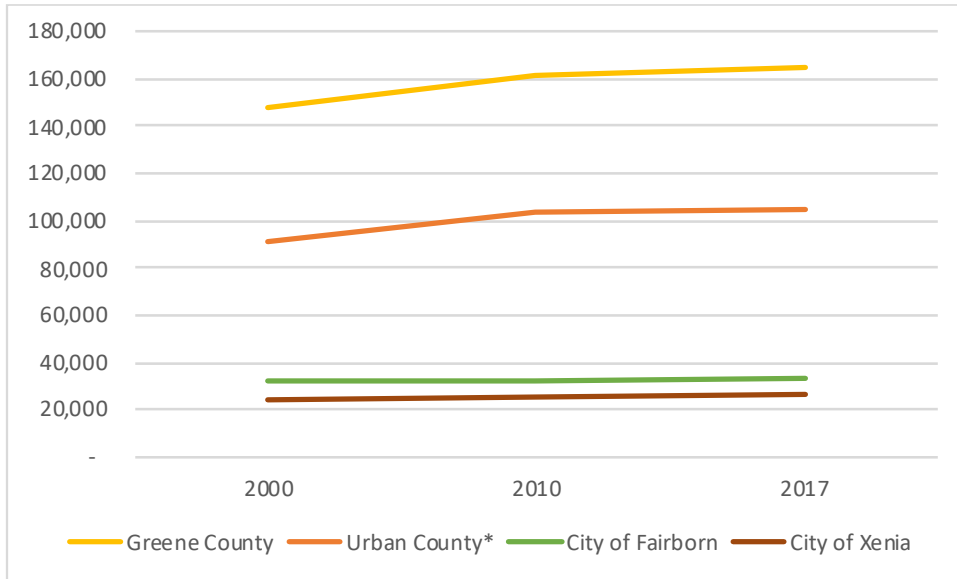
The Population of Greene County has increased by 11.5% since 2000. Most of this growth has occurred in the remainder of the County – Greene County exclusive of the Cities of Fairborn and Xenia – which experienced population growth of nearly 15% compared to only 4% in Fairborn and 8.4% in Xenia. The County’s rate of population growth has outpaced the rest of the Ohio’s which has only grown by 2.3% in the past 17 years. The majority of the County’s growth occurred between 2000 and 2010 when its population increased by 13,687 compared to an increase of only 3,252 between 2010 and 2017. Only Fairborn experienced more growth between 2010 and 2017. Compared to its six neighboring counties only Warren County grew faster than Greene County, while two others, Clark and Montgomery Counties, saw their populations contract.

Figure 2-1
Change in Population, 2000 – 2017

	2000	2010	2017	% Change 2000 - 2017
Ohio	11,353,140	11,536,504	11,609,756	2.3%
Greene County	147,886	161,573	164,825	11.5%
Remainder of County	91,670	103,502	105,288	14.9%
City of Fairborn	32,052	32,352	33,344	4.0%
City of Xenia	24,164	25,719	26,193	8.4%

Source: U.S. Census Bureau, Decennial Census (P001); 2013 – 2017 American Community Survey (B01003)

Figure 2-2
 Chart of Population Trends, 2000 – 2017



Source: U.S. Census Bureau, Decennial Census (P001); 2013 – 2017 American Community Survey (B01003)

There was significant growth in the County’s minority populations. The remainder of the County’s minority population grew at the fastest rate with 64.5% growth between 2000 and 2017. Most of this growth was in the number of Hispanics living in the region. Fairborn’s minority population grew by 56.7%, while its White population shrunk by 4.4% – the only jurisdiction covered by this AI to witness a contraction in its White population. Xenia’s minority population grew by 26.0%. Most of this growth occurred in the Other and Hispanic population groups. Xenia’s Asian/Pacific Islander population experienced a 22.0% decrease.

Despite the rapid pace of growth in minority populations across Greene County, minorities still represent a small fraction of each jurisdiction’s populations. In total, minorities only represent 15.0% of the entire County’s population. Black residents are the largest minority group at 5.5% in the remainder of the County, 7.7% of Fairborn’s, and 13.4% of Xenia’s populations. Hispanics are the fastest growing population group across all jurisdictions, but still represent less than 2.5% of the population in each, underscoring how even small increases in their population lead to a rapid rate of change.

Figure 2-3
Change in Population by Race, 2000 – 2017

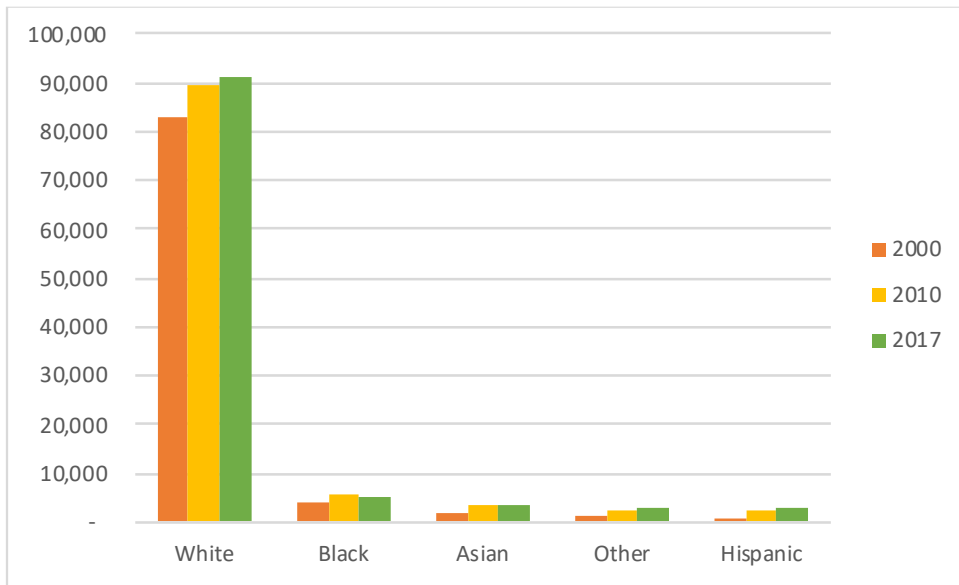
	Total Population	White*	Minority				Total Minority
			Black	Asian/Pacific Islander	All Other**	Hispanic	
2000							
Greene County	147,886	88.5%	6.3%	2.1%	1.9%	1.2%	11.5%
Remainder of County	91,670	90.8%	4.5%	2.0%	1.6%	1.1%	9.2%
City of Fairborn	32,052	86.3%	6.2%	3.4%	2.5%	1.7%	13.7%
City of Xenia	24,164	82.8%	13.3%	0.3%	2.4%	1.1%	17.2%
2010							
Greene County	161,573	85.1%	7.2%	2.9%	2.8%	2.1%	15.0%
Remainder of County	103,502	86.6%	5.5%	3.5%	2.4%	2.2%	13.5%
City of Fairborn	32,352	83.4%	7.7%	3.2%	3.3%	2.4%	16.7%
City of Xenia	25,719	81.1%	13.4%	0.5%	3.5%	1.7%	19.0%
2017							
Greene County	164,825	85.1%	7.2%	2.9%	2.8%	2.1%	15.0%
Remainder of County	105,288	86.6%	5.5%	3.5%	2.4%	2.2%	13.5%
City of Fairborn	33,344	83.4%	7.7%	3.2%	3.3%	2.4%	16.7%
City of Xenia	26,193	81.1%	13.4%	0.5%	3.5%	1.7%	19.0%
% Change 2000 - 2017							
Greene County	11.5%	6.0%	19.7%	63.3%	92.5%	145.4%	53.1%
Remainder of County	14.9%	9.8%	21.2%	84.0%	82.7%	178.3%	64.5%
City of Fairborn	4.0%	-4.4%	26.4%	33.8%	120.3%	120.8%	56.7%
City of Xenia	8.4%	4.7%	13.7%	-22.0%	80.0%	70.8%	26.0%

*All races are of non-Hispanic ethnicity

** All Other includes Native American, Other, and two or more races.

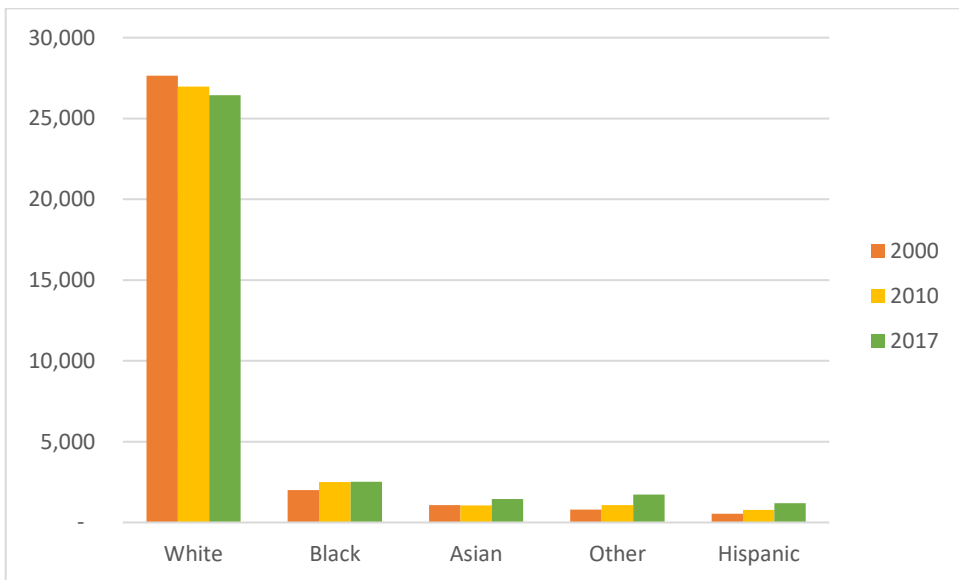
Source: U.S. Census Bureau, Decennial Census (P4); 2013 – 2017 American Community Survey (B03002)

Figure 2-4
Remainder of County: Racial/Ethnic Minority Characteristics, 2000 – 2017



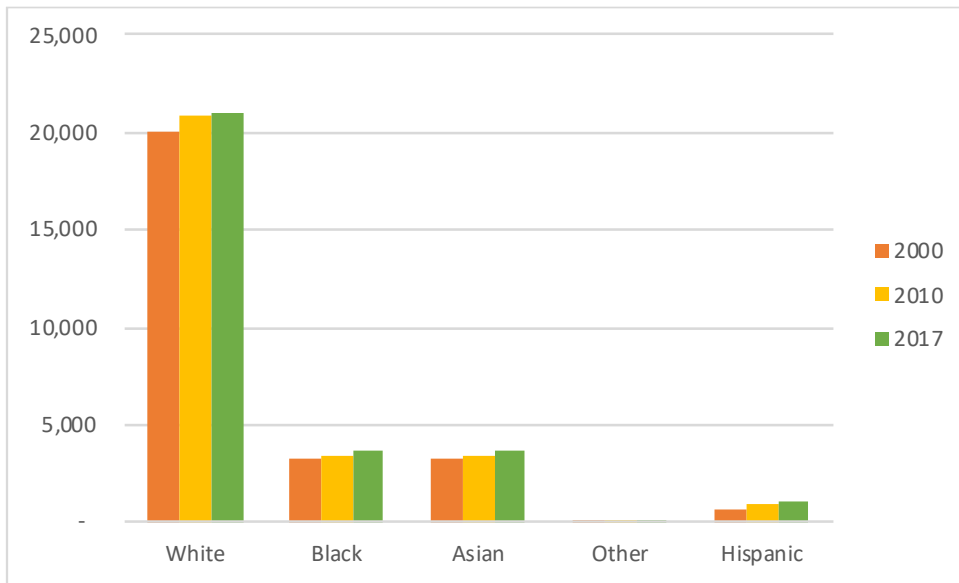
Source: U.S. Census Bureau, Decennial Census (P4); 2013 – 2017 American Community Survey (B03002)

Figure 2-5
City of Fairborn: Racial/Ethnic Minority Characteristics, 2000 – 2017



Source: U.S. Census Bureau, Decennial Census (P4); 2013 – 2017 American Community Survey (B03002)

Figure 2-6
 City of Xenia: Racial/Ethnic Minority Characteristics, 2000 – 2017



Source: U.S. Census Bureau, Decennial Census (P4); 2013 – 2017 American Community Survey (B03002)

The minority populations in the remainder of the County and the Cities of Fairborn and Xenia grew at a rapid pace from 2000 to 2017.

Despite this fast rate of growth, the minority population still comprises less than a fifth of each jurisdiction's populations.

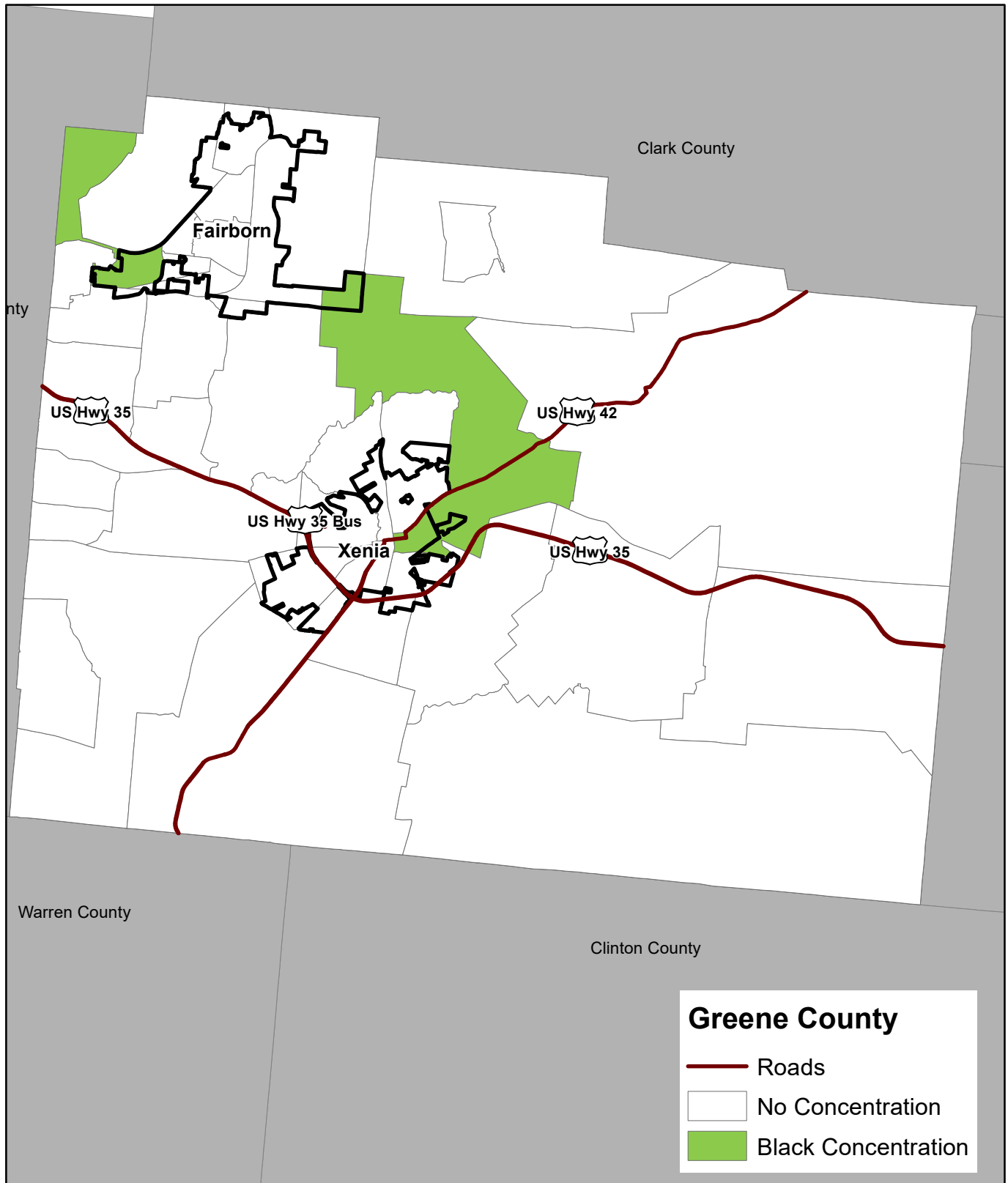
ii. Areas of Racial and Ethnic Minority Concentration

There exists a gap in income and wealth between White and minority households that is exacerbated by the concentration of minorities in particular neighborhoods that often have far less opportunity for minority children to access the tools associated with social mobility.¹

For the purposes of this AI, concentration is defined by a census tract where a minority group's population is ten percentage points higher in that census tract than its proportion in Greene County. For example, Greene County's population is 7.2% Black so a census tract with a concentration of Black persons will be 17.2% Black or more. Two of the County's 35 census tracts meet this threshold for any racial or ethnic minority group as depicted in Map 1 on the following page. These two census tracts are 2001.04 and 2406, both of which cross the boundaries between the County and the Cities of Fairborn and Xenia. The Census Bureau stopped publishing data by census tract that can be used to delineate between jurisdiction's boundaries after the Decennial Census in 2000, so the identification of whether the concentrations exist inside or

¹ Nancy McCardle, Dolores Acevedo-Garcia *Consequences of Segregation for Children's Opportunity and Wellbeing A Shared Future: Fostering Communities of Inclusion in an Era of Inequality* 2017.

MAP 1: AREAS OF RACIAL AND ETHNIC CONCENTRATION, 2017



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2013-2017 5-Year Estimates: Race and Ethnicity

outside the Cities is not possible with census data alone. The composition of each census tract is listed in Figure A-1 in the Appendix where blue highlights signal an area of minority concentration.

Two of the County's 35 census tracts are areas of concentration of Black residents.

These are areas where the Black population comprises over 17.2% of each census tract's population compared to 7.2% of the County's entire population.

iii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and lower income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant, and adult mortality rates and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity (DI). This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The DI is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.² The index is typically interpreted as the percentage of a specific racial or ethnic population that would have to move in order for a community or neighborhood to achieve full integration. A DI of less than 30 indicates a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation. The DI of Greene County's largest racial and ethnic groups is displayed below.

² The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to $1/2 * ABS \sum [(b/B)-(a/A)]$, where **b** is the subgroup population of a census tract, **B** is the total subgroup population in a city, **a** is the majority population of a census tract, and **A** is the total majority population in the city. **ABS** refers to the absolute value of the calculation that follows.

Figure 2-7
Dissimilarity Index with the White Population, 2017

	2017 DI with White Population	Population	% of Total
White	-	138,758	84.2%
Black	43.2	11,175	6.8%
Asian	45.0	4,951	3.0%
Hispanic*	30.2	4,450	2.7%

* Hispanic ethnicity is counted independently of race

Source: 2013 – 2017 American Community Survey (B03002)

Each group is considered moderately segregated according to the DI. Hispanics are the least segregated with a score of 30.2 meaning that less than a third of Hispanics would have to move in order to achieve full integration of the populations. Blacks have a score of 43.2 and Asians a score of 45.0, which means almost half of each group would have to move to new neighborhoods in order to achieve full integration.

iv. Race/Ethnicity and Income

Household income is one of several factors that determine a household’s ability to qualify for a mortgage. It is also a determining factor in what type of rental housing a household will be able to obtain. In all jurisdictions Asians had the highest median household income of all racial groups in 2017 followed by the median household income of Whites. The Asian population was too small for the Census Bureau to calculate poverty and income in Xenia. In Greene County, nearly a quarter of Black persons were living in poverty, while earning the lowest median household income. White persons were the least likely to be living in poverty with a rate of 10.9%

In Fairborn, the 2017 median household income was significantly lower than the County-wide median in all income groups. The poverty rate was also significantly higher, especially among Black households with over one-third of individuals living in poverty. Black and Hispanic households also earned significantly less than White and Asian households – median household income for Blacks and Hispanics was over \$10,000 less than the City-wide median.

Xenia had the lowest median household income and highest poverty rate in 2017 of all jurisdictions analyzed. Hispanics earned significantly less than the other groups. The median income for Hispanic households was almost \$20,000 less than that of White households. Despite this large gap, the poverty rate for Hispanics was 8.1%, which is likely a product of a small Hispanic population and a large difference in income between their households.

Adjusted for inflation, income has remained stagnant in the County and Fairborn, and it has fallen by 11.6% in Xenia. This has caused the total number of people living in poverty to increase by 9.9% in Greene County from 2010 to 2017. Due to the increase in population the poverty rate has only increased from 11.4% to 12.3%. The rate of poverty has decreased among Black residents across the County, however, it still remains among the highest of all racial and ethnic groups. Overall, minority residents in all jurisdictions have a higher poverty rate than that of Whites – the only exception is Hispanics in Xenia. The tendency of minorities to have lower incomes and higher rates of poverty will impact their ability to find and obtain housing that fits their needs. The trend of stagnating incomes and higher than average poverty rates implies that housing will continue to be difficult for these households to obtain. These difficulties can lead to

increasingly concentrated neighborhoods of poverty, which in turn leads to more challenges for residents of these neighborhoods that can last for generations.³

Figure 2-8
Median Household Income and Poverty by Race/Ethnicity 2010 – 2017

	Median Household Income 2010 (in 2017 dollars)	Poverty Rate 2010	Median Household Income 2017	Poverty Rate 2017
Greene County	\$63,520	11.4%	\$65,032	12.3%
White	\$66,177	9.7%	\$67,060	10.9%
Black	\$24,083	35.6%	\$40,852	24.8%
Asian	\$86,569	6.5%	\$84,702	12.1%
Hispanic*	\$55,887	10.2%	\$66,107	13.3%
City of Fairborn	\$44,046	20.7%	\$45,008	20.9%
White	\$47,345	18.6%	\$47,096	18.4%
Black	\$17,625	44.0%	\$33,220	36.4%
Asian	\$58,807	7.6%	\$55,216	22.5%
Hispanic*	\$50,624	18.9%	\$33,929	26.0%
City of Xenia	\$44,599	19.2%	\$39,415	22.8%
White	\$49,084	15.7%	\$42,445	20.8%
Black	\$22,863	37.6%	\$32,401	26.7%
Asian	-	-	-	23.4%
Hispanic*	\$75,086	14.1%	\$26,766	8.1%

* Hispanic ethnicity is counted independently of race

Source: U.S. Census Bureau, 2006 – 2010 & 2013 – 2017 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I, B17001, B17001A, B17001B, B17001D, B17001I)

From 2010 to 2017, the real median income was stagnant in all three jurisdictions. During this period, poverty rates remained high, especially for minorities.

Lower incomes and higher rates of poverty make it particularly burdensome for minority households to find and obtain housing that meets their needs. This can lead to further obstacles for these households as they become locked in areas of concentrated poverty.

The difference in income between minority groups is illustrated in the table and graphs below. In the remainder of the County, Black households are more heavily represented in the lower two income groups than White and other minority households. White and Hispanic households are more likely to be among the top income earners in the remainder of the County. In Fairborn, Black households are the most overrepresented group in the bottom two income groups. In

³ "The Growth and Spread of Concentrated Poverty, 2000 to 2008 – 2012," by Elizabeth Kneebone, 2014, *The Brookings Institute*, <https://www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/>

Xenia, Black and Hispanic households are underrepresented in the top two income groups compared to Asian and White households.

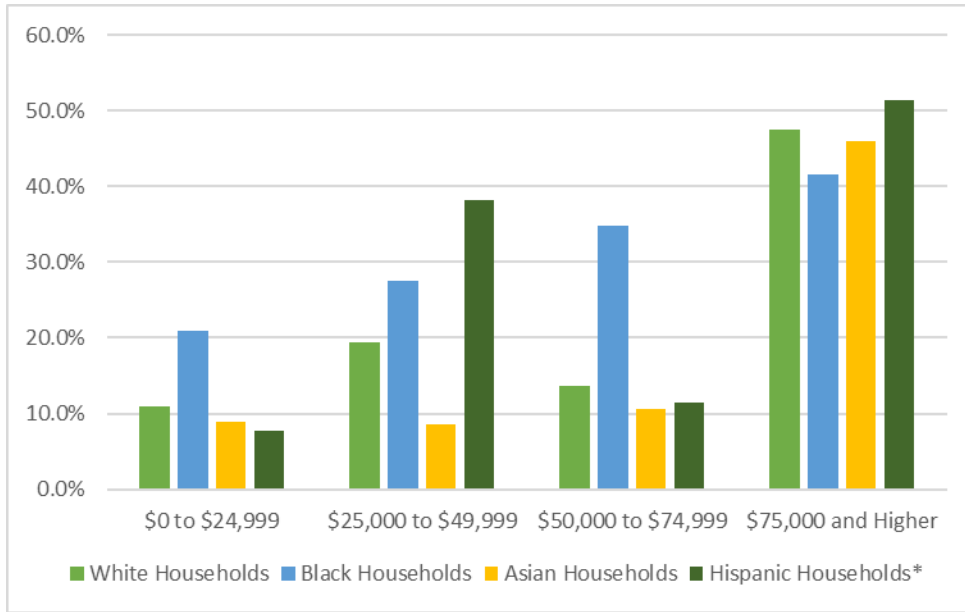
Figure 2-9
Household Income Distribution by Race, 2017

	Total	\$0 to \$24,999		\$25,000 to \$49,999		\$50,000 to \$74,999		\$75,000 and Higher	
		#	%	#	%	#	%	#	%
Greene County	64,702	12,302	19.0%	12,735	19.7%	11,607	17.9%	24,458	37.8%
White Households	57,522	10,205	17.7%	11,298	19.6%	10,223	17.8%	22,519	39.1%
Black Households	3,808	1,220	32.0%	864	22.7%	779	20.5%	872	22.9%
Asian Households	1,613	252	15.6%	220	13.6%	252	15.6%	639	39.6%
Hispanic Households*	1,370	242	17.7%	334	24.4%	202	14.7%	490	35.8%
Remainder of County	39,418	4,490	11.4%	7,694	19.5%	5,741	14.6%	18,592	47.2%
White Households	36,219	3,986	11.0%	7,025	19.4%	4,922	13.6%	17,218	47.5%
Black Households	1,362	284	20.9%	374	27.5%	474	34.8%	567	41.6%
Asian Households	1,093	97	8.9%	94	8.6%	116	10.6%	503	46.0%
Hispanic Households*	719	55	7.6%	275	38.2%	82	11.4%	370	51.5%
City of Fairborn	14,242	4,138	29.1%	2,721	19.1%	3,664	25.7%	3,664	25.7%
White Households	11,987	3,230	26.9%	2,209	18.4%	3,329	27.8%	3,329	27.8%
Black Households	997	364	36.5%	278	27.9%	124	12.4%	124	12.4%
Asian Households	491	145	29.5%	118	24.0%	125	25.5%	125	25.5%
Hispanic Households*	460	124	27.0%	30	6.5%	108	23.5%	108	23.5%
City of Xenia	11,042	3,674	33.3%	2,320	21.0%	2,202	19.9%	2,202	19.9%
White Households	9,316	2,989	32.1%	2,064	22.2%	1,972	21.2%	1,972	21.2%
Black Households	1,449	572	39.5%	212	14.6%	181	12.5%	181	12.5%
Asian Households	29	10	34.5%	8	27.6%	11	37.9%	11	37.9%
Hispanic Households*	191	63	33.0%	29	15.2%	12	6.3%	12	6.3%

* Hispanic ethnicity is counted independently of race

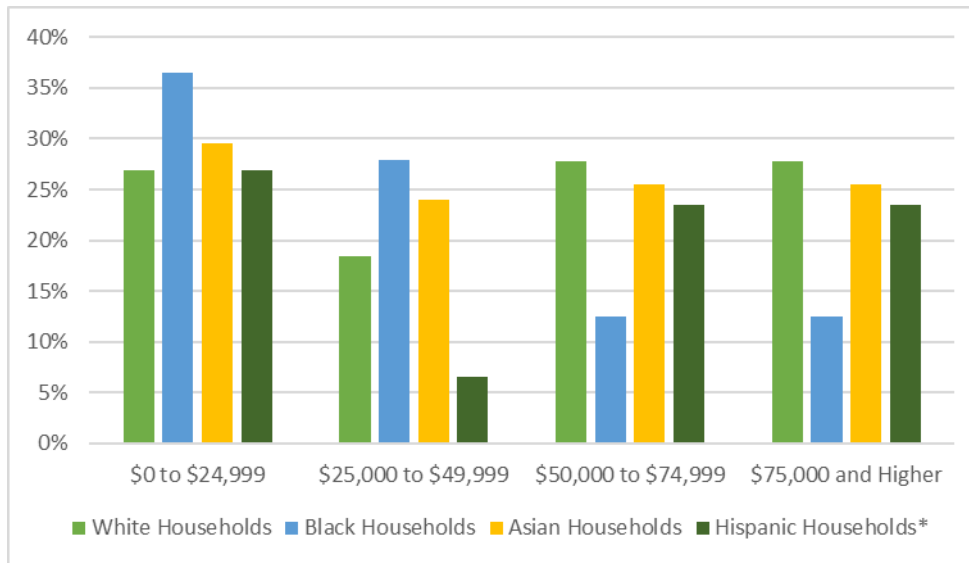
Source: U.S. Census Bureau, 2013 – 2017 American Community Survey (B19001)

Figure 2-10
Household Income Distribution by Race in the remainder of the County, 2017



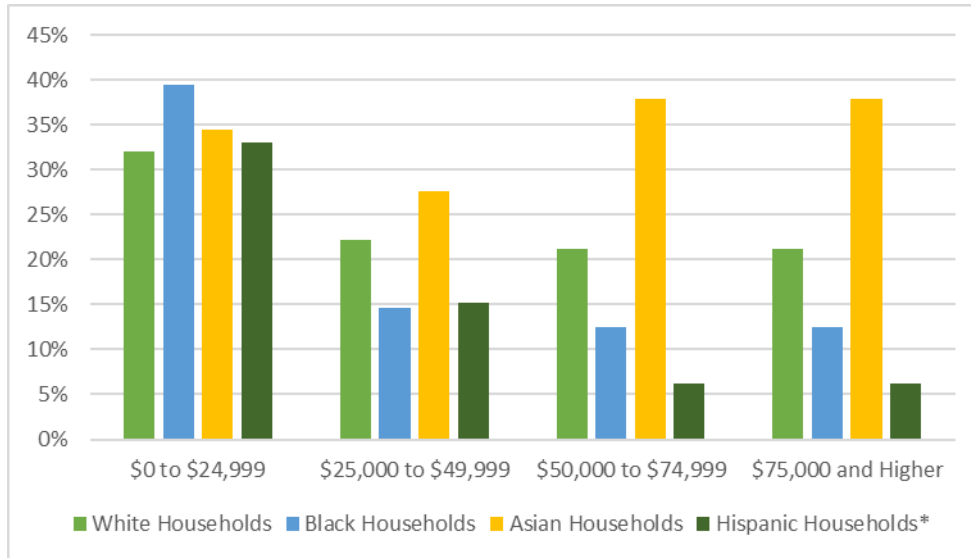
Source: U.S. Census Bureau, 2013 – 2017 American Community Survey (B19001)

Figure 2-11
Household Income Distribution by Race in the City of Fairborn, 2017



Source: U.S. Census Bureau, 2013 – 2017 American Community Survey (B19001)

Figure 2-12
Household Income Distribution by Race in the City of Xenia, 2017



Source: U.S. Census Bureau, 2013 – 2017 American Community Survey (B19001)

v. Concentrations of LMI Persons

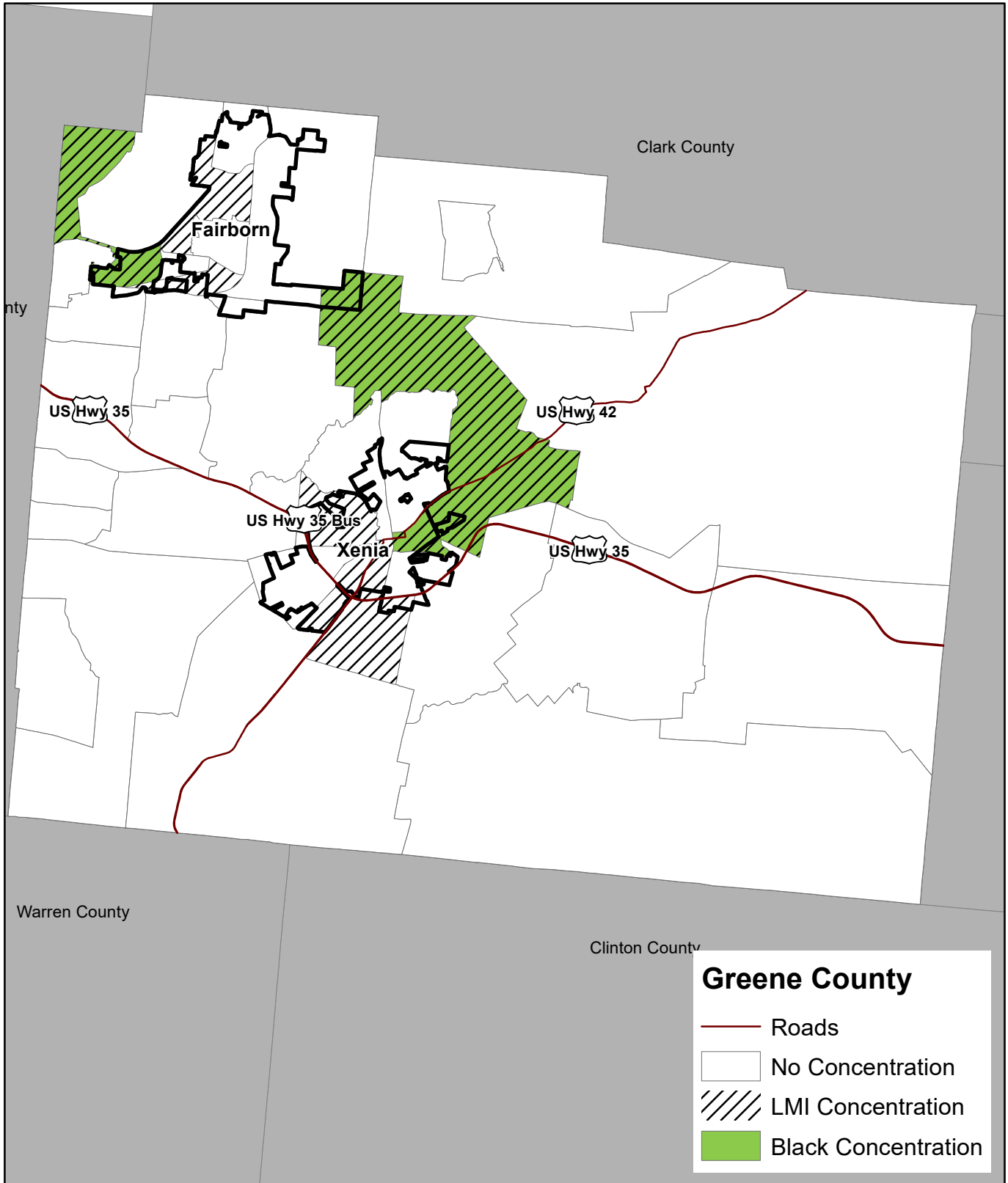
The CDBG Program includes a statutory requirement that at least 70% of the funds invested benefit low and moderate income (LMI) persons. As a result, HUD provides the percentage of LMI persons in each census block group for entitlements such as Greene County, Fairborn, and Xenia. An area of LMI concentration is a census tract where at least 51% of residents are LMI. Of the County’s 35 census tracts, eight, or 22.9%, qualify as areas of concentration of LMI persons. The composition of LMI persons in each census tract is listed in Figure A-2 in the Appendix. All areas of LMI concentration exist within and around the Cities of Fairborn and Xenia as depicted in Map 2. Only one of these census tracts is entirely contained within the boundary of Xenia. All others cross City and County boundaries.

Two of these eight LMI concentrated census tracts overlap with areas of racial concentration. These impacted areas, shown in red on Map 3, are where CDBG investments can have the greatest impact. Providing affordable housing outside of impacted areas, where and when possible, will increase housing choice where LMI families historically have not been able to live.

Eight of the County’s 35 census tracts, or 22.9%, are areas of LMI concentration. Two of the LMI concentrated census tracts are areas of concentration of Black residents.

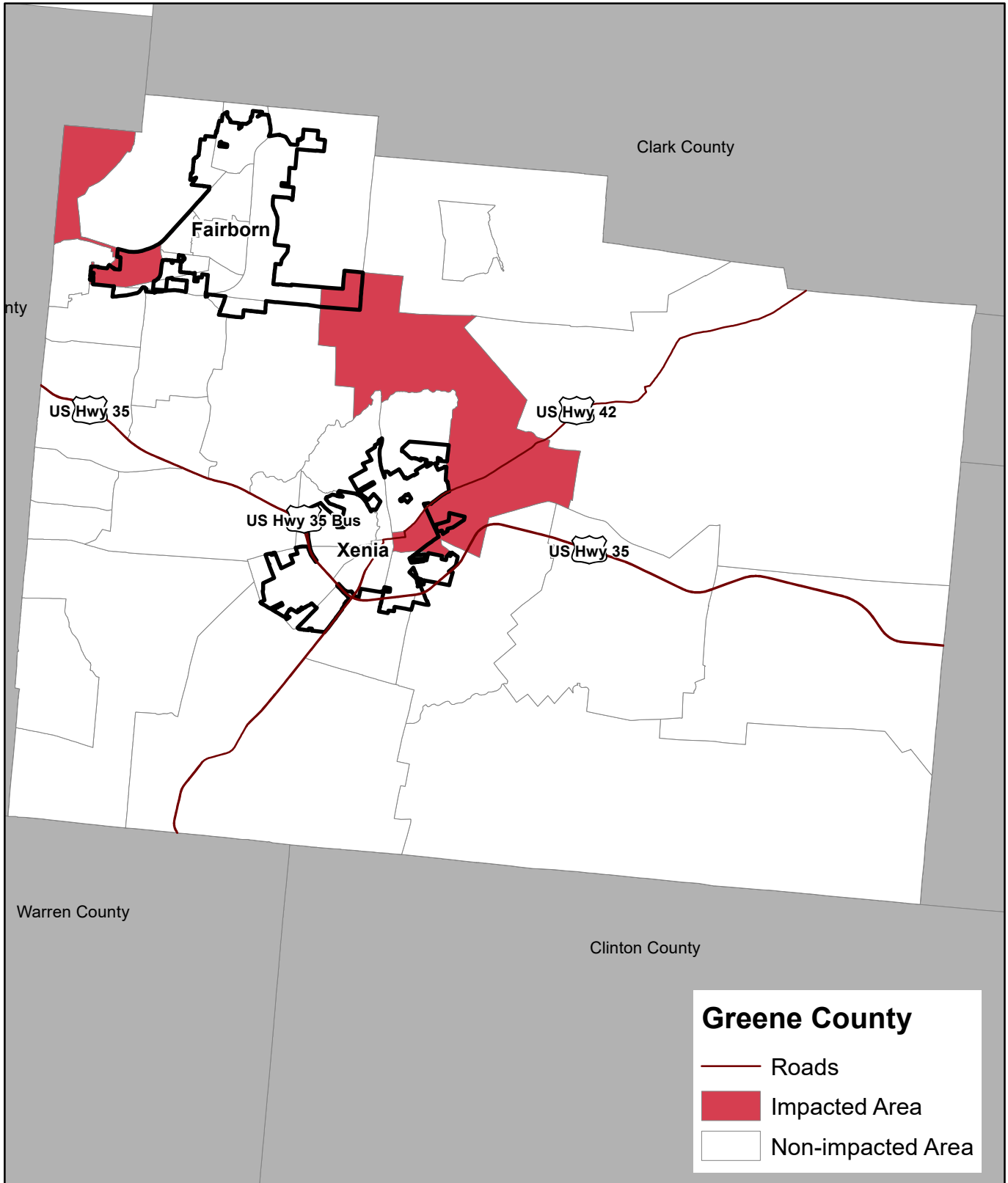
Providing affordable housing outside of these areas, where and when possible, will increase housing choice beyond areas of concentration of minorities and LMI persons.

MAP 2: AREAS OF LMI CONCENTRATION, 2017



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: LMI Data

MAP 3: IMPACTED AREAS, 2017



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: LMI Data, Race and Ethnicity

vi. Disability and Income

The Census Bureau reports disability status for non-institutionalized disabled persons age 5 and over. As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business.

The Fair Housing Act prohibits discrimination based on physical, mental, or emotional handicap, provided “reasonable accommodation” can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal). In Greene County, 12.4% of the population 5 years and older reported at least one disability in 2013, the year with the most recent data available.⁴

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities given their lower rate of employment. In Greene County outside of the two Cities, 9.7% of residents with disabilities were living in poverty compared to 7.0% of residents without disabilities in 2013. In Fairborn, 27.9% of disabled residents were below the poverty line compared to 26.3% of non-disabled residents. The difference was greatest in Xenia where 31.3% of residents with a disability were living in poverty compared to 27.2% of non-disabled residents.

Poverty among disabled residents is both caused and exacerbated by unemployment and low wages. In Greene County, only 25.6% of the disabled population age 16 and older were employed while 64.5% of residents without a disability were employed in 2017.⁵ Meanwhile median wages for disabled persons was \$20,271 compared to \$32,010 for non-disabled persons. Even in the absence of discrimination, residents with disabilities have difficulty in securing affordable housing that will meet their accessibility needs due to the circumstances of lower wages and rates of employment.

Disabled residents across Greene County and the Cities of Fairborn and Xenia experienced higher rates of poverty than non-disabled residents. Poverty creates additional barriers for residents with disabilities in securing affordable housing that meets their accessibility needs.

There are two major causes of higher rates of poverty: persons with disabilities are employed at less than half the rate of non-disabled residents and their median income is more than \$10,000 less than non-disabled persons.

vii. Familial Status and Income

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families, and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

⁴ U.S. Census Bureau, American Community Survey 2011 – 2013 (B18130)

⁵ U.S. Census Bureau, American Community Survey 2013 – 2017 (B18120)

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

Family households comprised 71.0% of all households in Greene County in 2017. From 2000 to 2017, the number of family households increased by 13.8%. The number of married-couple family households with children decreased by 6.3% while female-headed households with children increased by only 0.6%. Male-headed households with children experienced the largest growth rate at 64.9%, but still only represent 1.9% of all households.

In Fairborn, the number of family households decreased by 2.0%. Most of this decrease occurred among married-couple families with children. In 2000, married-couple families comprised 16.8% of households in Fairborn, and by 2017, this figure fell to 14.1%. Both female-headed households with children and male-headed households with children increased by 4.6% and 9.2%, respectively. The proportion of female-headed households with children held steady at 7.9% from 2000 and 2017, while male-headed households with children remained virtually unchanged.

The number of family households in Xenia increased by only 2.7%, while the proportion of households comprised of families fell from 29.6% to 60.7%. The number of married-couple families with children decreased by 27.4%, which decreased it from 22.1% of all households in 2000 to 13.6% of households in 2017. Female- and male-headed households with children increased by 4.6% and 9.2%, respectively. Female-headed households with children increased from 9.9% of households to 12.5% – the jurisdiction with the highest proportion of female-headed households with children.

Figure 2-13
Households by Type and Presence of Children, 2000 – 2017

	Total Households	Family Households									Non-Family and 1-Person Households	
		% of Total	Married-Couple Families		Female-Headed Households		Male-Headed Households		% of Total	With Children		Without Children
			% of Total	With Children	Without Children	% of Total	With Children	Without Children				
2000												
Greene County	55,312	70.8%	58.0%	25.1%	32.9%	9.6%	6.0%	3.6%	3.2%	1.7%	1.4%	29.2%
Remainder of County	32,319	76.2%	66.7%	29.5%	37.2%	6.7%	4.0%	2.7%	2.7%	1.4%	1.3%	23.8%
City of Fairborn	13,615	58.9%	42.8%	16.8%	26.0%	12.4%	7.9%	4.5%	3.7%	2.0%	1.7%	41.1%
City of Xenia	9,378	69.6%	50.2%	22.1%	28.1%	15.5%	9.9%	5.6%	3.8%	2.3%	1.6%	30.4%
2010												
Greene County	62,770	66.4%	51.9%	19.4%	32.5%	10.6%	6.1%	4.5%	3.9%	2.0%	2.0%	33.6%
Remainder of County	38,074	71.1%	60.1%	22.9%	37.3%	7.6%	4.3%	3.4%	3.4%	1.6%	1.7%	28.9%
City of Fairborn	14,306	55.9%	36.7%	12.4%	24.3%	14.4%	8.5%	5.9%	4.8%	2.3%	2.4%	44.1%
City of Xenia	10,390	63.8%	42.6%	16.2%	26.4%	16.3%	9.6%	6.7%	4.9%	2.5%	2.4%	36.2%
2017												
Greene County	64,702	65.8%	51.9%	19.2%	32.7%	10.0%	5.9%	4.1%	3.9%	2.1%	1.8%	34.2%
Remainder of County	39,418	71.0%	60.8%	22.6%	38.1%	6.6%	3.3%	3.2%	3.7%	1.9%	1.8%	29.0%
City of Fairborn	14,242	55.2%	37.5%	14.1%	23.4%	13.5%	7.9%	5.7%	4.2%	2.1%	2.1%	44.8%
City of Xenia	11,042	60.7%	38.9%	13.6%	25.3%	17.5%	12.5%	5.0%	4.3%	2.5%	1.7%	39.3%
Change 2000 - 2017	Total Change	% Change	% Change	% Change	% Change	% Change	% Change	% Change	% Change	% Change	% Change	% Change
Greene County	9,390	8.7%	4.7%	-10.5%	16.2%	21.0%	15.3%	30.4%	45.0%	41.2%	49.6%	37.1%
Remainder of County	7,099	13.8%	11.1%	-6.3%	24.9%	18.8%	0.6%	46.0%	65.0%	64.9%	65.1%	48.2%
City of Fairborn	627	-2.0%	-8.5%	-12.5%	-5.9%	14.0%	4.6%	30.2%	19.7%	9.2%	32.3%	14.1%
City of Xenia	1,664	2.7%	-8.7%	-27.4%	5.9%	32.6%	48.3%	4.7%	30.8%	30.5%	31.3%	52.2%

*Hispanic ethnicity is counted independently from race

Source: U.S. Census Bureau, 2013 – 2017 American Community Survey (B19001)

viii. Ancestry, Persons with LEP, and Poverty

It is illegal to refuse the right to housing based on place of birth or ancestry. In Greene County, 5.9% of residents are foreign-born compared to 5.5% in Fairborn and 1.1% in Xenia. In Greene County, 20.3% of children living in homes with at least one foreign-born parent were living below 200% of the poverty level compared to 15.2% of children living in homes with only native-born parents. In Fairborn, the inverse relationship is found with 38.5% of families with a foreign-born parent living below 200% of the poverty level compared to 52.7% of children with native-born parents. In Xenia, the proportions are nearly equal with 63.0% of children with a foreign-born parent compared to 61.4% of children with native-born parents living below 200% of the poverty line.⁶

Persons with limited English proficiency (LEP) are defined as persons who have a limited ability to read, write, speak or understand English. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

Greene County has small foreign language populations relative to the size of its population. The largest foreign language group that does not speak English “very well” is Spanish, which is spoken by only 0.47% of County residents.⁷ Spanish is spoken with greater frequency in Fairborn at 0.97% but is still a relatively small group. It is spoken with the least frequency in Xenia at 0.28%. The table below illustrates the top five languages spoken in Greene County, Fairborn, and Xenia. No language is spoken by more than one percent of each jurisdiction’s population.

⁶ U.S. Census Bureau, 2013 - 2017 American Community Survey (B05010)

⁷ *The most recent data available comes from the 2011 – 2015 American Community Survey (ACS).*

Figure 2-14
Population that Speaks English “Less Than Very Well” by Language Group, 2015

Language Group	Greene County	
	#	%
Spanish	727	0.47%
Arabic	638	0.41%
Chinese	473	0.30%
Other Asian languages	228	0.15%
Vietnamese	186	0.12%
Language Group	City of Fairborn	
	#	%
Spanish	298	0.97%
Other Asian languages	136	0.44%
Chinese	98	0.32%
Arabic	95	0.31%
Korean	58	0.19%
Language Group	City of Xenia	
	#	%
Thai	67	0.28%
Spanish	49	0.20%
Polish	24	0.10%
French (incl. Patois, Cajun)	22	0.09%
Tagalog	13	0.05%

Source: U.S. Census Bureau, 2011 - 2015 American Community Survey (B16001)

To determine whether translation of vital documents is required, a HUD entitlement community must first identify the number of LEP persons in a single language group who are likely to qualify for and be served by the jurisdictions’ programs. In Greene County, Fairborn, and Xenia, no individual languages with significant numbers (i.e., more than 1,000 or 5% of the population) of native speakers speak English less than “very well.”

There is no individual LEP language group that meets HUD’s threshold of at least 1,000 persons or 5% of a jurisdiction’s population in Greene County, Fairborn, or Xenia.

The Spanish and Arabic languages were close to the 1,000-person threshold in Greene County. The County should monitor the size of these populations and the number of requests for language assistive services so that it can provide appropriate services to its growing LEP population.

ix. Protected Class Status and Unemployment

Greene County had lower unemployment (5.7%) than the State of Ohio (6.5%) in 2017. Within Greene County outside of the two Cities, the unemployment rate (4.6%) is lower than the County as a whole. Outside of the two Cities, women have lower unemployment than men. Minority

groups tend to have similar unemployment rates as Whites except for Black workers, which were unemployed at a rate of 20.3% compared to Whites' at 3.8%.

Fairborn had a higher rate of unemployment at 7.8% than the County as a whole. Males (9.1%) were unemployed at a greater rate than women (6.5%), though both groups were unemployed at greater rates than at the County level. Black (8.3%) workers were unemployed at a greater rate than Whites (7.7%), however, this rate is significantly lower than the countywide rate (14.6%).

Xenia has a larger rate of unemployment than the County as a whole. The rate of unemployment for females is slightly higher than that of males. Unemployment among the Black (11.4%) and Hispanic (13.2%) minority groups is significantly higher than that of White (6.2%) workers.

Figure 2-15 Civilian Labor Force, 2017

	Ohio		Greene County		Remainder of County		City of Fairborn		City of Xenia	
	Total	%	Total	%	Total	%	Total	%	Total	%
Total CLF	5,866,915		81,679		52,601		17,332		11,746	
Employed	5,488,180	93.5%	77,038	94.3%	50,156	95.4%	15,972	92.2%	10,910	92.9%
Unemployed	378,735	6.5%	4,641	5.7%	2,445	4.6%	1,360	7.8%	836	7.1%
Male CLF	3,047,653		42,988		27,976		9,168		5,844	
Employed	2,840,965	93.2%	40,269	93.7%	26,475	94.6%	8,338	90.9%	5,456	93.4%
Unemployed	206,688	6.8%	2,719	6.3%	1,501	5.4%	830	9.1%	388	6.6%
Female CLF	2,819,262		38,691		24,625		8,164		5,902	
Employed	2,647,215	93.9%	36,769	95.0%	23,681	96.2%	7,634	93.5%	5,454	92.4%
Unemployed	172,047	6.1%	1,922	5.0%	944	3.8%	530	6.5%	448	7.6%
White CLF	4,902,960		70,629		46,862		14,126		9,641	
Employed	4,644,010	94.7%	67,174	95.1%	45,094	96.2%	13,037	92.3%	9,043	93.8%
Unemployed	258,950	5.3%	3,455	4.9%	1,768	3.8%	1,089	7.7%	598	6.2%
Black CLF	672,245		6,295		2,850		1,673		1,772	
Employed	576,936	85.8%	5,376	85.4%	2,272	79.7%	1,534	91.7%	1,570	88.6%
Unemployed	95,309	14.2%	919	14.6%	578	20.3%	139	8.3%	202	11.4%
Asian CLF	121,773		2,444		1,686		717		41	
Employed	116,614	95.8%	2,365	96.8%	1,652	98.0%	672	93.7%	41	100.0%
Unemployed	5,159	4.2%	79	3.2%	34	2.0%	45	6.3%	0	0.0%
Hispanic CLF	188,222		2,017		1,268		545		204	
Employed	171,469	91.1%	1,838	91.1%	1,205	95.0%	456	83.7%	177	86.8%
Unemployed	16,753	8.9%	179	8.9%	63	5.0%	89	16.3%	27	13.2%

Source: U.S. Census Bureau, 2013 - 2017 American Community Survey (B23001, C23002A, C23002B, C23002D, C23002I)

Minority groups in all jurisdictions tend to be unemployed at greater rates than White workers.

Lower rates of employment for minorities will lower their household earnings and make it more difficult to obtain or maintain affordable housing.

B. Housing Market

i. Housing Inventory

There were 69,576 housing units in Greene County in 2017 according to the American Community Survey. Outside of the two Cities, the County contained 59.8% of these units. The number of housing units grew by 3.0% since 2010 – a slower rate of growth than the County as a whole, which grew by 3.3% during this period. Fairborn contained 22.8% of the County’s housing units with a total of 15,836 units. Fairborn’s rate of housing growth was 4.4% from 2010 to 2017. Xenia contained 17.4% of the County’s housing with 12,118 units in 2017. Since 2010, the number of units in Xenia grew by 2.6%.

Housing unit growth from 2010 to 2017 is depicted in Map 4. There are 13 census tracts with a net loss of housing units, mostly located in the County outside of the Cities along with several census tracts in Fairborn. The impacted areas both faced some of the largest loss of housing units in the County – tracts 2001.4 (-7.0%) and 2406 (-6.7%). The largest gains occurred in and around Fairborn and Xenia. Figure A-3 in the Appendix contains the number of housing units per census tract in 2010 and 2017.

The County’s housing stock is majority single-family, owner-occupied units. Fairborn is the only jurisdiction with more rental stock than owner-occupied housing units. There was large variation across jurisdictions in the composition of their housing stocks. The availability of multi-family rental units can provide a more affordable option. Map 5 portrays the percent of multifamily housing comprising each census tract’s housing inventory. This data is included in Figure A-4 in the Appendix. The majority of multifamily housing is located in and around Fairborn and Xenia. Four census tracts have greater than half of their housing stock comprised of multifamily units. Only one of the impacted areas is majority multifamily units and one impacted area’s housing stock is only 10.9% multifamily units.

In the remainder of the County, 14.0% of the housing stock was renter-occupied, multi-family units in 2017. Over one-third of Fairborn’s housing stock was multi-family rental units and almost one-fifth of Xenia’s stock was multi-family rental. The majority of rental housing in all jurisdictions was multi-family. The lack of an adequate supply of affordable rental housing across the County restricts housing choice for lower income households.

Figure 2-16
Housing Units by Type and Tenure, 2017

	Owner-Occupied				Renter-Occupied				% Renter-Occupied Multi-Family Units ³
	Total	Single-Family ¹	Multi-Family ²	% Multi-Family	Total	Single-Family ¹	Multi-Family ²	% Multi-Family	
Greene County	43,261	42,759	502	1.2%	21,441	9,007	12,434	58.0%	19.2%
Remainder of County	29,754	29,565	189	0.6%	9,664	4,144	5,520	57.1%	14.0%
City of Fairborn	6,778	6,538	240	3.5%	7,464	2,720	4,744	63.6%	33.3%
City of Xenia	6,729	6,656	73	1.1%	4,313	2,143	2,170	50.3%	19.7%

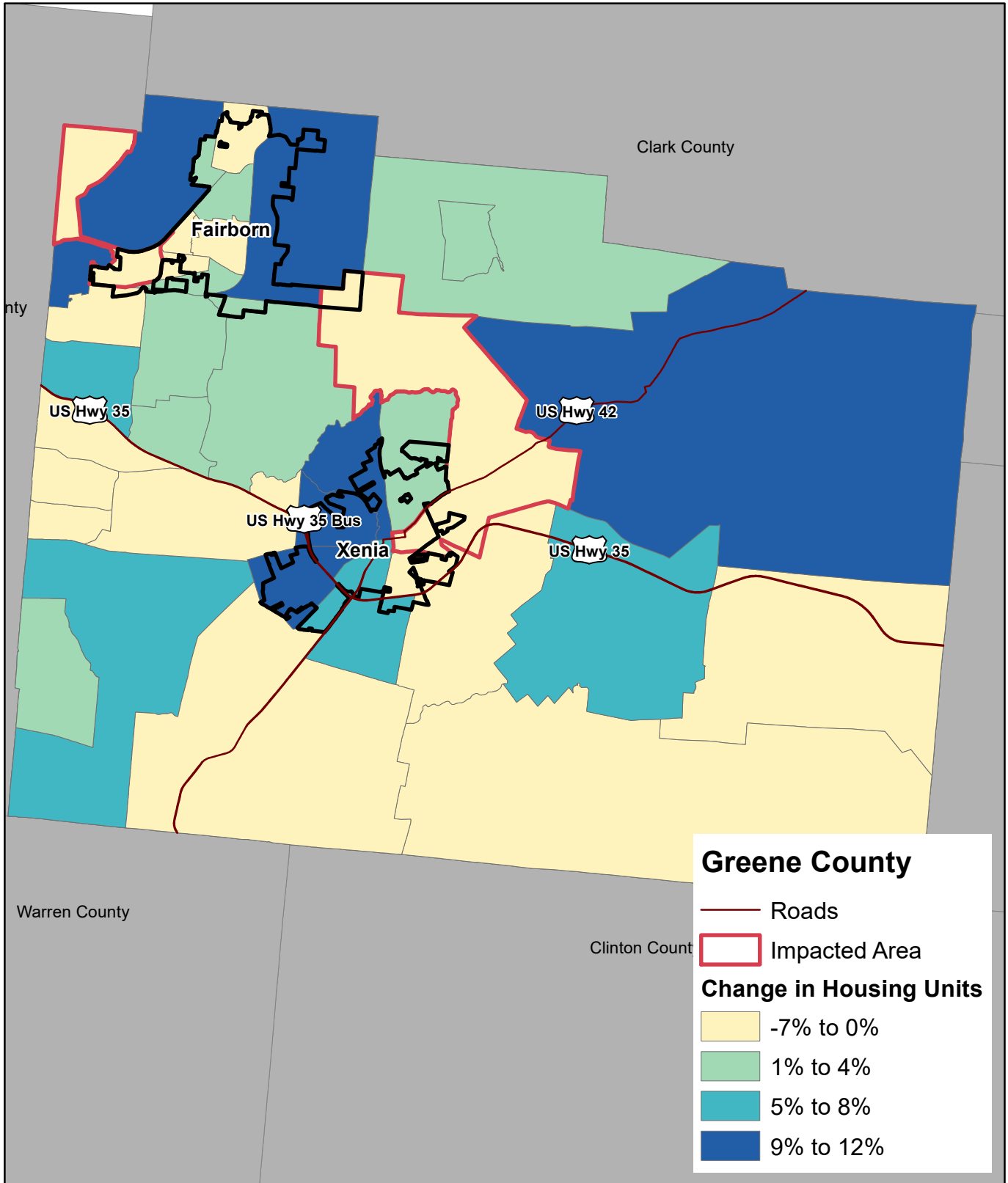
1. Includes detached and attached units, and mobile homes, boats, RVs, etc.

2. Includes structures with 2 or more units.

3. As a percent of all occupied units.

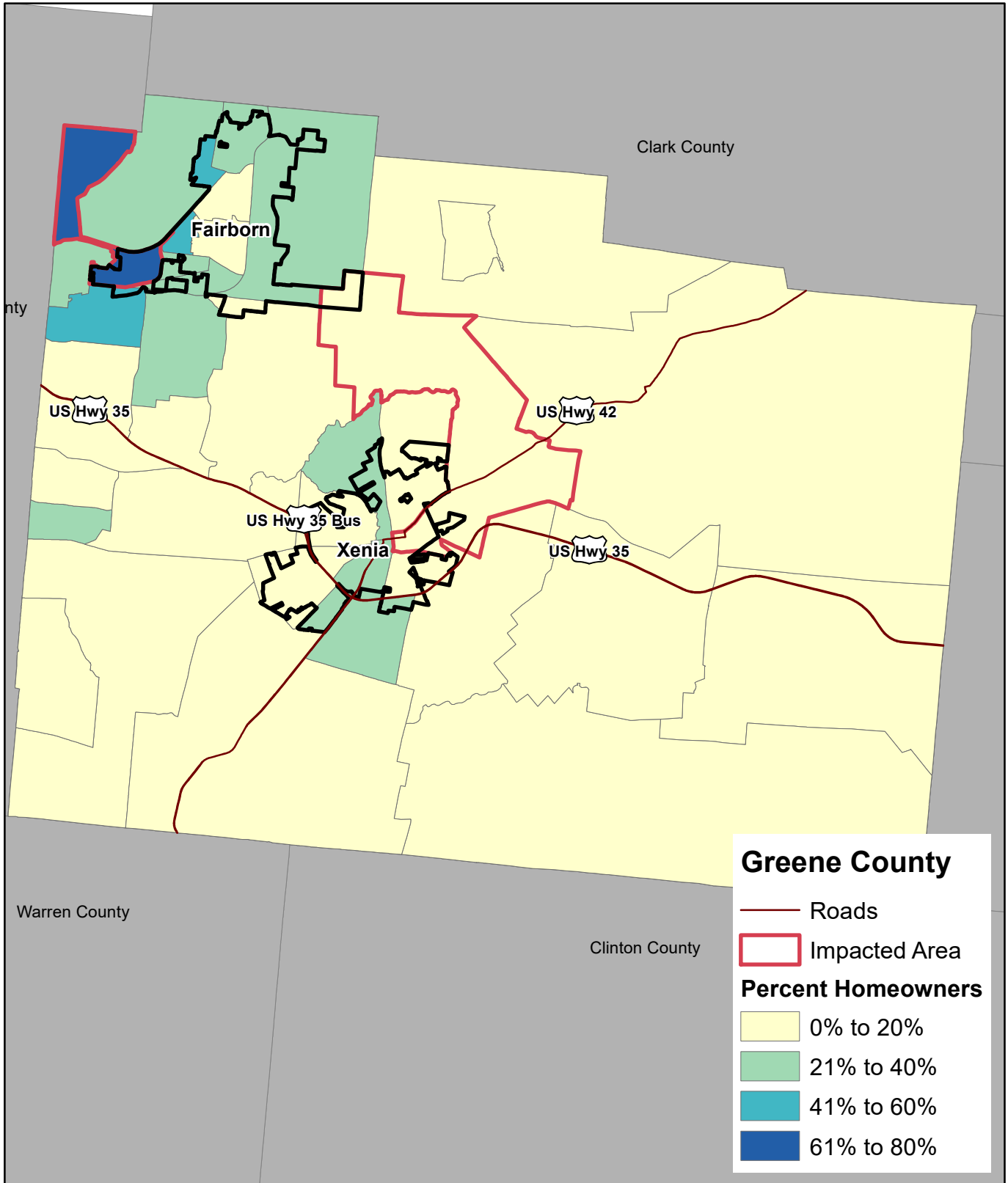
Source: 2013 - 2017 American Community Survey (B25032)

MAP 4: PERCENT CHANGE IN HOUSING UNITS, 2010 - 2017



Sources: U.S. Census Bureau Tiger/Line: County and Census Tract Boundaries, City Points, Roads; 2010 Decennial Census: Housing Units; American Community Survey, 2012-2016 5-Year Estimates: LMI Data, Race and Ethnicity, Housing Units

MAP 5: PERCENT MULTIFAMILY HOUSING UNITS, 2017



Sources: U.S. Census Bureau Tiger/Line: County and Census Tract Boundaries, City Points, Roads; American Community Survey, 2012-2016 5-Year Estimates: Housing Units

There is an inadequate supply of affordable multi-family rental housing stock in Greene County, Fairborn, and Xenia.

A larger supply of affordable multi-family rental housing in each jurisdiction's housing stock can assist low-income households.

ii. Protected Class Status and Homeownership

The value in homeownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."⁸

The homeownership rate outside of the two Cities fell from 78.2% in 2000 to 75.5% in 2017. Black and Hispanic households have the lowest homeownership rates of 43.2% and 51.0%, respectively. Black homeownership fell from 50.9% in 2000 to 43.2% in 2017, while the Hispanic rate fell from 59.4% to 51.0%.

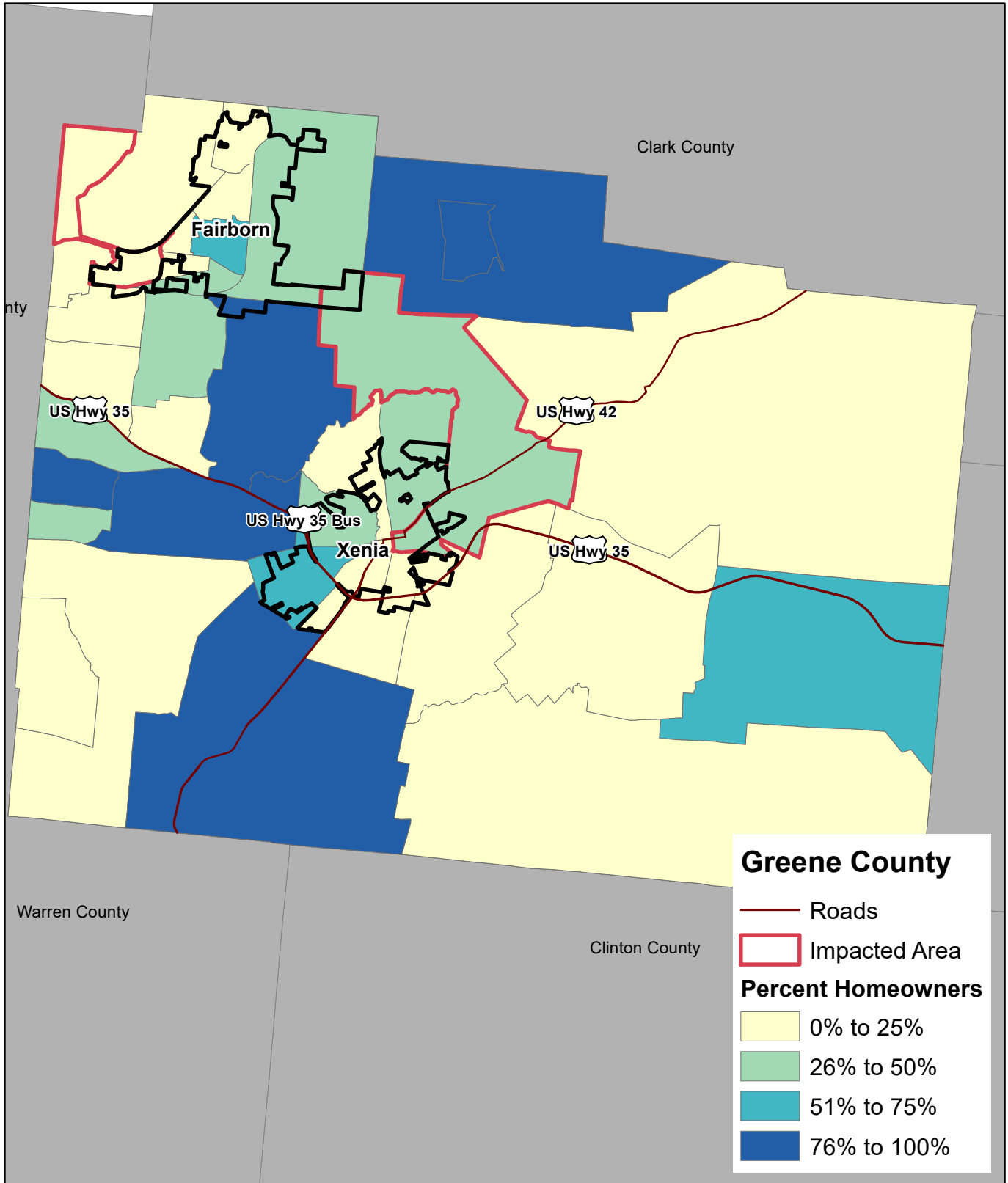
Homeownership rates for Black households are illustrated in Map 6. Rates are highest just outside of Fairborn and Xenia with the exception of several census tracts, including the two impacted areas. Asian homeownership, seen in Map 7, is mostly concentrated in the western portion of the County with several areas of high rates of ownership in Fairborn and Xenia. Hispanic rates of homeownership (Map 8) are highest outside of Fairborn and Xenia. Figure A-5 in the Appendix contains the housing ownership rates for each group by census tract.

Homeownership is lower in Fairborn than in the other two jurisdictions. The homeownership rate fell in Fairborn from 51.6% in 2000 to 47.6% in 2017. Despite the decrease, Hispanics and Asians increased their rates of homeownership, but minority groups still owned homes at rates far below White households. Black households were the least likely to own a home with a rate of only 18.7% in 2017. Asian households were the minority group most likely to own a home at a rate of 46.8% followed by Hispanics with a rate of 30.7%. These are compared to a rate of 52.3% for White households.

Xenia also experienced a drop in the rate of homeownership from 66.3% in 2000 to 60.9% in 2017. Hispanics experience the largest reduction in homeownership from 62.1% to 27.7%, while Asians were the only group to expand homeownership growing from 41.0% to 65.5%. Black households had the second lowest homeownership rate at 36.9%. White homeownership fell from 70.8% to become even with the Asian homeownership rate at 65.5%.

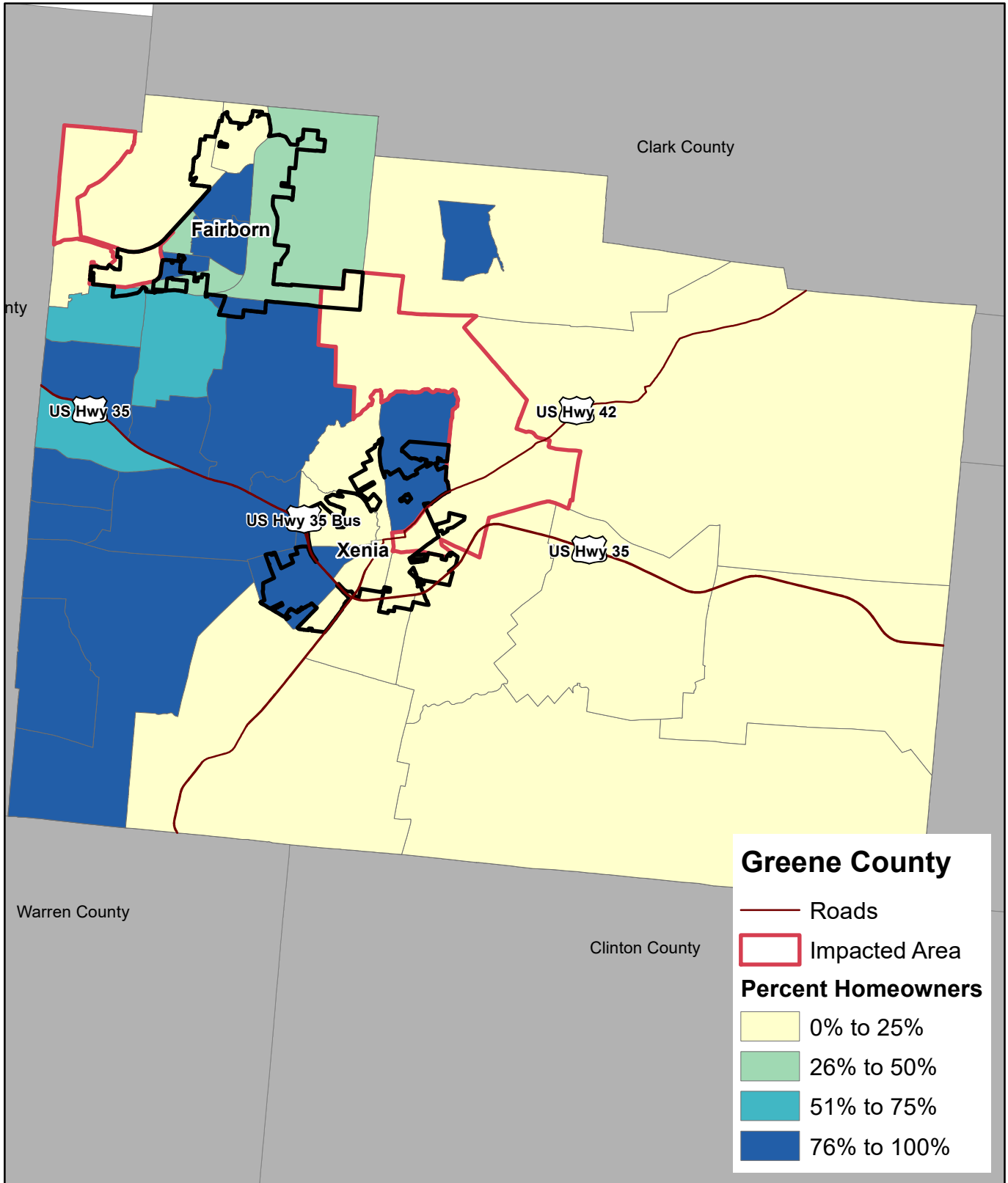
⁸ Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in *Segregation: The Rising Costs for America*, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

MAP 6: HOMEOWNERSHIP AMONG BLACK HOUSEHOLDS, 2017



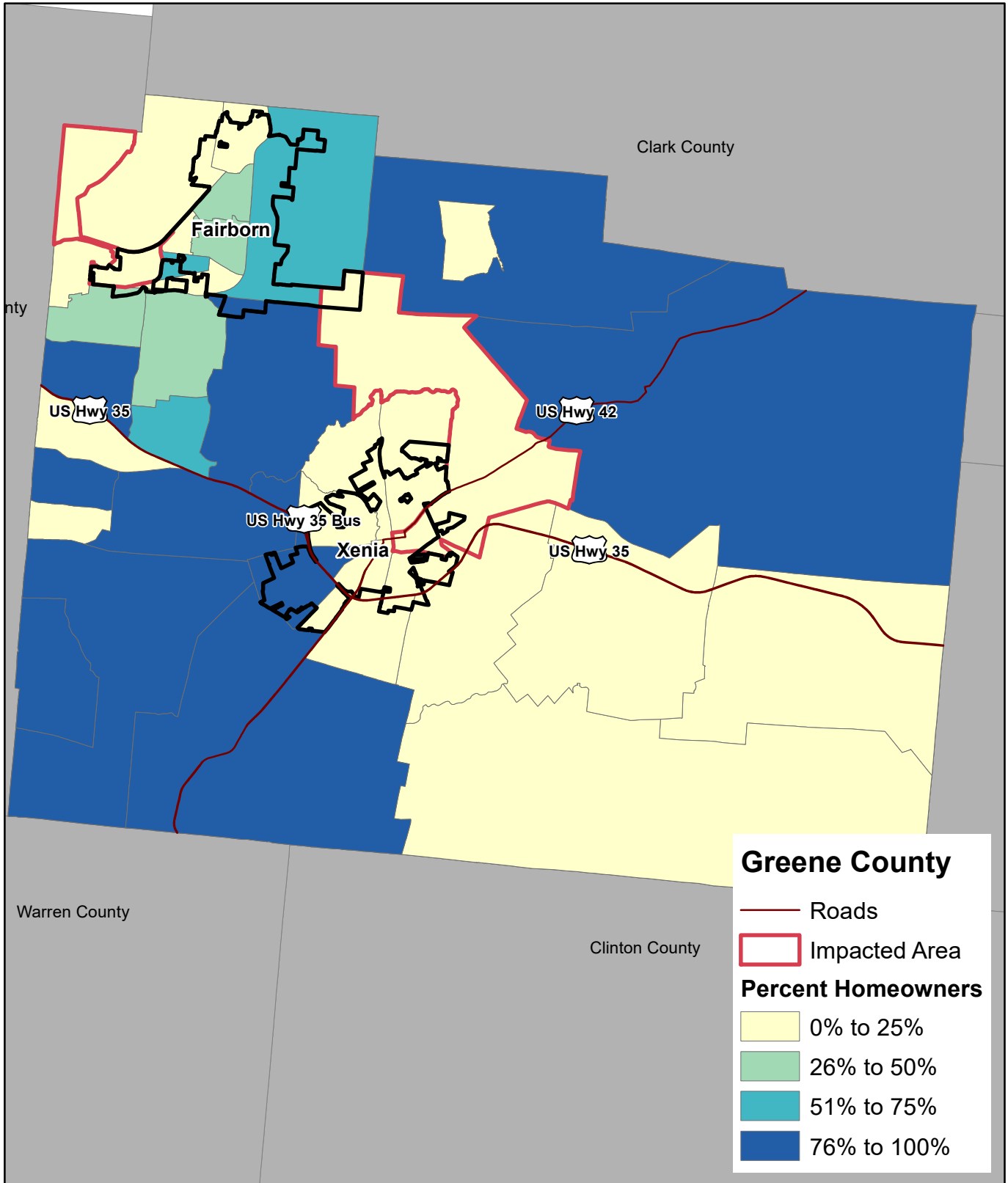
Sources: U.S. Census Bureau Tiger/Line: County and Census Tract Boundaries, City Points, Roads; 2010 Decennial Census: Housing Units; American Community Survey, 2012-2016 5-Year Estimates: Race & Ethnicity, Tenure

MAP 7: HOMEOWNERSHIP AMONG ASIAN HOUSEHOLDS, 2017



Sources: U.S. Census Bureau Tiger/Line: County and Census Tract Boundaries, City Points, Roads; 2010 Decennial Census: Housing Units; American Community Survey, 2012-2016 5-Year Estimates: Race & Ethnicity, Tenure

MAP 8: HOMEOWNERSHIP AMONG HISPANIC HOUSEHOLDS, 2017



Sources: U.S. Census Bureau Tiger/Line: County and Census Tract Boundaries, City Points, Roads; 2010 Decennial Census: Housing Units; American Community Survey, 2012-2016 5-Year Estimates: Race & Ethnicity, Tenure

Figure 2-17
Housing Tenure by Race, 2000 – 2017

	2000			2010			2017		
	Total	Own	Rent	Total	Own	Rent	Total	Own	Rent
Greene County	55,312	69.6%	30.4%	62,770	67.7%	32.3%	64,702	66.9%	33.1%
White	50,071	72.4%	27.6%	55,963	70.6%	29.4%	57,522	70.2%	29.8%
Black	3,105	41.4%	58.6%	3,936	37.3%	62.7%	3,808	34.4%	65.6%
Asian	986	48.5%	51.5%	1,544	58.0%	42.0%	1,613	64.9%	35.1%
Hispanic*	543	47.7%	52.3%	955	50.4%	49.6%	1,370	40.9%	59.1%
Remainder of County	32,346	78.2%	21.8%	38,074	75.8%	24.2%	39,418	75.5%	24.5%
White	30,227	79.6%	20.4%	34,914	77.5%	22.5%	36,219	77.3%	22.7%
Black	1,042	50.9%	49.1%	1,360	49.9%	50.1%	1,362	43.2%	56.8%
Asian	591	71.4%	28.6%	1,098	66.0%	34.0%	1,093	73.0%	27.0%
Hispanic*	229	59.4%	40.6%	566	57.4%	42.6%	719	51.0%	49.0%
City of Fairborn	13,623	51.6%	48.4%	14,306	50.7%	49.3%	14,242	47.6%	52.4%
White	12,130	55.3%	44.7%	12,352	54.7%	45.3%	11,987	52.3%	47.7%
Black	740	20.5%	79.5%	1,152	18.8%	81.2%	997	18.7%	81.3%
Asian	356	9.3%	90.7%	405	36.0%	64.0%	491	46.8%	53.2%
Hispanic*	211	28.0%	72.0%	265	34.0%	66.0%	460	30.7%	69.3%
City of Xenia	9,343	66.3%	33.7%	10,390	61.6%	38.4%	11,042	60.9%	39.1%
White	7,714	70.8%	29.2%	8,697	65.6%	34.4%	9,316	65.5%	34.5%
Black	1,323	45.7%	54.3%	1,424	40.2%	59.8%	1,449	36.9%	63.1%
Asian	39	59.0%	41.0%	41	58.5%	41.5%	29	65.5%	34.5%
Hispanic*	103	62.1%	37.9%	7	53.2%	46.8%	191	27.7%	72.3%

*Hispanic ethnicity is counted independently from race

U.S. Census Bureau, 2000 & 2010 Decennial Census (SF1 & SF3), 2013 – 2017 American Community Survey (B25003, B25003A, B25003B, B25003D, B25003I)

Homeownership rates in Greene County, Fairborn, and Xenia have fallen since 2000.

Minority groups, which tended to already have lower homeownership rates, were the hardest hit by the decline. Black homeownership fell from 50.9% to 43.2% outside of the two Cities, and from 20.5% to 18.7% in Fairborn and 45.7% to 36.9% in Xenia.

iii. Foreclosure Trends

The rate of foreclosure in Greene County was 0.04% in 2018 or 1 in every 1,919 homes according to RealtyTrac, an aggregator of nationwide residential foreclosure, loan and property sales data. This rate is lower than the Ohio statewide rate of 0.06%. In Fairborn, the rate was slightly lower than the County with 1 in every 2,297 homes being in foreclosure. Xenia’s rate was slightly higher at 1 in every 1,841 homes being in foreclosure. With fewer foreclosures than what occurred across much of the rest of Ohio, Greene County has a market that appears to have recovered to a greater extent from the foreclosure crisis that affected much of the country after the 2008 housing crisis.

iv. The Tendency of the Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected

classes. In 2010, the year with the most recently available data, minority groups were more likely to have families with three or more persons than White households in all three jurisdictions.

Figure 2-18
Families with Three or More Persons, 2010

Race/Ethnicity	Families with Three or More Persons							
	Greene County		Remainder of County		City of Fairborn		City of Xenia	
	#	%	#	%	#	%	#	%
All Family Households	22,124	53.1%	14,257	52.7%	4,179	52.3%	3,688	55.6%
White	19,643	52.1%	12,915	51.7%	3,635	51.4%	3,093	54.8%
Black	1,249	58.4%	472	58.7%	298	57.2%	479	58.9%
Asian	709	67.5%	577	69.4%	116	61.1%	16	57.1%
Some Other Race*	159	60.2%	92	62.2%	36	49.3%	31	72.1%
Two or More Races	364	64.5%	201	63.2%	94	67.1%	69	65.1%
Hispanic**	398	65.5%	257	67.5%	86	61.4%	55	63.2%

*Some Other Race includes Native Americans, Native Hawaiians, and individuals identifying as "some other race."

**Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, 2010 Decennial Census (P28).

In order to house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. Since minority households are more likely to have larger families and be renters, there needs to be a sufficient supply of larger rental units to meet the needs of their families. In Greene County outside of the two Cities, 40.0% of rental units have three or more bedrooms – up from 37.8% in 2010. This is compared to owner-occupied housing, 91.4% of which contain at least three bedrooms.

Only 29.6% of Fairborn’s rental stock contains three or more bedrooms in 2017. This is slightly lower than in 2010 when 29.8% of the rental stock contained at least three bedrooms. Homeowners have more access to larger housing units with 83.9% of owner-occupied units having at least three or more units.

Xenia’s rental stock was more likely than Fairborn to contain at least three bedrooms, nearly matching the proportion in the remainder of the County at 39.8%, which is up slightly from 39.0% in 2010. Homeowners in Xenia were more likely to obtain housing with a higher number of bedrooms with 85.1% of owner-occupied units containing at least three bedrooms.

Figure 2-19
Housing Units by Number of Bedrooms, 2010 – 2016

	Renter-Occupied Housing Stock		Owner-Occupied Housing Stock		Renter-Occupied Housing Stock		Owner-Occupied Housing Stock	
	# of Units	% of Total Units	# of Units	% of Total Units	# of Units	% of Total Units	# of Units	% of Total Units
Green County	2010				2017			
0-1 Bedrooms	4,720	24.2%	357	0.8%	5,039	23.5%	309	0.7%
2 Bedrooms	7,931	40.6%	4,635	10.9%	8,609	40.2%	4,354	10.1%
3 or More Bedrooms	6,878	35.2%	37,441	88.2%	7,793	36.3%	38,598	89.2%
Total	19,529	100.0%	42,433	100.0%	21,441	100.0%	43,261	100.0%
Remainder of County								
0-1 Bedrooms	1,857	21.5%	199	0.7%	1,955	20.2%	138	0.5%
2 Bedrooms	3,521	40.7%	2,812	9.6%	3,843	39.8%	2,429	8.2%
3 or More Bedrooms	3,269	37.8%	26,189	89.7%	3,866	40.0%	27,187	91.4%
Total	8,647	100.0%	29,200	100.0%	9,664	100.0%	29,754	100.0%
City of Fairborn								
0-1 Bedrooms	1,933	27.8%	87	1.3%	1,959	26.2%	77	1.1%
2 Bedrooms	2,937	42.3%	1,022	15.4%	3,296	44.2%	1,016	15.0%
3 or More Bedrooms	2,072	29.8%	5,508	83.2%	2,209	29.6%	5,685	83.9%
Total	6,942	100.0%	6,617	100.0%	7,464	100.0%	6,778	100.0%
City of Xenia								
0-1 Bedrooms	930	23.6%	71	1.1%	1,125	26.1%	94	1.4%
2 Bedrooms	1,473	37.4%	801	12.1%	1,470	34.1%	909	13.5%
3 or More Bedrooms	1,537	39.0%	5,744	86.8%	1,718	39.8%	5,726	85.1%
Total	3,940	100.0%	6,616	100.0%	4,313	100.0%	6,729	100.0%

Source: U.S. Census Bureau, 2006 – 2010 & 2013 – 2017 American Community Survey (B25042)

v. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods or communities because of a lack of affordable housing in those areas.

Real median housing value in Greene County fell by 6.2% from 2000 to 2017, while median gross rent rose by 2.5%. Median household income fell by 7.1%, which means that, even with falling housing values, homeownership remains out of reach for many households. Because median housing value is calculated by the census for the whole county, values in the County outside of the two Cities likely fell less than 6.2% due to the even larger drop in values in Fairborn and Xenia. Rising rents and falling incomes are further squeezing lower income households in the County.

Both home values and rents fell in Fairborn. The median housing value decreased by 14.6% and rents decreased by 6.0%. Median household income fell even further, however, dropping 15.2% between 2000 and 2017. The large drop in real income keeps affordable housing options out of reach for many of the City's households.

Xenia's home values fell by 20.7% while rents fell 0.7%. Median household income outpaced the decrease in rents and home values, dropping nearly 25%. Because income has fallen farther than rents and home values, affordable housing options remain limited for low-income residents.

Due to incomes falling faster than the cost of housing, lower income residents in Greene County have severely limited housing choice. Furthermore, with decreasing home values low-income

households depending on the value of their house as an appreciating asset are witnessing their investment depreciate, which is further exacerbating inequality among households.

Figure 2-20
Real Median Housing Value, Gross Rent, and Household Income 2000 – 2017

	Median Housing Value (Adjusted to 2017 Dollars)	Median Gross Rent (Adjusted to 2017 Dollars)	Median Household Income (Adjusted to 2017 Dollars)
2000			
Greene County	\$174,361	\$844	\$69,997
City of Fairborn	\$132,353	\$824	\$53,069
City of Xenia	\$117,391	\$695	\$52,448
2010			
Greene County	\$179,310	\$858	\$63,520
City of Fairborn	\$125,293	\$793	\$44,046
City of Xenia	\$110,612	\$735	\$44,599
2017			
Greene County	\$163,500	\$866	\$65,032
City of Fairborn	\$113,000	\$775	\$45,008
City of Xenia	\$93,100	\$693	\$39,415
% Change from 2000 - 2017			
Greene County	-6.2%	2.5%	-7.1%
City of Fairborn	-14.6%	-6.0%	-15.2%
City of Xenia	-20.7%	-0.3%	-24.8%

U.S. Census Bureau, 2000 Decennial Census (H076, H063, P053); 2006 – 2010 & 2013 – 2017 American Community Survey (B25077, B25064, B19013)

Despite falling housing values and rents, lower inflation-adjusted household incomes continue to keep affordable housing options out of reach for many households.

The median housing value fell by 6.2% in Greene County, 14.6% in Fairborn, and 20.7% in Xenia while real median income decreased 7.1%, 15.2% and 24.8%, respectively.

a. Rental Housing

Greene County outside of the two Cities has lost over 1,000 units or 24.2% of its rental housing stock with rents less than \$1,000 dollars per month since 2010. During the same time period, the stock of rental units renting for \$1,000 or more per month increased by 85.2%. The remainder of the County's rental stock is comprised of 43.1% units renting for less than \$1,000 per month.

Fairborn's rental stock is 81.0% units renting for less than \$1,000 per month. The number of these units has shrunk by 4.5% since 2010. Similarly, Xenia's rental stock is 86.6% units renting for less than \$1,000 per month. The availability of these types of units has grown by 4.1%, suggesting that Xenia has an affordable rental market compared to the remainder of the County and Fairborn.

Figure 2-21
Change in Affordable Rental Units, 2010 – 2017

Units Renting For:	2010	2017	Change 2000-2017	
			#	%
Remainder of County				
Less Than \$500	710	626	-84	-11.8%
\$500 - \$699	1,157	717	-440	-38.0%
\$700 to \$999	3,369	2,627	-742	-22.0%
\$1,000 or more	2,834	5,248	2,414	85.2%
City of Fairborn				
Less Than \$500	1,146	518	-628	-54.8%
\$500 - \$699	2,152	2,161	9	0.4%
\$700 to \$999	2,803	3,148	345	12.3%
\$1,000 or more	667	1,365	698	104.6%
City of Xenia				
Less Than \$500	772	942	170	22.0%
\$500 - \$699	1,487	1,137	-350	-23.5%
\$700 to \$999	1,106	1,424	318	28.8%
\$1,000 or more	375	544	169	45.1%

Sources: 2006 - 2010 & 2013 - 2017 American Community Survey (B25063)

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in each county in the U.S. for 2018. In Greene County, the FMR for a two-bedroom apartment in 2018 was \$765. The annual income required to make this rent affordable (no more than 30% of monthly income) is \$30,600. This required annual income is 47.1% of the County's median household income, 68.0% of Fairborn's median, and 77.6% of Xenia's median. The Ohio minimum wage was \$8.30 per hour or \$332 per week if working a 40-hour work week in 2018. In order to keep a two-bedroom apartment at the FMR affordable, a household would have to earn at least \$2,550 per month. At the minimum wage working 40 hours a week this would require 1.5 workers. The work hours required for a minimum wage earner to afford a two-bedroom apartment at the FMR is 71 hours. A zero-bedroom apartment requires 48 work hours.

A Supplemental Security Income (SSI) recipient in Greene County receives \$750 per month. The rent affordable to a household relying solely on SSI income can only afford a rent of \$225 per month. There are only 682 units in Greene County that rent for less than \$250 per month. Between 2010 and 2017, the number of apartments renting for this amount grew by only 13 units.

The FMR for a two-bedroom apartment in Greene County was \$765 in Greene County, which translates to a required annual household income of \$30,600 in order to keep this apartment affordable.

This annual income is 47.1% of Greene County's median household income, 68.0% of Fairborn's, and 77.6% of Xenia's. A rental market where the FMR takes up such a large proportion of a jurisdiction's median income is unaffordable to many households.

b. Sales Housing

The average sales price for a home in Greene County was \$182,767 in 2017 increasing to \$195,554 in 2018. The average sales price in Fairborn in 2017 was \$103,687 and \$105,163 in Xenia, based on the most recent data available. The number of units sold in Fairborn reached 456 and 429 were sold in Xenia. In the five-county region, the average sales price increased 8.5% from December 2017 to January 2018 with the number of sales increasing 1.06%.

One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level.⁹ Without knowing the price of each home sold in 2017, this can be approximated by calculating the maximum affordable purchase price a household earning the median income by different racial groups.

The calculations are based on a 30-year mortgage with the average interest rate for 2017, which was 3.9% as provided by Freddie Mac. The average annual homeowner's insurance in Greene County is \$724 according to V-Home Insurance, an internet-based home insurance comparison tool. The real estate millage used was 60.05, which was the midpoint between the highest and lowest millage rates in Greene County. A 10% tax rollback that is available in Greene County was also applied. A mortgage insurance rate of 0.6% was used. Calculations assume a 10% down payment, and that the buyer had no other debt. A house is considered affordable if its monthly housing cost does not exceed 30% of a household's gross income. These calculations are shown below in Figure 2-21.

A household in Greene County earning the median household income is unable to purchase a median priced house. When broken down by race, the housing market is only affordable to Asian households. The housing market is least affordable to Black households where the median earning household can only afford 55.9% of the purchase price of the median house in the County. Whites can afford 94.5% of the median priced house and Hispanics can afford 93.1%.

Fairborn's housing market is more affordable than the County as a whole. A household earning the median income can afford to purchase a house that is about \$10,000 more expensive than the median priced house. When broken down by race, the market is only affordable to White and Asian households. A Black household earning the median income can only afford a home priced at 78.8% of the median price and Hispanics can only afford 80.7%.

Xenia's housing market is mostly unaffordable. The median earning household in the City can afford to purchase a home that is approximately \$7,000 less than what the median house sold for in 2017. The only group that the market is affordable to is White households. The market is least affordable to Hispanic households, which the median household could only afford a house

⁹ Joe Light, "Last of the Red-Hot Markets," Money Magazine December 2007: 53-56.

priced at 61.2% of the median priced house. A Black household could only afford a home priced at 75.6% of the median priced house in Xenia.

Figure 2-22
Maximum Affordable Home Purchase Price, 2017

	Median Household Income 2016	Monthly Mortgage Payment				Total Allowable PITI Payment (30% gross income)	Total allowable debt service (43% gross income)	Maximum Affordable Purchase Price	Median Housing Value 2016
		Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance	PMI				
Greene County	\$65,032	\$718	\$753	\$71	\$84	\$1,626	\$2,330	\$167,285	\$182,767
White	\$67,060	\$741	\$778	\$71	\$86	\$1,677	\$2,403	\$172,740	
Black	\$40,852	\$439	\$461	\$71	\$51	\$1,021	\$1,464	\$102,252	
Asian	\$84,702	\$945	\$992	\$71	\$110	\$2,118	\$3,035	\$220,188	
Hispanic*	\$66,107	\$730	\$766	\$71	\$85	\$1,653	\$2,369	\$170,176	
City of Fairborn	\$45,008	\$487	\$511	\$71	\$57	\$1,125	\$1,613	\$113,430	\$103,687
White	\$47,096	\$511	\$536	\$71	\$60	\$1,177	\$1,688	\$119,046	
Black	\$33,220	\$351	\$368	\$71	\$41	\$831	\$1,190	\$81,726	
Asian	\$55,216	\$529	\$555	\$71	\$62	\$1,380	\$1,979	\$123,176	
Hispanic*	\$33,929	\$359	\$377	\$71	\$42	\$848	\$1,216	\$83,633	
City of Xenia	\$39,415	\$422	\$443	\$71	\$49	\$985	\$1,412	\$98,388	\$105,163
White	\$42,445	\$457	\$480	\$71	\$53	\$1,061	\$1,521	\$106,537	
Black	\$32,401	\$341	\$358	\$71	\$40	\$810	\$1,161	\$79,523	
Asian	-	-	-	-	-	-	-	-	
Hispanic*	\$26,766	\$276	\$290	\$71	\$32	\$669	\$959	\$64,368	

*Hispanic ethnicity is counted independent of race

Calculations by Mullin & Longergan

The maximum affordable purchase price for households earning the median income places homeownership out of reach for many residents – especially minorities.

A Black household earning the median household income for Blacks can only afford a house priced at 55.9% of the County's median sales price in 2018, 78.8% of the price in Fairborn, and 75.6% of the median price in Xenia.

vi. Protected Class Status and Housing Problems

Lower income minority households tend to experience housing problems at a higher rate than lower income White households.¹⁰ In 2015, the year with the most recently available data, renters in Greene County faced housing problems at a greater rate than homeowners – 72.4% compared to 58.1%. Among both renters and owners, Black and White households faced housing problems at similar rates; however, among Hispanics, homeowners and renters faced lower rates of housing problems. In the case of homeowners, housing problems were experienced at drastically lower rates with only 11.8% of Hispanic households experiencing at least one type of housing problem compared to 58.1% of all County households.

¹⁰ HUD defines housing problems as (1) cost burden of 30% or more (i.e. paying more than 30% of gross income on monthly housing expenses), and/or (2) lacking complete kitchen or plumbing facilities, and/or (3) overcrowding of more than 1.01 persons per room.

Figure 2-23
Housing Problems by Race, 2015

	All Households 0-80% of MFI	
	Total	% With Housing Problem
Renters		
White Non-Hispanic	8,920	72.5%
Black Non-Hispanic	1,545	73.1%
Hispanic	440	65.9%
Total	10,905	72.4%
Owners		
White Non-Hispanic	8,505	58.3%
Black Non-Hispanic	275	58.2%
Hispanic	34	11.8%
Total	8,814	58.1%

Source: 2015 HUD Comprehensive Housing Affordability Strategy Data

3. Evaluation of Fair Housing Profile

This section provides a review of the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

A. Existence of Fair Housing Complaints

A lack of filed complaints does not necessarily indicate a lack of housing discrimination. Some persons may not file complaints because they are not aware of how to go about filing a complaint or where to go to file a complaint. In a tight rental market, tenants may avoid confrontations with prospective landlords. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Finally, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

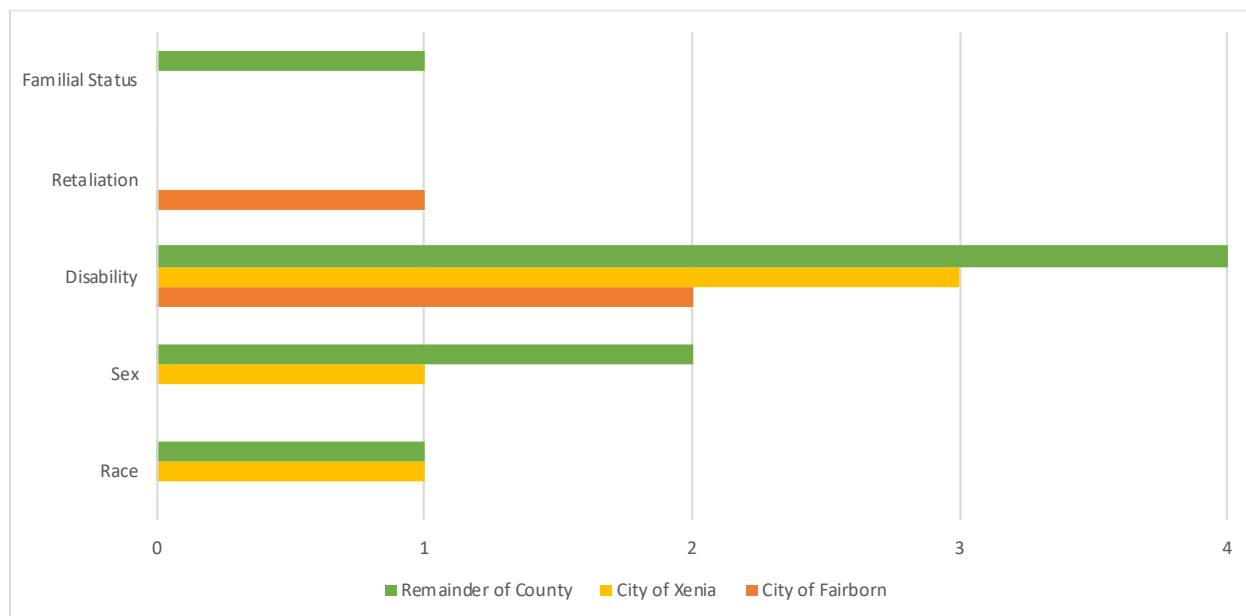
i. HUD's Office of Fair Housing and Equal Opportunity

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD processes complaints from persons regarding alleged violations of the Fair Housing Act. There was only one complaint filed through FHEO during the 2016 – 2018 time frame. In 2016, a complaint was filed on the basis of discrimination originating in Xenia. It resulted in an administrative closure.

a. Ohio Civil Rights Commission

The Ohio Civil Rights Commission (OCRC) oversees the enforcement of state and federal fair housing laws. There were 12 total complaints filed with OCRC between 2016 and 2018. Because there can be multiple bases for filed complaints, there was a total of 16 bases for complaints. During this period, disability was overwhelmingly the primary basis for complaints. There were nine complaints involving discrimination based on disability. There were three complaints on the basis of sex, two on the basis of race, and one each for retaliation and familial status.

Figure 3-1
Reasons for Fair Housing Complaints Filed with OCRC 2016 – 2018



Fairborn had three complaints of housing discrimination: two complaints involved a disability and one retaliation. There was no cause found for two of the complaints, however, one disability complaint resulted in a settlement of \$500.

There were four complaints in Xenia: one involved the bases of race and sex, while the other three were all regarding disability. There was no cause found in two of the cases, one case resulted in administrative closure, and the other two were opened in 2018 and are ongoing. Stakeholders in Xenia commented that residents often do not know how to contact fair housing or initiate a fair housing discrimination complaint, which suggests that the level of discrimination is higher than that reported. This is in part because Xenia only recently began taking calls inquiring about housing discrimination complaints and not all residents may be aware of the change.

In Greene County outside of the two Cities, there were five complaints involving a total of eight bases. Three cases had two bases for the complaint. One case involved the bases of sex and disability, one with race and disability, and one with sex and familial status. The remaining two complaints were filed due to disability. Of the five cases, one resulted in a conciliation, two resulted in a judgment of no cause, and two are still open. County stakeholders suggested that landlords are likely asking for specific information that may be aimed at the protected classes during the application process. They believe that this may be one of the main drivers of complaints – especially disability related complaints – in the County.

Discrimination based on disability was the primary basis alleging housing discrimination.

Out of 12 housing discrimination complaints in Greene County filed with the Ohio Civil Rights Commission between 2016 and 2018, nine included disability as the basis for discrimination.

ii. Existence of Fair Housing Legal Proceedings

There were no fair housing related legal proceedings existing in any of the jurisdictions analyzed.

iii. Determination of Unlawful Segregation

There were no determinations of unlawful segregation in any of the jurisdictions analyzed

4. Evaluation of Public Policies

A. The City of Fairborn

i. Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status or national origin may constitute such impediments. In the State of Ohio, ancestry and military status are also protected classes.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates public policies in order to determine opportunities for affirmatively furthering fair housing.

a. Investment of CDBG Funds

As a HUD entitlement community, Fairborn receives CDBG funds directly from HUD. According to the City's 2018 Action Plan, Fairborn has used a large proportion of its funding for housing rehabilitation since 2015. Fairborn has also taken advantage of the State's Community Housing Impact Preservation Program (CHIP), which provides funds to local governments to improve and provide affordable housing for LMI residents. Fairborn received CHIP funds in 2010, 2013, and 2016.

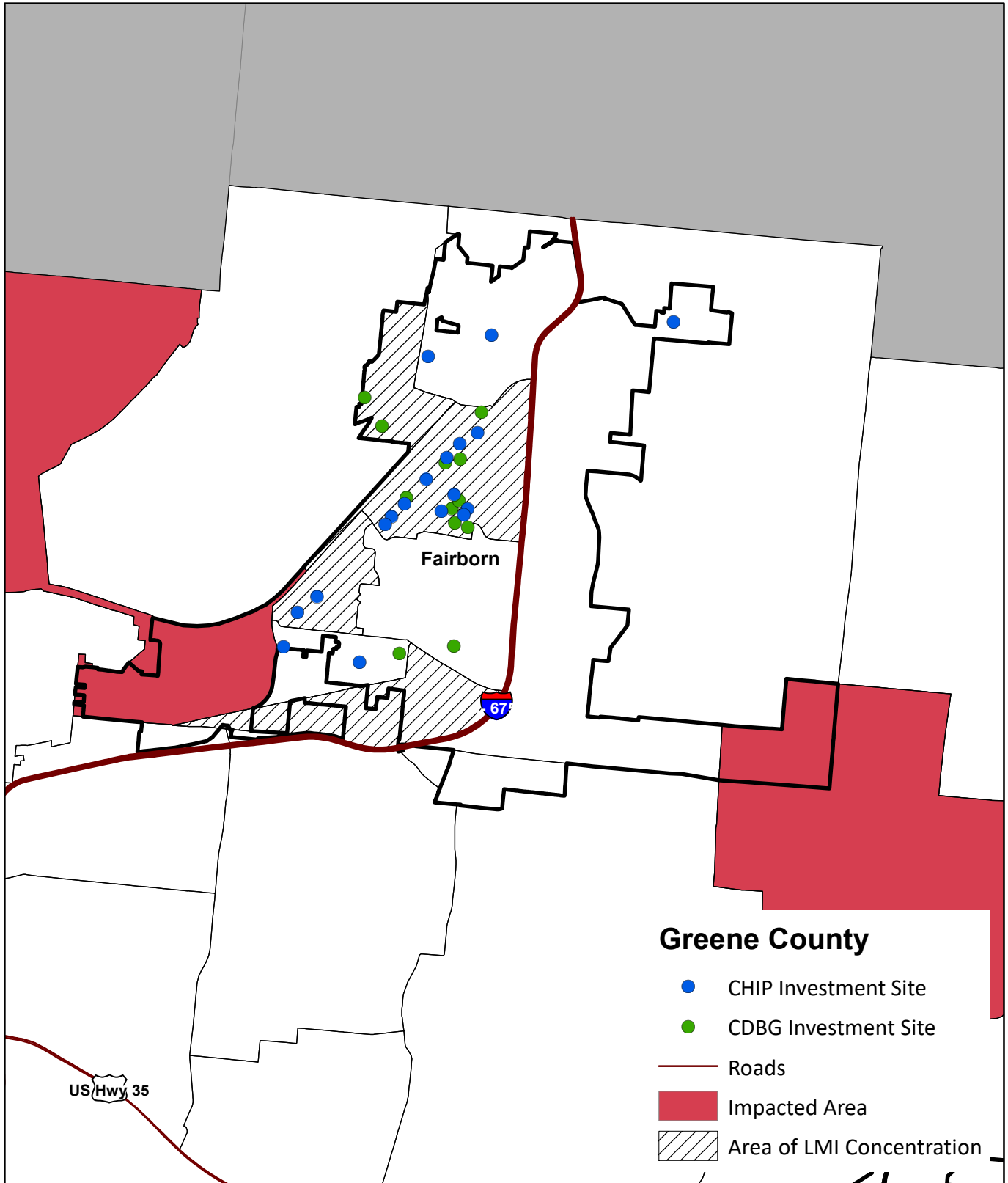
Using these two funding sources, Fairborn has assisted 30 households. As illustrated on Map 9, nearly all of the assisted households are in areas of concentration of LMI residents. The race and ethnicity of those assisted is unknown.

b. Appointed Boards and Commissions

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

In 2017, Fairborn was 83.4% White and 7.7% Black. Together all minority groups totaled 16.7% of the City's population. In order to be representative, the City's boards and commissions should have a similar composition of minorities as well as approximately half male and half female.

MAP 9: CITY OF FAIRBORN CDBG AND CHIP INVESTMENT, 2010 - 2017



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: LMI Data, Race and Ethnicity

Planning Board

The Planning Board helps determine the impact of the proposed development by making recommendations to the Fairborn City Council on matters affecting physical growth and development and amendments to the Comprehensive Land Use Plan. It consists of 12 board members. There is one (8.3%) board member who is Black while the remaining 11 are White. Four (33.3%) board members are female. In order to be more representative of the City's population, the board should seek out at least one more qualified minority and two qualified female board members.

Board of Zoning Appeals

The BZA has the power to make decisions on applications for dimensional, locational, and use variances, appeals of decisions of the Zoning Administrator and appeals the decisions of the Planning Board on Conditional Use Applications. They also hear and determine all administrative adjustments referred to it by the Zoning Administrator and appealed to it by adjacent property owners under the standards of review for a dimensional or locational variance, as they case may be. They also hear and determine all appeals to the Residential Building Code. The board is comprised of five members. There is one (20.0%) board member who is Black and the remaining members are White. There are two (40.0%) female board members. This board is sufficiently representative of the City's population.

c. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures. The State of Ohio uses the 2017 Ohio Building Code. It stipulates that buildings designed or constructed after 2011 with both this code and the 2010 ADA Standards for Accessible Design. Due to State law, no city can establish standards more stringent than those outlined in the state code.

d. Persons with Limited English Proficiency

The City's largest LEP language group is Spanish with 298 persons or 0.97% of the population. The City should continue to monitor this population to ensure that it is able to provide services in compliance with Title VI of the Civil Rights Act.

e. Anti-Displacement and Relocation Assistance Plan

In the event a community's development plans result in the displacement of residents and loss of affordable housing due to demolition, communities are required to have an anti-displacement and relocation assistance plan. The purpose of such a policy is to ensure that, in the event residents are displaced, they will be rehoused in a manner that provides as little disruption to their lives as possible, and to replace any affordable units that are lost due to development.

Fairborn adopted an Anti-Displacement and Relocation Assistance Plan in June 2004. It stipulates that the City will replace any housing formerly occupied by LMI residents within three years of the beginning of any demolition or conversion activity. The City will

also submit its plan and schedule for replacement of any units lost to the public. Additionally, any replacement unit built must remain affordable for at least ten years. If a low-income household is displaced, Fairborn will provide relocation assistance to displaced residents as required by HUD.

f. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to future development and the preservation of existing assets. Each jurisdiction analyzed in this AI have separate entities with planning authority for their respective areas of responsibility.

The Fairborn Comprehensive Land Use Plan Update 2016 divides Fairborn into four separate districts based on current development patterns. The Comprehensive Plan provides the following descriptions for each of these four districts.

Downtown District

The Downtown District is characterized by the dense, walkable commercial strip along Main Street, the auto-centric commercial uses along Broad Street, and the small lot, urban neighborhood homes throughout the area. Lacking significant greenfield land, recommendations focus on strategic redevelopment of existing development and creating a recognizable brand to attract more visitors to the downtown core.

Central District

The Central District is characterized by the significant amount of residential area, home to 50% of Fairborn's population. In the heart of the Central District is Five Points, a commercial node with great potential to increase the density, mix of uses, and tax base for the surrounding neighborhoods. Separating Fairborn and Wright Patterson Air Force Base is Kauffman Avenue, also located in the Central District. This corridor will serve an important role in attracting visitors and personnel from the base, as well as from nearby Wright State University.

University District

The University District is home to Wright State University, student-oriented neighborhoods, and the Colonel Glenn Highway commercial corridor. While development of much of the land in this district will be guided by the University's master plan, a collaboration between the City and school is encouraged to ensure future development aligns with long term goals of both parties.

East District

Incorporating the newly annexed CEMEX-owned land, the East District is home to the highest proportion of developable land, both greenfield and brownfield, which may be allocated for conservation, remediation, and/or development. With the highly travelled I-675 running north-south through its core, this district will likely attract larger commercial and office uses looking for high visibility and easy highway access.

The Comprehensive Plan observes that the City is in need of more housing options to attract and retain young professionals. Part of this mix is affordable housing in the University District and near the Downtown District.

However, the Comprehensive Plan lacks an overall housing element. By including housing as part of the planning process, the City could incentivize the development of housing City-wide that will provide options to residents of all age groups and income levels. A housing element of the Comprehensive Plan could also address the

concentrations of low-income and minority households. These issues should be addressed in the context of providing housing choice in all areas of the City for residents of a variety of income levels with attention paid to providing access to the protected classes.

The City of Fairborn lacks a housing element in its primary long-range planning document.

By including housing as part of the planning process, Fairborn could incentivize the development of housing city-wide that will provide housing options to residents of all age groups and income levels. A housing element of the Comprehensive Plan could also address the concentrations of low-income and minority households.

g. Zoning

The analysis of zoning regulations was based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The opportunity to develop alternative designs (such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments)
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single family zoning districts
- Restrictions on the number of unrelated persons in dwelling units.

1. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles, and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

Fairborn's zoning ordinance was adopted in December 2017.

2. Residential Zoning Districts

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the municipality's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

Because members of the protected classes are often also in low-income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

Fairborn has four different residential zoning districts reaching a maximum intended residential density of 20 units per acre. Suburban Residential is the least dense allowing for only single-family and duplex housing and a desired maximum density of up to six units per acre. The Urban Edge and Medium Density Residential districts allow for the building of multi-family units for up to ten and 20 units per acre, respectively. The Neighborhood Center allows for mixed use developments that incorporate residential units.

While the types of districts are enough to allow for a variety of housing types the majority of the City's residential districts are zoned for the less dense Suburban Residential and Urban Edge Residential. Increasing the availability of multi-family developments, especially near transit and commercial centers, will allow for lower income households to have increased access to City amenities and jobs. It will also avoid the concentration of affordable housing in just one or two locations in the City.

While Fairborn's zoning code allows for a variety of lot sizes and housing types, the majority of the City's residential areas are zoned for larger single-family housing.

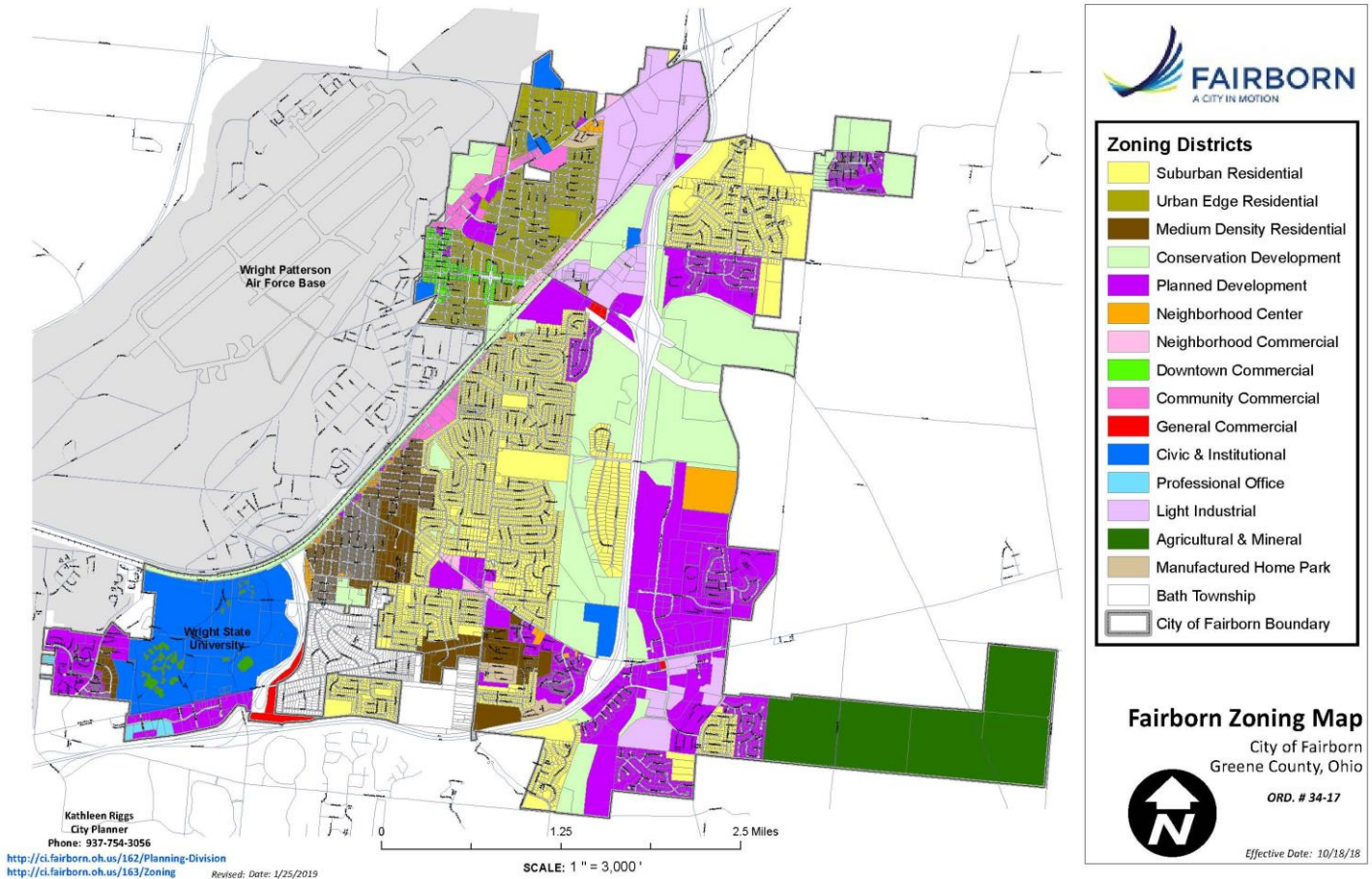
By increasing the amount of space allowing more density and multi-family developments, especially near transit and commercial centers, the City will increase low-income households' access to jobs and City amenities. It will also prevent the concentration of low-income households in one or two locations in the City.

Figure 4-1
City of Fairborn Residential Zoning Districts

Residential Zoning Districts	Principal residential uses	Use	Minimum Lot Size	Desired Density (dwellings per net acre)
SR	Suburban Residential	Single-family	15,000 sq. ft.	3 to 6
		Duplex	7,500 sq. ft.	
UER	Urban Edge Residential	Single-family	7,000 sq. ft.	5 to 10
		Duplex	3,125 sq. ft.	
		Multi-family	2,000 sq. ft. per one bedroom plus 500 sq. ft. per additional bedrooms	
MDR	Medium Density Residential	Single-family	6,000 sq. ft.	10 to 20
		Duplex	3,125 sq. ft.	
		Multi-family	2,000 sq. ft. per one bedroom plus 500 sq. ft. per additional bedrooms	
NCTR	Neighborhood Center	Mixed-use Residential	1,000 sq. ft. per unit	No stated density, however, desired use is small to medium sized commercial and residential units suggests at least 10 to 20 units.

Source: City of Fairborn Zoning Code

Figure 4-2
City of Fairborn Zoning Map



3. Definition of Family

Local zoning and land use laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities violate the Fair Housing Act. Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can also impede the development of group homes, effectively restricting housing choice for persons with disabilities.

Fairborn's zoning ordinance defines family as one or more persons living together as a single housekeeping unit in a dwelling unit. This is a sufficiently broad definition focusing on single housekeeping unit.

4. Regulations of Group Homes

Group homes are residential uses for persons with disabilities that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other single-family residential use. Because a group home for the disabled serves to provide a non-institutional experience for its occupants, imposing conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless enforced against all residential uses in the zoning district, are an impediment to the siting of group homes and are inconsistent with the Fair Housing Act.

According to Fairborn's zoning ordinance:

"Congregate housing group residential means apartments and dwellings with communal dining facilities and services, such as housekeeping, organized social and recreational activities, transportation services and other support services appropriate for the residents (e.g. student housing)."

Group homes for residents with developmental disabilities are permitted by right in all residential districts so long as they house between one and eight persons. Group homes housing between nine and sixteen persons are allowed as a conditional use in UER and MDR zoned districts. Group homes for residents with developmental disabilities provide for fair housing opportunities for this group, however, they should be expanded to include all disabilities covered by the Fair Housing Act.

Fairborn's treatment of group homes provides affordable housing opportunities for residents with developmental disabilities, however, it should be expanded to include all disabilities covered by the Fair Housing Act

Fairborn should update its zoning ordinance to include residents with any disabilities covered by the Fair Housing Act.

B. City of Xenia

i. Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status or national origin may constitute such impediments. In the State of Ohio, ancestry and military status are also protected classes.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates public policies in order to determine opportunities for affirmatively furthering fair housing.

a. Investment of CDBG Funds

Xenia applied for the State of Ohio CHIP program in conjunction with Greene County in 2014 and 2017. The County administers the grant. Over this time period nearly \$600,000 worth of CHIP funds was spent in Xenia on rehab or home repair. This impacted 31 households out of the 55 assisted by the County. As illustrated in Map 10 included in the Greene County section the majority of this investment occurred in areas of LMI concentration and particularly in the City's one area impacted by racial and LMI concentration.

Xenia also receives CDBG funds from the State of Ohio. Since 2010, the City has not funded any housing rehab, repair, or development with these funds. Its projects have primarily been directed at façade improvements and ADA pedestrian curb cuts and curb repairs.

b. Appointed Boards and Commissions

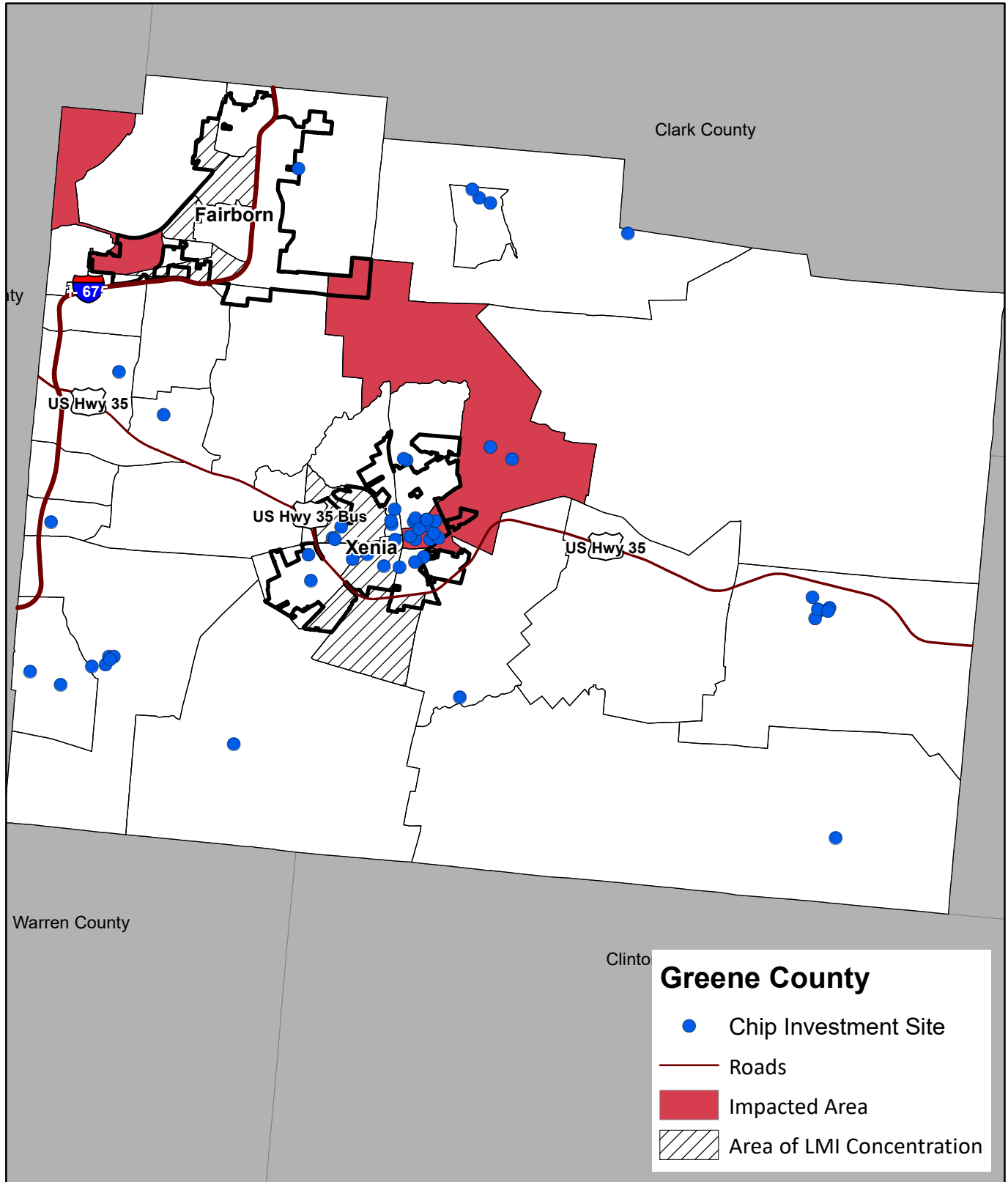
A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

In 2017, Xenia was 81.1% White and 13.4% Black. Together all minority groups totaled 19.0% of the City's population. In order to be representative, the City's boards and commissions should have a similar composition of minorities as well as approximately half male and half female.

Board of Zoning Appeals

The Board of Zoning Appeals hears and decides upon zoning variances and appeals under the Property Maintenance Code. It has six members, all of whom are White. Two members are female (33%) and the rest are male. In order to be more representative of

MAP 10: GREENE COUNTY CHIP INVESTMENT, 2015 - 2018



Sources: U.S. Census Bureau TIGER/Line: County and Census Tract Boundaries, City Points, and Roads; American Community Survey, 2012-2016 5-Year Estimates: LMI Data, Race and Ethnicity

Xenia's population, the board should have at least one member who is Black as well as an additional female board member and persons with disabilities.

Economic Development Advisory Board

The Economic Development Advisory Board advises the City Council on economic development programs and policies as well as incentives. It has seven members. Two board members are Black (28.6%) and two are female. The board is representative of the City's minority population; however, one to two additional female board members would make it more representative of the entire City along with persons with disabilities.

c. Persons with Limited English Proficiency

Xenia's largest LEP language group is Thai with only 67 persons or 0.28% of the population. While not required to have a LAP, the City should continue to monitor the size of its LEP populations in order to continue providing City services.

d. Anti-Displacement and Relocation Assistance Plan

In the event a community's development plans result in the displacement of residents and loss of affordable housing due to demolition, communities are required to have an Anti-Displacement and Relocation Assistance Plan. The purpose of such a policy is to ensure that, in the event residents are displaced, they will be rehoused in a manner that provides as little disruption to their lives as possible while also seeking to replace the number of lost affordable housing units.

Xenia adopted an Anti-Displacement and Relocation Assistance Plan in June 2013. It stipulates that the City will replace any housing formerly occupied by LMI residents within three years of the beginning of any demolition or conversion activity. The City will also submit its plan and schedule for replacement of any units lost to the public. Additionally, any replacement unit built must remain affordable for at least ten years. If a low-income household is displaced, Xenia will provide relocation assistance as required by HUD.

e. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to future development and the preservation of existing assets. Each jurisdiction analyzed in this AI have separate entities with planning authority for their respective areas of responsibility.

Xenia adopted a comprehensive plan, known as the X-Plan, in 2013. The X-Plan addresses housing in the context of improving and sustaining its neighborhoods. It discusses the depressed value of its housing market as a function of higher rates of renters, increasing vacancy rates, and deterioration of its aging housing stock and streetscapes. In order to improve the condition of its housing market the X-Plan proposes many strategies. Among these strategies are several elements that are relevant to fair housing.

1. Develop and maintain a neighborhood indicator database

A neighborhood indicator database, which includes tracking code violations, housing values, vacancy rates, and single-family rental conversions, would allow the City to identify neighborhoods where policy interventions can slow or halt neighborhood decline.

2. Update property and housing maintenance codes

The City's Property Maintenance Code dates to 1996, while its Housing Code dates to 1992. Furthermore, these ordinances overlap one another in spots and overlap with the Building Code. The result is an often confusing and inadequate set of regulations. Updating these codes will allow the City to keep its housing stock from further deterioration through simplified codes and enforcement.

3. Work with Greene County jurisdictions to establish a landbank.

Establishing a landbank will allow the City to quickly acquire properties that are tax-delinquent or vacant. Coupled with an affordable housing strategy, the City could increase homeownership opportunities for lower income households.

4. Update zoning, subdivision and street design standards to reflect sound neighborhood design principles.

The X-Plan identifies the need for zoning regulations that encourage new housing construction, additions and alterations that are compatible with established neighborhood architecture and scale. According to the future land use identified by the Plan, this means more dense, mixed-use development in the urban core with density gradually decreasing as distance from the core increases. The intent is to create a variety of housing types and affordability around the City without disrupting current neighborhood character.

The X-Plan addresses housing in the context of the current character. The denser development that tends to create the most affordable housing opportunities is focused primarily in the urban core but with such a lack of transportation, the urban core makes more sense.

While Xenia's comprehensive planning document focuses on housing through the context of its neighborhoods.

The plan focuses on maintaining current neighborhood characteristics, which focuses most affordable housing opportunities at the urban core.

f. Zoning

The analysis of zoning regulations was based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The opportunity to develop alternative designs (such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments)

- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single family zoning districts
- Restrictions on the number of unrelated persons in dwelling units.

1. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles, and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

Xenia's zoning ordinance was adopted in July 2016 and last amended in March 2018.

2. Residential Zoning Districts

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the municipality's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

Because members of the protected classes are often also in low-income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

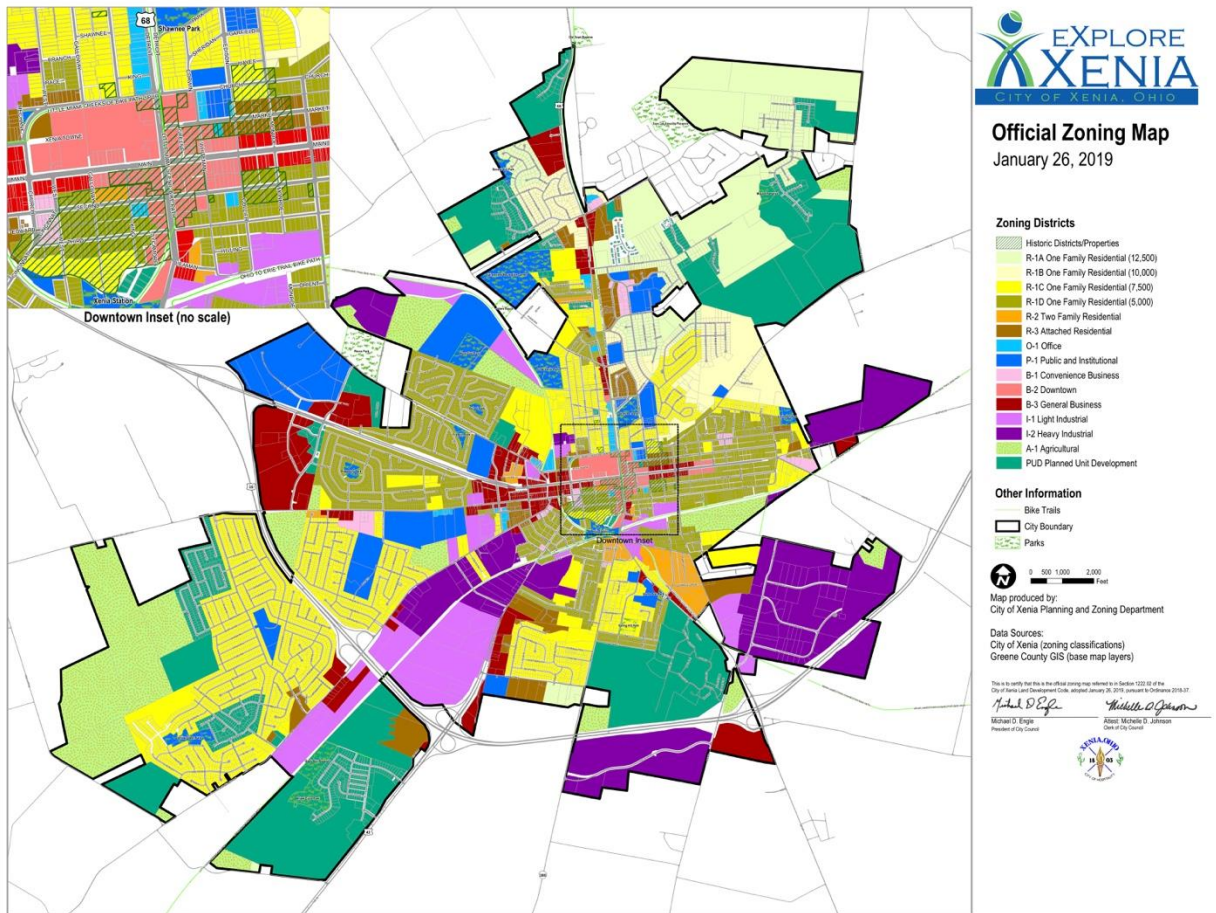
Xenia has eight zones that allow for development of residential units. Four of these allow for multi-family (R-2, R-3, O-1, PUD) and two are mixed-use (O-1 and PUD). The City's single-family zoned areas allow for between three and eight units per acre. The majority of the City is zoned for the less dense single-family housing (R-1A, R-1B); however, much of the area near Downtown is zoned dense single-family and multi-family. The City's mixed-use PUD districts are in a variety of locations, which, in theory, could provide a variety of housing types near jobs and commercial opportunities. Increasing the availability of multi-family units will allow the City to provide additional housing opportunities in a variety of locations and price points for residents.

Figure 4-3
City of Xenia Residential Zoning Districts

Residential Zoning Districts	Principal residential uses	Use	Minimum Lot Size	Maximum Density (dwellings per net acre)
R-1A	One-Family Residential District	Single-family Detached	12,500 sq. ft.	3
R-1B	One-Family Residential District (10,000)	Single-family Detached	10,000 sq. ft.	4
R-1C	One-Family Residential District (7,500)	Single-family Detached	7,500 sq. ft.	5
R-1D	One-Family Residential District (5,000)	Single-family Detached	5,000 sq. ft.	8
R-2	Two-Family Residential District	Two Unit Multi-family	4,750 sq. ft. per dwelling	4
R-3	Attached Residential District	Attached housing Multi-family	7,000 sq. ft. + 2,500 sq. ft. per additional unit	N/A
O-1	Mixed-use	Mixed Office Space and Residential Use	No Minimum Lot Size	N/A
PUD (Planned Unit Development)	Mixed-use	Mixed Commercial and Residential Use	At Least 2 Acres	N/A

Source: City of Xenia Zoning Ordinance

Figure 4-4
City of Xenia Zoning Map



3. Definition of Family

Local zoning and land use laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities violate the Fair Housing Act. Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively restricting housing choice for persons with disabilities.

Xenia’s zoning code defines family as “One or two persons or parents, with their direct lineal descendants and adopted children (and including the domestic employees thereof), together with not more than two persons not so related, living together in the whole or part of a dwelling comprising a single housekeeping unit. Every additional group of two or fewer persons living in such housekeeping unit shall be considered a separate family for the purpose of this code.”

This definition has the potential to discriminate against persons living in non-traditional housing situations for economic or other reasons. The City should update its definition of family in order to be consistent with fair housing law and to address current socio-economic challenges.

The City defines a family as being one or two persons or parents with direct lineal descendants and adopted children living with no more than two other unrelated persons.

This definition is restrictive and could discriminate against persons living in non-traditional housing situations for economic or other reasons.

4. Regulations of Group Homes

Xenia's zoning ordinance states that any person may operate a licensed residential facility that provides room and board, personal care, habilitation services, and supervision in a family setting for between six and eight persons with "mental retardation" or developmental disability in R-1A, R-1B, R-1C, R-1D, R-2, R-3, and PUD residential districts. It allows for facilities with between nine and sixteen persons in R-2, R-3, and PUD residential districts.

While the zoning code appears to accommodate residents with disabilities, stakeholders commented that other barriers may be preventing them from forming group homes such as parking minimums. The City should eliminate parking minimums for group homes or providing reasonable accommodation that will support residents with disabilities by waiving off-street parking requirements.

Xenia's zoning ordinance refers to residents with a developmental disability as having "mental retardation."

This language should be updated to the more current term of "developmental disability."

Stakeholders commented that barriers such as minimum off-street parking may prevent the formation of group homes in Xenia.

The City should amend its ordinances to remove minimum off-street parking requirements for group homes, or providing reasonable accommodation that will support residents with disabilities by waiving off-street parking requirements.

C. Greene County

i. Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status or national origin may constitute such impediments. In the State of Ohio, ancestry and military status are also included protected classes.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates public policies in order to determine opportunities for affirmatively furthering fair housing.

a. Public Housing

The Greene County Metro Housing Authority (GMHA) manages the County's supply of public housing. In 2018, there were 395 households living in GMHA housing with 956 residents. The majority of households were White (71.4%) or Black (25.3%). Less than 4.0% were of another race. In 2017, the Greene County's population was comprised of over 15.0% minorities, however, its minorities comprise almost twice that proportion of the County's public housing residents. Over half of the households are family households with two or more persons. Elderly households comprise 13.9% of GMHA residents.

	Public Housing Households	
	# of Households	%
Total Households	395	100.0%
Black Households	100	25.3%
White Households	282	71.4%
Asian Households	3	0.8%
Other Race Households	10	2.5%
Family	248	62.8%
Elderly	55	13.9%

Note: Percentage may not equal 100% due to rounding and overlap of family types.

Source: Metropolitan Housing Authority of Greene County

b. Investment of CDBG Funds

Greene County applied for the State of Ohio CHIP program in conjunction with Xenia in 2014 and 2017. The County administers the grant. The County assisted 55 households

with rehab and home repair with its awarded CHIP funds. As illustrated in Map 10, the majority of investment occurred in Xenia – 31 of the 55 households—while the remaining 24 households were in the County. Of the 24 households in the County, two were in an impacted area. The rest were primarily clustered in the municipalities of Beavercreek, Bellbrook, and Jamestown with the remaining eight scattered throughout Greene County.

c. Appointed Boards and Commissions

A community’s sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community’s commitment to housing related goals and objectives are often measured by board members, directorships and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership and commitment is a prerequisite to strategic action.

In 2017, Greene County was 85.1% White, 7.2% Black, and total minorities comprised 15.0% of the County. In order to be representative, the City’s boards and commissions should have a similar composition of minorities as well as approximately half male and half female along with persons with disabilities.

Homecroft, Incorporated

Homecroft, Incorporated is non-profit that purchases homes for individuals with developmental disabilities. Five of its board members are appointed by county commissioners. The organization receives part of its funding through Community Development Block Grants from the County. The board consists of six members. All members are White and two are female. None have any physical disabilities. Ideally, the board would have at least one board member who is Black to represent the largest minority group in the County. The board should also be approximately half female. At least one person with a physical disability would add additional representation for the community members it serves.

Greene Metropolitan Housing Authority

The board provides oversight to GMHA. It consists of five board members. One member is Black, while the remaining members are White. There are three female board members. No board member has disability. This board is fairly representative of the County’s population, however, it should consider adding a member with a disability in order to provide representation to residents with a disability who use GMHA’s services.

There are no minority board members for Homecroft, Incorporated. Additionally, only one-third of the board is female.

In order to be more representative of the County’s population, the board should consider adding additional members that reflect the diversity of the County.

d. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures. The State of Ohio uses the 2017 Ohio Building Code. It stipulates that buildings designed or constructed after 2011 with both this code and the 2010 ADA Standards for Accessible Design. Due to State law, no city can establish standards more stringent than those outlined in the state code.

e. Persons with Limited English Proficiency

Greene County has a fairly large Spanish speaking LEP population at 727 persons. It should monitor whether this population continues to grow and requests for translation of vital documents in order to meet this population's needs.

f. Anti-Displacement and Relocation Assistance Plan

In the event a community's development plans result in the displacement of residents and loss of affordable housing due to demolition, communities are required to have an Anti-Displacement and Relocation Assistance Plan. The purpose of such a policy is to ensure that, in the event residents are displaced, they will be rehoused in a manner that provides as little disruption to their lives as possible.

Greene County adopted an Anti-Displacement and Relocation Assistance plan in 2018. It stipulates that the County will replace any housing formerly occupied by LMI residents within three years of the beginning of any demolition or conversion activity. Before any activity takes place, the County will also make public and submit its plan and schedule for replacement of any units lost to the Ohio Development Services Agency and Office of Community Development . Additionally, any replacement unit built must remain affordable for at least ten years. If a low-income household is displaced, the County will provide relocation assistance as required by HUD.

g. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to future development and the preservation of existing assets. Each jurisdiction analyzed in this AI have separate entities with planning authority for their respective areas of responsibility.

The most recent long-range planning document used by the remainder of Greene County is Perspectives 2020: A Future Land Use Plan for Greene County, Ohio. It was formally adopted by the Regional Planning and Coordinating Commission and the Greene County Board of Commissioners in 2002. The Plan describes the different residential development types as rural residential and low-, medium-, and high-density residential development areas. Urban residential growth has been concentrated in the western portion of the County near the more highly populated urban centers. The Plan envisions future growth to be concentrated in these areas.

The Plan recognizes the need to avoid development patterns which will concentrate low-income housing in a small number of areas. It also seeks to encourage the development of a variety of housing types and sizes affordable across a variety of

income levels. However, the future land use map envisions the majority of dense residential development to remain in a few urban cores with no mention of mixed-use development. By increasing the number of locations where multi-family and mixed-use developments can occur, the County can ensure a variety of housing types that are affordable to different income levels will be available across a variety of locations.

Greene County's 2020 Future Land Use Plan recognizes the need to avoid development patterns which will concentrate low-income housing in a small number of areas. However, the future land use map envisions the majority of dense residential development to remain in a few urban cores with no mention of mixed-use development.

By increasing the number of locations where multi-family and mixed-use developments can occur, the County can ensure a variety of housing types that are affordable to different income levels will be available across a variety of locations.

h. Zoning

In Ohio, the power behind land development decisions resides with municipal governments through the formulation and administration of local controls. Greene County does not have a zoning ordinance.

ii. Private Sector Policies

In addition to the public sector policies that influence fair housing choice, there are private sector policies that can influence the development, financing, and advertising of real estate. While Greene County and its jurisdictions cannot be held responsible for impediments to fair housing choice identified in private sector policies, they do have an obligation to identify such impediments and bring them to the attention of the appropriate entity.

In this section of the AI, mortgage lending practices and high-cost lending are analyzed.

a. Mortgage Lending Practices

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

The most recent HMDA data available for Greene County is from 2015 to 2017. Reviewing this data helps to determine the need to encourage area lenders, other business lenders, and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans for home purchases. The data focus on the number of homeowner mortgage applications received by lenders for home purchase of one- to four-family dwellings and manufactured housing units in the County. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no

information is provided or categorized as not applicable, no analysis has been conducted due to lack of information. Figure 4-5 summarizes three years of HMDA data by race, ethnicity, and action taken on the applications, followed by detailed analysis. Incomes were analyzed based on whether or not an applicant's income was greater than or less than the median income of the census tract of the home the applicant was attempting to buy. Data is only available at the county level.

In Greene County, there were a total of 1,777 mortgage applications between 2015 and 2017 and 1,105 (62.2%) were approved by a bank and originated. Applicants above the median income of the census tract for which they were trying to purchase a home had applications originated at a rate of 70.4% compared to only 47.4% for applicants below the median income.

There were differences between racial and ethnic groups in the rate of origination. White applicants above the median income originated a mortgage at a rate of 71.6% and applicants below the median originated at a rate of 50.7%. Black applicants above the median only originated a loan at a rate of 36.6% and a rate of only 25.9% for those below the median. Asians fared somewhat better with applicants above the median originating a mortgage at a rate of 68.3% and originating at a rate of 29.4% for applicants below the median. Hispanics originated at a rate of 58.3% when above the median income and a rate of only 25.0% when below. Generally, minority groups were less likely than Whites to originate a loan even when earning above the median income of the census tract for which they were trying to purchase a home.

Figure 4-5
Mortgage Originations by Race and Income 2015 – 2017

	Income Level*	Applications	Origination	% Originated
White	Above Median	933	668	71.6%
	Below Median	503	255	50.7%
Black	Above Median	41	15	36.6%
	Below Median	27	7	25.9%
Asian	Above Median	41	28	68.3%
	Below Median	17	5	29.4%
Native Hawaiian or Other Pacific Islander	Above Median	2	-	0.0%
	Below Median	-	-	0.0%
Native American	Above Median	9	9	100.0%
	Below Median	7	2	28.6%
Information Not Provided	Above Median	118	85	72.0%
	Below Median	79	31	39.2%
Hispanic or Latino	Above Median	24	14	58.3%
	Below Median	8	2	25.0%
Total	Above Median	1,144	805	70.4%
	Below Median	633	300	47.4%
	Grand Total	1,777	1,105	62.2%

*Data grouped based on if applicant's income was above or below the median for the census tract

Note: Data excludes high-cost mortgages

Source: Consumer Financial Protection Bureau HMDA database, 2015 - 2017

Out of the total 672 mortgage applications that were denied, 602 were provided with a reason for denial. The most common reason cited for denial was that the debt-to-income ratio was too high followed by a poor credit history and collateral (value of house is believed to be less than the requested mortgage). Over two-thirds of denials fall into one of these three categories. The prevalence of debt-to-income ratio and credit history in denials point to the need for credit and debt counseling services in Greene County. These services can help residents correct poor credit histories or eliminate other obstacles toward a successful mortgage application.

Figure 4-6
Reason for Mortgage Denial

Denial Reason	#	%
Debt-to-income ratio	154	25.6%
Credit history	144	23.9%
Collateral	116	19.3%
Credit application incomplete	90	15.0%
Other	42	7.0%
Insufficient cash (downpayment, closing costs)	26	4.3%
Employment history	18	3.0%
Unverifiable information	12	2.0%
Total	602	100%

Minority mortgage loan applicants were less likely to be approved even among higher income applicants. Black applicants who were above the median income originated a mortgage at a rate of 36.6% compared to 50.7% of Whites.

The majority of applications were denied due to a high debt-to-income ratio and poor credit history. Providing debt and credit counseling services could increase the number of applications approved and increase homeownership in the County.

The widespread housing market crisis of 2008 has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties, and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels, and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete

an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.”

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

From 2015 to 2017, there were only 42 high-cost mortgages in Greene County. This represents 3.7% of all mortgages in the County. Among approved applicants below the median income, 8.0% received a high-cost mortgage compared to 1.9% of applicants above the median. Minority groups above the median income did not receive high-cost loans, however, those below the median were more likely to receive a high-cost loan than White applicants below the median.

Figure 4-7
High-cost Mortgages by Race and Income, 2015 – 2017

	Income Level*	High-cost Originations	Total Originations	Percent High-cost
White	Above Median	14	682	2.1%
	Below Median	22	277	7.9%
Black	Above Median	-	15	0.0%
	Below Median	1	8	12.5%
Asian	Above Median	-	28	0.0%
	Below Median	1	6	16.7%
Native Hawaiian or Other Pacific Islander	Above Median	-	-	0.0%
	Below Median	-	-	0.0%
Native American	Above Median	-	9	0.0%
	Below Median	1	3	33.3%
Information Not Provided	Above Median	2	87	2.3%
	Below Median	1	32	3.1%
Hispanic or Latino	Above Median	-	14	0.0%
	Below Median	-	2	0.0%
Total	Above Median	16	821	1.9%
	Below Median	26	326	8.0%
	Grand Total	42	1,147	3.7%

*Data grouped based on if applicant's income was above or below the median for the census tract

Source: Consumer Financial Protection Bureau HMDA database, 2015 - 2017

Low-income minority applicants were more likely to receive a high-cost loan compared to low-income White applicants.

The prevalence of high-cost loans among minorities will more likely cause cost burden and potentially cause default.

5. Current Fair Housing Profile

State or local laws may be certified as substantially equivalent to the federal Fair Housing Act when the U.S. Department of Housing and Urban Development (HUD) determines that the law provides rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Act. The State of Ohio passed the Ohio Civil Rights Act of 1959 which prohibited discrimination in employment on the basis of race, color, religion, national origin, and ancestry. In 1965, protections were expanded to include the prohibition of discrimination in the rental or purchase of homes. The protected classes have also been expanded to include military status and ancestry. Each of the three jurisdictions analyzed for this AI also have passed local fair housing ordinances.

A. City of Fairborn

Fairborn passed a fair housing ordinance in May 2000. The Ordinance expands the protected classes to include creed, age, marital atatus, and eeligion. It also prohibits discrimination against the protected classes in the selling or renting of housing and in providing a loan or money for housing. The Ordinance prohibits discrimination in advertising practices.

Figure 5-1
Comparison of Protections Against Discrimination in Fairborn

Protected Class	Federal Fair Housing Act	Ohio Civil Rights Act	Fairborn Fair Housing Ordinance
Race	•	•	•
Color	•	•	•
National Origin	•	•	•
Sex	•	•	•
Familial Status	•	•	•
Disability Status	•	•	•
Religion	•	•	•
Creed			•
Age			•
Marital Status			•
Ancestry		•	
Military Status		•	

B. City of Xenia

Xenia’s fair housing ordinance prohibits intimidation or interference of members of the protected classes trying to obtain housing. In Xenia the protected classes are those established by the Federal Fair Housing Act and the Ohio Civil Rights Act.

Figure 5-2
Comparison of Protections Against Discrimination in Xenia

Protected Class	Federal Fair Housing Act	Ohio Civil Rights Act	Xenia Fair Housing Ordinance
Race	•	•	•
Color	•	•	•
National Origin	•	•	•
Sex	•	•	•
Familial Status	•	•	•
Disability Status	•	•	•
Religion	•	•	•
Ancestry		•	
Military Status		•	•

C. Greene County

Greene County’s fair housing ordinance establishes that the Greene County Fair Housing Office will assist those who feel they have been discriminated against because they are a member of one of the protected classes as they seek equity under state and federal laws.

Figure 5-3
Comparison of Protections Against Discrimination in the Remainder of the County

Protected Class	Federal Fair Housing Act	Ohio Civil Rights Act	Greene County Fair Housing Resolution
Race	•	•	•
Color	•	•	•
National Origin	•	•	•
Sex	•	•	•
Familial Status	•	•	•
Disability Status	•	•	•
Religion	•	•	•
Ancestry		•	
Military Status		•	•

D. Fair Housing Survey

An online survey was conducted to assess the fair housing experiences of residents and other stakeholders. A total of 195 surveys received. Survey respondents were majority White with the response rate among Blacks being 12.9%. This is fairly representative of the County where 7.2% of the population is Black. Nearly 30.0% of respondents had a disability and almost 80.0% were female. Almost half of the respondents were between the ages of 25 and 44, and 40.0% were between the ages of 45 to 64.

Most respondents (85.6%) lived in one of two zip codes, 45324 and 45385. There were 18 respondents who specified they felt they were discriminated against. Xenia is where most discrimination was experienced with seven instances followed by Fairborn with five. Of those experiencing discrimination, 70% responded that the discriminatory behavior was committed by a landlord. The most common reasons for discrimination were families with children or use of Housing Choice Vouchers. There were also some reported instances of discrimination due to a disability.

Only 11.1% of respondents reported the incident of possible discrimination. Of those that did not report their cases, 62.5% believed it would not have made a difference and 25.0% did not know who to report the incident to.

The fair housing survey revealed that 70% of instances of potential discrimination were committed by a landlord.

These results show the need for fair housing education, outreach, and enforcement activities.

6. General Fair Housing Observations

A. City of Fairborn

The minority populations in Fairborn grew at a rapid pace from 2000 to 2017.

Despite this fast rate of growth, the minority population still comprises less than a fifth of the City's population.

Fairborn contains part of two of the County's impacted areas.

These are areas where the Black population comprises over 17.2% of the census tract's population compared to Blacks only comprising 7.2% of the County's entire population. In impacted areas there is a higher likelihood of decreased opportunity for social mobility due to factors such as low income, less homeownership, and decreased access to quality schools.

From 2010 to 2017, the real median income has stagnated in Fairborn. During this period poverty rates have remained high, especially for minorities.

Lower incomes and higher rates of poverty make it particularly burdensome for minority households to find and obtain housing that meets their needs. This can lead to further stagnation for these households as they become locked in areas of concentrated poverty.

Fairborn contains four census tracts that are areas of LMI concentration. Two of the LMI concentrated census tracts is an area of concentration of minority residents.

Providing affordable housing outside of these areas, where and when possible, will increase housing choice beyond areas of concentration of minorities and LMI persons.

Disabled residents in Fairborn experienced higher rates of poverty than non-disabled residents. Poverty creates additional barriers for residents with disabilities in securing affordable housing that meets their accessibility needs.

There are two major causes to the higher rate of poverty: disabled persons are employed at less than half the rate of non-disabled residents and their median income is more than \$10,000 less than non-disabled persons.

There is no individual LEP language group that meets HUD's threshold of at least 1,000 persons or 5% of a jurisdiction's population in Fairborn.

The Spanish-language group contained nearly 300 persons and stood at nearly 1% of the population.

Minority groups in Fairborn tend to be unemployed at greater rates than White workers.

Lower rates of employment for minorities will lower their household earnings and make it more difficult to obtain or maintain affordable housing.

There is an inadequate supply of multi-family rental housing stock in Fairborn.

A larger supply of affordable multi-family rental housing in each jurisdiction's housing stock can assist low-income households.

Homeownership rates in Fairborn have fallen since 2000.

Minority groups, which tended to already have lower homeownership rates, were the hardest hit by the decline in homeownership. Black homeownership fell from 20.5% to 18.7% in the City.

Minority families are more likely to live in families with three or more persons. In order to meet their needs, these families require housing with more bedrooms to prevent overcrowding.

Since minorities are less likely to be homeowners, they need this type of housing to be available in the rental stock. In Fairborn, 29.6% of the City's rental stock contained at least three bedrooms.

Despite falling housing values and rents, lower inflation-adjusted household incomes continue to keep affordable housing options out of reach for many households.

The median house value fell by 14.6% in Fairborn, while real median income fell 15.2%.

The FMR for a two-bedroom apartment in Greene County was \$765, which translates to a required annual household income of \$30,600 in order to keep this apartment affordable.

This required annual income is 68.0% of Fairborn's median income. A rental market where the FMR takes up such a large proportion of a jurisdiction's median income is unaffordable to many households.

The maximum affordable purchase price for households earning the median income reveals that homeownership is out of reach for many residents – especially minorities.

A Black household earning the Black median household income can only afford a house priced at 78.8% of the median sales price in Fairborn.

B. City of Xenia

The minority populations in Xenia grew at a rapid pace from 2000 to 2017.

Despite this fast rate of growth, the minority population still comprises less than a fifth of the City's population.

Xenia contains part of one of the County's impacted areas.

These are areas where the Black population comprises over 17.2% of the census tract's population compared Blacks only comprising 7.2% of the County's entire population. Impacted areas are where there is a higher likelihood of decreased opportunity for social mobility due to factors such as low income, less homeownership, and decreased access to quality schools.

From 2010 to 2017, the real median income has stagnated in Xenia. During this period poverty rates have remained high, especially for minorities.

Lower incomes and higher rates of poverty make it particularly burdensome for minority households to find and obtain housing that meets their needs. This can lead to further stagnation for these households as they become locked in areas of concentrated poverty.

Three of the City's census tracts are areas of LMI concentration. One of the LMI concentrated census tracts, or are areas of concentration of Black residents.

Providing affordable housing outside of these areas, where and when possible, will increase housing choice beyond areas of concentration of minorities and LMI persons.

Disabled residents in Xenia experienced higher rates of poverty than non-disabled residents. Poverty creates additional barriers for residents with disabilities to obtain housing that meets their additional needs.

There are two major causes of higher rates of poverty: persons with disabilities are employed at less than half the rate of non-disabled residents and their median income is more than \$10,000 less than non-disabled persons.

Minority groups tend to be unemployed at greater rates than White workers.

Lower rates of employment for minorities will lower their household earnings and make it more difficult to obtain or maintain affordable housing.

There is an inadequate supply of multi-family rental housing stock in Xenia.

A larger supply of affordable multi-family rental housing can assist low-income households.

Homeownership rates in Xenia have fallen since 2000.

Minority groups, which tended to already have lower homeownership rates, were the hardest hit by the decline in homeownership. Black homeownership fell from 45.7% to 36.9% in Xenia.

Despite falling housing values and rents, lower inflation-adjusted household incomes continue to keep affordable housing options out of reach for many households.

The median house value fell by 20.7% in Xenia while real median income fell 24.8%.

The FMR for a two-bedroom apartment in Greene County was \$765, which translates to a required annual household income of \$30,600 in order to keep this apartment affordable.

This required annual income is 77.6% of Xenia's median income. A rental market where the FMR takes up such a large proportion of a jurisdiction's median income is unaffordable to many households.

The maximum affordable purchase price for a household earning the median income reveals that homeownership is out of reach for many residents – especially minorities.

A Black household earning the Black median household income can only afford a house priced at 75.6% of the median home's price in Xenia.

C. Greene County

The minority populations in the remainder of the County grew at a rapid pace from 2000 to 2017.

Despite this fast rate of growth, the minority population still comprises less than a fifth of the remainder of Greene County's population.

Two of the County's 35 census tracts are areas of concentration of Black residents.

These are areas where the Black population comprises over 17.2% of the census tract's population compared to Blacks only comprising 7.2% of the County's entire population. These are areas where there is a higher likelihood of decreased opportunity for social mobility due to factors such as low income, less homeownership, and decreased access to quality schools.

From 2010 to 2017, the real median income has stagnated in the remainder of Greene County. During this period poverty rates have remained high, especially for minorities.

Lower incomes and higher rates of poverty make it particularly burdensome for minority households to find and obtain housing that meets their needs. This can lead to further stagnation for these households as they become locked in areas of concentrated poverty.

Eight of the County's 35 census tracts, or 22.9%, are areas of LMI concentration. Two of the LMI concentrated census tracts, or 25%, are areas of concentration of Black residents.

Providing affordable housing outside of these, where and when possible, areas will increase housing choice beyond areas of concentration of minorities and LMI persons.

Disabled residents in the remainder of the County experienced higher rates of poverty than non-disabled residents. Poverty creates additional barriers for residents with disabilities to obtain housing that meets their additional needs.

There are two major causes of higher rates of poverty: persons with disabilities are employed at less than half the rate of non-disabled residents and their median income is more than \$10,000 less than non-disabled persons.

There is no individual LEP language group that meets HUD's threshold of at least 1,000 persons or 5% of a jurisdiction's population in Greene County, Fairborn, or Xenia.

While not required to have a LAP based off of this data, the Spanish and Arabic languages were close to the 1,000-person threshold in Greene County. The County should monitor the size of these populations and the number of requests for document translation so that it can provide services to its growing LEP population.

Minority groups in the remainder of the County tend to be unemployed at greater rates than White workers.

Lower rates of employment for minorities will lower their household earnings and make it more difficult to obtain or maintain affordable housing.

There is an inadequate supply of multi-family rental housing stock in the remainder of the County.

A larger supply of affordable multi-family rental housing in housing stock can assist low-income households.

Homeownership rates in the remainder of the County have fallen since 2000.

Minority groups, which tended to already have lower homeownership rates, were the hardest hit by the decline in homeownership. Black homeownership fell from 50.9% to 43.2% in the remainder of the County.

Minority families are more likely to live in families with three or more persons. In order to meet their needs, these families require housing with more bedrooms to prevent overcrowding.

Since minorities are less likely to be homeowners, they need this type of housing to be available in the rental stock. In the remainder of the County, 40.0% of the rental stock contained at least three bedrooms.

Despite falling housing values and rents, lower inflation-adjusted household incomes continue to keep affordable housing options out of reach for many households.

The median house value fell by 6.2% in Greene County, while real median income fell 7.1%.

The FMR for a two-bedroom apartment in Greene County was \$765, which translates to a required annual household income of \$30,600 in order to keep this apartment affordable.

This required annual income is 47.1% of Greene County's median income. A rental market where the FMR takes up such a large proportion of a jurisdiction's median income is unaffordable to many households.

The maximum affordable purchase price for household earning the median income reveals that homeownership is out of reach for many residents – especially minorities.

A Black household earning the Black median household income can only afford a house priced at 55.9% of the County's median sales price in 2018.

7. Impediments to Fair Housing

A. City of Fairborn

The City of Fairborn lacks a housing element to its primary long-range planning document.

By including housing as part of the planning process, the City could incentivize the development of housing City-wide that will provide affordable housing options to residents of all age groups and income levels. A housing element of the Comprehensive Plan could also address the concentrations of low-income and minority households.

In order to address local issues with landlords who are failing to maintain their properties or consistently receive fair housing complaints, a long-term housing strategy should incorporate a landlord registry. A landlord registry can be a useful tool in tracking errant landlords who are consistently breaking fair housing law or code violations. The City can also require landlords to undergo fair housing training upon registering as a way to ensure they understand their responsibilities under the law. Landlords who are found to be breaking the law can also be required to undergo additional training.

Stakeholders expressed concern that housing is currently built too far away from job centers. This puts pressure on low-income residents who are then required to own a car and spend additional income on gas and insurance just to be employed. Bus routes in the area are not enough to accommodate low-income residents without a car. The City needs to include a transportation aspect to its long-term planning for housing in order to develop affordable housing closer to job centers and transportation options for residents that are not close to job centers.

Action Item 1: Add a housing element to each new long-range planning document the City creates going forward.

Action Item 2: Establish a landlord registry and rules and regulations that will allow the City to ensure landlords are trained in their responsibilities under fair housing laws.

Action Item 3: Include a transportation element to any long-term housing plans the City develops.

While Fairborn's zoning code allows for a variety of lot sizes and housing types, the majority of the City's residential areas are zoned for larger single-family housing.

By increasing the amount of space allowing more density and multi-family developments, especially near transit and commercial centers, the City will increase low-income households' access to jobs and City amenities. It will also prevent the concentration of low-income households in one or two locations in the City.

Action Item 1: Adjust the zoning map to allow for more multi-family housing built around the City, but especially near commercial centers and transportation routes.

Fairborn's treatment of group homes provides fair housing opportunities for residents with developmental disabilities, however, it should be expanded to provide the same opportunities for residents with physical disabilities as well.

The primary basis of fair housing complaints originating in Fairborn is disability. Fairborn should update its zoning ordinance to include residents with physical disabilities in its treatment of group homes. It should also add language for the reasonable accommodation of residents with physical disabilities. These two actions will allow these residents the ability to seek similar housing opportunities as non-disabled residents.

According to the fair housing survey that was conducted, 25.0% of respondents did not know who to contact when facing housing discrimination. The County should conduct further outreach to public in order to raise awareness of residents' rights to fair housing and the resources that are available to them when discriminated against in the housing market. Additionally, the County should work with the County to conduct fair housing training with elected officials and appointed board members. This will decrease the likelihood that potentially discriminatory policies are enacted.

Action Item 1: Amend the zoning ordinance regarding group homes to include residents with all disabilities covered by FHA.

Action Item 2: Amend zoning ordinance to include a reasonable accommodation of residents with disabilities.

Action Item 3: Conduct fair housing education and outreach to the public in order to raise awareness of residents' rights and the resources that are available when facing housing discrimination.

Action Item 4: Conduct fair housing training of elected officials and appointed board members in cooperation with other communities such as Greene County and Xenia in order to decrease the likelihood that potentially discriminatory policies are enacted or decisions made.

The City's Zoning Planning Board should be more reflective of the population.

Fairborn is 7.7% Black and, in total, minorities represent 16.7% of the City's population. In order to be more representative of the City's whole population, the board should have at least one member who is a racial minority. Additionally, 33.3% of board members are female. Ideally, about half of the board members should be female.

Action Item 1: Seek out qualified minority and female candidates for the Planning Board.

B. City of Xenia

The City defines a family as being one or two persons or parents with direct lineal descendants and adopted children living with no more than two other unrelated persons.

This definition is too restrictive and could discriminate against persons living in non-traditional housing situations for economic reasons.

Action Item 1: Amend the zoning ordinance so the definition of family is more inclusive of non-traditional family types without a limit on the number of persons and with emphasis on functioning as a single house-keeping unit.

Xenia's zoning ordinance refers to residents with a developmental disability as having "mental retardation."

This language should be updated to the more current term of "developmental disability."

Action Item 1: Amend the zoning ordinance so that all references of "mental retardation" are changed to "developmental disability."

While the zoning code appears to accommodate residents with disabilities, stakeholders commented that other barriers may be preventing them from forming group homes such as parking minimums.

For this reason, the City should seek out ways to lift these additional barriers such as altering or removing parking minimums for group homes, or creating reasonable accommodation language that will support residents with disabilities by allowing them to find other housing situations.

Action Item 1: Amend the zoning ordinance to remove minimum off-street parking for group homes.

Action Item 2: Add reasonable accommodation language to the zoning ordinance to make it easier for residents with disabilities.

Action Item 3: Conduct fair housing training of elected officials and appointed board members in cooperation with the County and Fairborn in order to decrease the likelihood that potentially discriminatory policies are enacted or decisions made.

The City's Zoning Board of Appeals should be more reflective of the population.

Xenia is 13.4% Black and, in total, minorities represent nearly one-fifth of the City's population. In order to be more representative of the City's whole population, the board should have at least one member who is Black.

Action Item 1: Seek out qualified minority candidates for the Zoning Board of Appeals.

Disability is the primary basis for the City's housing complaints to the Ohio Civil Rights Commission.

Stakeholders in Xenia commented that residents often do not know how to contact fair housing representatives or initiate a fair housing discrimination complaint, which suggests the potential for more fair housing issues in Xenia than the data is able to convey. The City should expand its fair housing outreach in order to ensure both residents and landlords know their rights and responsibilities under fair housing law.

According to the fair housing survey that was conducted, 25.0% of respondents did not know who to contact when facing housing discrimination. Xenia should conduct further outreach to public in order to raise awareness of residents' rights to fair housing and the resources that are available to them when

discriminated against in the housing market. Additionally, the Xenia should work with other communities, especially Fairborn and the County, to conduct fair housing training with elected officials and appointed board members. This will decrease the likelihood that potentially discriminatory policies are enacted or decisions made.

Action Item 1: Conduct annual outreach to landlords in order to distribute fair housing information and conduct fair housing training.

Action Item 2: Conduct fair housing outreach to the public in order raise awareness of their rights and the resources that are available when facing housing discrimination.

While Xenia’s comprehensive planning document focuses on housing through the context of its neighborhoods, it does not do enough to create more fair and affordable housing opportunities across the City.

The plan focuses on maintaining current neighborhood characteristics, which focuses most affordable housing opportunities at the urban core. Stakeholders in Greene County also commented on the lack of affordable housing near transportation routes, while the availability of Flex Routes and times needed to be expanded. The City needs a long-term planning and strategy that focuses on creating affordable housing opportunities in a variety of locations across the City – especially in areas near job centers and public transportation routes.

Action Item 1: Create a long-term planning document focusing on housing and includes a transportation element as it relates to housing.

C. Greene County

Discrimination based on disability was the primary basis for housing discrimination complaints.

Out of 12 total housing discrimination complaints in Greene County filed with the Ohio Civil Rights Commission between 2016 and 2018, nine included disability as a basis for discrimination. Stakeholders suggested this could be, in part, due to landlords requesting specific information from applicants that would allow them to discriminate against particular groups.

According to the fair housing survey that was conducted, 25.0% of respondents did not know who to contact when facing housing discrimination. The County should conduct further outreach to public in order to raise awareness of residents' rights to fair housing and the resources that are available to them when discriminated against in the housing market. Additionally, the County should work with other communities, especially Fairborn and Xenia, to conduct fair housing training with elected officials and appointed board members. This will decrease the likelihood that potentially discriminatory policies are enacted.

Action Item 1: Conduct outreach and training for landlords so that they understand their responsibilities under fair housing law.

Action Item 2: Conduct fair housing outreach to the public in order raise awareness of their rights and the resources that are available when facing housing discrimination.

Action Item 3: Conduct fair housing training of elected officials and appointed board members in cooperation with Fairborn and Xenia in order to decrease the likelihood that potentially discriminatory policies are enacted or decisions made.

The County has a large population of limited English proficiency (LEP) residents that are Spanish-speaking.

The County should monitor the number of requests for Spanish language interpreters and the translation of documents into Spanish. By monitoring for these activities, the County can better anticipate the needs of this population and provide services for them.

Action Item 1: Track requests for Spanish language interpreters and the translation of documents into Spanish.

There are no minority board members for Homecroft, Incorporated. Additionally, only one-third of the board is female.

In order to be more representative of the County's population, the board should add additional members that reflect the diversity of the County.

Action Item 1: Seek out qualified board members that reflect the diversity of the County. Out of the six board members, at a minimum the board should have at least one member who is Black and three who are female.

The County's future land use map envisions the majority of dense residential development to remain in a few urban cores with no mention of mixed-use development.

Greene County's 2020 Future Land Use Plan recognizes the need to avoid development patterns which will concentrate low-income housing in a small number of areas, however, much of its planning still creates the conditions that will continue to concentrate poverty in Fairborn and Xenia. Stakeholders have

also expressed concern that the County's planning is preventing lower income residents from living outside of these areas. By increasing the number of locations where multi-family and mixed-use developments can occur, the County can ensure a variety of housing types that are affordable to different income levels will be available across a variety of locations.

Action Item 1: Work with communities around Greene County to create affordable housing opportunities outside of Fairborn and Xenia.

8. Fair Housing Action Plan

A. City of Fairborn

Action Description	Timeframe				
	2020	2021	2022	2023	2024
Form Housing Strategy					
<i>Add a housing element to each new long-range planning document the City creates going forward.</i>	●	●	●	●	●
<i>Establish a landlord registry and rules and regulations that will allow the City to ensure landlords are trained on their responsibilities under fair housing laws.</i>		●			
<i>Include a transportation element to any long-term housing plans the City develops.</i>	●	●	●	●	●
Amend Zoning Ordinance and Map					
<i>Amend the zoning ordinance regarding group homes to include residents with all disabilities covered by FHA.</i>		●			
<i>Amend zoning ordinance to include a reasonable accommodation of residents with disabilities.</i>			●		
<i>Adjust the zoning map to allow for more multi-family housing built around the City, but especially near commercial centers and transportation routes.</i>				●	
Conduct Fair Housing Training and Outreach					
<i>Seek out qualified minority and female candidates for the Planning Board.</i>	●	●	●	●	●
<i>Conduct fair housing education and outreach to the public in order to raise awareness of residents' rights and the resources that are available when facing housing discrimination.</i>	●	●	●	●	●
<i>Conduct fair housing training of elected officials and appointed board members in cooperation with other communities such as Fairborn and Xenia in order to decrease the likelihood that potentially discriminatory policies are enacted.</i>	●	●	●	●	●

B. City of Xenia

Action Description	Timeframe				
	2020	2021	2022	2023	2024
Amend Zoning Code and adjust Zoning Board					
<i>Amend the zoning ordinance so the definition of family is more inclusive of non-traditional family types without a limit on the number of persons and with emphasis on functioning as a single house-keeping unit.</i>		●			
<i>Amend the zoning ordinance so that all references of “mental retardation” are changed to “developmental disability.”</i>		●			
<i>Seek out qualified minority candidates for the Zoning Board of Appeals.</i>	●	●	●	●	●
<i>Amend the zoning ordinance to remove minimum off-street parking for group homes.</i>			●		
<i>Add reasonable accommodation language to the zoning ordinance to make it easier for residents with disabilities.</i>			●		
Expand Access to and Awareness of Fair and Affordable Housing					
<i>Conduct annual outreach to resident and landlord groups in order to distribute fair housing information and conduct fair housing training.</i>	●	●	●	●	●
<i>Conduct fair housing outreach to the public in order raise awareness of their rights and the resources that are available when facing housing discrimination.</i>	●	●	●	●	●
<i>Conduct fair housing training of elected officials and appointed board members in cooperation with the County and Fairborn in order to decrease the likelihood that potentially discriminatory policies are enacted or decisions made.</i>	●	●	●	●	●
<i>Create a long-term planning document focusing on housing and includes a transportation element as it relates to housing.</i>					●

C. Greene County

Action Description	Timeframe				
	2020	2021	2022	2023	2024
Fair Housing Education and Outreach					
<i>Conduct outreach and training for landlords so that they understand their responsibilities under fair housing law.</i>	●	●	●	●	●
<i>Conduct fair housing outreach to the public in order raise awareness of their rights and the resources that are available when facing housing discrimination.</i>	●	●	●	●	●
<i>Conduct fair housing training of elected officials and appointed board members in cooperation with Fairborn and Xenia in order to decrease the likelihood that potentially discriminatory policies are enacted or decisions made.</i>	●	●	●	●	●
<i>Track requests for Spanish language interpreters and the translation of documents into Spanish.</i>		●			
Expand Access to Fair and Affordable Housing					
<i>Seek out qualified board members that reflect the diversity of the County for appointed boards and commissions. At a minimum boards should have at least one member who is Black and half who are female.</i>	●	●	●	●	●
<i>Work with communities around Greene County to create affordable housing opportunities outside of Fairborn and Xenia.</i>	●	●	●	●	●

9. City of Fairborn Signature Page

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for City of Fairborn is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program.

(Signature of Authorizing Official)

Date

10. City of Xenia Signature Page

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for City of Xenia is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program.

(Signature of Authorizing Official)

Date

11. Greene County Signature Page

By my signature I certify that the Analysis of Impediments to Fair Housing Choice for Greene County is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program.

(Signature of Authorizing Official)

Date

A. Appendix

Figure A-1
Census Tract by Race, 2017

	Total Population	White	Black	Asian/Pacific Islander	Hispanic*
Census Tract 2001.01	2,992	80.9%	3.4%	3.0%	7.6%
Census Tract 2001.03	3,779	67.4%	10.7%	7.0%	4.2%
Census Tract 2001.04	6,148	68.9%	17.3%	8.2%	3.4%
Census Tract 2003	3,766	92.1%	2.7%	0.6%	0.8%
Census Tract 2004	2,261	85.9%	6.5%	3.8%	0.5%
Census Tract 2005	5,226	85.7%	4.1%	3.1%	4.9%
Census Tract 2006	3,498	86.5%	7.4%	1.6%	2.7%
Census Tract 2007	4,139	69.7%	13.2%	1.9%	4.2%
Census Tract 2009	5,878	85.5%	3.5%	4.2%	2.3%
Census Tract 2101	5,625	69.6%	6.7%	11.1%	5.8%
Census Tract 2102	8,220	89.5%	1.6%	1.7%	3.4%
Census Tract 2103	3,552	94.0%	1.5%	1.9%	1.3%
Census Tract 2104.01	5,071	86.3%	5.9%	3.5%	0.5%
Census Tract 2104.02	5,044	83.6%	2.2%	9.1%	1.8%
Census Tract 2105	5,414	90.7%	1.9%	3.7%	2.5%
Census Tract 2106.01	9,080	81.6%	1.8%	10.1%	3.8%
Census Tract 2106.02	5,206	93.4%	0.0%	1.8%	1.0%
Census Tract 2106.03	6,311	86.7%	2.6%	5.0%	4.7%
Census Tract 2201	7,999	94.3%	0.0%	1.6%	3.5%
Census Tract 2202	7,748	90.8%	5.1%	1.0%	0.9%
Census Tract 2301	2,628	96.4%	0.3%	0.0%	2.2%
Census Tract 2401	3,316	84.0%	11.3%	0.0%	3.2%
Census Tract 2402	4,992	83.4%	11.4%	0.0%	0.5%
Census Tract 2403.01	8,692	84.5%	9.2%	0.5%	1.8%
Census Tract 2403.02	3,705	80.5%	12.0%	0.4%	3.2%
Census Tract 2405	4,535	84.0%	13.0%	0.2%	1.7%
Census Tract 2406	4,933	45.7%	44.5%	0.4%	2.3%
Census Tract 2407	2,355	95.0%	4.0%	0.0%	0.0%
Census Tract 2550	3,646	80.3%	11.9%	1.2%	3.5%
Census Tract 2601	6,463	88.8%	6.3%	1.2%	1.5%
Census Tract 2701	3,818	98.8%	0.6%	0.1%	0.1%
Census Tract 2801.01	2,624	99.1%	0.0%	0.0%	0.4%
Census Tract 2801.02	2,231	98.8%	0.1%	0.0%	0.5%
Census Tract 2802	1,356	92.0%	2.1%	1.0%	2.2%
Census Tract 2803	2,574	66.1%	13.5%	1.3%	11.3%

* Hispanic ethnicity is counted independently of race

Source: 2013 – 2017 American Community Survey (B03002)

Figure A-2
Areas of Concentration of LMI Persons, 2017

Census Tract	Number of LMI Individuals	Total Population	LMI Percent
Census Tract 2001.01	1,145	2,440	46.9%
Census Tract 2001.03	2,385	4,020	59.3%
Census Tract 2001.04*	1,960	2,905	67.5%
Census Tract 2003	1,330	3,450	38.6%
Census Tract 2004	1,030	1,885	54.6%
Census Tract 2005	2,450	4,790	51.1%
Census Tract 2006	900	3,355	26.8%
Census Tract 2007	2,690	3,690	72.9%
Census Tract 2009	740	5,955	12.4%
Census Tract 2101	1,245	5,235	23.8%
Census Tract 2102	1,285	7,335	17.5%
Census Tract 2103	600	3,655	16.4%
Census Tract 2104.01	995	5,030	19.8%
Census Tract 2104.02	1,115	5,305	21.0%
Census Tract 2105	560	4,710	11.9%
Census Tract 2106.01	1,485	8,130	18.3%
Census Tract 2106.02	660	5,170	12.8%
Census Tract 2106.03	360	5,295	6.8%
Census Tract 2201	840	7,250	11.6%
Census Tract 2202	2,110	7,725	27.3%
Census Tract 2301	600	2,680	22.4%
Census Tract 2401	925	2,920	31.7%
Census Tract 2402	2,365	4,370	54.1%
Census Tract 2403.01	3,050	8,230	37.1%
Census Tract 2403.02	2,345	4,180	56.1%
Census Tract 2405	1,475	4,295	34.3%
Census Tract 2406*	1,960	3,685	53.2%
Census Tract 2407	985	2,960	33.3%
Census Tract 2550	865	3,040	28.5%
Census Tract 2601	1,195	4,220	28.3%
Census Tract 2701	1,280	3,590	35.7%
Census Tract 2801.01	575	2,580	22.3%
Census Tract 2801.02	320	2,285	14.0%
Census Tract 2802	295	1,345	21.9%
Census Tract 2803	755	2,600	29.0%

* Area of Racial Concentration

Source: HUD 2018 LMI Estimates based on 2006 - 2010 American Community Survey

Figure A-3
Change in Housing Units by Census Tract, 2010 – 2017

Census Tract	Housing Units 2010	Housing Units 2017	Percent Change
Census Tract 2001.01	1,243	1,243	0.0%
Census Tract 2001.03	2,013	1,936	4.0%
Census Tract 2001.04	2,017	2,168	-7.0%
Census Tract 2003	1,653	1,753	-5.7%
Census Tract 2004	1,236	1,232	0.3%
Census Tract 2005	2,182	2,165	0.8%
Census Tract 2006	1,610	1,613	-0.2%
Census Tract 2007	2,275	2,316	-1.8%
Census Tract 2009	3,089	2,750	12.3%
Census Tract 2101	2,844	2,844	0.0%
Census Tract 2102	3,179	3,041	4.5%
Census Tract 2103	1,437	1,440	-0.2%
Census Tract 2104.01	2,374	2,545	-6.7%
Census Tract 2104.02	2,157	2,173	-0.7%
Census Tract 2105	2,096	2,130	-1.6%
Census Tract 2106.01	3,883	3,853	0.8%
Census Tract 2106.02	2,247	2,180	3.1%
Census Tract 2106.03	2,126	2,089	1.8%
Census Tract 2201	2,959	2,811	5.3%
Census Tract 2202	3,200	3,165	1.1%
Census Tract 2301	1,136	1,159	-2.0%
Census Tract 2401	1,581	1,433	10.3%
Census Tract 2402	2,267	2,083	8.8%
Census Tract 2403.01	3,578	3,247	10.2%
Census Tract 2403.02	2,029	1,917	5.8%
Census Tract 2405	2,014	2,004	0.5%
Census Tract 2406	1,627	1,744	-6.7%
Census Tract 2407	1,180	1,199	-1.6%
Census Tract 2550	1,822	1,756	3.8%
Census Tract 2601	1,783	1,595	11.8%
Census Tract 2701	1,556	1,560	-0.3%
Census Tract 2801.01	1,106	1,038	6.6%
Census Tract 2801.02	929	976	-4.8%
Census Tract 2802	614	606	1.3%
Census Tract 2803	534	477	11.9%

Note: Highlighted rows are census tracts impacted by high concentrations of minority and LMI persons

Source: Census Bureau, 2010 Decennial Census (SF1); 2013 - 2017 American Community Survey (B25032)

Figure A-4
Housing Units by Type, 2017

Census Tract	Total Housing Units	Single-family	Multi-family	Percent Multi-family
Census Tract 2001.01	1,243	868	375	30.2%
Census Tract 2001.03	2,013	1,267	746	37.1%
Census Tract 2001.04	2,017	452	1,565	77.6%
Census Tract 2003	1,653	1,280	373	22.6%
Census Tract 2004	1,236	526	710	57.4%
Census Tract 2005	2,182	2,092	90	4.1%
Census Tract 2006	1,610	1,512	98	6.1%
Census Tract 2007	2,275	911	1,364	60.0%
Census Tract 2009	3,089	2,269	820	26.5%
Census Tract 2101	2,844	1,247	1,597	56.2%
Census Tract 2102	3,179	3,169	10	0.3%
Census Tract 2103	1,437	1,316	121	8.4%
Census Tract 2104.01	2,374	1,431	943	39.7%
Census Tract 2104.02	2,157	1,999	158	7.3%
Census Tract 2105	2,096	2,045	51	2.4%
Census Tract 2106.01	3,883	2,686	1,197	30.8%
Census Tract 2106.02	2,247	2,119	128	5.7%
Census Tract 2106.03	2,126	2,126	-	0.0%
Census Tract 2201	2,959	2,881	78	2.6%
Census Tract 2202	3,200	2,676	524	16.4%
Census Tract 2301	1,136	1,126	10	0.9%
Census Tract 2401	1,581	1,034	547	34.6%
Census Tract 2402	2,267	1,816	451	19.9%
Census Tract 2403.01	3,578	3,530	48	1.3%
Census Tract 2403.02	2,029	1,287	742	36.6%
Census Tract 2405	2,014	1,565	449	22.3%
Census Tract 2406	1,627	1,449	178	10.9%
Census Tract 2407	1,180	1,034	146	12.4%
Census Tract 2550	1,822	1,506	316	17.3%
Census Tract 2601	1,783	1,537	246	13.8%
Census Tract 2701	1,556	1,391	165	10.6%
Census Tract 2801.01	1,106	1,106	-	0.0%
Census Tract 2801.02	929	913	16	1.7%
Census Tract 2802	614	594	20	3.3%
Census Tract 2803	534	369	165	30.9%

Note: Highlighted rows are census tracts impacted by high concentrations of minority and LMI persons.

Source: Census Bureau, 2013 - 2017 American Community Survey (DP04)

Figure A-5
Rates of Homeownership by Race, 2017

Census Tract	Percent White Homeowners	Percent Black Homeowners	Percent Asian Homeowners	Percent Hispanic Homeowners
Census Tract 2001.01	59.5%	0.0%	100.0%	63.5%
Census Tract 2001.03	55.5%	42.6%	42.3%	19.2%
Census Tract 2001.04	15.6%	3.4%	17.3%	0.0%
Census Tract 2003	58.4%	1.9%	-	-
Census Tract 2004	39.6%	6.3%	11.5%	0.0%
Census Tract 2005	60.6%	23.4%	100.0%	31.0%
Census Tract 2006	78.5%	53.7%	100.0%	31.1%
Census Tract 2007	24.2%	4.9%	33.3%	0.0%
Census Tract 2009	71.1%	39.7%	41.8%	61.4%
Census Tract 2101	35.7%	11.3%	53.6%	28.6%
Census Tract 2102	83.9%	0.0%	100.0%	83.0%
Census Tract 2103	84.9%	40.9%	75.0%	0.0%
Census Tract 2104.01	62.0%	27.4%	100.0%	-
Census Tract 2104.02	87.9%	100.0%	86.5%	100.0%
Census Tract 2105	94.1%	100.0%	100.0%	100.0%
Census Tract 2106.01	64.2%	39.8%	52.8%	37.1%
Census Tract 2106.02	85.5%	-	100.0%	65.8%
Census Tract 2106.03	93.3%	100.0%	100.0%	84.0%
Census Tract 2201	93.8%	-	100.0%	100.0%
Census Tract 2202	80.8%	0.0%	100.0%	100.0%
Census Tract 2301	90.3%	100.0%	-	100.0%
Census Tract 2401	59.3%	20.0%	-	12.8%
Census Tract 2402	55.2%	43.4%	-	-
Census Tract 2403.01	84.7%	59.4%	100.0%	100.0%
Census Tract 2403.02	54.7%	9.1%	0.0%	0.0%
Census Tract 2405	81.2%	47.1%	100.0%	0.0%
Census Tract 2406	50.9%	49.9%	-	0.0%
Census Tract 2407	74.8%	17.6%	-	-
Census Tract 2550	63.3%	81.1%	100.0%	0.0%
Census Tract 2601	77.1%	20.0%	0.0%	100.0%
Census Tract 2701	73.9%	62.5%	-	0.0%
Census Tract 2801.01	90.7%	-	-	-
Census Tract 2801.02	78.3%	-	-	-
Census Tract 2802	86.0%	100.0%	-	100.0%
Census Tract 2803	6.6%	0.0%	0.0%	0.0%

Note: Highlighted rows are census tracts impacted by high concentrations of minority and LMI persons. Cells denoted with - mean no persons of that race living in census tract

Source: 2013 – 2017 American Community Survey (B25003, B25003A, B25003B, B25003D, B25003I)