2020 **Fair Housing Assessment**

June 3, 2020

Clermont County Fair Housing Assessment

May 22, 2020

Prepared with assistance by:

MCKENNA

235 East Main Street, Suite 105
Northville, Michigan 48167
248-596-0920
www.mcka.com

I. Acknowledgments

Clermont County Board of Commissioners

David Painter, President
Edwin Humphrey, Vice President
Claire B. Corcoran

Clermont County Department of Community and Economic Development

Sherri Cmar

Clermont County Housing Advisory Committee

Bonnie Batchler
George Brown
Gregory Carson
Tim Dick
Joe Dills
Jaime Fightmaster
Juwanna Hall
Candy Holbrook
Edwin Humphrey
Andrew Kuchta
Sue McKinley
Julieanne Nesbit
Debbie Queener
Paul Queener
Sharon Richmond
Ken Stringer
Dawn Stutz
Leann Watson
Brian Weichert

II. Executive Summary

Clermont County has prepared this Fair Housing Assessment, with assistance from McKenna. This document analyzes the various potential impediments to affordability, accessibility, and fair housing choice throughout the County.

The major conclusions of the analysis are as follows:

- Within Clermont County, various racial/ethnic groups are well-integrated, with dissimilarity indices approaching zero. However, the populations of minority groups are very small compared to Metropolitan Cincinnati as a whole, and the region is highly segregated (the white/black dissimilarity index is just over 71). Data and anecdotes suggest that there are barriers to minorities moving to Clermont County, even though the small number that do live in the County are well-integrated with the white majority.

- Publicly supported housing is located in a broad range of communities throughout the County, allowing neighborhood choice for those seeking affordable housing. However, additional affordable housing is needed in the southern part of the County.

- The Housing Choice Voucher program in Clermont County is highly successful in placing participants in the neighborhoods of their choice, with a robust mix of landlords in various parts of the County accepting vouchers.

- Aging housing stock in older, poorer communities such as Felicity and Chilo contributes to a significant problem of sub-standard housing in that part of the County. Speculation in properties located in the Ohio River flood plain in the riverfront communities (especially New Richmond) has also resulted in sub-standard housing.

- Variability in the proficiency of school districts, a lack of reliable public transportation, and the clustering of jobs near Interstate 275 lead to severe disparities in access to community assets between the more affluent communities in the western part of the County and the poorer communities in the south and east.

- Housing Opportunities Made Equal conducts fair housing enforcement within Clermont County, but receives no funding from the County directly, limiting effectiveness. Clermont has already begun to remedy this problem by issuing a Request for Proposals (RFP) for fair housing services.

The chart below shows the determinants that are analyzed within this document, as recommended by HUD. The planning team determined the level of influence listed in the right-hand column based on available data, and local experience and knowledge. Determinants designated as "Moderately Significant" or "Highly Significant" are linked to specific goals in Chapter V, so that the County's fair housing goals stem directly from the identified impediments to the provision of quality, affordable, accessible housing for all persons in the neighborhood of their choice.

Determinants of:	Level of Influence:
Segregation and R/ECAP's:	
• Land Use and Zoning	• Moderately Significant
• Occupancy Restrictions	• Not Significant
• Residential Real Estate Steering	• Moderately Significant
• Community Opposition	• Highly Significant
• Economic Pressures	• Moderately Significant
• Major Private Investments	• Moderately Significant
• Municipal and State Services	• Moderately Significant
• Foreclosure Patterns	• Moderately Significant
• Other – Flood Plains	• Highly Significant
Publicly Supported Housing Location and Occupancy:	• Moderately Significant
• Land Use and Zoning	• Not Significant
• Siting Decisions for Public Housing	• Not Significant
• Siting Decisions for LIHTC Housing	• Not Significant
• Siting Decisions for Other Publicly Supported Housing	
• Community Resistance to Public Housing[1]	
• Regional Collaboration or Lack Thereof	• Highly Significant
• Other – None	• Moderately Significant
Mobility:	
• Lack of Housing Choice Voucher Program	• Not Significant
• Admission or Residency Preferences	• Not Significant
• Quality of Mobility Counseling Programs	• Not Significant
• Lack of Support for Voucher Mobility	• Not Significant
• Lack of Landlord Participation	• Not Significant
• Landlord Refusal to Accept Sources of Income	• Not Significant
• Other – None	
Disproportionate Housing Needs:	
• Land Use and Zoning	• Not Significant
• Occupancy Restrictions	• Not Significant
• Economic Pressures	• Highly Significant
• The Availability of Two+ Bedroom Affordable Units	• Not Significant
• The Availability of Two+ Bedroom Publicly Supported Units	• Not Significant
• Housing Stock Deterioration	• Highly Significant
• Foreclosure Patterns	• Highly Significant
• Private Investments	• Moderately Significant
• Other – Flood Plains	• Highly Significant
Disparities in Access to Community Assets/Exposure to Adverse Community Factors:	
• Presence and Location of Proficient Schools	• Highly Significant
• School Assignment Policies	• Not Significant
• Availability and Reliability of Public Transportation	• Highly Significant
• Location of Employers	• Highly Significant
• Patterns of Public Investment	• Moderately Significant
• Private Investments	• Moderately Significant
• Foreclosure Patterns	• Moderately Significant
• Lack of Regional Collaboration	• Moderately Significant
• Other – None	
Disability and Access Issues:	
• Lack of Affordable Accessible Housing	• Highly Significant

• Siting of Accessible Housing • Lack of Assistance for Modifications • Restrictive Zoning Laws • Lack of Access to Publicly Supported Housing • Lack of Transition Assistance • Lack of Supportive Services • Lack of Access to Proficient Schools • Lack of Public Transportation • Access to Government Services • Inaccessible Public Infrastructure • Other – None	• Not Significant • Moderately Significant • Not Significant • Moderately Significant • Not Significant • Not Significant • Moderately Significant • Highly Significant • Not Significant • Highly Significant
Fair Housing Compliance and Infrastructure: • Unresolved Violations • Community Opposition • Support from Public Officials • Housing Discrimination • Lack of Fair Housing Education • Lack of Resources • Other – None	 • Not Significant • Not Significant • Not Significant • Highly Significant • Not Significant • Moderately Significant

III.   Community Participation Process

A.   Outreach Activities

This Plan was developed over an extended period of time, starting in February of 2019 and concluding with the submittal of the locally approved plan in May 2020. A Public Hearing was held on May 13, 2020 by the Clermont County Board of Commissioners. Clermont County also held two topic specific focus group meetings to obtain public and stakeholder comments. An initial focus group meeting was held with the Housing Advisory Committee to develop the plan's objectives and priority needs in February 2019. A second focus group with local municipal officials from the 27 member communities of Clermont County took place in September of 2019. A public open house was held in August of 2019 to solicit input from County residents. One was held in the evening, at the Union Township Civic Center and one in the day, at the Clermont County Public Library. All meetings were advertised in local papers and on the County website.

B.   Success of Outreach Activities

The outreach included cross-departmental coordination within the County staff, as well as targeted outreach to community organizations and service providers that have key knowledge about community assets and needs.

- Staff consulted with other Departments in order to obtain the most accurate information possible.
- An extensive process of citizen and stakeholder input that included public hearings, two planning open houses, and three focus group meetings to obtain stakeholder views and needs.
- Interviews with Clermont County Board of Commissioners.
- Online survey/Questionnaire to reach individuals not able to attend one of the scheduled Plan development meetings.
- Information sharing and discussion among member communities during Plan development.
- Notice of the 5-Year Consolidated Plan focus group meetings was sent via email to the 27 community members of the Urban County.

This process ensured presentation and coverage of all issues to affected residents and stakeholders, with opportunity for their review and comment.

C.   Summary of Comments

The major findings of the public engagement process are summarized below:

1.   Public Facilities and Infrastructure

There is a high demand for public facilities and infrastructure improvement throughout the communities within Clermont County. This was a top-ranking priority for residents, local officials, the County Board, and non-profit organizations. Stakeholders felt that if infrastructure issues could be addressed, many of the other issues would improve as well. Safety improvements to roadways, sidewalks, bikeways, and crossing improvements to serve low-income residents can address transportation needs. Similarly, recreational needs, and improvements to the quality of life for low income resident were identified as a priority. Infrastructure improvements to water, sewer, septic, and stormwater treatment systems were also identified as priorities.

2.   Economy

Over the past decade, the County and its residents have benefited from an improved economy, as incomes and housing values have risen overall. However, lower-income residents continued to experience economic stagnation. This issue is confounded by several low-income census tracts in the County losing their Low- and Moderate-Income (LMI) designation, which has added an income survey barrier to maintaining eligibility for project funding in some neighborhoods. Nevertheless, the overall economic strategy for the County as a whole – focused on job creation, training of residents, skill building, and investment in quality infrastructure – are primary goals of this plan, and were vastly supported by participating residents and organizations. Lifting the County through economic development is a fundamental pathway to improving the lives of the County's low-income and special needs residents. While the economic outlook continues to improve, the County recognizes the advantage to maintaining a level flexibility in the Consolidated Plan. To assure that the plan would reflect the values of the community at large, the public process focused on identifying key issues and outlining priority objectives to guide implementation activities.

3.   Public Services

There is wide consensus of the need for continuing and improving public services, including services to homeless and those at risk of becoming homeless, emergency services to help at-risk populations keep their homes, services for children and their families, services for victims of domestic violence, and human services to help low-income people cope with daily life. Participants commented that resources were needed to address a pervasive substance abuse problem in the County that has severe impact on low-income residents. The needs in this category outweighed the available funding, and it was noted that the limitation of 15% of Community Development Block Grant (CDBG) funds to public services was a challenge for communities.

4.   Owner and Rental Housing

The provision of quality affordable housing and a mix of housing types is a priority for the County. Many of the County's better-established historic villages lack a supply of quality affordable housing. Participants noted a lack in one-bedroom units across the County. This is because, especially in rural areas, there is a predominance of single-family housing dwelling types and a gap in the availability of apartments and condos. This issue is confounded by the difficulty to provide septic and water services in rural areas, due to high cost and environmental issues.

5.   Homelessness

Homelessness and the prevention of homelessness is a priority for the County. The County recognizes that HUD is shifting priorities away from providing shelter beds and transitional shelters; however, it is apparent that the community needs more shelter beds to accommodate the current demand.

6.   Summary of Comments or Views Not Accepted and Reasons for Not Accepting Them:

All comments and views submitted in this process were incorporated into the plan.

7.   Summary

The Consolidated Plan reflects the coordinated efforts of the County, local municipalities and active residents, as well as the wide network of housing and human services providers in Clermont County. Through strategies outlined in this plan, the effectiveness and impact of federal funds will be maximized through thoughtful investment of resources, reduced duplication of services, and improved service delivery. The goals and objectives identified in this plan aim to improve the quality of life in Clermont County, particularly for low-income, homeless, and special needs individuals and families.

IV.   Assessment of Past Goals and Actions

Below is a list of the Fair Housing Goals from the 2015 Fair Housing Assessment, organized by determinant, followed by a short description of the County's progress towards those goals since 2015:

A. Segregation and R/ECAPs

1.   **Land Use and Zoning: Moderate Significance**

Goal: Amend Zoning Ordinances throughout the County to eliminate barriers to fair housing choice.
Progress: None of the Zoning regulations identified in 2015 as potential barriers to siting publicly supported housing have been revised.

2.   **Residential Real Estate Steering: Moderate Significance**

Goal: Improve fair housing education programs for real estate agents and landlords.
Progress: Clermont County partners with Housing Opportunities Made Equal (HOME) to provide fair housing education programs for real estate agents and landlords.

Goal: Increase enforcement of fair housing laws regarding steering.
Progress: Since 2015, Clermont County has used Community Development Block Grant money to fund HOME's fair housing enforcement activities in the county. Creating this dedicated funding has increased the resources available for fair housing enforcement.

3.   **Community Opposition: High Significance**

Goal: Execute robust information campaigns for major new publicly supported housing developments to build community support and dispel myths.
Progress: There has not been a concerted effort to build community support for new publicly supported housing developments.

4. **Economic Pressures: Moderate Significance**

> **Goal:** Develop new publicly supported housing in the southern part of the County where there is an unmet need for affordable housing.
>
> **Progress:** No new publicly supported housing has been constructed in the southern part of the County yet.

5. **Major Private Investments: Moderate Significance**

> **Goal:** Work with private developers to build LIHTC projects in the southern part of the County where there is an unmet need for affordable housing.
>
> **Progress:** No new private LIHTC developments have been constructed in the southern part of the County yet.

6. **Municipal and State Services: Moderate Significance**

> **Goal:** Invest in municipal infrastructure in small, poor communities such as Felicity, Chilo, and Moscow to improve municipal services.
>
> **Progress:** No major investments in municipal infrastructure have made been in those communities.

7. **Foreclosure Patterns: Moderate Significance**

> **Goal:** Continue programs to assist foreclosure victims and prevent foreclosures.
>
> **Progress:** Anti-foreclosure programs are ongoing and have assisted residents throughout the County.

8. **Other – Flood Plains: High Significance**

> **Goal:** Create a County program to help relocate households from housing in the Ohio River flood plain.
>
> **Progress:** No County program has yet been created to help relocate households from the Ohio River flood plain.

B. Publicly Supported Housing Location and Occupancy

1. Land Use and Zoning: Moderate Significance

Goal: Amend Zoning Ordinances throughout the County to eliminate barriers to siting publicly supported housing.

Progress: None of the Zoning regulations identified in 2015 as potential barriers to siting publicly supported housing have been revised.

2. Community Resistance to Public Housing: High Significance

Goal: Execute robust information campaigns for major new publicly supported housing developments to build community support and dispel myths.

Progress: There has not been a concerted effort to build community support for new publicly supported housing developments.

3. Regional Collaboration or Lack Thereof: Moderate Significance

Goal: Collaborate with other communities in the region on affordable housing issues.

Progress: Clermont County is in constant communication with local units of government and regional partners with regard to affordable housing issues.

C. Mobility

No determinants were considered significant barriers to mobility.

D. Disproportionate Housing Needs

1. Economic Pressures: High Significance

Goal: Develop new publicly supported housing in the southern part of the County where there is an unmet need for affordable housing.

Progress: No new publicly supported housing has been constructed in the southern part of the County yet.

2. Housing Stock Deterioration: High Significance

Goal: Use both public and private funds to invest in the housing stock in older, poorer communities in the County.

Progress: Housing rehabilitation programs are ongoing throughout the county, but there are still many older housing units in need of repair.

3. Foreclosure Pattern: High Significance

Goal: Continue programs to assist foreclosure victims and prevent foreclosures.

Progress: Anti-foreclosure programs are ongoing and have assisted residents throughout the County.

4. Private Investments: Moderate Significance

Goal: Work with private developers to build LIHTC projects in the southern part of the County where there is an unmet need for affordable housing.
Progress: No new private LIHTC developments have been constructed in the southern part of the County yet.

5.   **Other – Flood Plains: High Significance**

Goal: Create a County program to help relocate households from housing in the Ohio River flood plain.
Progress: No County program has yet been created to relocated households from the Ohio River flood plain.

E.   Disparities in Access to Community Assets/Exposure to Adverse Community Factors

1.   **Presence and Location of Proficient School: High Significance**

Goal: Invest in lower performing school districts to make school proficiency more consistent across the County.
Progress: School districts across the county endeavor to improve performance year over year. However, no new funding sources or programs have been initiated.

2.   **Availability and Reliability of Public Transportation: High Significance**

Goal: Develop a dedicated regional funding source for public transportation in the Cincinnati region outside Hamilton County.
Progress: A new sales tax within Hamilton County was recently approved to replace the City of Cincinnati income tax as the primary local funding for the Southwest Ohio Regional Transit Authority (SORTA). Goods sold within Clermont County will not be subject to the tax, but Clermont County residents will pay the tax on goods purchased in Hamilton County. The additional funding for SORTA may lead to improved transit within Clermont County.

Goal: Increase collaboration between Clermont Transportation Connection (CTC) and SORTA to improve public transportation in Clermont County.
Progress: CTC and SORTA have not developed any new official partnerships, but have collaborated and communicated to achieve mutual goals.

3.   **Location of Employers: High Significance**

Goal: Increase economic development efforts and infrastructure investment in the southern and eastern parts of the County to induce more employers to move to that area.
Progress: Development of new jobs and industries in the southern and eastern part of the County has been slow, but efforts are ongoing to promote economic development in those communities.

4.   **Patterns of Public Investment: Moderate Significance**

Goal: Increase public investments in the southern part of the County.

Progress: There has not been a substantial increase in public investments in the southern part of the county.

5. **Foreclosure Pattern: High Significance**
   Goal: Continue programs to assist foreclosure victims and prevent foreclosures.
   Progress: Anti-foreclosure programs are ongoing and have assisted residents throughout the County.

6. **Regional Collaboration or Lack Thereof: Moderate Significance**
   Goal: Collaborate with other communities in the region on affordable housing issues.
   Progress: Clermont County is in constant communication with local units of government and regional partners with regard to affordable housing issues.

F.   Disability and Access Issues

1. **Lack of Affordable Accessible Housing: High Significance**
   Goal: Develop additional affordable accessible housing for non-seniors.
   Progress: While new housing has been developed, there has been no new housing supported by Clermont County CDBG or General Funds. There has been no specific focus on additional affordable accessible housing for non-seniors.

2. **Lack of Assistance for Modifications: Moderate Significance**
   Goal: Expand programs that provide assistance for accessibility modifications.
   Progress: Accessibility programs are ongoing throughout the County, but have not changed in scope or scale.

3. **Lack of Access to Publicly Supported Housing: Moderate Significance**
   Goal: Develop additional publicly supported accessible housing.
   Progress: No additional publicly supported housing has been developed.

4. **Lack of Access to Proficient Schools: High Significance**
   Goal: Invest in lower performing school districts to make school proficiency more consistent across the County.
   Progress: Local school districts and the State of Ohio are investing to improve proficiency, but there is no County-led program to improve school proficiency.

5. **Lack of Public Transportation: High Significance**
   Goal: Develop a dedicated regional funding source for public transportation in the Cincinnati region outside Hamilton County.
   Progress: A new sales tax within Hamilton County was recently approved to replace the City of Cincinnati income tax as the primary local funding for SORTA. Goods sold within Clermont County will not be subject to the tax, but Clermont County residents will pay the tax on goods purchased in Hamilton County. The additional funding for SORTA may lead to improved transit within Clermont County.

Goal: Increase collaboration between CTC and SORTA to improve public transportation in Clermont County.
Progress: CTC and SORTA have not developed any new official partnerships, but have collaborated and communicated to achieve mutual goals.

6. **Inaccessible Public Infrastructure: High Significance**
Goal: Invest in accessibility improvements for public infrastructure.
Progress: New public infrastructure meets Americans with Disabilities Act guidelines.

G. Fair Housing Compliance and Infrastructure

1. **Unresolved Violations: Moderate Significance**
Goal: Directly fund fair housing enforcement from Clermont County to ensure the most effective enforcement.
Progress: Since 2015, Clermont County has funded HOME's fair housing enforcement activities in the County using CDBG funding. Creating this dedicated funding has increased the resources available for fair housing enforcement, and reduced the number of unresolved violations.

2. **Support from Public Officials: Moderate Significance**
Goal: Work with Clermont County Commissioners to make fair housing and affordable housing County priorities.
Progress: Clermont County Commissioners decided in 2015 to directly fund HOME's fair housing enforcement activities through CDBG funding.

3. **Housing Discrimination: High Significance**
Goal: Improve fair housing education programs for real estate agents and landlords.
Progress: Clermont County partners with Housing Opportunities Made Equal (HOME) to provide fair housing education programs for real estate agents and landlords.

Goal: Increase enforcement of fair housing laws regarding steering.
Timeline: 1-2 years
Priority: High

4. **Lack of Fair Housing Education: High Significance**
Goal: Improve fair housing education programs for real estate agents and landlords.
Progress: Clermont County partners with Housing Opportunities Made Equal (HOME) to provide fair housing education programs for real estate agents and landlords.

Goal: Increase enforcement of fair housing laws regarding steering.
Progress: Since 2015, Clermont County has funded HOME's fair housing enforcement activities in the County using CDBG funding. Creating this dedicated funding has increased the resources available for fair housing enforcement, and reduced the number of unresolved violations.

5. **Lack of Resources: Moderate Significance**
Goal: Directly fund fair housing enforcement from Clermont County to ensure the most effective enforcement.

Progress: Since 2015, Clermont County has funded HOME's fair housing enforcement activities in the County using CDBG funding. Creating this dedicated funding has increased the resources available for fair housing enforcement, and reduced the number of unresolved violations.

V.   Fair Housing Analysis

A. Description of Jurisdiction and Region

The jurisdiction covered by this Fair Housing Assessment is Clermont County, Ohio. Located east of Cincinnati and north of the Ohio River, the County is home to approximately 203,216 people, according to 2018 American Community Survey estimates.

For comparison with local data, Clermont is compared to the Cincinnati Metropolitan Area, defined as the Metropolitan Statistical Area and including and including the following Counties:

In Ohio:

Brown County
Butler County
Clermont County
Hamilton County
Warren County

In Kentucky:

Boone County
Bracken County
Campbell County
Gallatin County
Kenton County
Mason County
Pendleton County

In Indiana:

Dearborn County
Ohio County
Union County

For purposes of conciseness, the region is referred to as "Metropolitan Cincinnati" is this document. 2.1 million people live in Metropolitan Cincinnati according to the latest Census estimates.

B. Socioeconomic Profile

Table 1: Demographic Data (2018), Clermont County and Metropolitan Cincinnati

	Clermont County		Metropolitan Cincinnati	
Race/Ethnicity	**Number**	**Percent (%)**	**Number**	**Percent (%)**
White	187,331	94.92%	1,723,455	81.50%
Black	2,234	1.13%	253,816	12.00%
Hispanic	2,896	1.47%	54,992	2.60%
Asian or Pacific Islander	1,958	0.99%	41,245	1.95%
Native Americans	349	0.18%	3,272	0.15%
Some Other Race	189	0.10%	3,243	0.15%
Two or More Races	2406	1.22%	34,557	1.63%
Total	197,363	100.00%	2,114,580	100.00%
National Origin (Foreign-Born)				
Mexico	503	20.84%	11,301	23.16%
Philippines	371	15.37%	2,962	6.07%
Canada	353	14.62%	2,849	5.84%
India	280	11.60%	11174	22.90%
Germany	216	8.95%	3,314	6.79%
Vietnam	215	8.91%	2,895	5.93%
China excl. Hong Kong & Taiwan	172	7.13%	5,674	11.63%
Limited English Proficiency (LEP) Language				
Spanish	597	48.73%	4,091	40.61%
Arabic	143	11.67%	2,509	24.91%
German	141	11.51%	2,435	24.17%
Vietnamese	124	10.12%	1,039	10.31%
Disability Type				
Hearing Difficulty	7,150	14.59%	67,344	14.11%
Vision Difficulty	4,155	8.48%	41,143	8.62%
Cognitive Difficulty	9,415	19.21%	97,662	20.47%
Ambulatory Difficulty	13,075	26.68%	131,412	27.54%
Self-Care Difficulty	5,645	11.52%	48,858	10.24%
Independent Living Difficulty	9,561	19.51%	90,741	19.02%
Sex				
Male	97,326	49.31%	1,033,702	48.88%
Female	100,037	50.69%	1,080,878	51.12%
Age				
Under 18	50,590	25.63%	527,230	24.93%
18-64	123,529	62.59%	1,329,345	62.87%
65+	23,244	11.78%	258,005	12.20%
Family Type				
Families with Children	24,142	44.87%	248,984	45.70%

Table 2: Demographic Trends (1990-2018), Clermont County

Clermont County	1990		2000		2010		2018	
Race/Ethnicity	Number	Percent	Number	Percent	Number	Percent	Number	Percent
White	148,084	98.60%	172,886	97.10%	189,250	95.90%	193,269	95.11%
Black	1,291	0.90%	1,621	0.90%	2,284	1.20%	2,858	1.41%
Hispanic	721	0.50%	1,547	0.90%	2,896	1.50%	3,822	1.88%
Asian or Pacific Islander	453	0.30%	1,129	0.60%	1,920	1.00%	2,652	1.31%
Native American	218	0.10%	333	0.20%	403	0.20%	312	0.15%
Other	141	0.10%	467	0.30%	792	0.40%	4,125	2.03%
National Origin								
Foreign Born:	*	*	2,785	1.60%	4,256	2.10%	4590	2.26%
Limited English Proficiency (LEP)								
LEP:	*	*	2,814	1.60%	2,563	1.20%	272	0.13%
Sex								
Male	*	*	87,337	49.10%	97,326	49.30%	100,124	49.27%
Female	*	*	90,640	50.90%	100,037	50.70%	103,092	50.73%
Age								
Under 18	*	*	49,696	27.90%	50,590	25.60%	47,954	23.60%
18-64	*	*	111,534	62.70%	123,529	62.60%	124,386	61.21%
65+	*	*	16,747	9.40%	23,244	11.80%	30,876	15.19%
Family Type								
With Children	*	*	25,148	38.10%	24,142	32.30%	24,799	32.71%

Table 3: Demographic Trends (1990-2018), Metropolitan Cincinnati

	1990		2000		2010		2018	
Race/Ethnicity	Number	Percent	Number	Percent	Number	Percent	Number	Percent
White	1,601,562	87.41%	1,691,611	84.80%	1,723,455	80.91%	1,771,834	81.70%
Black	203,292	11.09%	238,796	11.97%	273,540	12.84%	265,271	12.23%
Hispanic	9,298	0.51%	22,446	1.13%	54,992	2.58%	68,236	3.15%
Asian or Pacific Islander	13,761	0.75%	28,583	1.43%	49,053	2.30%	55,286	2.55%
Native American	2,206	0.12%	8616	0.43%	9779	0.46%	3,076	0.14%
Other	2,194	0.12%	4,778	0.24%	19,332	0.91%	73,358	3.38%
National Origin								
Foreign Born:	31850	1.74%	51,286	2.57%	90,785	4.30%	102,035	4.70%
Limited English Proficiency (LEP)								
LEP	18866	1.03%	29,167		42,560	2.00%	10,074	0.46%
Sex								
Male	880,689	48.06%	968,692	48.56%	1,041,528	48.90%	1,063,212	49.02%
Female	951624	51.94%	1,026,138	51.44%	1,088,623	51.10%	1,105,613	50.98%
Age								
Under 18	490,800	26.79%	541,829	27.16%	470,796	22.10%	470,796	22.10%
18-64	1,125,607	61.43%	1,219,643	61.14%	1,399,176	65.70%	1,399,176	65.68%
65+	215,906	11.78%	233,358	11.70%	260,179	12.20%	260,179	12.21%
Family Type								
With Children	244,949	50.47%	202,546	4988.00%	250,851	30.20%	250,851	30.20%

Source: HUD, 2018 ACS
*Indicates data that are not available.

A.   Race/Ethnicity

As Tables 1, 2 and 3 show, the population of Clermont County is overwhelmingly White – 95.11% as of the 2018 American Community Survey. Metropolitan Cincinnati is nearly 4 times more diverse than Clermont County, with a non-White population of approximately 18.3%. The largest minority race in both the County and the Metro Area is Black/African-American, who comprise 12.23% of the Metro population, and 1.41% of Clermont County. People identifying as Hispanic were the largest non-White group in the County, at 1.88%.

All non-White groups except Native Americans are under-represented in the County compared to the Metro Area at large. This report will seek to determine the causes of that under-representation.

Over the past twenty years, Clermont County has become somewhat more diverse, with the White population falling from 97.1% in 2000 to 95.9% in 2010 and now 95.1% in 2018. The proportion of all minority groups increased over the past 30 years, with nearly all minority groups reporting increases of at least 20% in each decade. While Whites comprise a lower proportion of Clermont County's population today than in 1990, the population of Whites has continued to increase along with those of minorities. Though population increases among Whites have not been as significant as those among minorities, they are notable enough to offset an otherwise notable impact of minority population increases over the last three decades.

B.   Foreign-Born Residents

The proportion of foreign-born residents in the County is similar to that of the Metro Area as a whole. The largest group of immigrants is those from Asia, who make up 1.1% of the County and 2.06% of the Metro Area. Other large foreign-born groups include those born in Europe, Latin America, and Northern America.

The County does lag behind the Metro Area in the proportion of residents born in Africa. These residents make up 12.59% of the Metro Area, but makes up only 2.57% of the County. This document will seek to determine if there is a barrier to housing this immigrant group in Clermont County.

The foreign-born population in Clermont County has nearly doubled since 2000, but still makes up only 2.26% of the County, compared to 4.7% of the Metro Area. This document will also seek to determine whether there is a barrier to immigrant groups in general living in Clermont County.

C.   Limited English Proficiency

The most common first language among those residents with limited English proficiency in both the County and the Metro Area is Spanish. Other common languages are other Indo-European Languages, and Asian and Pacific Island Languages.

In general, the proportion of residents with limited English proficiency is similar in the County and the Metro Area as a whole.

D.   Disability

The proportion of people with certain disabilities is similar in the County and in the Metro Area at large. It does not appear that there is a barrier to people with disabilities living in the County. However, there may be barriers to people with disabilities living in certain communities, neighborhoods, or complexes. This document will seek to determine if that is the case.

E.   Sex

The proportion of the sexes is similar in the County and in the Metro Area at large. It does not appear that there is a barrier to people of either sex living in the County.

F.   Age/Family Type

Clermont County has a slightly higher proportion of school-aged children living in the County than the Metro Area at large (23.60% compared to 22.10%). There are also a higher proportion of families with children (32.71% to 30.20%). It is possible that this difference is because parts of Clermont County are considered desirable places to raise a family. This document will determine whether all parts of the County have access to the schools, parks, amenities, and neighborhoods that are desirable to families, or whether there are barriers to quality housing for those with children.

Between 2010 and 2018, the proportion of children under 18 in the County dropped from 25.6% to 23.60% and the proportion of households with children, remained relatively unchanged, with a slight increase from 32.3% to 32.71%. This change may be due to the aging population of the State of Ohio and the United States in general, or may be due to barriers to quality, affordable housing in neighborhoods that are desirable to families. This document will seek to determine which of those is the case.

The proportion of seniors over 65 is similar in both the County and the Metro Area. The proportion of seniors in the County increased from 11.8% in 2010 to 15.19% in 2018. It does not appear that there is a barrier to seniors living in the County, but this document will analyze whether seniors have access to quality, affordable housing near the amenities that they need.

VI.   General Issues

A. Segregation/Integration and R/ECAPs

The AI was completed using the Affirmatively Furthering Fair Housing (AFFH) framework as suggested by HUD. This document used the raw AFFH version AFFH0004a, which was released in February of 2018 and revised in March 2019. Although the data were released in 2018, they rely heavily on the 2009-2013 5-year American Community Survey (ACS) dataset as well as the 2009-2013 Comprehensive Housing Affordability Strategy (CHAS) data. This period was the height of the Great Recession, and describes a starkly different economic and demographic landscape than the post-recession recovery, followed by the Covid-19 crisis in which we find ourselves today. Wherever possible, this report used the 2014-2018 ACS data to describe AFFH data concepts, such as the Limited English Proficiency (LEP) or the Dissimilarity Index. Also included is the most recent 2012-2016 CHAS data to address housing affordability. As a result, this document attempts to update the AFFH data concepts to the most accurate data available.

The seven opportunity indices relied upon relied on the AFFH data provided in the 2018 February release. All data, including the dissimilarity index, came directly from the AFFH raw dataset.

The "dissimilarity index" provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast; and again, using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the city will be 100. The higher the dissimilarity index value, the higher the level of segregation in an area.

As a general rule, HUD considers the thresholds appearing in Table 4, below to indicate low, moderate, and high levels of segregation:

Table 4: Interpreting the Dissimilarity Index, Clermont County

Measure	Values	Description
Dissimilarity Index [range 0-100]	<40	Low Segregation
	40-54	Moderate Segregation
	>55	High Segregation

To assist communities in identifying racially/ethnically-concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-White population of 50 percent or more. Regarding the poverty threshold, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. This translates into the following equation:

$$\frac{R}{ECAP_i} = yes \dots if \dots \begin{cases} PovRate_i \geq \left[3 * \mu_{PovRate}^{cbsa} \right] \\ or \\ PovRate_i \geq 0.4 \end{cases} \cap \left[\frac{(Pop_i - NHW_i)}{Pop_i} \right] \geq 0.50$$

B. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Dissimilarity Index

Table 5: Race/Ethnicity Dissimilarity Index Released 2018, Clermont County and Metropolitan Cincinnati

	Clermont County	Metropolitan Cincinnati
Non-White/White	22.07	58.07
Black/White	30.51	71.02
Hispanic/White	22.42	40.30
Asian or Pacific Islander/White	34.69	49.02

Source: HUD AFFH version AFFH0004a released February 2018

Table 6: Race/Ethnicity Dissimilarity Index Trend (1990-2018), Clermont County and Metropolitan Cincinnati

	Clermont County				Metropolitan Cincinnati			
	1990	2000	2010	2018	1990	2000	2010	2018
Non-White/White	18.61	14.21	16.07	22.07	68.9	60.96	53.05	58.07
Black/White	30.91	22.98	22.98	30.51	75.45	72.36	66.78	71.02
Hispanic/White	18.59	12.86	17.07	22.42	26.02	28.95	36.79	40.30
Asian or Pacific Islander/White	32.03	32.22	25.54	34.69	42.97	41.16	42.19	49.02

Source: HUD AFFH version AFFH0004a released February 2018

Current Levels of Segregation

Tables 5 and 6 show the dissimilarity indices for Clermont County and Metropolitan Cincinnati. Clermont County's are below 40, indicating that the small minority populations in the County are well integrated with the white majority. However, the dissimilarity indices for the Metro Area show segregation, especially between Blacks and Whites. The lack of minority residents in Clermont County and other outlying/suburban counties is a major driver of this segregation. Potential barriers to housing in the County for minorities, especially the most prevalent group, African-Americans, should be analyzed closely.

Change in Segregation over Time

In general, Metropolitan Cincinnati has become less segregated for Whites and non-Whites over time, with the dissimilarity index dropping from 68.9 to 53.05 between 1990 and 2010. Decreased segregation among Whites and Blacks appears to be the primary reason for this change with segregation between this minority group and Whites having had the most significant decrease – nearly

ten points – over that time. The gradual increase in the African-American population in Clermont County is also indicative of the slow, but positive, trend toward increased racial integration.

However, the segregation of Whites and Hispanics in the Metropolitan area has gotten worse over time, with the White/Hispanic index increasing by more than 10 points from 26.02 to 36.79 between 1990 and 2010. Despite the fact that Hispanics are the fastest growing minority group in Clermont County, segregation between Hispanics and Whites has not improved as quickly as it has between Whites and other minority groups. While segregation between Whites and Hispanics appeared to be improving between 1990 and 2010 – decreasing by roughly 6 points over that time – the segregation gap re-widened with an increase of roughly 5 points between 2000 and 2010. This report will seek to determine the causes of ongoing, and increasing segregation between White and Hispanic groups.

For Whites and Asians, the Dissimilarity Index has remained relatively unchanged between 1990 and 2010, hovering near 42 at the Metropolitan level. Clermont County has experienced greater progress than the Metro region with regard to segregation between Whites and Asians – having decreased by roughly seven points between 1990 and 2010.

2. Geographic Analysis

Map 1A: Current Race/Ethnicity Density, Clermont County and Metropolitan Cincinnati
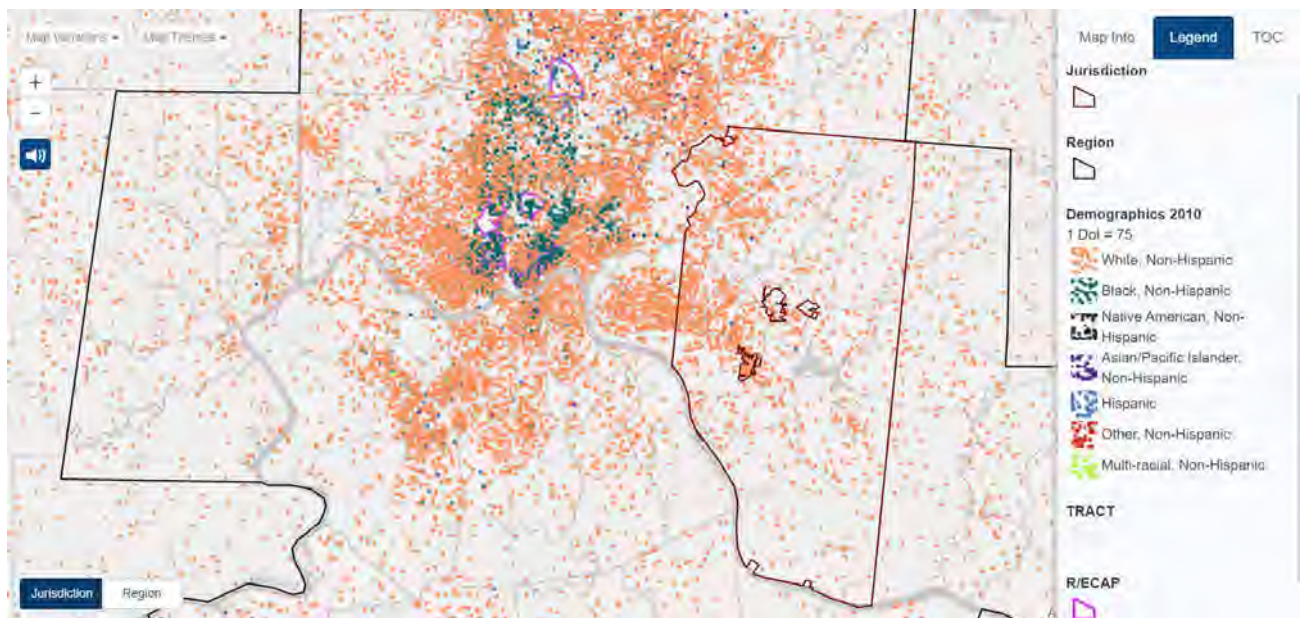
The above map illustrates the proportion of whites, blacks, Hispanics, Asians, and other minority groups throughout Clermont County and the Metropolitan Cincinnati region. R/ECAP Census Tracts are highlighted in purple. However, because there are no R/ECAP Census Tracts in Clermont County, these areas do not appear on the County maps generated for this report.

Map 1B: Racial Breakdown – White Population, Clermont County
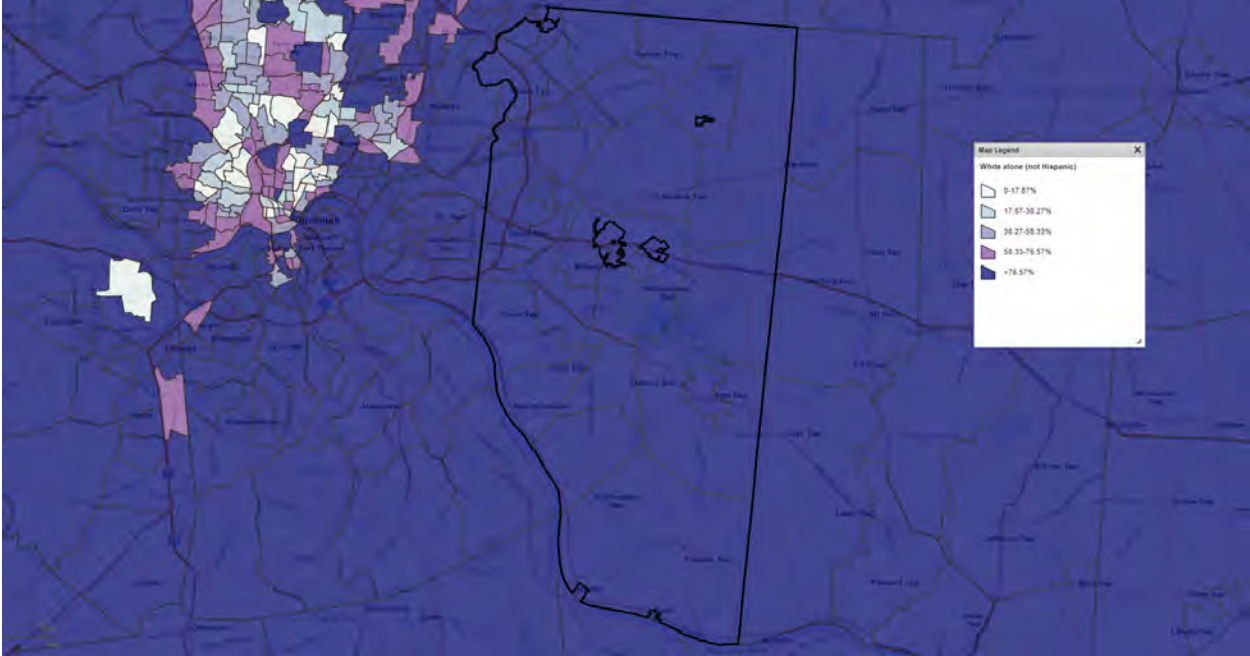
Map 1C: Racial Breakdown – Black Population, Clermont County
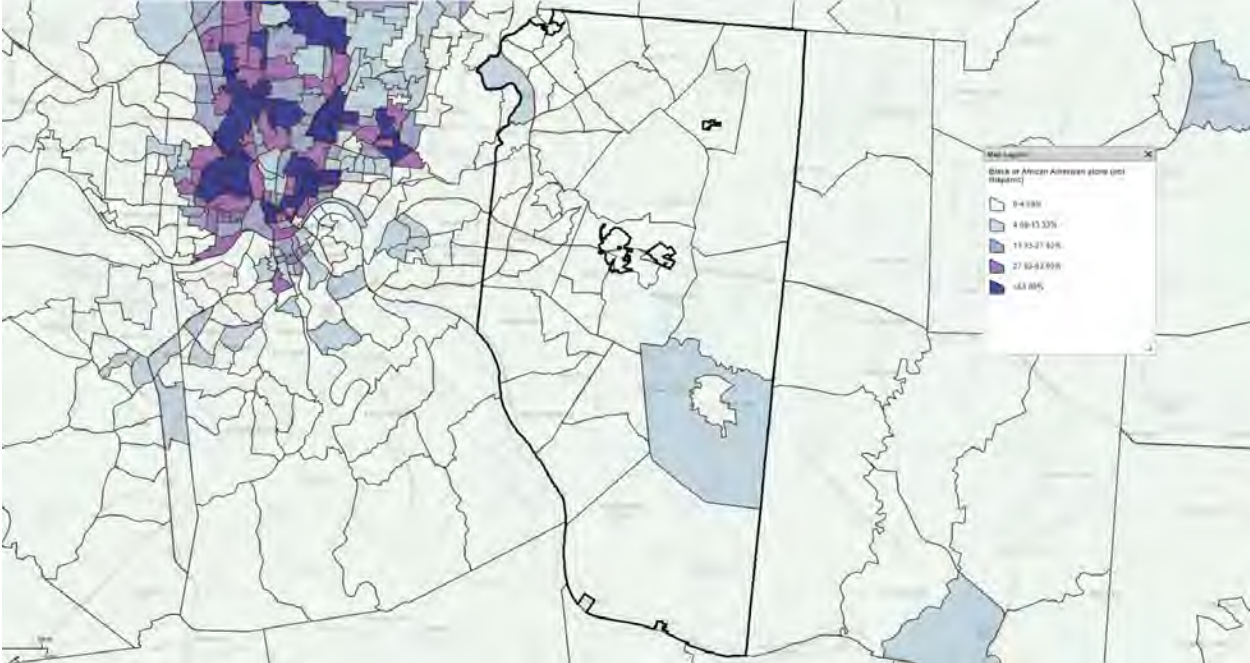
Map 1D: Racial Breakdown – American Indian/Alaskan Native Population, Clermont County
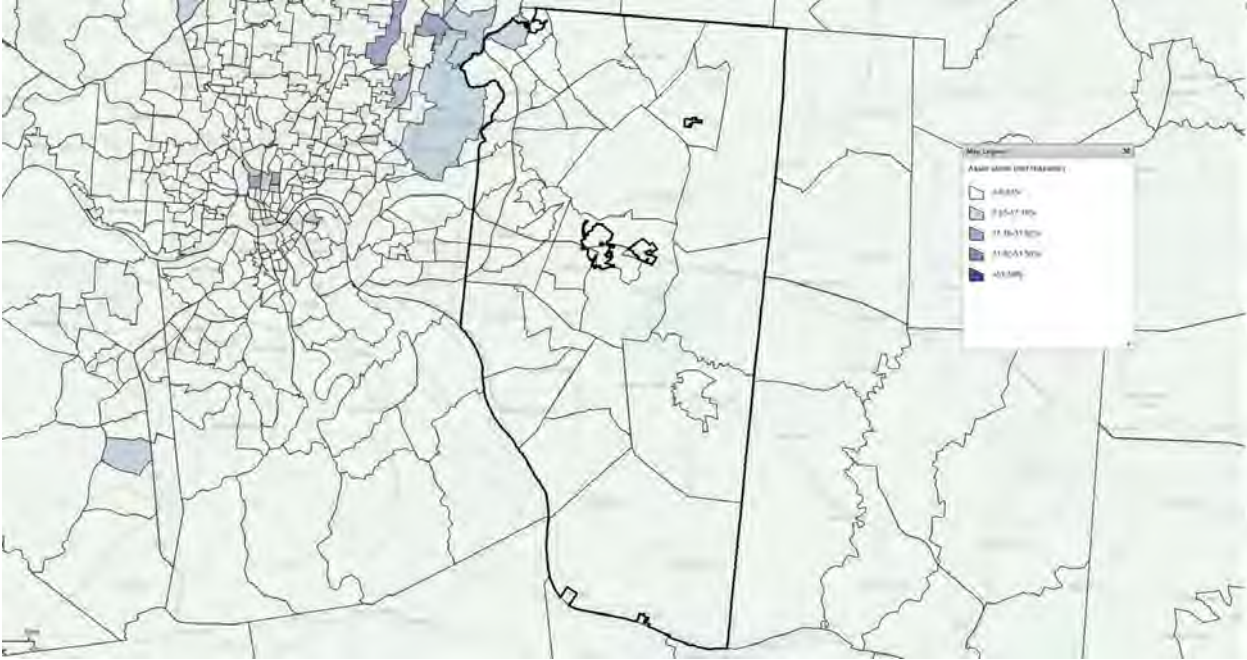
Map 1E: Racial Breakdown – Asian Population, Clermont County
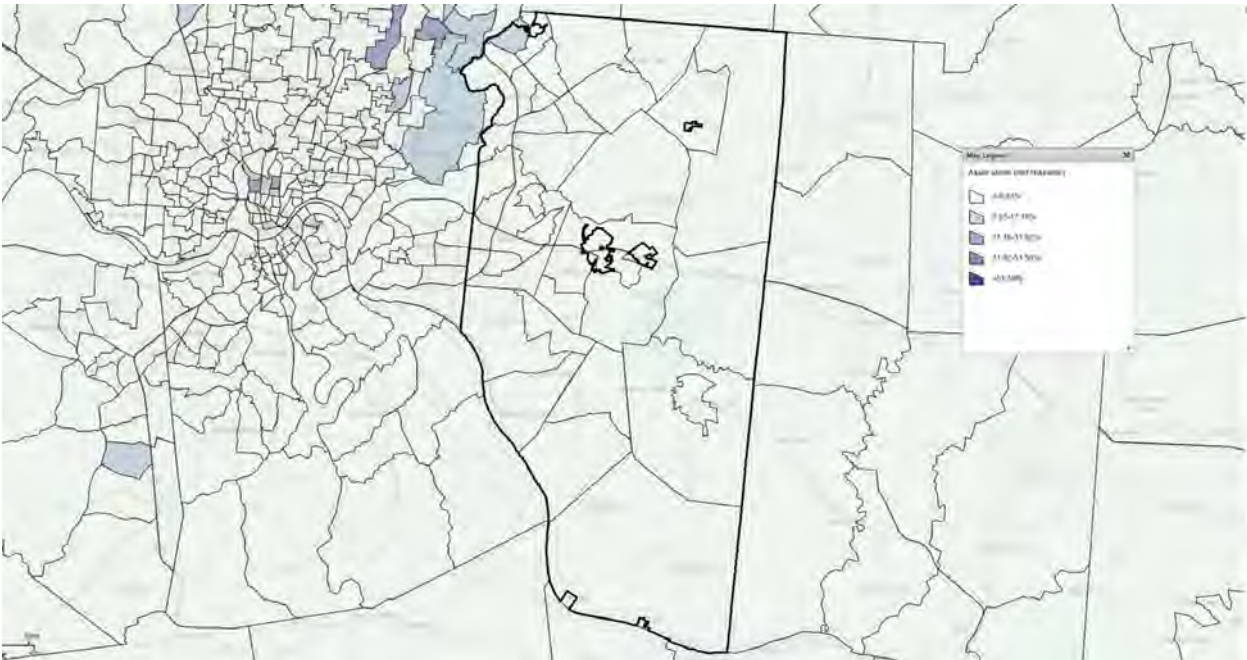
Map 1F: Racial Breakdown – Native Hawaiian/ Pacific Islander Population, Clermont County
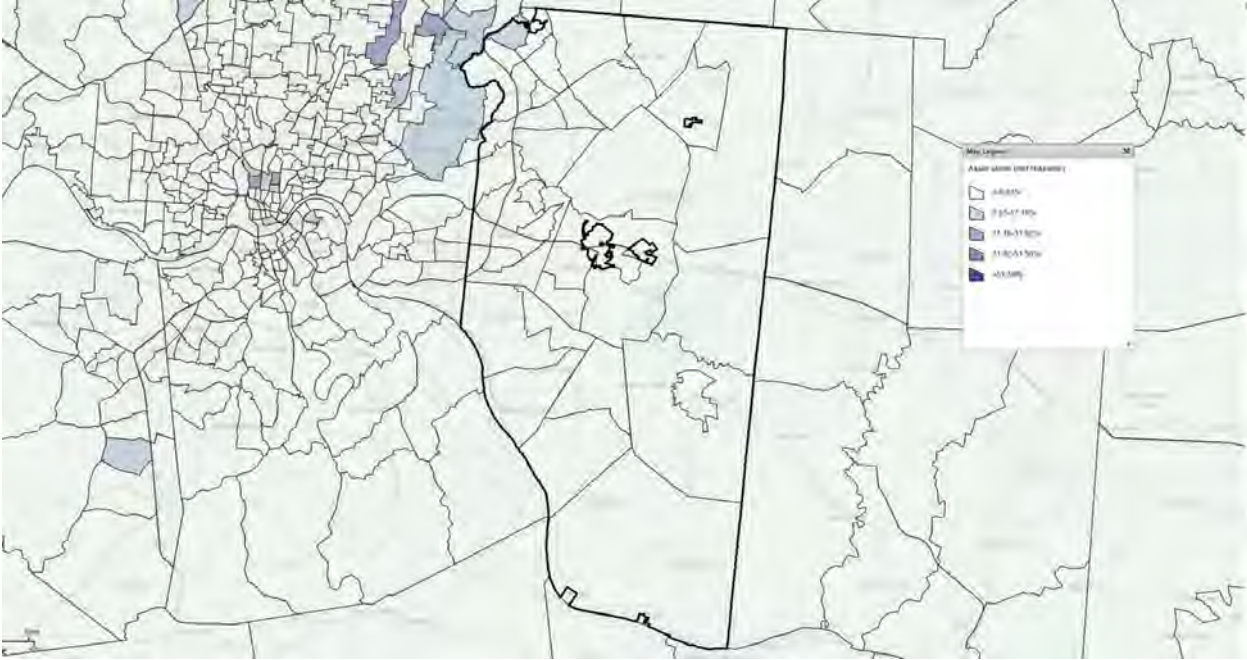
Map 1G: Racial Breakdown – Some Other Race and Two Or More Races Population, Clermont County
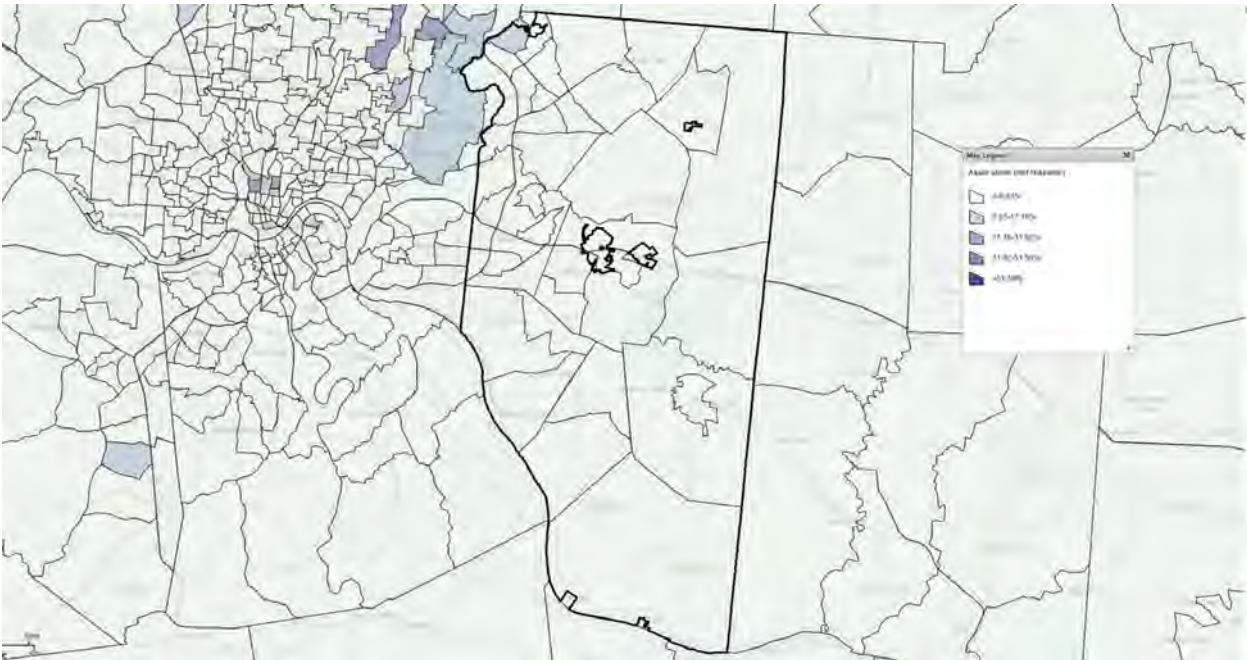
Map 1H: Racial Breakdown – Hispanic Population, Clermont County
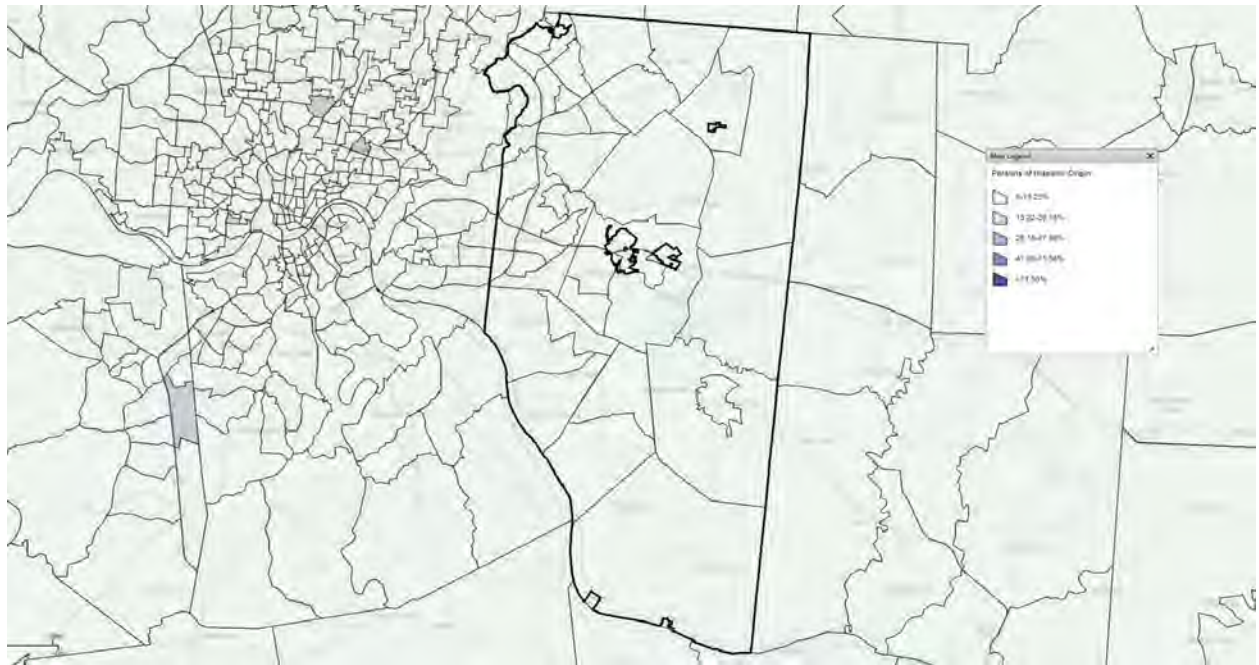
Map 1I: Racial Breakdown – White Population, Metropolitan Cincinnati
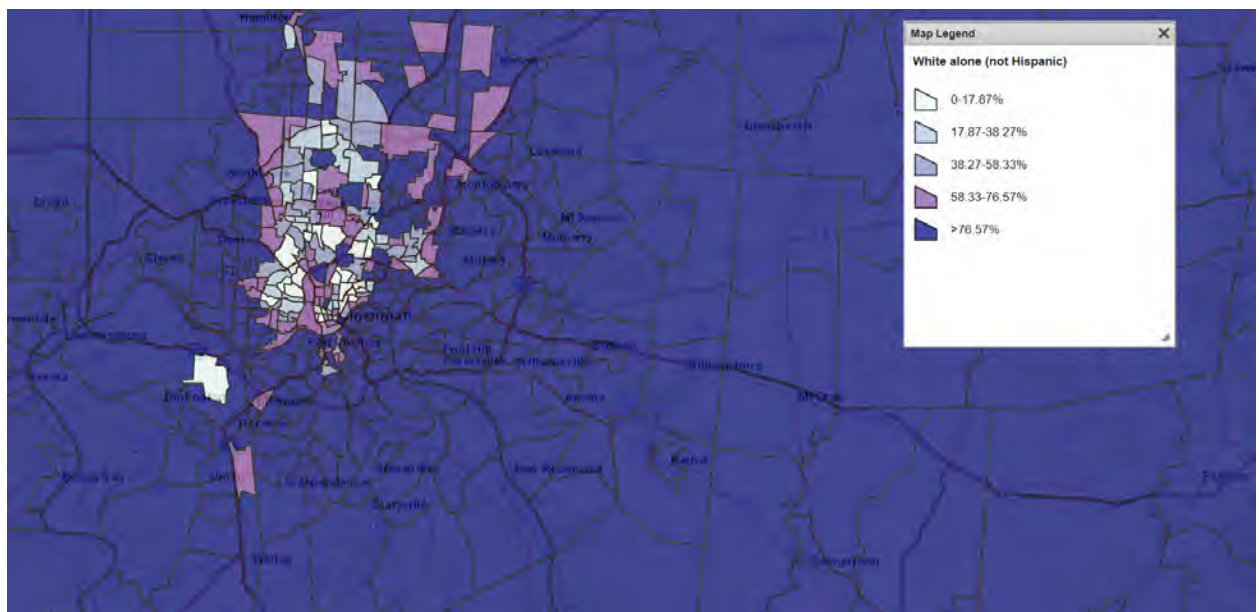
Map 1J: Racial Breakdown – Black Population, Metropolitan Cincinnati
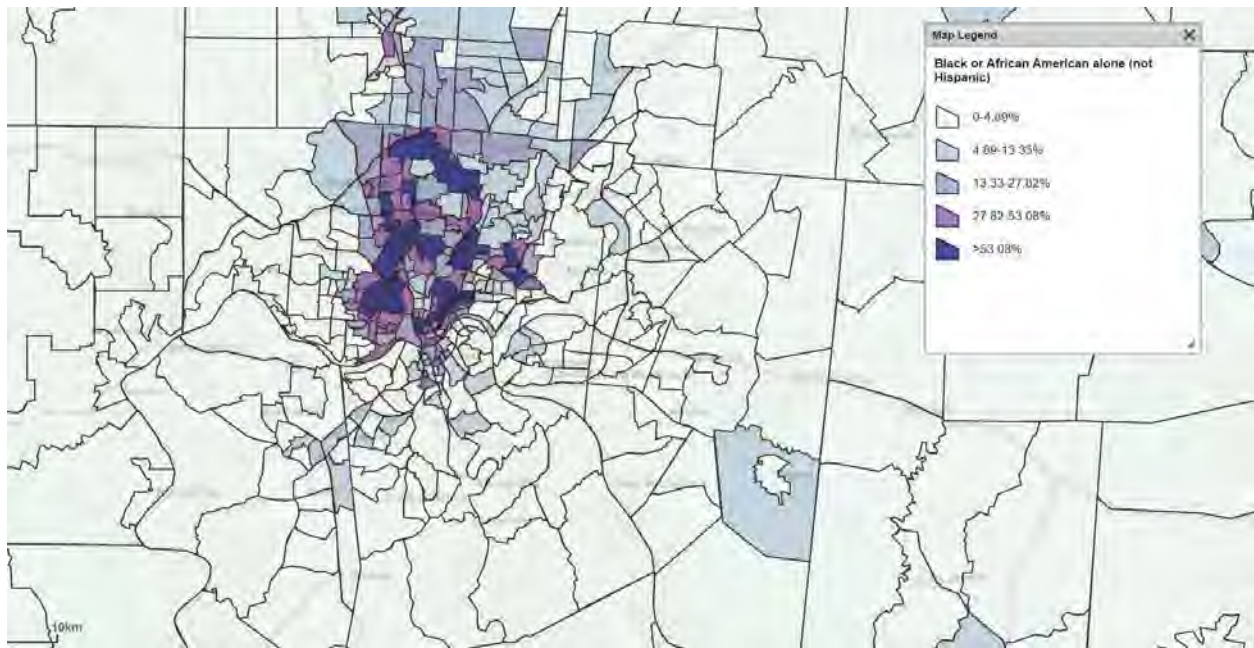
Map 1K: Racial Breakdown – American Indian/Alaskan Native Population, Clermont County
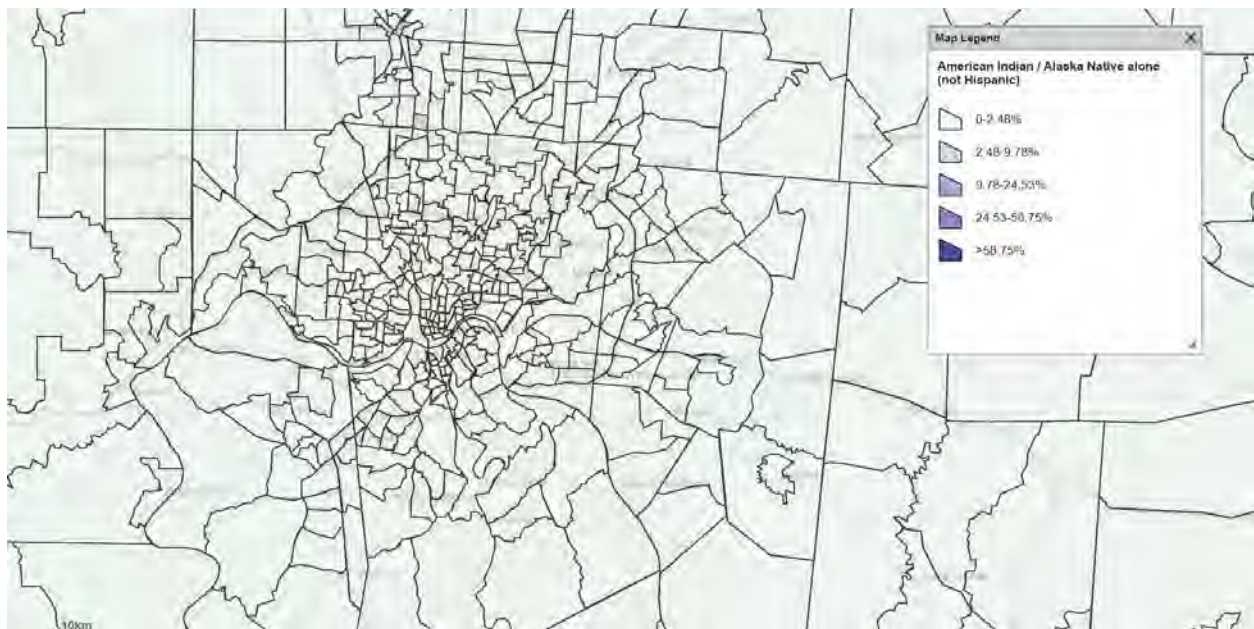
Map 1L: Racial Breakdown – Asian Population, Metropolitan Cincinnati
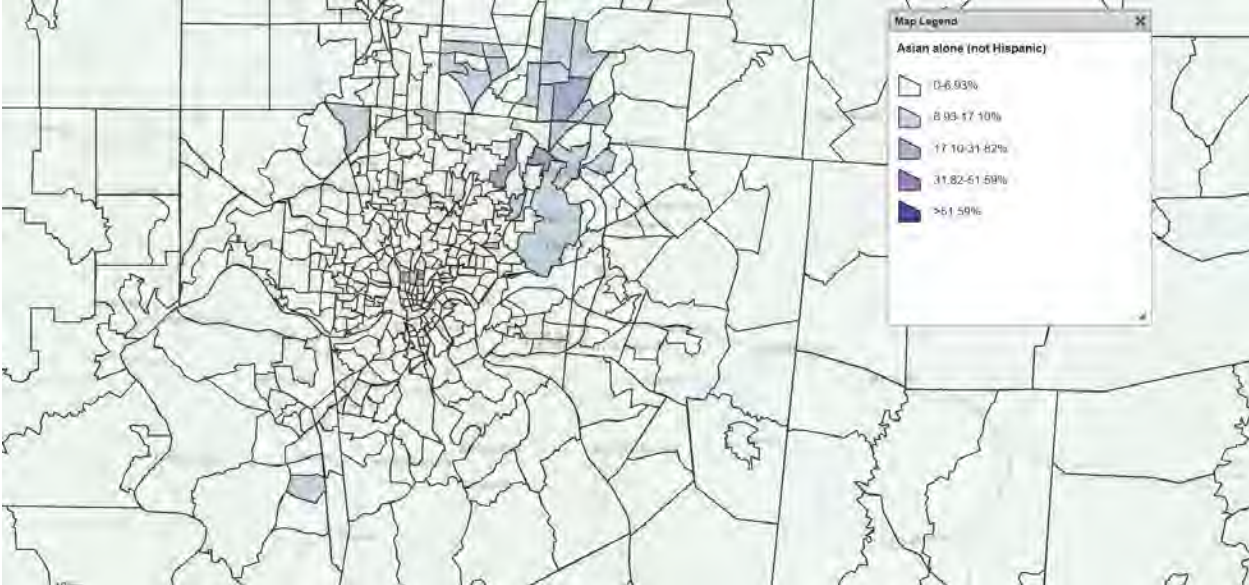
Map 1M: Racial Breakdown – Native Hawaiian/ Pacific Islander Population, Clermont County
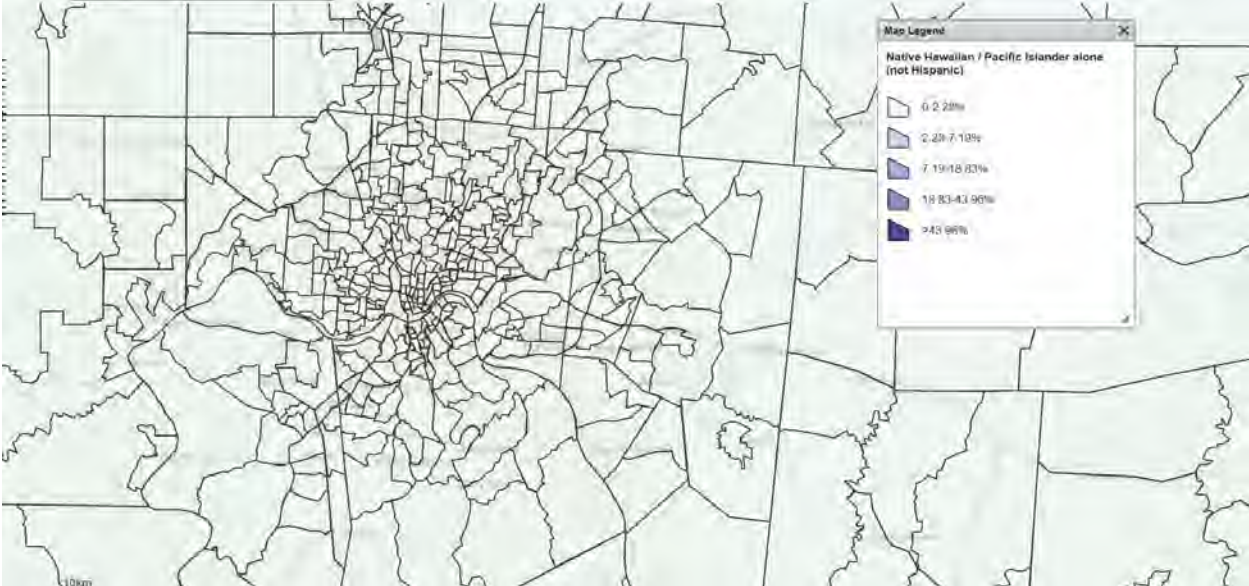
Map 1N: Racial Breakdown – Some Other Race and Two Or More Races Population, Clermont County
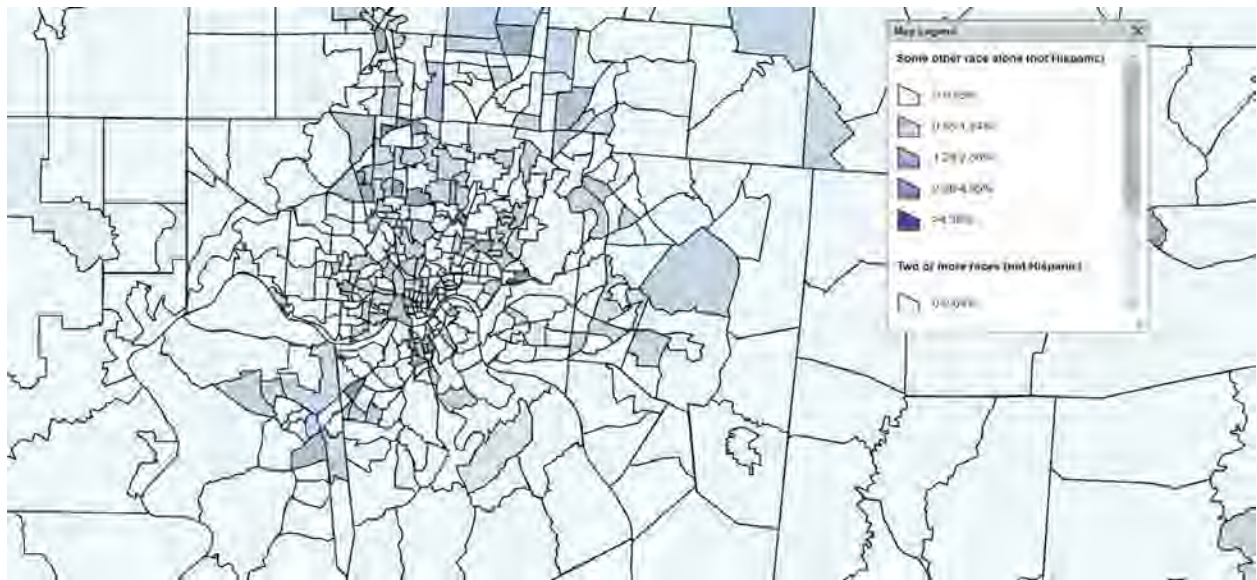
Map 1O: Racial Breakdown – Hispanic Population, Metropolitan Cincinnati
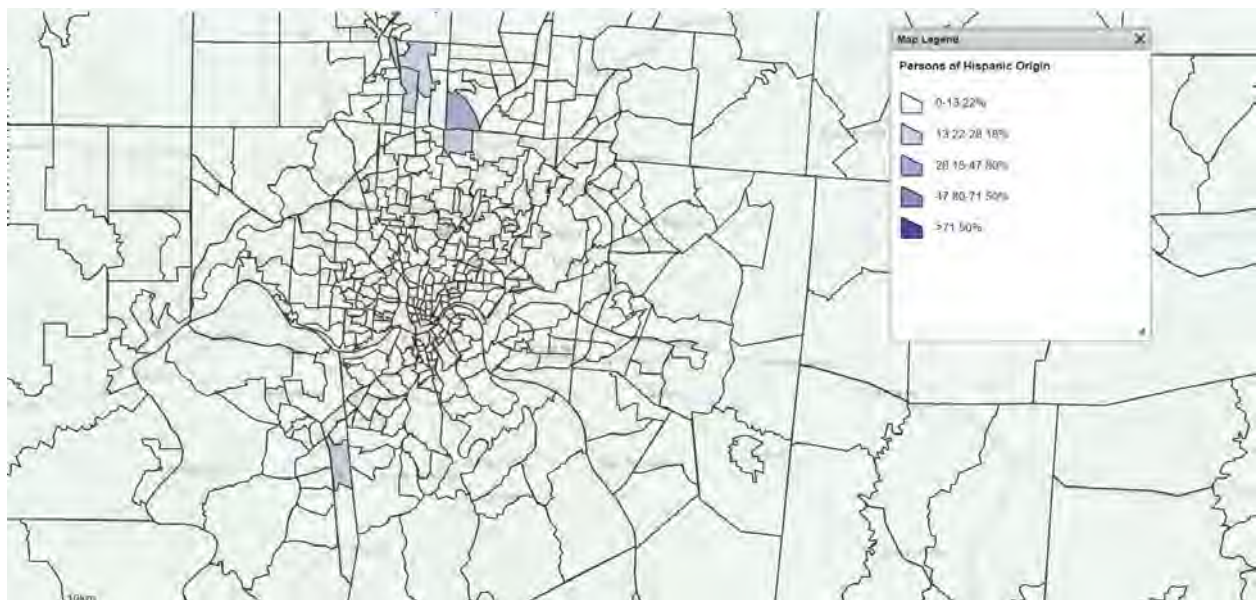
Ethnic/Racial Cluster Neighborhoods

Within Clermont County, Whites are the overwhelming majority of the population in every area. Regionally, the largest minority concentrations are in the north and west parts of the City of Cincinnati, as well as some of the inner-ring northern suburbs. The residents of these areas are overwhelmingly Black. There are relative concentrations of Hispanics (over 25% of residents) in select areas of the region near Northeast suburbs, most notably the City of Springdale. There are also relative concentrations of Asians (between 10% and 20%) near Northeast suburbs, most notably near Deerfield Township.

There are no clusters of American Indian/Alaskan Native, individuals living residents in the Metropolitan Cincinnati region that are visible on the maps.

R/ECAP Census Tracts

There are no R/ECAP Census Tracts in Clermont County, because none of the Census Tracts have a white population below 50%. In the Metro Area, the R/ECAP tracts are clustered on the north and west sides of Cincinnati. African-Americans are the largest racial/ethnic group in all metro area R/ECAP tracts. This indicates segregation in the region. While Clermont does not have any R/ECAP tracts, its general lack of minority groups contributes to the regional problem.

Location and Characteristics of R/ECAP Tracts

The largest cluster of R/ECAP Census Tracts in Metropolitan Cincinnati are located in the City of Cincinnati along the Interstate 75 corridor on the City's west side. This corridor, which also contains a heavily used freight rail line, is lined with industrial buildings. Similarly, there is a smaller cluster of R/ECAP tracts along the Interstate 71 corridor, which also contains industrial uses. The Avondale neighborhood, home to racial unrest in the 1960s, is part of that corridor. The heavy-duty transportation corridors and industrial uses in these neighborhoods have negative consequences for the nearby residents, many of whom are minorities and/or live in poverty.

Another cluster of R/ECAP Tracts is located just north of Downtown Cincinnati, in Cincinnati's historical "Over-the-Rhine" (OTR) neighborhood, where some of the City's oldest housing is located. However, this neighborhood has been the target of new investment in recent years, as new housing, businesses, and residents have transformed the area. New investment has resulted in integration of racial and economic groups, but has also caused gentrification and the displacement of poor and minority populations. At the time of the last AI, the Black population in this neighborhood was between 50% and 75% across the three main census tracts covering the neighborhood. Currently in two of the neighborhood's largest southern census tracts, the Black population has declined significantly to just 34% and 35%. It should be noted that in OTR's two largest northern census tracts, the concentrations among Black people are 76.4% and 69.6% respectively. This could be an indicator of poorer Black individuals being driven from the southern areas of OTR to the northern portions of OTR as rents and economic investments increase in the southern portion of the neighborhood.

Map 2A: Past Race/Ethnicity Density (1990), Clermont County and Metropolitan Cincinnati
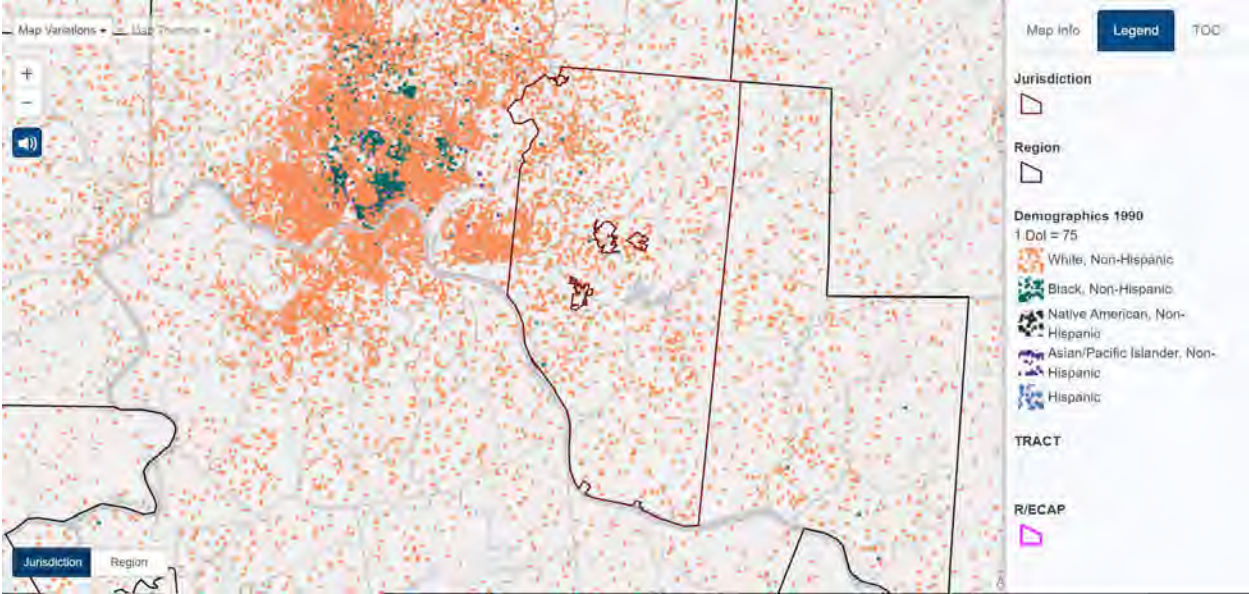
Map 1B: Past Race/Ethnicity Density (2000), Clermont County and Metropolitan Cincinnati
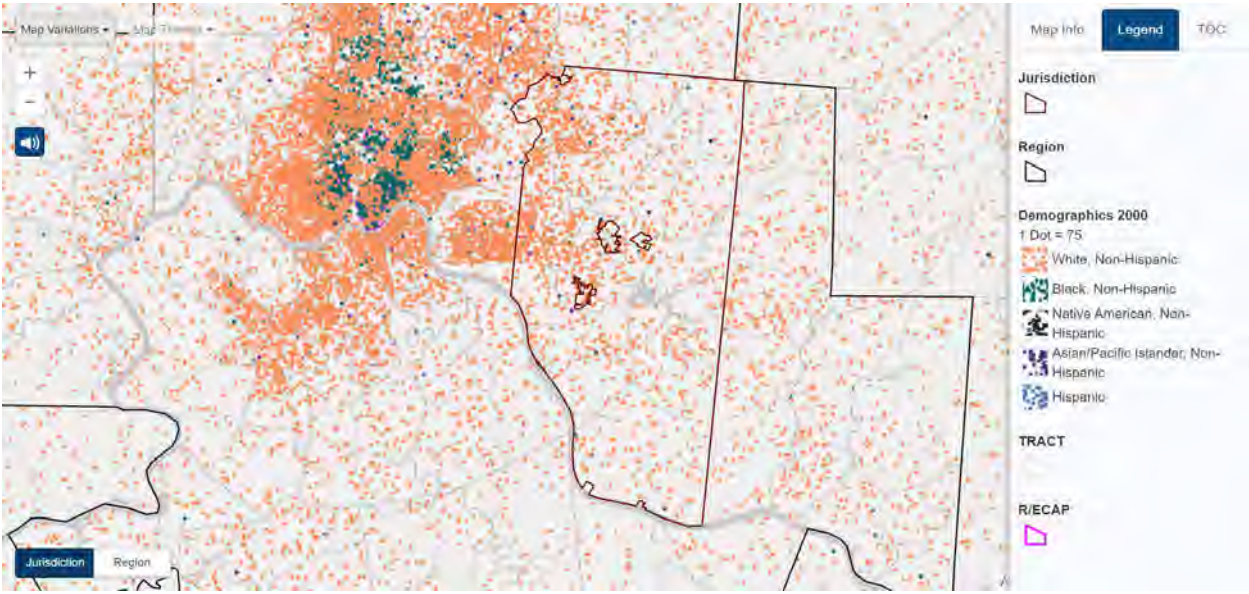
Map 2C: Past Race/Ethnicity Density (2010), Clermont County and Metropolitan Cincinnati
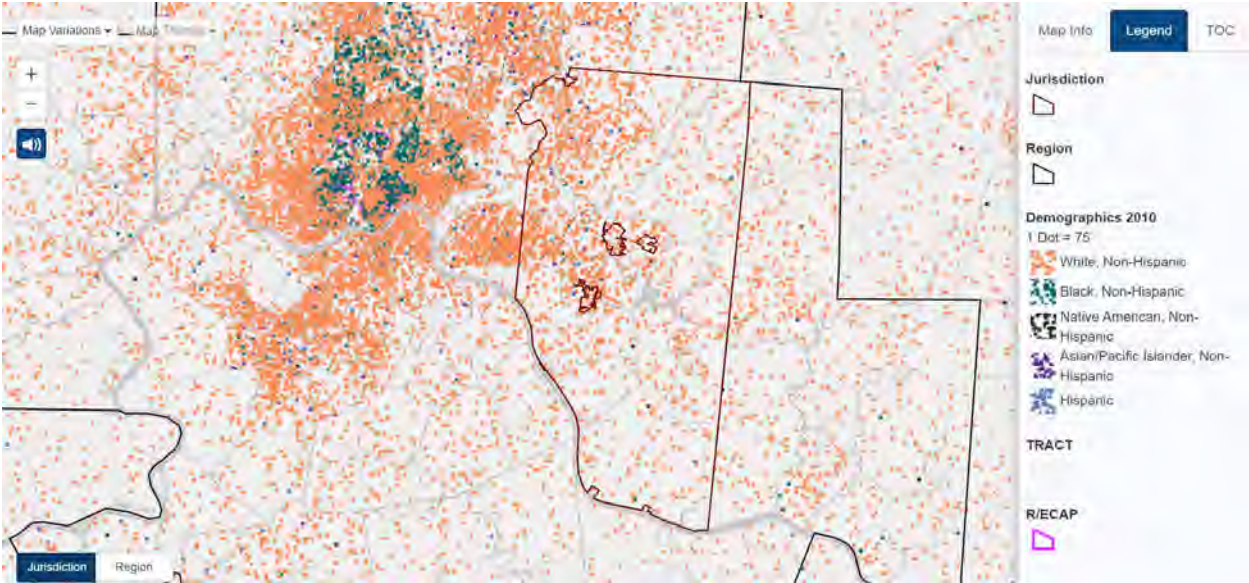
Table 7: Change in Race/Ethnicity (1990-2018), Clermont County

	1990-2000	2000-2010	2010-2018
White	16.75%	9.47%	2.12%
Black	25.56%	40.90%	25.13%
Hispanic	114.56%	87.20%	31.98%
Asian or Pacific Islander	149.23%	70.06%	38.13%
Native American	52.75%	21.02%	-22.58%
Other	231.21%	69.59%	420.83%

Source: US Census 2000, 2010; ACS 2018 (5-Year Estimates)

Segregation/Integration Change over Time

As illustrated in Map 2, Submaps A-C, minority groups have grown beyond primarily existing in central Cincinnati in 1990, to areas throughout the region. Some of the most notable minority migrations are trending towards the northern areas of the region, while smaller minority groups have dispersed south into the region and eastward into the westernmost areas of Clermont County. The presence of more jobs, affordable housing, and/or diverse communities may all be contributing to the attractiveness of the northern areas of the region in comparison to eastern areas like Clermont County for minority families.

As shown in Table 7, minority populations in Clermont County have experienced notable growth rates in the last two decades. It should also be noted that while Whites comprise a lower proportion of the population than in 1990, the population of Whites has continued to increase along with those of minorities – therefore offsetting the impact of minority population increases over the last three decades. Within Clermont County, the growing minority populations are generally integrating into

neighborhoods, as the very low dissimilarity indexes suggest. However, elsewhere in the region, neighborhood migration retains a segregated pattern.

In Butler County and northern Hamilton County suburbs, the White population continues to move north, while minority populations move out of the core of Cincinnati into inner-ring suburbs. In some core neighborhoods, such as Over-The-Rhine and the neighborhoods near the University of Cincinnati, there is a growing White population in formerly heavily minority areas. While this could represent an opportunity for increased integration in core neighborhoods, it has instead resulted in gentrification, where higher-income White households are displacing poor minority households.

Map 3: Current National Origin (Top 5) Density, Clermont County and Metropolitan Cincinnati
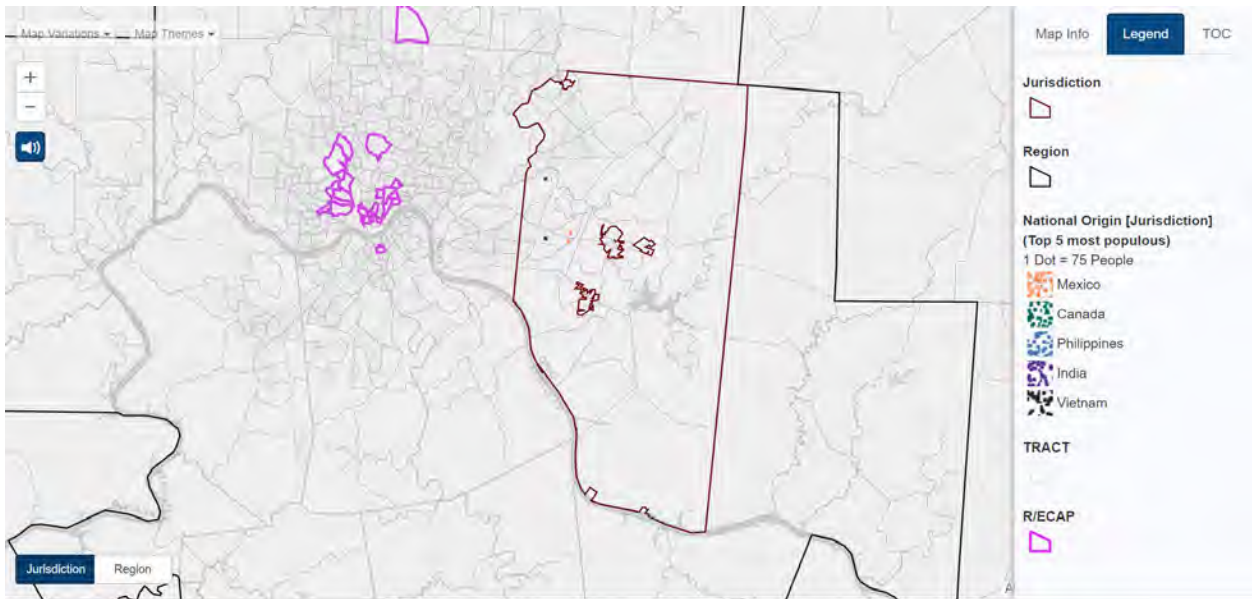
Concentrations of Foreign-Born
Metropolitan Cincinnati has very few concentrations of immigrant groups. In fact, the City is known for lacking ethnic neighborhoods. There is a slightly larger population of Hispanics in the suburb of Springdale, but it is not clear how much of that population was foreign-born.

Clermont County has no concentrations of foreign-born people.

Persistent Segregation
There is no persistent segregation within Clermont County itself, but decades-old, racially biased federal housing policies continue to have a lasting impact on Metropolitan Cincinnati today. African-Americans, who were once prohibited from buying homes and confined to certain neighborhoods, still largely reside in areas that maintain a persistent segregated character. Suburban areas are largely White, as are some specific neighborhoods in the City, while other neighborhoods are largely Black (Hispanics and Asians are less concentrated in specific areas).

Within the City, there are some areas that are seeing racial integration, such as Over-The-Rhine, but as noted above, the City's industrial corridors along I-75 and I-71 are where the highest concentrations of

R/ECAP census tracts are located. These concentrations date back decades and have changed little. The Avondale neighborhood, where race riots erupted in the 1960s, is still a R/ECAP Census Tract.

New R/ECAP Tracts

There are no new R/ECAP tracts in Clermont County, because the small numbers of minorities that have moved there have not clustered in any particular area. R/ECAP tracts remain largely unchanged within the Metro Area at large, as well. They generally remain clustered in the parts of the City of Cincinnati described above.

Two R/ECAP tracts identified immediately north of Downtown Cincinnati in the previous AI have lost their R/ECAP definition in recent years, as a larger and more prosperous white population moved into Cincinnati's "Over-The-Rhine" neighborhood. As previously described, this migration has caused the displacement of existing, long-time, minority residents.

Vulnerable Neighborhoods

New R/ECAP tracts are forming in the northern reaches of the City of Cincinnati and inner ring northern suburbs. These areas currently have concentrations of minorities that exceed 50%, and growing concentrations of poverty throughout. There are now more census tracts in the northern reaches of Cincinnati and inner ring northern suburbs where the poverty rates exceed 30% than when the last AI was completed. It is important that the City of Cincinnati acknowledge these ongoing changes and direct resources to these areas to prevent disinvestment and ensure stability for these groups.

There are no areas in Clermont County that are vulnerable to becoming R/ECAPs, as identified at this time.

Additionally, there are concentrations of poverty (between 9.21% and 17.64%) in the rural parts of Clermont County, especially near Williamsburg Township and New Richmond (between 17.64% and 28.17%). These areas are not concentrations of minorities, nor are they ever likely to be. However, these communities face major challenges in providing quality, affordable housing.

Table 8: Limited English Proficiency (LEP) Persons, 2010, Clermont County and Metropolitan Cincinnati

	Clermont County		Metropolitan Cincinnati	
Limited English Proficiency (LEP) Language	Number	Percent (%)	Number	Percent (%)
1. Spanish	997	0.5%	18,443	0.9%
2. Chinese	180	0.1%	2,969	0.1%
3. Russian	112	0.1%	1,367	0.1%
4. Vietnamese	105	0.1%	1,783	0.1%
5. French	68	0.0%	2,305	0.1%
6. Other Slavic Languages	58	0.0%	237	0.0%
7. Other Indo-European Languages	57	0.0%	226	0.0%
8. Thai	49	0.0%	280	0.0%
9. Other Indic Languages	46	0.0%	707	0.0%
10. Korean	37	0.0%	893	0.0%

Source: HUD AFFH version AFFH0004a released February 2018

This map shows proportion of non-English speakers by language in Clermont County and Metropolitan Cincinnati.
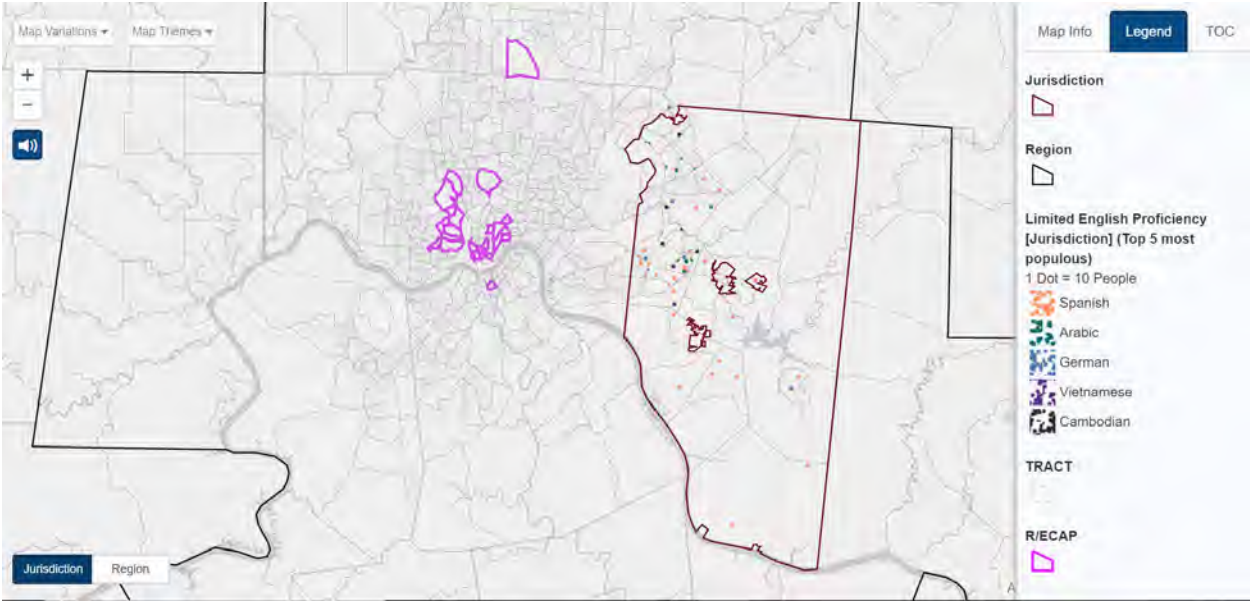
Limited English Proficiency

By far the largest first language for people with Limited English Proficiency is Spanish, in both the County and the Metro Area. Other common first languages include Russian, Chinese, and Vietnamese. The overall proportion of people with Limited English Proficiency is not large, with the proportion in Clermont County under 1%.

There are clusters of Limited English Proficiency households located in the midwestern and northwestern areas of Clermont County. Spanish-speaking households are most common in these areas. This analysis will seek to determine the causes of this overrepresentation.

Other clusters of Limited English Proficiency in the region exist in central Cincinnati and some inner-ring Hamilton County suburbs, most notably Springdale, which has a relatively high Hispanic population.

Table 9: Racial/Ethnic Groups, Families with Children, and National Origin Groups that reside in R/ECAPs (Top 10), Clermont County and Metropolitan Cincinnati

	Clermont County		Metropolitan Cincinnati	
R/ECAP Race/Ethnicity	**Number**	**Percent (%)**	**Number**	**Percent (%)**
Total Population in R/ECAPs			61,223	100.00%
White	*	*	12,771	20.86%
Black	*	*	43,197	70.56%
Hispanic	*	*	2,796	4.57%
Asian or Pacific Islander	*	*	740	1.21%
Native American	*	*	125	0.20%
Other	*	*	104	0.17%
Family Type				
Total Households in R/ECAPs	*	*	13,150	100.00%
Families with Children	*	*	7,990	60.76%
National Origin				
Total Population in R/ECAPs	*	*	61223	100.00%
Total Foreign Born*	*	*	2,238	3.66%

Source: HUD AFFH version AFFH0004a released February 2018
*Data Not Available

3. Disproportionate Representation in R/ECAP Tracts

As noted above, there are no R/ECAP Tracts within Clermont County. However, within the Metro Area's R/ECAP Tracts, Blacks are far over-represented. African-Americans make up 12.0% of the regional population, but 71% of the population within R/ECAP Tracts. Over 17% of the Black population in the region lives in R/ECAP Tracts – up by 7% since the previous AI. While segregation is not an issue within Clermont County, Clermont's lack of minority population is a contributor to the regional segregation issue.

Foreign-born individuals and households with children are also disproportionately represented in R/ECAP Tracts.

4. Additional Information about Segregation

Because there are no R/ECAPs within Clermont County, and the regional segregation issues have been addressed above, no additional information has been included here.

5. Determinants of Segregation/R/ECAPs

Land Use and Zoning: Moderately Significant

After analyzing the Zoning Ordinances of the municipalities within Clermont County, the following potential issues were identified. While these zoning restrictions may be grounded in the protection of health, safety, and welfare, they should be evaluated for their impact of the provision of quality, affordable housing for all people.

- A number of communities, including the City of Milford, the Village of Amelia, the Village of Bethel, the Village of Williamsburg, Batavia Township, Miami Township, and Stonelick

Township, have maximum building heights in their districts that permit multi-family housing that restrict buildings to three stories or less. Affordable housing in small buildings is hard to make financially feasible, so these restrictions may restrict the development of quality, affordable housing.

- Batavia Township restricts multiple-family developments to six units per acre, a low density that increases costs and makes the development of affordable housing difficult.
- Franklin Township has no zoning district that permits multiple-family housing, although it does permit manufactured housing parks.

Occupancy Restrictions: Not Significant

The only occupancy restriction of note in Clermont County is senior housing. This occupancy restriction does not create R/ECAPs or other segregated areas.

Residential Real Estate Steering: Moderately Significant

The Focus Groups reported that real estate steering is not a significant issue in Clermont County. However, the regional Fair Housing organization, Housing Opportunities Made Equal (HOME), reported that, while steering is not widespread, it does happen frequently enough to discourage minorities from moving to Clermont County. Specifically, HOME has found that:

- African-Americans have been discouraged from moving to certain areas because of landlord assumptions that they won't be able to afford the rent (regardless of the household's actual income).
- Real estate agents have discouraged African-Americans from putting offers on homes in certain neighborhoods.
- Hispanics have been confronted with disproportionate requirements to prove their immigration status, even when they are US citizens.

Community Opposition: Highly Significant

Focus groups reported that in several municipalities, there is community opposition to all multiple-family development, whether or not there is an affordable component. Opposition generally centers on the perception of crime. Focus group participants stated that race is not usually an explicit component of community opposition, and that opposition occurs even when the residents of the proposed housing are likely to be predominantly white.

HOME reported that there is more passive community opposition in some single-family neighborhoods to new minority homeowners, generally in the form of rudeness or "cold shoulders" rather than organized opposition in a public forum.

Economic Pressures: Moderately Significant

Rents are rising in the County's economically successful city and village centers, such as Amelia, Milford, and Batavia, where amenities are walkable and in close proximity. This is making it more difficult to find affordable housing in those communities. Low-income households are more easily finding housing in more suburban-style complexes, rural areas, and villages and cities with fewer jobs and amenities, such as Felicity or Chilo.

Major Private Investments: Moderately Significant

Most private investment in the County has been development of new housing and shopping in the County's richest communities, such as Milford, Union Township, and Amelia. These investments,

combined with a lack of investment in poorer communities like Felicity and Chilo, is widening the gap between the rich and poor areas in the County. Within certain communities, especially New Richmond, private investment has mainly taken place in wealthier neighborhoods, leaving retail, jobs, and amenities difficult to reach for poorer households, especially given the hilly topography of the community, which can make walking to certain locations very difficult.

Municipal and State Services and Amenities: Moderately Significant
Because of a lack of tax base, many communities in the southern and eastern parts of the County are unable to provide the same quality of services as communities in the western portion of the County. Housing in the south and east is more affordable, leading to higher concentrations of poverty, which is exacerbated by poor municipal services.

State and County services are generally evenly distributed throughout the County.

Foreclosure Patterns: Moderately Significant
Clermont County is still feeling the effect of the Great Recession, in the form of lingering foreclosure issues. Foreclosures hit the County's poorer communities harder than the richer communities, leading to a widening of the gap in quality of life between the western and eastern/southern portions of the county.

Other - Flood Plains: Highly Significant
The County's riverfront communities, such as New Richmond, Moscow, and Chilo, are experiencing a major problem with housing in the Ohio River Flood Plain. Much of the housing in this area has been bought by speculators hoping to be bought out by Federal programs aimed at removing housing from flood plains. While waiting for buy-outs, speculators act as slumlords, renting very low-quality housing to low-income residents. Some residences have undergone shoddy and unsafe "improvements" designed to comply with flood plain regulations. Examples include stacks of cinder blocks elevating manufactured homes and makeshift wood frames acting as "stilts." These unsafe conditions disproportionately impact households in poverty.

6.   Publicly Supported Housing Patterns

Publicly Supported Housing Demographics
The tables below show the demographic breakdown within public and subsidized housing facilities in Clermont County.

Table 10: Total Units of Publicly Supported Housing, Clermont County

Housing Units	Number	Percent (%)
Total Housing Units	80,656	100.00%
Public Housing	195	0.24%
Project-Based Section 8	1010	1.25%
Other HUD Multi-Family	362	0.45%
HCV Program	919	1.14%

Source: HUD AFFH version AFFH0004a released February 2018

Housing Type	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	179	7.98%	9	6.25%	5	2.59%	0	0.00%
Project-Based Section 8	930	41.48%	46	31.94%	13	1.31%	3	75.00%
Other HUD Multi-Family	349	15.57%	3	2.08%	0	0.00%	1	25.00%
HCV Program	784	34.97%	86	59.72%	9	1.02%	0	0.00%
Clermont County total Public Housing	2,242	100.00%	144	100.00%	27	1.47%	4	100.00%
Households earning 0-30% AMI	6,730	9.50%	164	18.17%	190	26.68%	14	2.80%

Source: HUD AFFH version AFFH0004a released February 2018

Hispanic households have the highest prevalence of households earning less than 30% AMI. Black households have the second highest prevalence of households earning less than 30% AMI. The AMI for Metropolitan Cincinnati is $64,183, 30% of which is $19,254.90. The Census reports that at least 8.4% of households in Clermont County (6,483 households) had incomes less than $14,999 in 2010, and another 8.3% had incomes less than $24,999 (6,406 households). Based on the average household size for the County (2.61 people), there are approximately 33,640 people (16.55%) of the population living in a household that makes below approximately 30% of AMI in Clermont County. With nearly 7,100 households in need of housing assistance, the County's barely 200 public housing units, and just under 900 housing vouchers are insufficient - serving only 5.6% of this population.

Likelihood of Racial/Ethnic Groups to Live in One Category of Publicly Supported Housing
Public Housing: Of the total population of Clermont County, 0.01% of Whites, 0.4% of Blacks, 0.2% of Hispanics, and 0.0% of Asians live in public housing. Therefore, Blacks are slightly more likely than other racial/ethnic groups to live in Public Housing.

Housing Choice Vouchers: Of the total population of Clermont County, 0.4% of Whites, 3.8% of Blacks, 0.3% of Hispanics, and 0.0% of Asians participate in the Housing Choice Vouchers program. Therefore, Blacks are much more likely than other racial/ethnic groups to participate in the Voucher program.

Project Based Section 8: Of the total population of Clermont County, 0.5% of Whites, 2.1% of Blacks, 0.4% of Hispanics, and 0.2% of Asians participate in the Housing Choice Vouchers program. Therefore, blacks are much more likely than other racial/ethnic groups to participate in the Project-Based Section 8 Program

Other HUD Multifamily: Of the total population of Clermont County, 0.2% of Whites, 0.13% of Blacks, 0% of Hispanics, and 0.05% of Asians participate in the Housing Choice Vouchers program. Therefore, whites are much more likely than other racial/ethnic groups to participate in the HUD Multifamily Housing program.

Demographics of Publicly Supported Housing Compared to Overall County

The representation of racial/ethnic groups in public housing is roughly proportional to their proportions in Clermont County as a whole. There do not appear to be any racial/ethnic minority groups that are over-represented in the Housing Choice Voucher Program. However, it does appear that Hispanics may be underrepresented in the HCV program. Hispanics are 3 times more likely than White households to have household incomes less than 30% AMI. Further, just 14.2% of Hispanic households in need – defined as those earning 0%-30% AMI – receive public housing support, compared to 33% of White households and 87.8% of Black households. This analysis will seek to determine the cause of this underrepresentation.

Patterns of Occupancy in Publicly Supported Housing

The race/ethnicity, national origin, family status, and religion of residents of publicly supported housing generally reflect the overall population of Clermont County. However, improvements can be made with regard to increasing housing opportunities for Hispanic residents.

7. Publicly Supported Housing Location and Occupancy

Map 5: Public Housing, Project-Based Section 8, Other Multi-Family, and LIHTC Locations Mapped with Race/Ethnicity Density, Clermont County
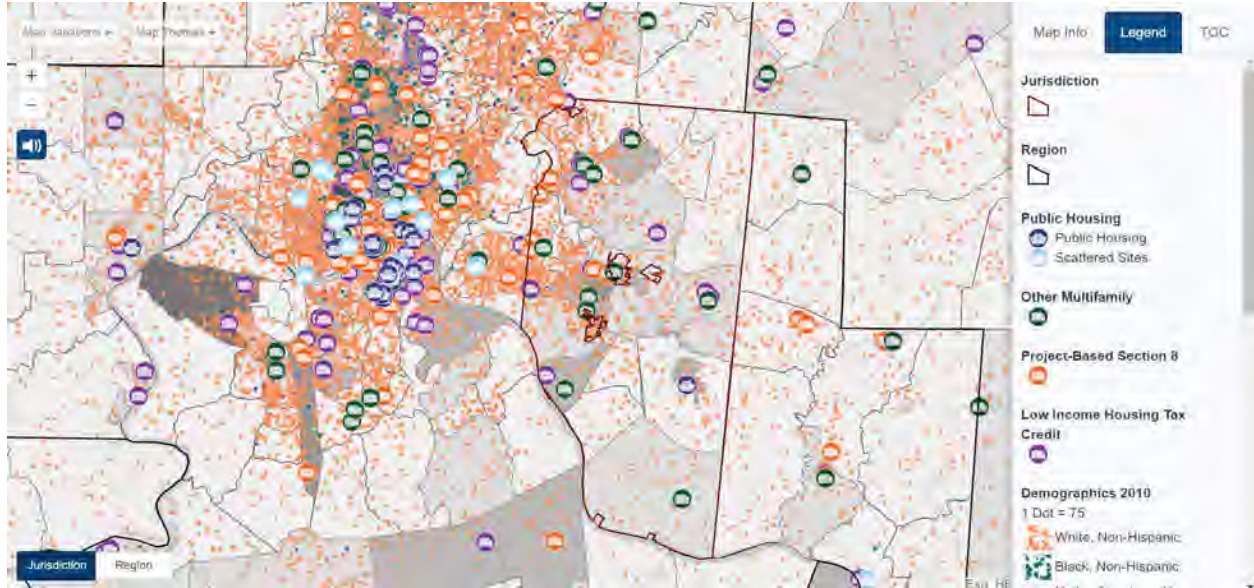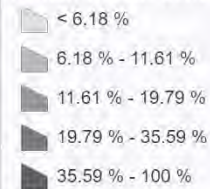
8. Patterns of Siting Publicly Assisted Housing

In addition to the data presented in the preceding Map, following table shows the publicly-supported housing facilities in the 27 communities in Clermont County:

Municipality	Public Housing	Project-Based Section 8	LIHTC
City of Loveland			
City of Milford		Sem Villa Tabaleen Cove Oakwood	
Village of Amelia		Amanda Acres Chaucer Square Amelia Crossing	1 Development
Village of Batavia		Batavia Village	
Village of Bethel	Bethel Woods (Senior)		
Village of Chilo			
Village of Felicity			
Village of Moscow			
Village of Neville			
Village of New Richmond		Steamboat Trails River Bluffs	1 Development
Village of Newtonsville			
Village of Owensville		Owensville Commons Clermont Villa Owensville Manor	3 Developments
Village of Williamsburg	Williamsburg Woods	Harmony Senior Village	4 Developments
Batavia Township		Bella Vista College Hill Thomaston Meadows	2 Developments
Franklin Township		Garrison Place	
Goshen Township		O'Bannon Terrace	
Jackson Township			1 Development
Miami Township		Ahepa (Senior)	
Monroe Township	Monroe Woods		
Ohio Township			
Pierce Township			
Stonelick Township			
Tate Township			
Union Township		Beechwood Villa Union Township Summerside Woods	1 Development
Washington Township			
Wayne Township			
Williamsburg Township		Lytle Trace Dimmit Woods	

In general, publicly-supported housing is spread throughout the County, and is not confined to areas with high poverty rates or concentrations of minorities. However, there is a lack of publicly-supported housing in the County's poorest communities, such as the Village of Felicity, the Village of Chilo, the Village of Moscow, and Washington Township, all located in south end of the County.

Table 12: Publicly Supported Units and R/ECAPS, Clermont County

	Total Units	% Elderly	% with Disability	% White	% Black	% Hispanic	% Asian or Pacific Islander
Public Housing							
R/ECAP Tracts	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Non-R/ECAP Tracts	217	*	*	97.2%	2.8%	1.4%	0.0%
Project-Based Section 8							
R/ECAP Tracts	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Non-R/ECAP Tracts	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other HUD Multi-Family							
R/ECAP Tracts	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Non-R/ECAP Tracts	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
HCV Program							
R/ECAP Tracts	0	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Non-R/ECAP Tracts	891	*	*	93.1%	6.3%	0.9%	0.6%

Source: HUD AFFH version AFFH0004a released February 2018
*Indicates data that is not available

9.   Disproportionate Concentration in R/ECAP Tracts

There are no R/ECAP Tracts in Clermont County.

Table 13: Development Census Tract Level Demographics by Public Housing, Project-based Section 8, Other Multi-Family, LIHTC and Other Federal Housing, Clermont County

	Development Race/Ethnicity (%)	Census Tract Race/Ethnicity (%)	% Households with Children	% Poverty in Census Tract
Public Housing				
Bethel Woods (Tract 418)			**416**	**9%**
White	98.8%	99%		
Black	0.0%	1.4%		
Hispanic	0.0%	0.9%		
Asian	0.0%	0.0%		
Monroe Woods (Tract 417)			**462**	**19.9%**
White	95.3%	99.2%		
Black	4.2%	0.8%		
Hispanic	0.0%	1.0%		
Asian	0.0%	0%		
Williamsburg Woods (Tract 409)			**583**	**11.8%**

White	98.6%	97.3%		
Black	1.4%	1.8%		
Hispanic	0.0%	0.1%		
Asian	0.0%	0.6%		
Project-Based Section 8				
Ahepa (Tract 404)			**563**	**17.8%**
White	*	97.5%		
Black	*	0.7%		
Hispanic	*	1.8%		
Asian	*	1.1%		
Amanda Acres (Tract 411.03)			**929**	**7.4%**
White	*	98.1%		
Black	*	2.9%		
Hispanic	*	0.8%		
Asian	*	0.3%		
Chaucer Square (Tract 411.03)			**929**	**7.4%**
White	*	98.1%		
Black	*	2.9%		
Hispanic	*	0.8%		
Asian	*	0.3%		
Lytle Trace (Tract 409)			**583**	**11.8%**
White	*	97.3%		
Black	*	1.8%		
Hispanic	*	0.1%		
Asian	*	0.6%		
O'Bannon Terrace (Tract 402.3)			**844**	**1.3%**
White	*	98.8%		
Black	*	5.3%		
Hispanic	*	1.9%		
Asian	*	0.8%		
Owensville Commons (Tract 408)			**516**	**7.9%**
White	*	98.1%		
Black	*	3.0%		
Hispanic	*	0.2%		
Asian	*	0.0%		
Sem Villa (Tract 405)			**500**	**8.3%**
White	*	96.3%		
Black	*	2.9%		
Hispanic	*	5.0%		
Asian	*	1.3%		
Steamboat Trails (Tract 416)			**541**	**13%**
White	*	99%		
Black	*	0.9%		
Hispanic	*	3.4%		
Asian	*	0.4%		
Tabaleen Cove (Tract 405)			**500**	**8.3%**

White	*	96.3%		
Black	*	2.9%		
Hispanic	*	5.0%		
Asian	*	1.3%		
Batavia Village (Tract 411.02)			**631**	**23.9%**
White	*	93.9%		
Black	*	3.7%		
Hispanic	*	1.5%		
Asian	*	1.6%		
Beechwood Villa (Tract 414.03)			**563**	**17.8%**
White	*	98.9%		
Black	*	1.1%		
Hispanic	*	0.6%		
Asian	*	0.2%		
Bella Vista (Tract 411.02)			**631**	**23.9%**
White	*	93.9%		
Black	*	3.7%		
Hispanic	*	1.5%		
Asian	*	1.6%		
Clermont Villa (Tract 405)			**500**	**8.3%**
White	*	96.3%		
Black	*	2.9%		
Hispanic	*	5.0%		
Asian	*	1.3%		
College Hill (Tract 411.02)			**631**	**23.9%**
White	*	93.9%		
Black	*	3.7%		
Hispanic	*	1.5%		
Asian	*	1.6%		
Green Tree Village (Tract 414.03)			**563**	**17.8%**
White	*	98.9%		
Black	*	1.1%		
Hispanic	*	0.6%		
Asian	*	0.2%		
Oakwood (Tract 404.01)			**384**	**1.8%**
White	*	97.5%		
Black	*	0.7%		
Hispanic	*	1.8%		
Asian	*	1.1%		
Owensville Manor (Tract 406)			**905**	**3.5%**
White	*	98.1%		
Black	*	3.0%		
Hispanic	*	0.2%		
Asian	*	0.0%		
Amelia Crossing (Tract 411.03)			**929**	**7.4%**
White	*	98.1%		

Black	*	2.9%		
Hispanic	*	0.8%		
Asian	*	0.3%		
Harmony Senior Village (Tract 409)			**583**	**11.8%**
White	*	97.3%		
Black	*	1.8%		
Hispanic	*	0.1%		
Asian	*	0.6%		
River Bluffs (Tract 416)			**541**	**13%**
White	*	99%		
Black	*	0.9%		
Hispanic	*	3.4%		
Asian	*	0.4%		
Garrison Place (Tract 420)			**600**	**12.1%**
White	*	99.7%		
Black	*	0.9%		
Hispanic	*	1.5%		
Asian	*	0.0%		
Thomaston Meadows (Tract 411.03)			**929**	**7.4%**
White	*	98.1%		
Black	*	2.9%		
Hispanic	*	0.8%		
Asian	*	0.3%		
Summerside Woods (Tract 414.03)			**563**	**17.8%**
White	*	98.9%		
Black	*	1.1%		
Hispanic	*	0.6%		
Asian	*	0.2%		
Dimmit Woods (Tract 409)			**583**	**11.8%**
White	*	97.3%		
Black	*	1.8%		
Hispanic	*	0.1%		
Asian	*	0.6%		
Other HUD Multi-Family				
There are no Other HUD Multi-Family Developments in Clermont County, according to HUD records.				
LIHTC				
Project-by-project information for LIHTC Developments is not available. Information for the Census Tracts that contain LIHTC projects is below.				
401.01	**1 Development**		**283**	**6.1%**
White	*	60.2%		
Black	*	12.3%		
Hispanic	*	18.3%		
Asian	*	5.6%		
405	**1 Development**		**500**	**8.3%**
White	*	96.3%		
Black	*	2.9%		

Hispanic	*	5%		
Asian	*	1.3%		
406	**2 Developments**		**905**	**3.5%**
White	*	98.1%		
Black	*	3.0%		
Hispanic	*	0.2%		
Asian	*	0.0%		
408	**2 Developments**		**516**	**7.9%**
White	*	98.1%		
Black	*	3.0%		
Hispanic	*	0.2%		
Asian	*	0.0%		
409	**4 Developments**		**583**	**11.8%**
White	*	97.3%		
Black	*	1.8%		
Hispanic	*	.1%		
Asian	*	.6%		
411.02	**2 Developments**		**631**	**23.9%**
White	*	93.9%		
Black	*	3.7%		
Hispanic	*	1.5%		
Asian	*	1.6%		
411.03	**1 Development**		**929**	**7.4%**
White	*	98.1%		
Black	*	2.9%		
Hispanic	*	0.8%		
Asian	*	0.3%		
414.03	**1 Development**		**563**	**17.8%**
White	*	98.9%		
Black	*	1.1%		
Hispanic	*	.6%		
Asian	*	.2%		
414.04	**1 Development**		**413**	**8.1%**
White	*	96.6%		
Black	*	0.8%		
Hispanic	*	4.9%		
Asian	*	4.5%		
416	**1 Development**		**541**	**13%**
White	*	99%		
Black	*	0.9%		
Hispanic	*	3.4%		
Asian	*	0.4%		

Source: HUD, US Census 2010, Clermont Metropolitan Housing Authority
*Indicates Data that is Not Available

Public Housing Residents Compared to Neighborhood Demographics

The racial/ethnic mix of residents in public housing is generally similar to the racial mix of the surrounding neighborhoods, in that residents are predominantly White across the board. No public housing developments are located in segregated areas, because there are no concentrations of minorities in the County.

However, with regard to specific developments and specific racial/ethnic groups, there is one notable inconsistency between a neighborhood and a development:

- Just over 4% of the residents of Monroe Woods are Black, compared to 0.4% of the surrounding area in Monroe Township.

In general, project siting decisions have not caused public housing developments to locate in segregated areas and have not caused disproportionate clusters of minorities within communities.

### Project-Based Section 8 and Other HUD Residents Compared to Neighborhood Demographics

Data are not available on a development-by-development basis for Project-Based Section 8. Analyzing data by Census Tract, none of the Project-Based Section 8 developments are located in segregated areas.

There are no Other HUD Multi-Family Developments in the County, according to the information provided by HUD.

LIHTC Residents Compared to Neighborhood Demographics

Data are not available on a development-by-development basis for LIHTC. Analyzing data by Census Tract, none of the Project-Based Section 8 developments are located in segregated areas. There are clusters of LIHTC developments in Williamsburg and Owensville, both of which have similar racial/ethnic proportions to the rest of the County.
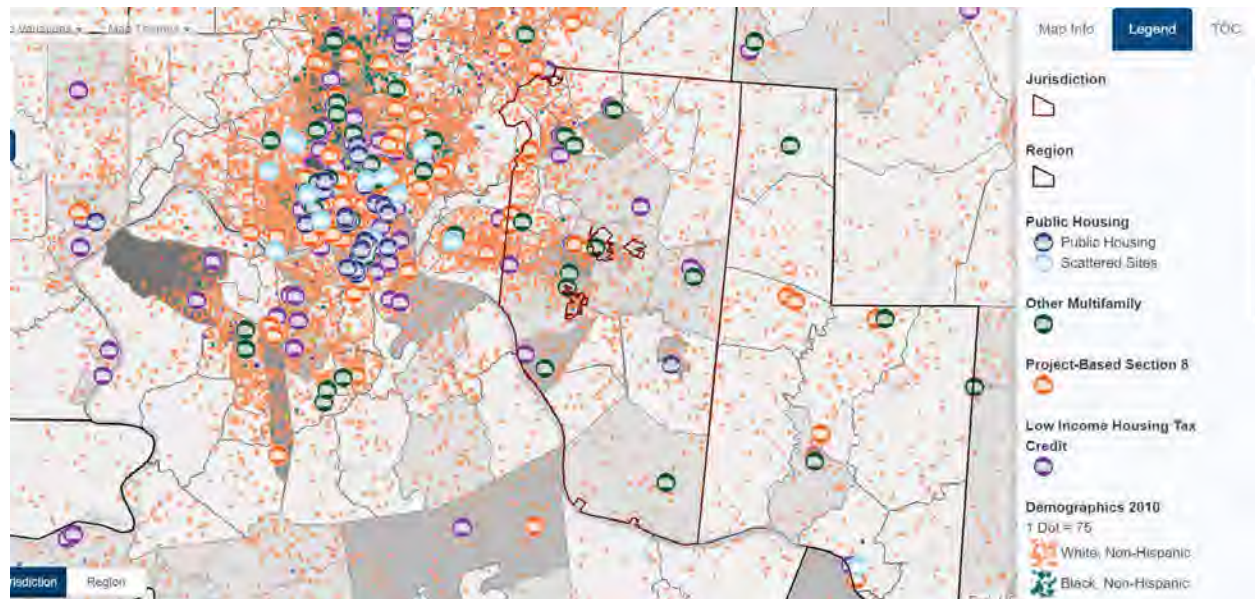
Patterns of HCV Usage

Based on the data available for Map 6, HCV participants commonly choose to live in Union Township, Milford, Batavia Township, the Village of Amelia, the Village of Batavia, and the Village of Bethel. The predominant racial/ethnic group in these areas is White, and there are no concentrations of foreign-born individuals in these areas.

Proportion of HCVs Used in R/ECAP Tracts.

Zero HCVs are used in R/ECAP Tracts in Clermont County, because there are no R/ECAP Tracts in Clermont County.

Use of Vouchers in LIHTC Developments

HCV participants have faced no barriers to using the vouchers in LIHTC Developments.

10. Publicly Supported Housing and Mobility Policies

Publicly Supported Housing Policies

Residency Preferences and Impact on Housing Choice
The only residency preference in the publicly-supported housing developments in Clermont County is senior housing.

Of the three public housing developments, only Bethel Woods is restricted to seniors. However, this means that the only options for public housing in Clermont County for families are Monroe Woods in Monroe Township and Williamsburg Woods in Williamsburg.

For Project-Based Section 8 developments, some of the County's developments are restricted to seniors. However, with 24 Project-Based Section 8 developments located throughout the County, there are plenty of options for families.

It is not clear how many, if any, LIHTC developments are restricted to seniors. However, there are 16 LIHTC developments located around the County, leaving plenty of options for non-seniors.

There are no Other HUD Multi-Family Developments in the County.

Public Support or Opposition to Siting Publicly-Supported Housing
The Focus Groups reported that there is substantial public opposition to all multiple-family housing in many parts of the County. This opposition creates a hurdle to located publicly-supported housing. However, the Clermont Metropolitan Housing Authority, HUD, and private developers have all been successful at locating developments throughout the County, despite public opposition.

State Policies Impacting Siting of LIHTC
The 2014 Ohio Qualified Allocation Plan (QAP) has several priorities that may make siting LIHTC projects in certain parts of Clermont County difficult:

- The QAP gives priority to projects located within walking distance of amenities and/or within mixed-use developments. While these are important goals, the rural parts of the Township do not have walkable amenities, and the poorer villages, such as Chilo and Felicity, have few amenities even though they have walkable neighborhoods. Additionally, zoning approvals for mixed-use development may be difficult under the Zoning Ordinances of some of the municipalities in the County.

- The QAP gives priority to renovated older buildings, rather than new construction. Again, this is an important goal, but it makes development in the rural portions of the County difficult.

- The QAP gives priority to projects that are near major employers. Clermont's major employers are all in the western and central parts of the County, again making development in the rural eastern and southern portions of the County difficult.

Mobility Policies

HCV Policies Impacting Neighborhood Choice
The Clermont Metropolitan Housing Authority works to ensure that HCV program participants can live in any neighborhood they choose. CMHA works closely with landlords and has successfully

placed HCV participants all over the County, including in the most popular communities and neighborhoods.

Awareness Programs for HCV Holders

CMHA keeps an updated list of properties that welcome HCV participants across the County. This list is used to match HCV participants with housing options in their neighborhood of choice.

Barriers to HCV Use

Barriers to using HCV in a given neighborhood are not substantial. CMHA has had experiences with landlords that were unwilling to take vouchers, but these experiences are not widespread and there are plenty of housing options throughout the County for HCV participants.

B.   Determinants of Segregation/R/ECAPs related to Publicly Supported Housing Location and Occupancy

1.   Land Use and Zoning: Moderately Significant

After analyzing the Zoning Ordinances of the municipalities within Clermont County, the following potential issues were identified. While these zoning restrictions may be grounded in the protection of health, safety, and welfare, they should be evaluated for their impact on the development of publicly-supported housing.

- A number of communities, including the City of Milford, the Village of Amelia, the Village of Bethel, the Village of Williamsburg, Batavia Township, Miami Township, and Stonelick Township, have maximum building heights in their districts that permit multi-family housing that restrict buildings to three stories or less. Affordable housing in small buildings is hard to make financially feasible, so these restrictions may restrict the development of quality, affordable housing.
- Batavia Township restricts multiple-family developments to six units per acre, a low density that increases costs and makes the development of affordable housing difficult.
- Franklin Township has no zoning district that permits multiple-family housing, although it does permit manufactured housing parks.
- Union Township has a prohibition on zoning any new land for multiple-family development, although Mixed-Use Planned Unit Developments are permitted to include multiple-family.

2.   Siting Decisions for Public Housing: Not Significant

There are three Public Housing developments in Clermont County. None are located within segregated areas, R/ECAPs, or concentrations of poverty.

3.   Siting Decisions for LIHTC Housing: Not Significant

There are LIHTC developments scattered throughout in Clermont County. The places where there are clusters of LIHTC developments, such as Owensville and Williamsburg, are not segregated areas and are not concentrations of poverty.

While there are some concerns with regard to the priorities in the QAP, as discussed above, they have not had a noticeable negative impact on the siting of LIHTC developments.

4. **Siting Decisions for Other Publicly Supported Housing: Not Significant**
There are Project-Based Section 8 developments scattered throughout in Clermont County. Some are located in areas of concentrated poverty, such as Felicity, but there are options throughout the County, allowing plenty of choice in neighborhoods for those needing affordable housing.

5. **Admission or Residency Preferences for Public Housing: Not Significant**
While some publicly supported housing developments in the County are reserved for seniors, there are plenty of other options located all over the County.

6. **Community Resistance to Public Housing: Highly Significant**
Focus groups reported that in several municipalities, there is community opposition to all multiple-family development, whether or not it is publicly supported. Opposition generally centers on the perception of crime. Focus group participants stated that race is not usually an explicit component of community opposition, and that opposition occurs even when the residents of the proposed housing are likely to be predominantly White. Despite this opposition, the Clermont Metropolitan Housing Authority, HUD, and private developers have succeeded in located publicly supported housing throughout the County.

7. **Regional Collaboration or Lack of Regional Collaboration: Moderately Significant**
Within Clermont County, a lack of collaboration has not been a barrier to locating publicly supported housing. However, County housing authorities such as the Clermont Metropolitan Housing Authority are tasked solely with providing housing within their own County, which could lead to a lack of regional planning and collaboration on housing issues.

8. **Other: None**

C. Determinants of Segregation/R/ECAPs related to Mobility

1. **Lack of Housing Choice Voucher Program: Not Significant**
Clermont County has a robust HCV program.

2. **Admission or Residency Preferences for Housing Choice Vouchers: Not Significant**
The HCV program is open to anyone who meets the income qualifications.

3. **Quality of Mobility Counseling Programs: Not Significant**
The Clermont Metropolitan Housing Authority consistently helps HCV participants find housing in their neighborhood of choice.

4. **Lack of Support for Voucher Mobility: Not Significant**
Support for the HCV program is strong.

5. **Lack of Landlord Participation: Not Significant**
The CMHA has a robust roster of landlords throughout the County that accept vouchers.

6. **Landlord Refusal to Accept Other Sources of Income, such as Social Security, Disability, Retirement, and Other Tenant-Based Rental Assistance: Not Significant**

   Landlords refusing to accept certain forms of payment has not been a significant barrier to housing choice in Clermont County, according to both CMHA and HOME.

7. **Other: None**

D.   Disproportionate Housing Needs

1.   Demographic Patterns

Table 14: Households Experiencing One or More Housing Burdens by Race/Ethnicity and Family Size, Clermont County and Metropolitan Cincinnati

	Clermont County		Metropolitan Cincinnati	
One or More Housing Burdens	**Number**	**Percent (%)**	**Number**	**Percent (%)**
White	18,945	26.75%	189466	28.11%
Black	414	45.85%	48782	48.5%
Hispanic	248	34.83%	6498	43.68%
Asian or Pacific Islander	74	14.98%	3963	28.75%
Native American	20	9.39%	437	34.52%
Other	205	35.96%	3590	40.91%
Family Type				
Family Households, <5 people	10,390	22.53%	114,930	24.62%
Family Households, >5 people	2,155	31.37%	24,842	34.41%
Non-Family Households	7,370	35.56%	112,965	41.19%

Source: HUD AFFH version AFFH0004a released February 2018
*Indicates Data that is Not Available.
All percentages indicate the share of the total number of households in Clermont County.

Table 15: Severe Housing Burdens by Race/Ethnicity, Clermont County and Metropolitan Cincinnati

	Clermont County		Metropolitan Cincinnati	
Severe Housing Burdens	**Number**	**Percent (%)**	**Number**	**Percent (%)**
White	7,655	10.81%	86,081	12.77%
Black	213	23.59%	27,297	27.14%
Hispanic	124	4.86%	4,261	16.49%
Asian or Pacific Islander	24	17.42%	2,274	28.64%
Native American	20	9.39%	287	22.67%
Other	100	17.54%	1,903	21.69&

Source: HUD AFFH version AFFH0004a released February 2018
*Indicates Data that is Not Available.
All percentages indicate the share of the total number of households in Clermont County.

Groups More Likely to Experience Housing Burdens

African-Americans are the most likely racial/ethnic group to experience housing burdens, with 45.85% of the Black population in Clermont experiencing one or more. Other minorities and Hispanics are the second and third most likely, at 35.96% and 34.83% respectively. This report will seek to determine the causes of that over-representation.

Native Americans are the least likely to experience severe housing burdens, with just 9.39% of the Native American population experiencing one or more.

Groups More Likely to Experience Severe Housing Burdens

African-Americans are the most likely racial/ethnic group to experience severe housing burdens, with 23.59% of the Black population in Clermont experiencing one or more. Other minorities and Asian/Pacific Islanders are the second and third most likely, at 17.54% and 17.42% respectively. This report will seek to determine the causes of that over-representation.

Hispanics are the least likely to experience severe housing burdens, with just 4.86% of the Hispanic population experiencing one or more.

Housing Burdens and Foreign-Born Residents

No data is available on foreign-born residents and housing burdens. The high levels of housing burdens on Backs, Hispanics, and other minorities indicates that immigrants from Africa, Latin America, and other parts of the world may be disproportionately experiencing housing burdens.

Table 16: Number of Bedrooms for Units for Publicly Supported Housing, Clermont County

|	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units	
Housing Units	Number	Percent (%)	Number	Percent (%)	Number	Percent (%)
Public Housing	78	57.3%	31	22.8%	27	19.9%
Project-Based Section 8	308	34.9%	303	34.4%	270	30.6%
Other HUD Multi-Family	0	0.0%	0	0.0%	0	0.0%
HCV Program	2	6.2%	15	46.9%	15	46.9%

Source: HUD
*Indicates data that is not available.

Balance of Unit Types

In general, the publicly-supported housing available in Clermont County includes a balance of unit types. Project-Based Section 8 housing units are almost evenly distributed between one bedroom, two bedroom, and three-or-more bedroom units. Most voucher participants are living in units that are two or more bedrooms. The public housing developments as a group skew toward one-bedroom units, but that is because of the Bethel Woods senior development, which is almost entirely comprised of one-bedroom units.

E.   Geographic Patterns

Map 7A: Households Experiencing One or More Housing Burdens with Race/Ethnicity Density, Clermont County and Metropolitan Cincinnati
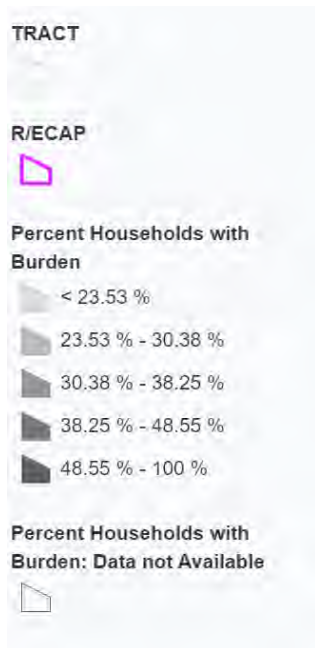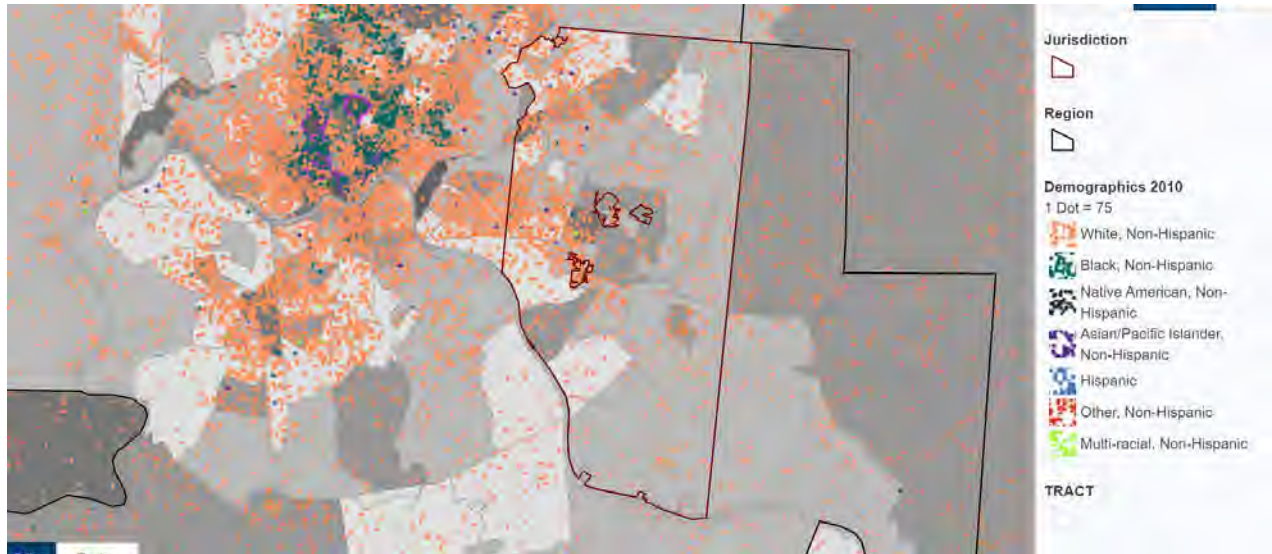
Map 7B: Households Experiencing One or More Housing Burdens with National Origin Density, Clermont County and Metropolitan Cincinnati
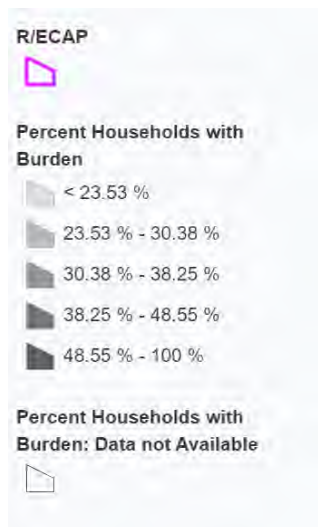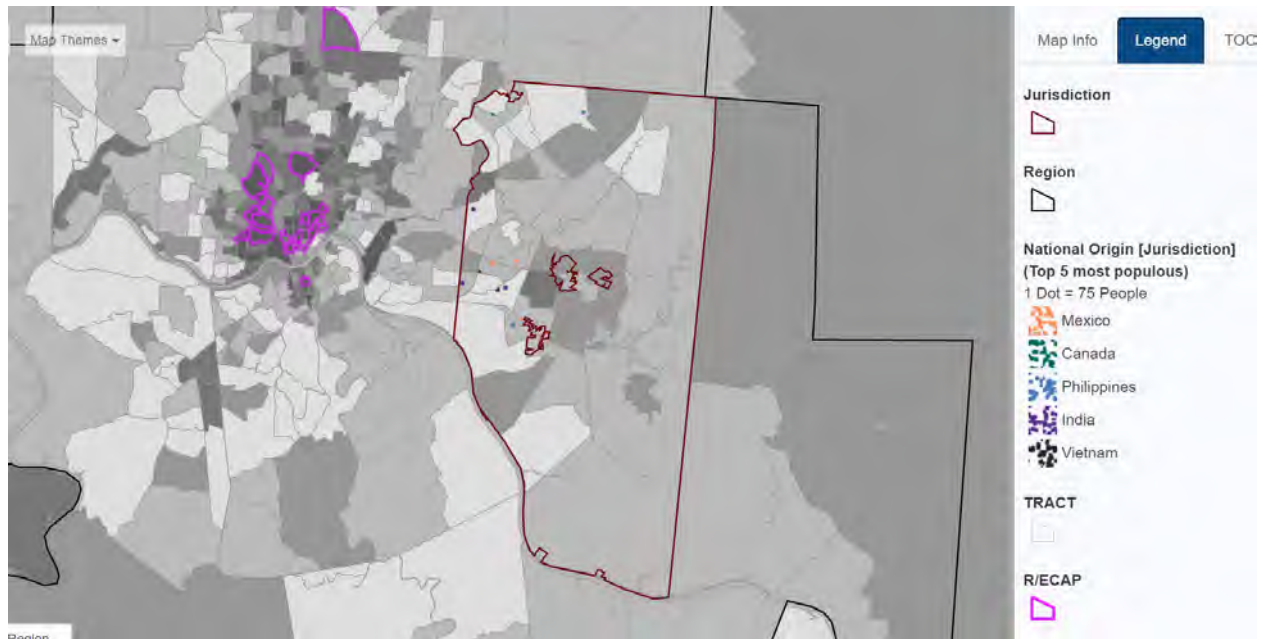
1. **Geographic Locations of Housing Needs**

   The areas in and around Batavia Township, Miami Township, Summerside, and Union Township all appear to have disproportionate numbers of households with housing burdens.

2. **Additional Information about Disproportionate Housing Needs**

   No additional information is available about disproportionate housing needs.

3. **Determinants of Disproportionate Housing Needs**

   Land Use and Zoning Laws: Not Significant

   The review of the various Zoning Ordinances in the County did not determine that any zoning laws are likely to produce housing burdens.

   Occupancy Restrictions: Not Significant

   There is no evidence that the restriction of some publicly-supported housing to senior residents has caused a substantial number of households to have housing burdens.

   Economic Pressures: Highly Significant

   Households with housing burdens in the County tend to be among Clermont's poorest families. They tend to live in manufactured housing or very old housing stock in poor communities like Felicity and Chilo, where jobs and amenities are scarce. Worsening the problem, very little publicly-supported housing has been developed in that part of the County.

   The Availability of Affordable Units with Two or More Bedrooms: Not Significant

   There is an abundance of affordable housing units with two or more bedrooms located throughout the County. In some cases, these units are affordable due to public support programs, and in other cases the market rate for housing is affordable to households with a wide range of incomes.

   The Availability of Publicly-Supported Units with Two or More Bedrooms: Not Significant

   There are nearly 650 publicly-supported housing units with two or more bedrooms in Clermont, and they are located in many different parts of the County, although as discussed above, there are very few units in the southern part of the County.

   Housing Stock Deterioration: Highly Significant

   Housing stock deterioration is a major concern in the County's poorest communities, especially those in the southern part of the County. It is also a concern in some wealthier areas that have aging housing stocks, such as the village cores of Batavia and Amelia. In many cases throughout the County, homeowners have been unable to keep up with repairs, and landlords have been unwilling or unable to modernize their properties.

   Foreclosure Patterns: Highly Significant

   Foreclosures have worsened the problem of housing stock deterioration, with bank-owned properties throughout the County falling into disrepair. Foreclosures during the Great Recession impacted all parts of the County, but the poorest communities, which already struggled with deteriorating housing stock, were hit the hardest.

   Private Investments: Moderately Significant

   Private investment in housing in the County has mainly been in the western section, near Interstate 275, especially in Milford and Union Townships. The lack of private investment in the eastern and

southern parts of the County has contributed to the deteriorating housing stock and housing burdens experienced by the residents of those communities.

Other - Flood Plain: Highly Significant

In the communities along the Ohio River, landlords have been speculating on property within the flood plain, hoping to be bought out by Federal programs. These landlords do not maintain the properties, even though many are occupied with tenants. This leads to low-income households living not only in the flood plain, but also in deteriorating housing that is associated with housing burdens.

F. Disparities in Access to Community Assets and Exposure to Adverse Community Factors

HUD has developed a two-stage process for analyzing disparities in access to community assets. The first stage involves quantifying the degree to which a neighborhood offers features commonly viewed as important community assets such as education, employment, and transportation, among others. This stage uses metrics that rank each neighborhood along a set of key dimensions. In the second stage, HUD combines these dimension rankings with data on where people in particular subgroups live to develop a measure of that group's general access or exposure to each asset dimension. These summary measures can then be compared across subgroups to characterize disparities in access to community assets. HUD considers community assets a multi-dimensional notion. To focus the analysis, HUD developed methods to quantify a select number of the important stressors and assets in every neighborhood. These dimensions were selected because existing research suggests they have a bearing on a range of individual outcomes. In particular, HUD has selected six dimensions upon which to focus:

1. **Poverty**

   HUD created a simple poverty index to capture the depth and intensity of poverty in a given neighborhood.

2. **Neighborhood School Proficiency**

   The neighborhood school proficiency index uses school-level data on the performance of students on state exams to describe which neighborhoods have high-performing elementary schools and which have lower-performing elementary schools.

3. **Labor Market Engagement**

   The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in that neighborhood.

4. **Transit Access**

   HUD has constructed a transit access index where available data exists to support local analysis. HUD uses data on over 200 transit agencies that provide data through the General Transit Feed Specification (GTFS) standard at GTFS Exchange (http://www.gtfs-data-exchange.com/) to assess relative accessibility within metro areas (or balance of state).

5. **Job Accessibility**

   The job access index summarizes the accessibility of a given residential neighborhood as a function of its distance to all job locations, with distance to larger employment centers weighted more heavily.

6. **Health Hazards Exposure**

   HUD has constructed a health hazards exposure index to summarize potential exposure to harmful toxins at a neighborhood level.

To identify disparities in access to community assets, HUD PD&R calculates exposure indices for each asset dimension across a range of subgroups, including protected classes as identified in the Fair Housing Act. The exposure index calculates a weighted average for a given characteristic.

Table 17: Indices by Race/Ethnicity and among Poor Households, Clermont County and Metropolitan Cincinnati

	Poverty Exposure Index	School Proficiency Index	Labor-Market Engagement Index	Transit Trips Index	Jobs Proximity Index	Environmental Health Hazard Exposure Index
Clermont County						
Total Population	*	*	*	*	*	*
White	61.74	71.98	55.35	35.71	44.81	53.43
Black	59.88	72.99	59.21	39.2	50.64	46.63
Hispanic	63.4	72.39	60.46	38.32	47.3	48.61
Asian or Pacific Islander	69.09	74.92	66.65	39.99	48.34	45.77
Native American	58.94	68.44	52.38	37.6	47.46	52.56
Other	*	*	*	*	*	*
Poor Population						
White	49.31	67.27	45.25	35.85	45.07	54.82
Black	58.24	66.36	50.06	36.64	47.8	56.21
Hispanic	41.51	55.29	55.86	42.2	50.02	38.03
Asian or Pacific Islander	65.85	55.25	67.15	45.26	48.9	43.1
Native American	35.98	53.76	55.66	40.13	60.7	37.02
Other	*	*	*	*	*	*
Metropolitan Cincinnati						
Total Population	*	*	*	*	*	*
White	61.46	60.67	59.64	42.47	*	*
Black	30.8	31.18	37.22	58.01	*	*
Hispanic	46.65	51.85	51.52	49.55	*	*
Asian or Pacific Islander	71.4	70.55	73.84	49.23	*	*
Native American	50.59	51.53	50.82	46.21	*	*
Other	*	*	*	*	*	*
Poor Population						
White	*	*	*	*	*	*
Black	*	*	*	*	*	*
Hispanic	*	*	*	*	*	*
Asian or Pacific Islander	*	*	*	*	*	*
Native American	*	*	*	*	*	*
Other	*	*	*	*	*	*

*Source: HUD AFFH version AFFH0004a released February 2018*

*The indices above have not yet been provided by HUD, and the information needed to calculate them is either unavailable or impractical to gather given time constraints. For the purposes of this report, other data has been collected to report to HUD in order to fulfill the requirements for a Fair Housing Assessment.

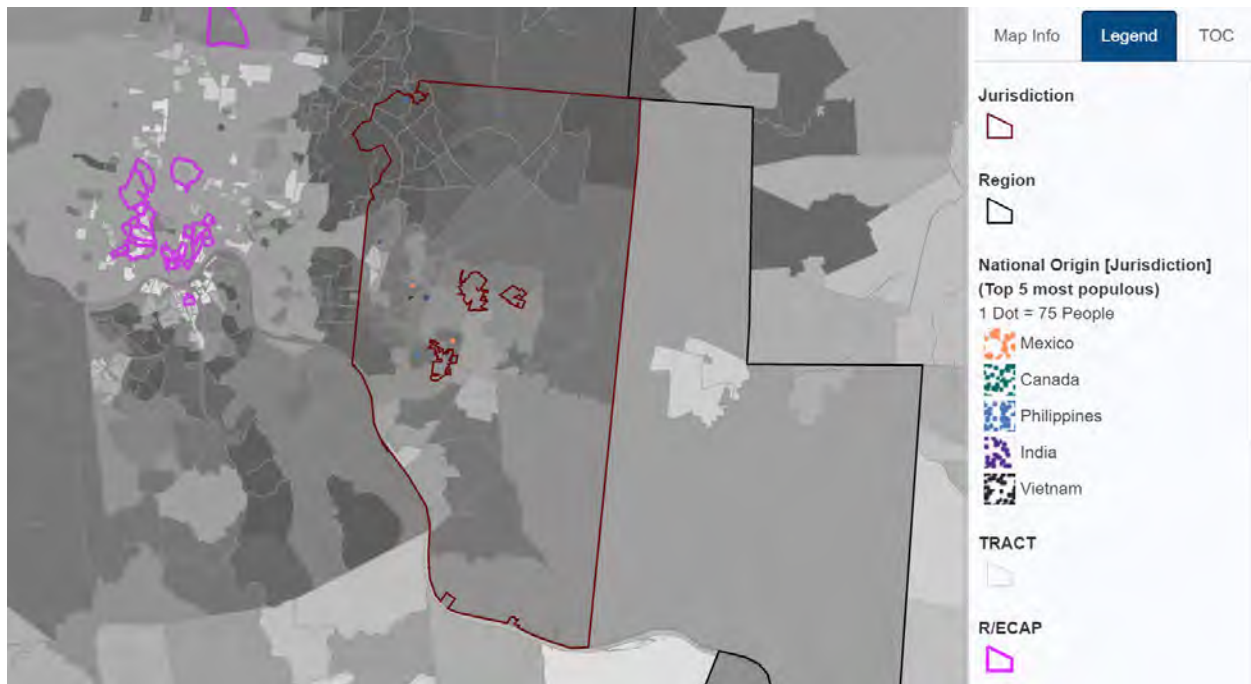## 7. Disparities in Access to Community Assets

Schools

The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower-performing elementary schools. A higher score indicates a higher-quality school system in a given neighborhood.
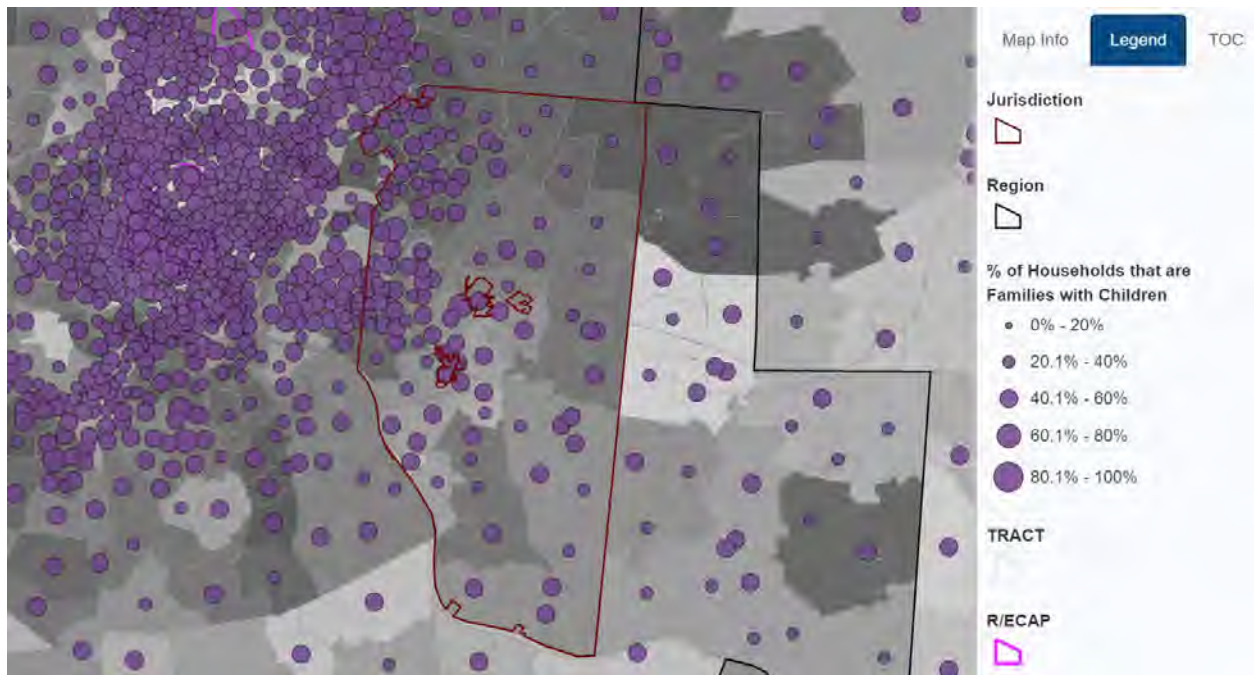
Map 8A: Race/Ethnicity –Schools Proficiency Index, Clermont County and Metropolitan Cincinnati
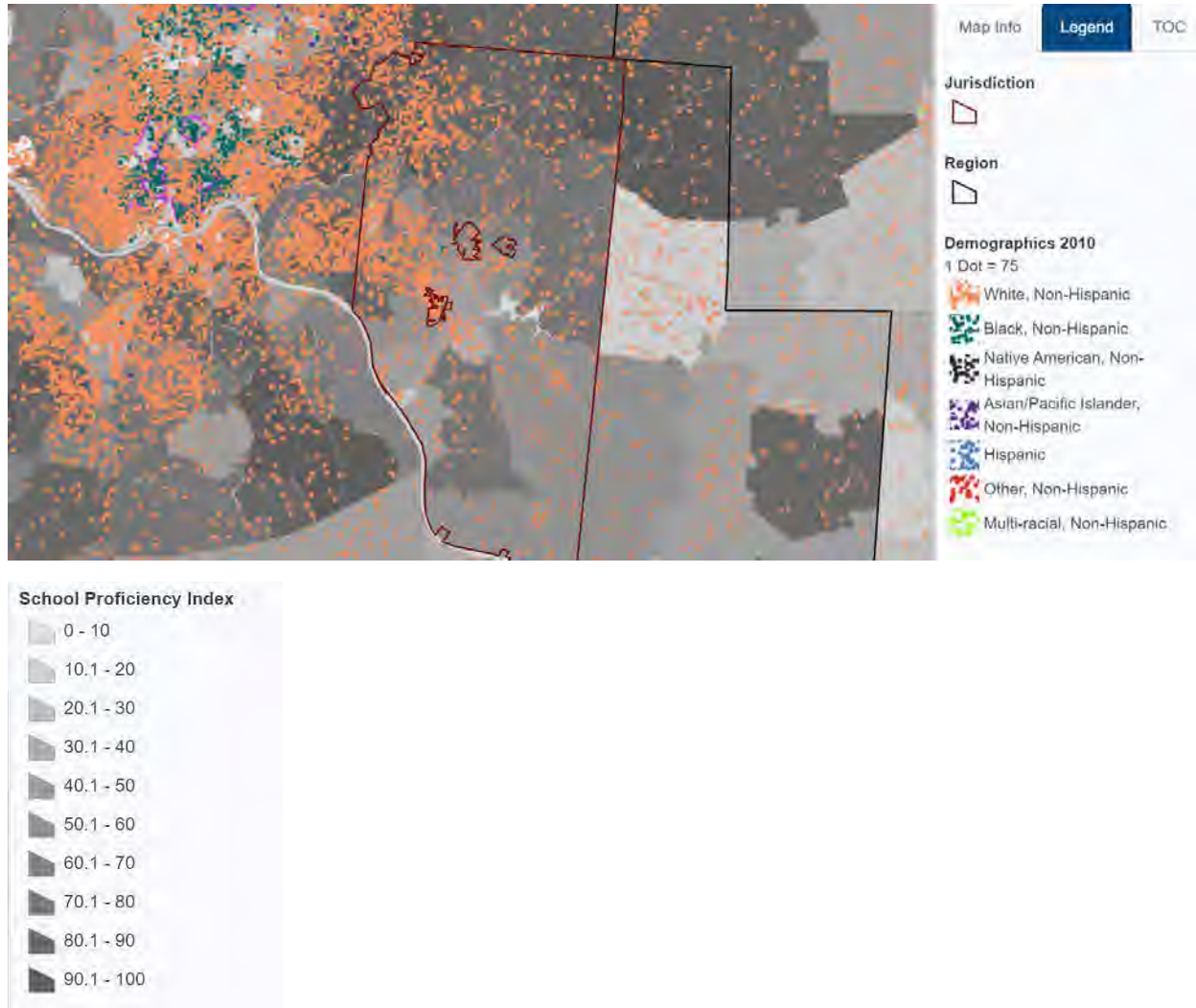
Map 8B: National Origin – Schools Proficiency Index, Clermont County and Metropolitan Cincinnati

School Proficiency Index
- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

There are no R/ECAP Census Tracts in Clermont County, so these areas do not appear on the maps generated for this report.

A map of the School Districts in Clermont County has been provided below to support the discussion of school proficiency and fair housing.

School Districts in Clermont County, Ohio
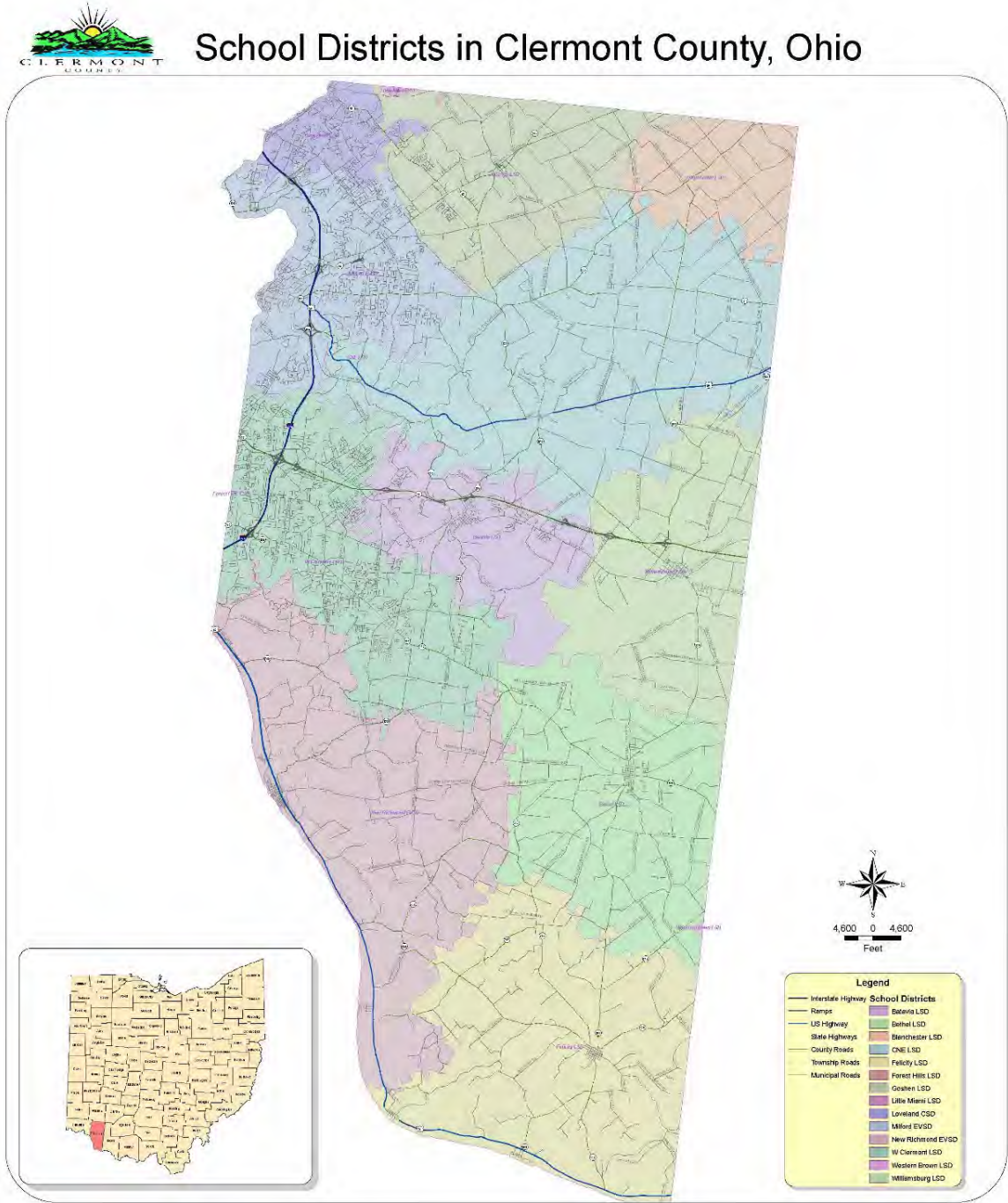
Educational Performance – Elementary Schools

The table below shows the "Performance Index" for Elementary Schools within each of the 14 school districts within Clermont County, as calculated by the Ohio Department of Education. Higher numbers indicate higher proficiency. The performance index does not differentiate between elementary schools and high schools, so this analysis will cover the school district as a whole.

School District	2015 Performance Index	2019 Performance Index
Batavia	98.185	89.87
Bethel	103.249	91.14
Blanchester	101.474	86.86
Clermont Northeast	98.112	80.55
Felicity	93.802	87.062
Forest Hills	106.888	100.81
Goshen	103.865	93.57
Little Miami	104.629	96.02
Loveland	105.912	101.11
Milford	106.054	96.93
New Richmond	102.606	87.80
West Clermont	98.515	87.36
Western Brown	96.345	84.61
Williamsburg	101.155	90.81

Source: Ohio Department of Education

The most proficient school district in the County is Loveland followed by Forest Hills, although most of that school district is in Hamilton County. Close behind is Milford, which is mostly within Clermont and Little Miami. The school district with the lowest Performance Index is Clermont Northeast, with Western Brown, Blanchester, West Clermont, and Felicity also registering lower scores.

In general, the best school districts in Clermont are in the western portion of the County, with less proficient school districts in the east and south. While the County's racial and ethnic integration (and lack of R/ECAP tracts) means that no particular racial or ethnic group is disproportionately located in a lower performing district, the lowest performing school districts are also the poorest parts of the County. This is a major disparity in access to an important community asset.

Educational Performance – Middle/High Schools

Because the available data does not differentiate between elementary schools and middle/high schools, no separate analysis of middle/high schools will be performed.

**Place of Residence and Access to Proficient Schools**

Families that live in the southern portion of the County, specifically within the Felicity School District, have very little access to proficient schools. There are no private schools in that portion of the County, and the public district is not as proficient as other schools in the area. This lack of proficient schools does not disproportionately impact any racial/ethnic group, any foreign-born

population, or children with Limited English Proficiency, but it does severely impact the communities in that part of the County.

Access to Jobs and Unemployment

The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.
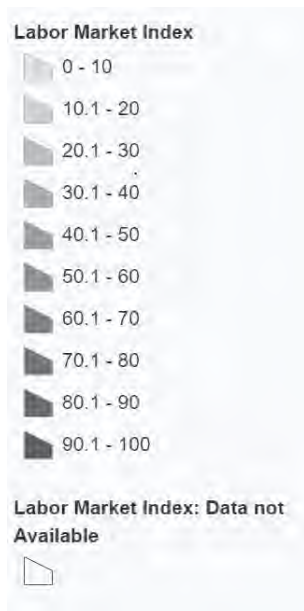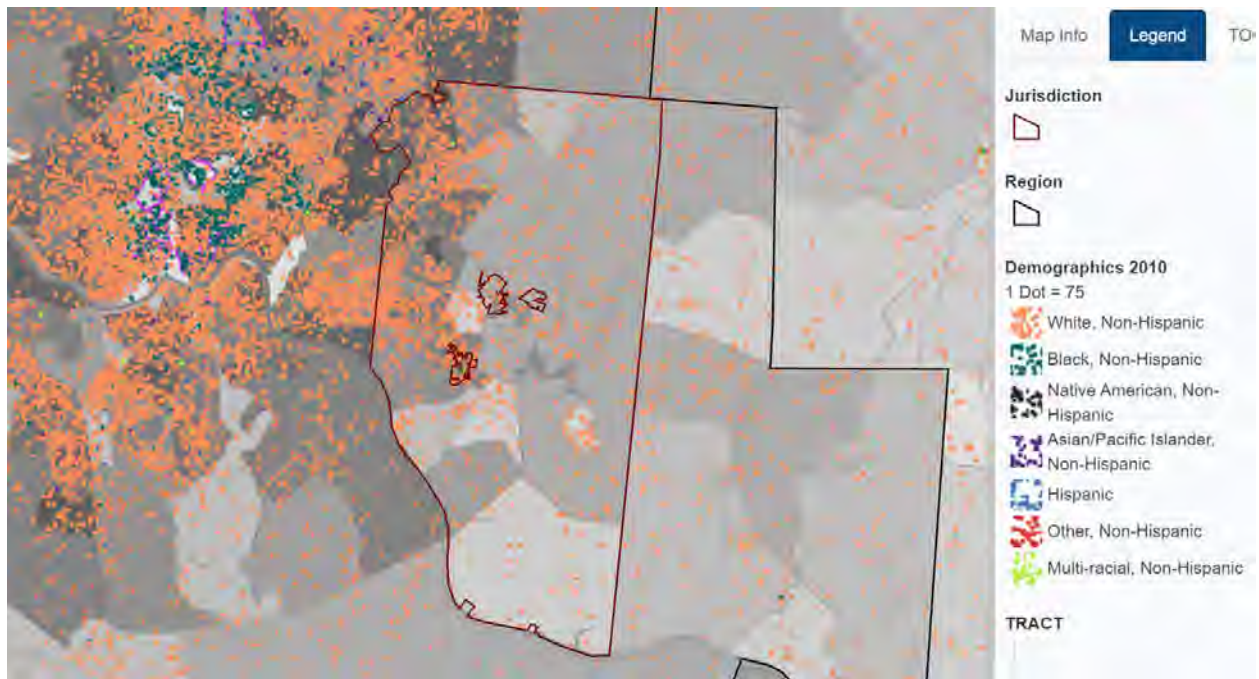
Map 9A: Race/Ethnicity – Jobs Proximity Index, Clermont County and Metropolitan Cincinnati
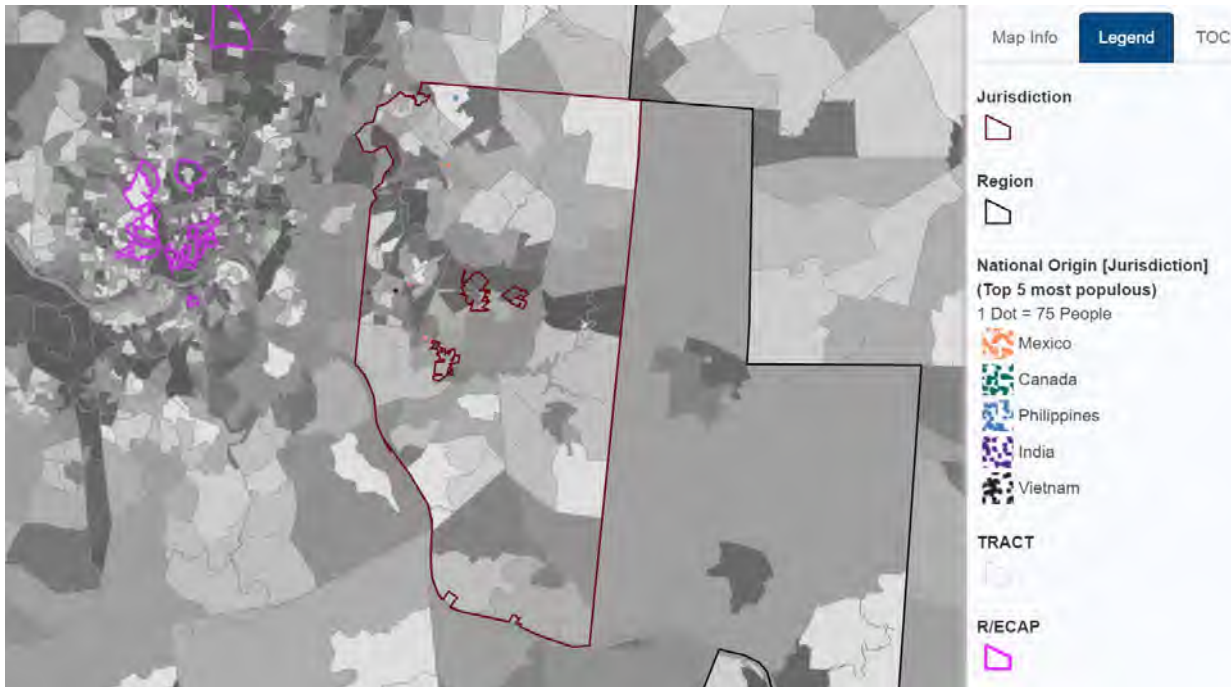
**Map 9B: National Origin – Jobs Proximity Index,** Clermont County and Metropolitan Cincinnati

Jobs Proximity Index
- 0 - 10
- 10.1 - 20
- 20.1 - 30
- 30.1 - 40
- 40.1 - 50
- 50.1 - 60
- 60.1 - 70
- 70.1 - 80
- 80.1 - 90
- 90.1 - 100

Jobs Proximity Index: Data not Available
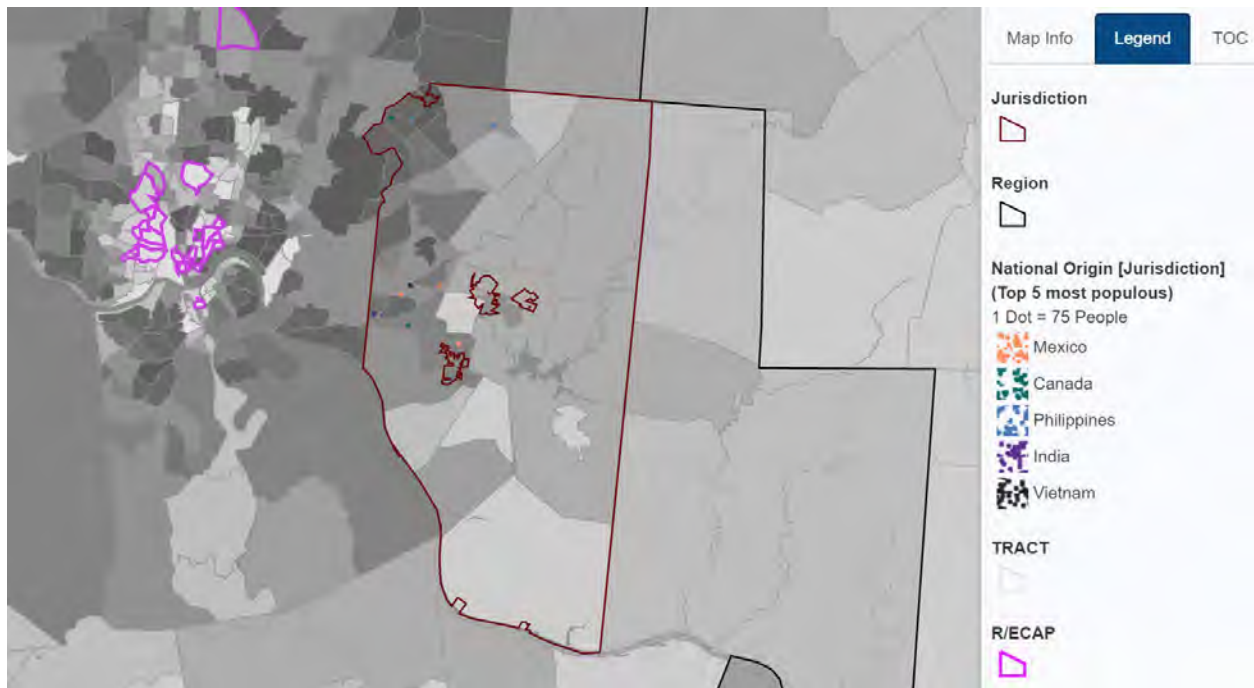
Map 9D: R/ECAPs – Jobs Proximity Index, Clermont County and Metropolitan Cincinnati

There are no R/ECAP Census Tracts in Clermont County, so these areas do not appear on the maps generated for this report.

The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. The higher the score, the higher the labor force participation and human capital in a neighborhood.
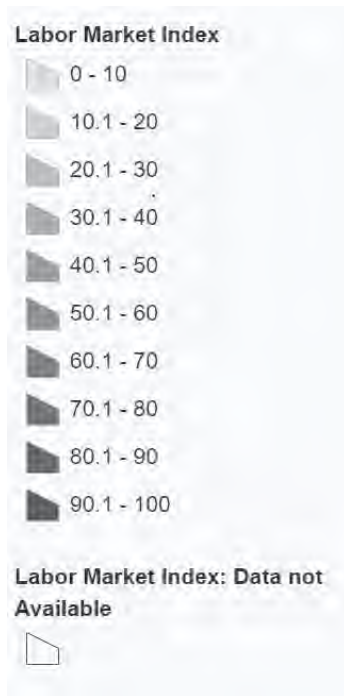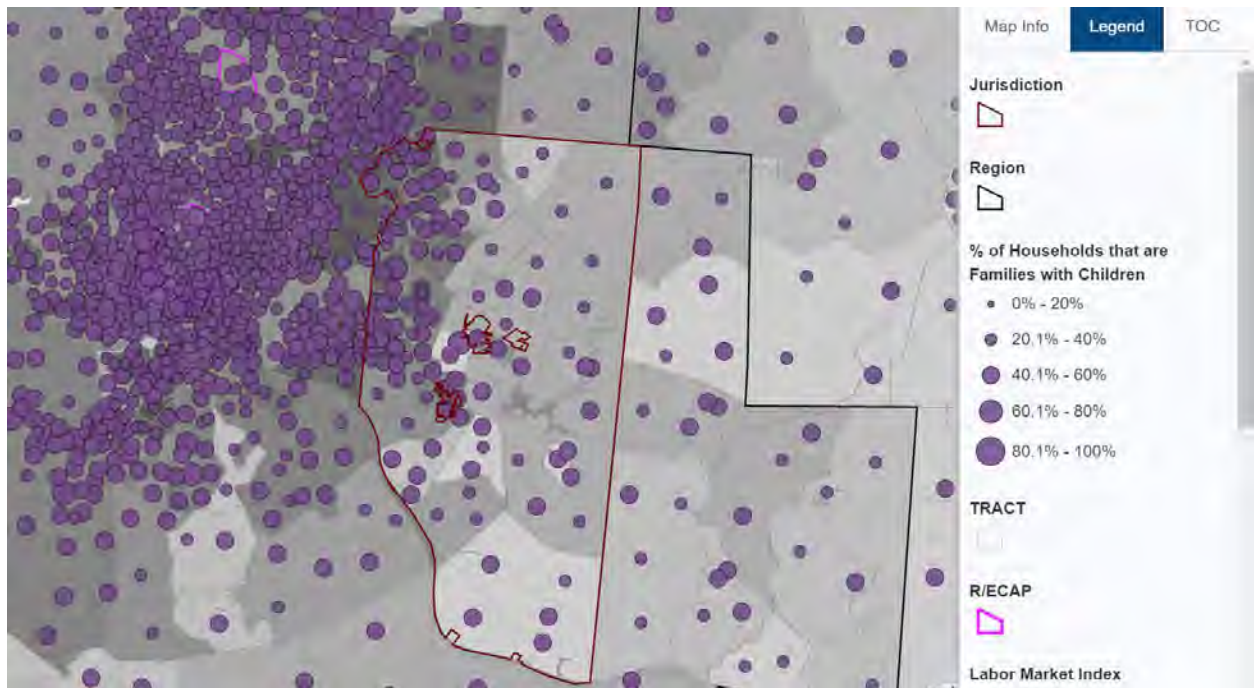
Map 10A: Race/Ethnicity –Labor Engagement Index, Clermont County and Metropolitan Cincinnati
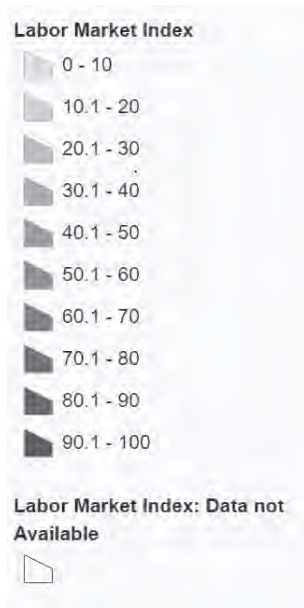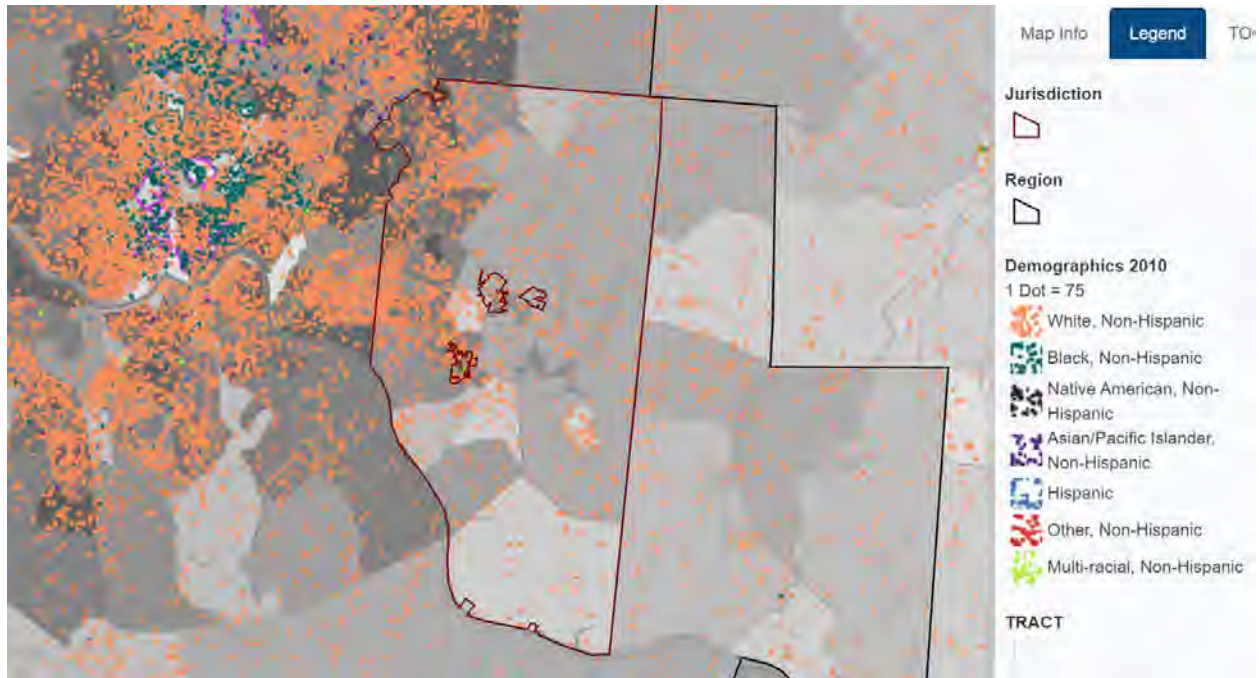
Map 10B: National Origin – Labor Engagement Index, Clermont County and Metropolitan Cincinnati
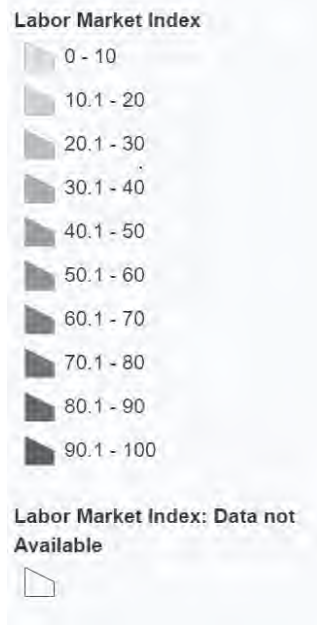
Map 10C: Family Status – Labor Engagement Index, Clermont County and Metropolitan Cincinnati

There are no R/ECAP Census Tracts in Clermont County, so these areas do not appear on the maps generated for this report.

Disparities in Job Access and Labor Market Engagement by Race/Ethnicity
Within Clermont County, the integrated nature of the population makes it difficult to determine based on a geographical analysis whether there are disparities in job access or labor market engagement between racial/ethnic groups. Generally, all racial and ethnic groups have similar geographic access to jobs.

Within the metropolitan region, many of the R/ECAP Census tracts and other concentrations of minorities are located near the region's largest job center, Downtown Cincinnati.

Job Access Comparison by Neighborhood
The areas of Clermont County with the best access to jobs are those on the western edge of the County, specifically along I-275, such as Union Township, Milford, and Loveland. Major village centers such as Batavia, Amelia, and Bethel also have strong access to jobs (although Batavia experienced a sharp decline in the number of jobs in the Village from 2000-2010).

Unemployment is the highest in the southern portion of the County, especially the communities along the Ohio River and Felicity. These communities have very poor job access, with long, difficult commutes to employment centers near I-275 and in the larger villages. Because of the integrated nature of the population of Clermont County, this disparity in job access does not disproportionately impact any racial/ethnic group, any foreign-born population, or people with Limited English Proficiency. However, it does represent a serious fair housing concern.
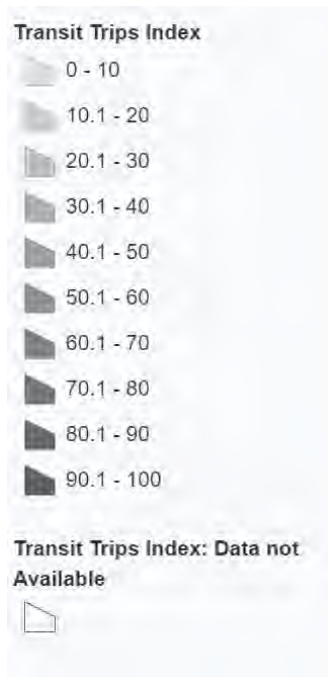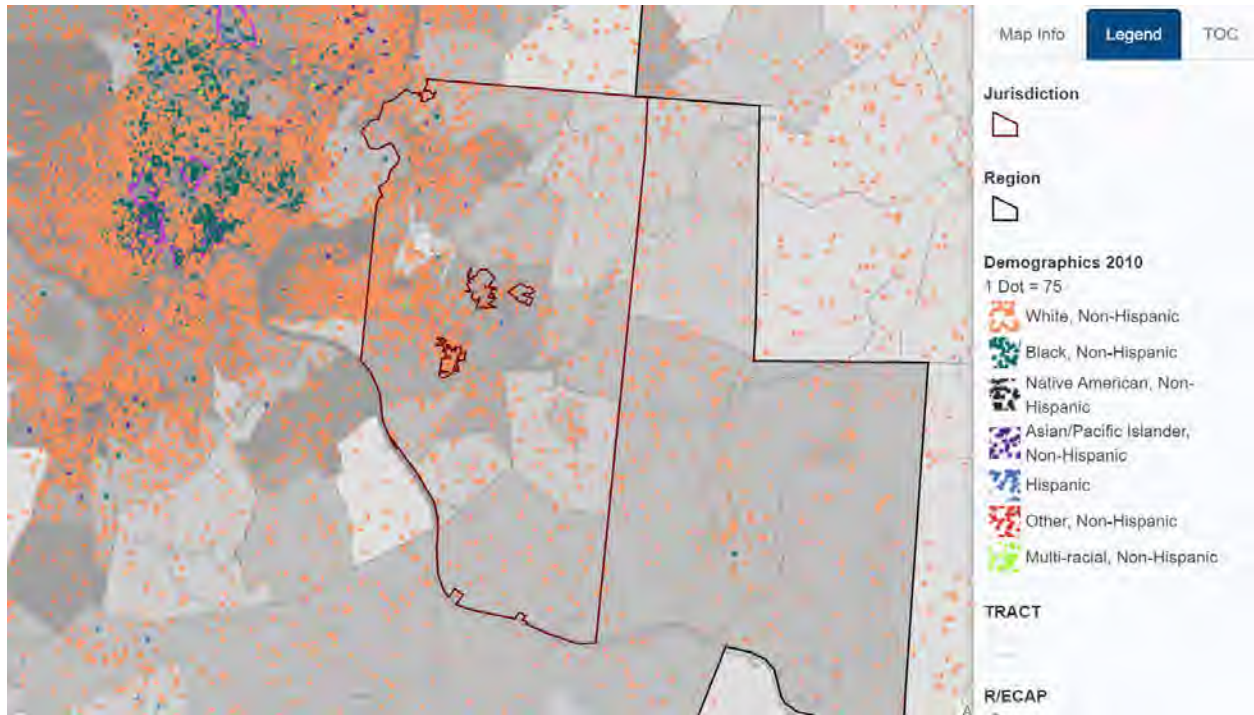
Job Training Programs
The Clermont County office of Ohio Means Jobs is located in Union Township near I-275, in the far western portion of the Township. While the office serves the entire county, and is located in a densely populated area, this non-central location leaves much of the County almost an hour drive from the job training resources available at the center. This is a serious fair housing concern.
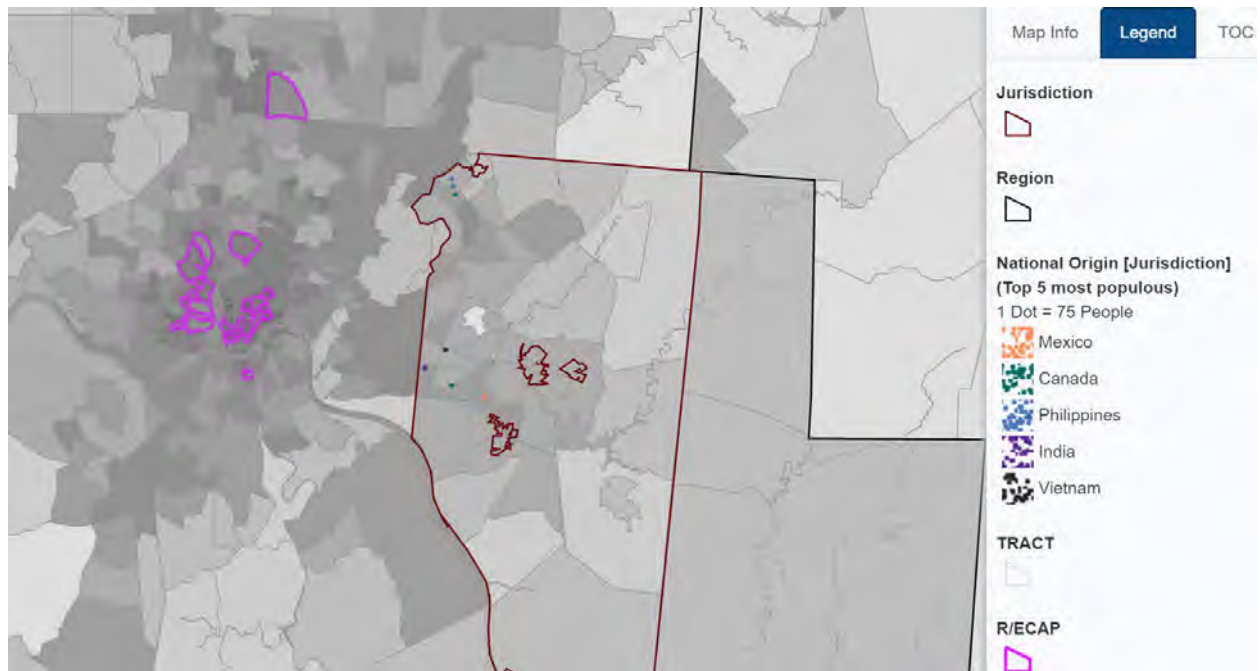
Public Transportation
This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region. The higher the value, the more likely residents in that neighborhood utilize public transit.

Map 11A: Race/Ethnicity – Transit Proximity Index, Clermont County and Metropolitan Cincinnati

Legend:

Map Info | Legend | TOC

Jurisdiction

Region

Demographics 2010
1 Dot = 75
White, Non-Hispanic
Black, Non-Hispanic
Native American, Non-Hispanic
Asian/Pacific Islander, Non-Hispanic
Hispanic
Other, Non-Hispanic
Multi-racial, Non-Hispanic

TRACT

R/ECAP

Transit Trips Index
0 - 10
10.1 - 20
20.1 - 30
30.1 - 40
40.1 - 50
50.1 - 60
60.1 - 70
70.1 - 80
80.1 - 90
90.1 - 100

Transit Trips Index: Data not Available

Map 11C: Family Status – Mapped Transit Proximity Index, Clermont County and Metropolitan Cincinnati
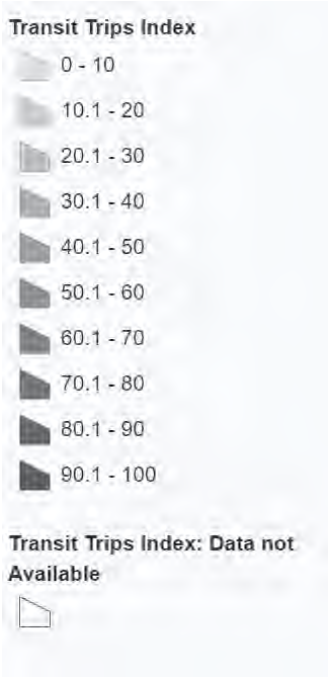
There are no R/ECAP Census Tracts in Clermont County, so these areas do not appear on the maps generated for this report.

A map of bus routes provided by the Southwest Ohio Regional Transit Authority has been included to support the discussion of transit proximity.
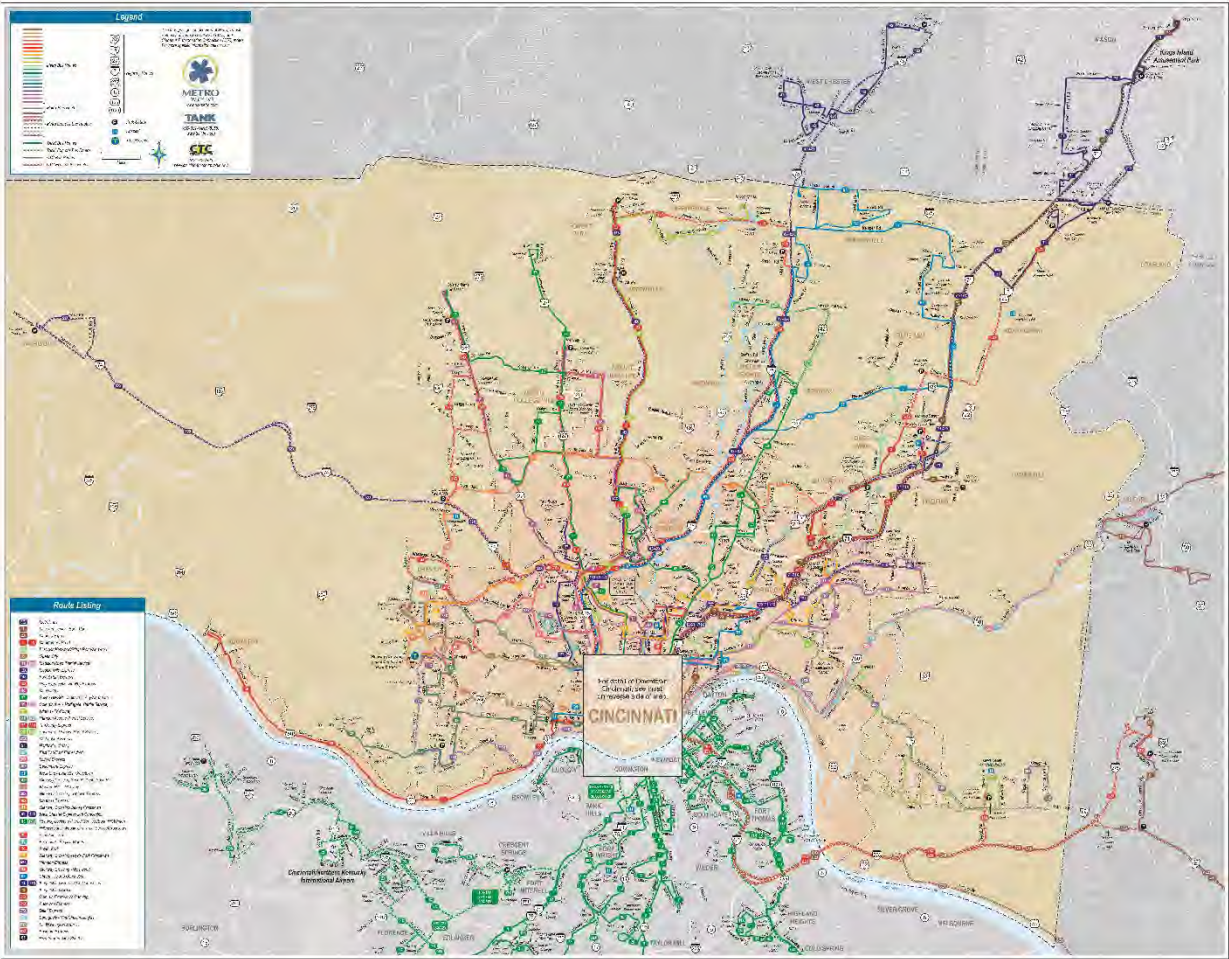
Differences in Access to Public Transportation

The Southwest Ohio Regional Transit Authority (SORTA), operates five bus routes (known locally as the "Metro") that run from Hamilton County into Clermont County:

- **Route 28**, which runs from Downtown Cincinnati to Milford, via Wooster Pike and Columbia Parkway.
- **Route 29X**, which offers express service on the same route as Route 28.
- **Route 82X,** which offers express service from the Union Township Civic Center to Downtown Cincinnati via Interstates 275 and 471.
- **Route C2X,** which offers express service from New Richmond to Downtown Cincinnati via Interstates 275 and 471.

- **Route C4X,** which offers express service from Amelia to Downtown Cincinnati via Interstates 275 and 471.

Metro also operates two bus routes that operate entirely within Clermont County:

- **Route C1**, which offers service between Eastgate Mall and Amelia.
- **Route C3**, which circulates through Milford and Miami Township.

The Clermont Transportation Connection (CTC) collaborates with SORTA to run Routes C2X and C4X, as well as running a fixed route service (known as "Route 1") between Eastgate Mall and Felicity. However, Route 1 runs only one round trip per day - to Eastgate in the morning and to Felicity in the afternoon. CTC also offers paratransit, senior transportation, and dial-a-ride services throughout the County.

The routes listed above serve only a relatively small portion of the County. Many communities are not served by public transportation, except CTC's dial-a-ride services. Some of the un-served or underserved communities are among the County's poorest, and already suffer from long commutes to job centers. Because of the integrated nature of the population of Clermont County, the disparity in public transportation does not disproportionately impact any racial/ethnic group, any foreign-born population, or people with Limited English Proficiency. However, it does represent a serious fair housing concern.

Connections Created by Public Transportation
CTC's Route 1 connects a low-asset/high poverty area (Felicity) to a high-asset/low poverty job center in Union Township/Eastgate Mall. However, it only runs one round trip per day. Other low-asset/high poverty areas such as Chilo and Moscow have no fixed-route public transportation connections to job centers or high-asset/low poverty areas. Most bus routes in the County connect high asset/low poverty areas such as Amelia and Milford to major job centers such as Downtown Cincinnati.

There are no fixed-route public transportation options that connect low-asset/high poverty areas to proficient schools.

Impact of Laws and Policies on Public Transportation
The funding structures of both SORTA and CTC make it difficult to expand public transportation in Clermont County.

The funding system for SORTA limits Metro service outside of the City of Cincinnati. There is no regional funding mechanism for SORTA, which receives 30% of the City of Cincinnati's income tax, in addition to State and Federal funding. Because the system is mostly funded by the City of Cincinnati, suburban service is limited, especially outside Hamilton County. Despite not providing any funds directly for the regional transit authority, Clermont County does have a representative on the SORTA Board of Directors.

CTC is funded by Clermont County, but a lack of available funds has led to limited service. In addition, the rural nature of much of the County makes public transportation difficult.

The funding structures of both SORTA and CTC make it difficult to expand public transportation in Clermont County.

Other Community Assets – Retail
Retail is unevenly distributed around the County, with most of the major retail outlets, including grocery stores, located in the western part of the County, specifically the Eastgate area in Union Township, Milford, Loveland, Batavia, and Amelia. Residents of the southern portion of the County, especially in the southeast such as Felicity and Chilo, face long drives and little to no public transportation alternatives to do simple errands. This is a major fair housing concern.

## 8.   Exposure to Adverse Community Factors

Exposure to Neighborhood Poverty
The low poverty index captures poverty in a given neighborhood. A higher the score indicates less exposure to poverty in a neighborhood.
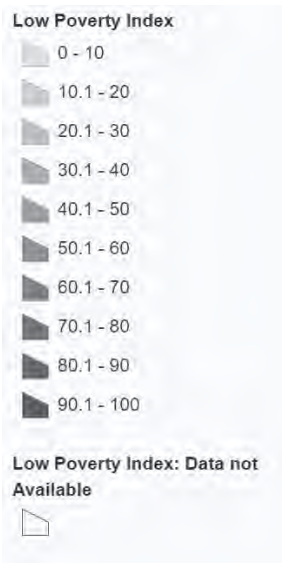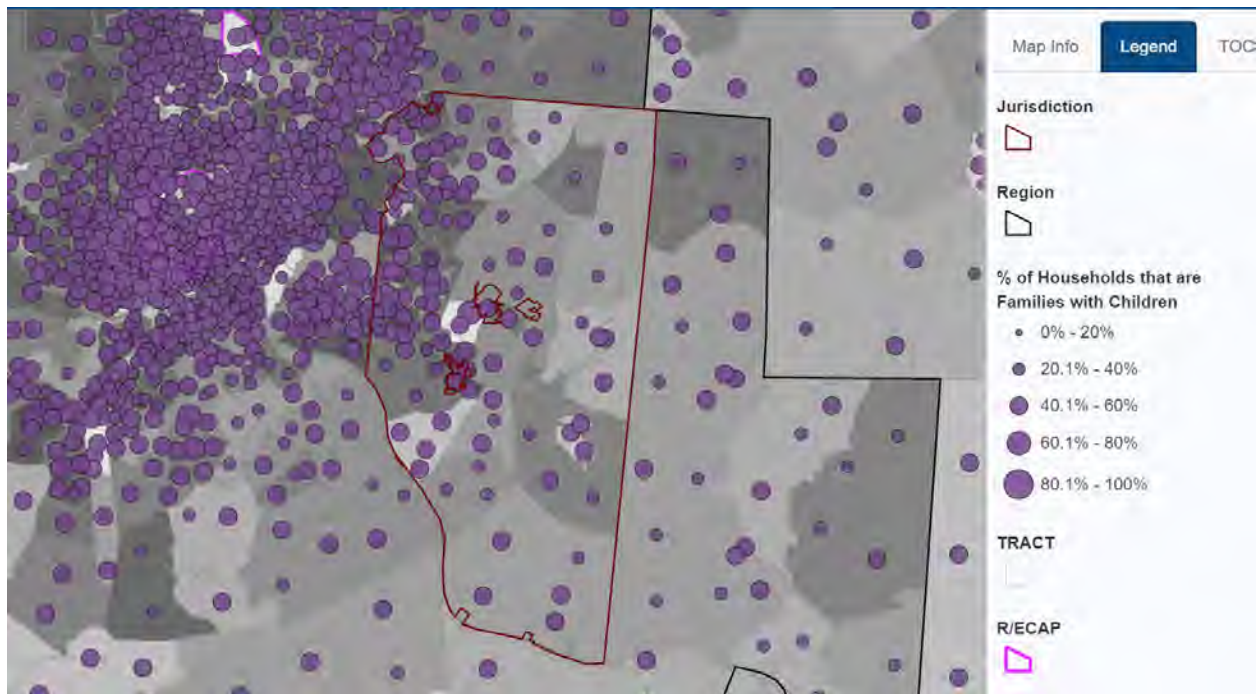
Map 12A: Race/Ethnicity – Poverty Exposure Index, Clermont County and Metropolitan Cincinnati
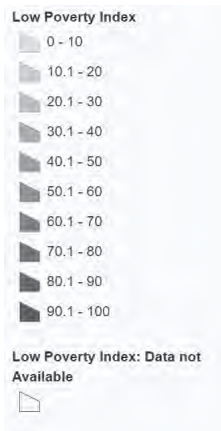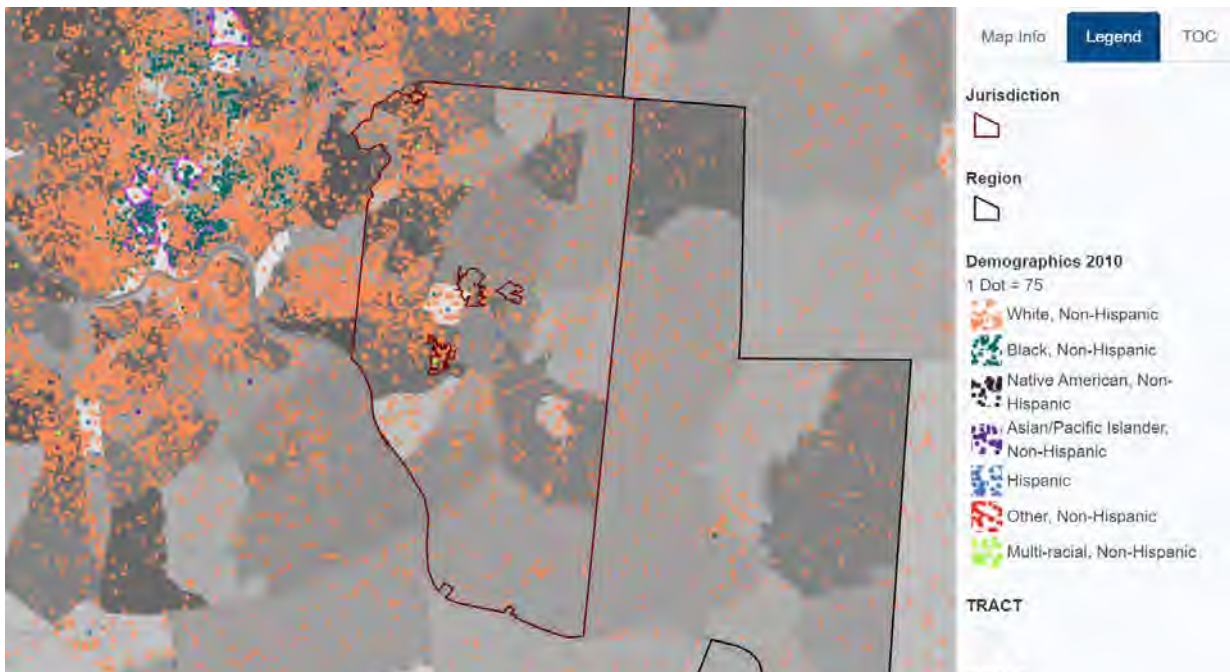
**Map 12B: National Origin – Poverty Exposure Index,** Clermont County and Metropolitan Cincinnati
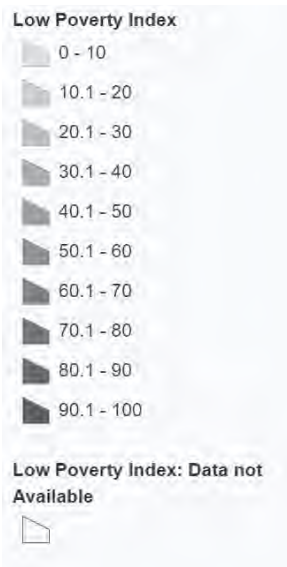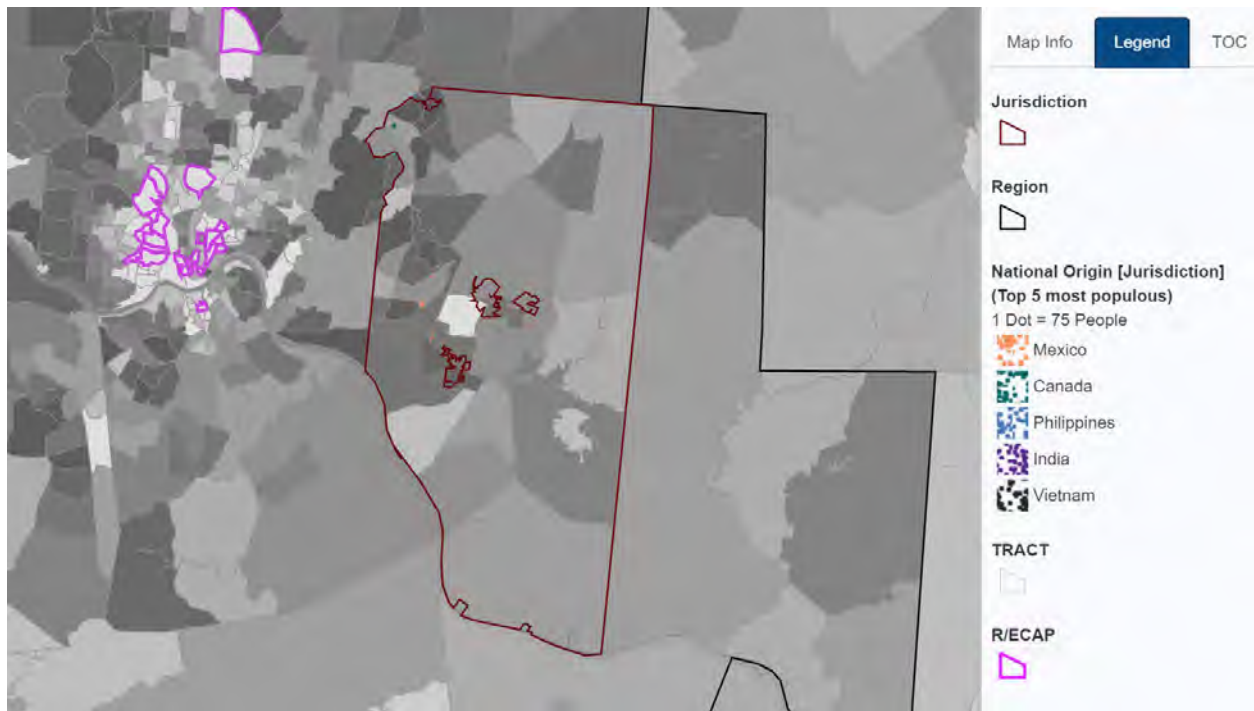
Map 12C: Family Status – Mapped Poverty Exposure Index, Clermont County and Metropolitan Cincinnati

Map 12D: R/ECAPs – Mapped Poverty Exposure Index, Clermont County

There are no R/ECAP Census Tracts in Clermont County, so these areas do not appear on the maps generated for this report.

Map 13: Poverty Rate – Clermont County
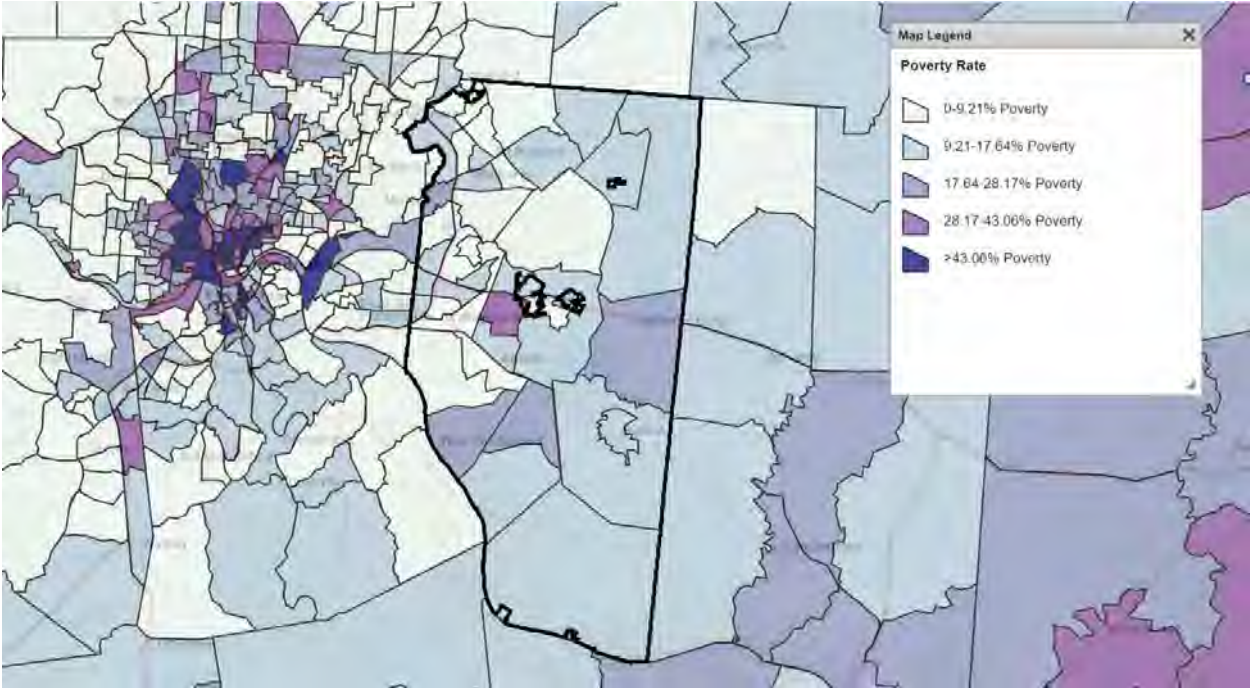
Disparity in Exposure to Neighborhood Poverty by Race/Ethnicity
Because of the integrated population in Clermont County, there is little to no disparity between racial/ethnic groups in terms of exposure to poverty. Regionally, minorities, especially African-Americans, live with disproportionate exposure to poverty in several neighborhoods in Cincinnati, especially on the north and west sides of the City.

Neighborhood Disparities in Poverty Rate
In general, the most rural areas of the County have the highest poverty rates, especially the southern part of the County. However, the only Census Tract where more than 50% of the population is below the poverty rate is in a part of Milford near I-275 that has a heavy concentration of multiple-family housing (most of which is not publicly supported housing).

Areas with more than 25% poverty include Ohio Township, a portion of Batavia Township, and the Village of Williamsburg.

Environmental Health Hazards

Map 14A: Race/Ethnicity – Environmental Health Hazards Index
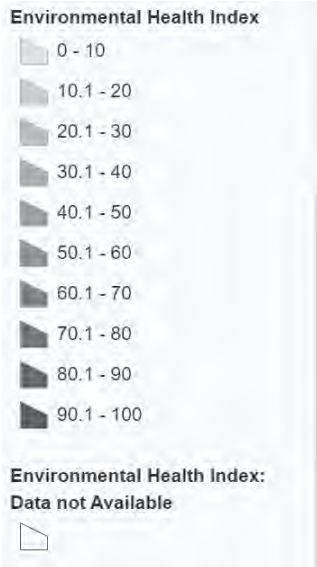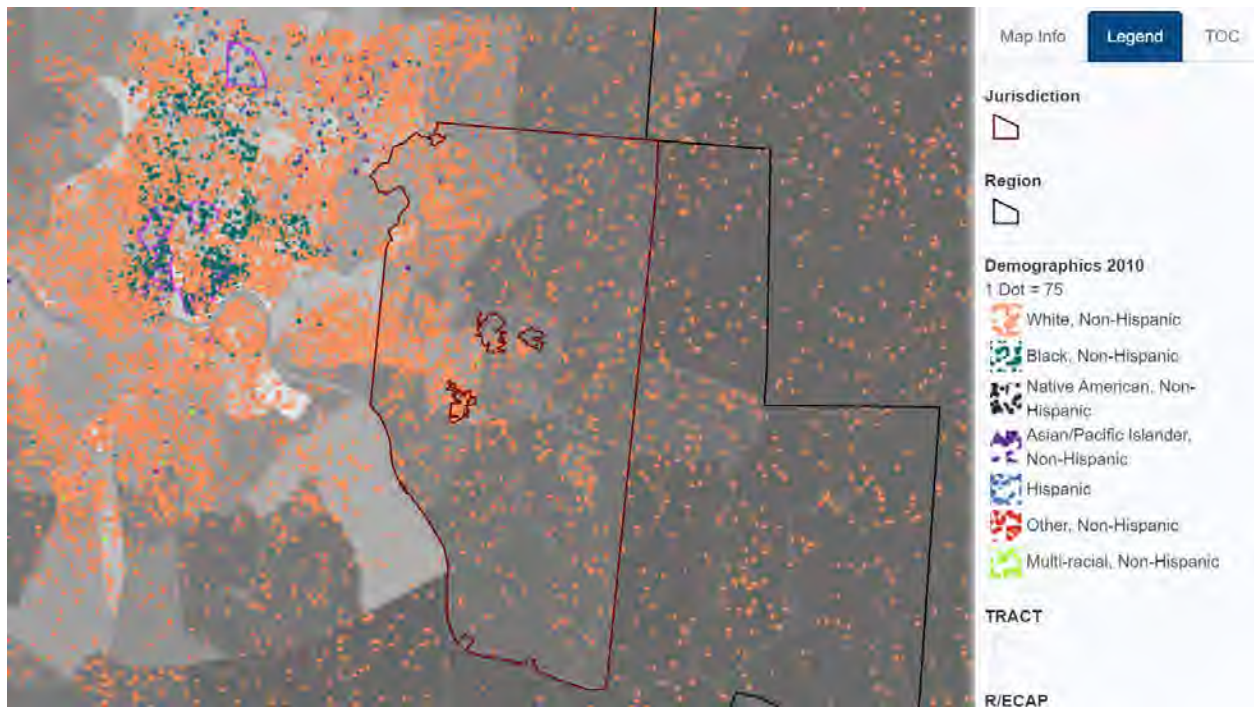
Map 14B: National Origin – Environmental Health Hazards Index

Map 14C: Family Status – Mapped Environmental Health Hazards Index

There are no R/ECAP Census Tracts in Clermont County, so these areas do not appear on the maps generated for this report.

Disparity in Exposure to Environmental Health Hazards by Race/Ethnicity
Because of the integrated population in Clermont County, there is little to no disparity between racial/ethnic groups in terms of exposure to environmental health hazards.

Neighborhood Disparities in Exposure to Environmental Health Hazards
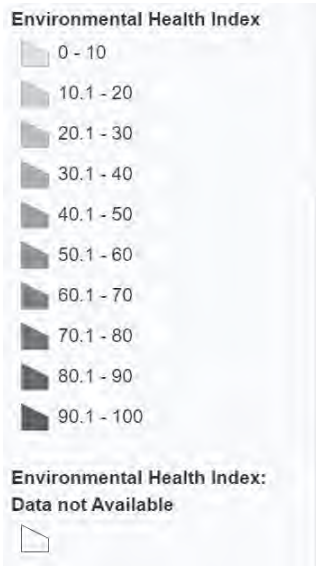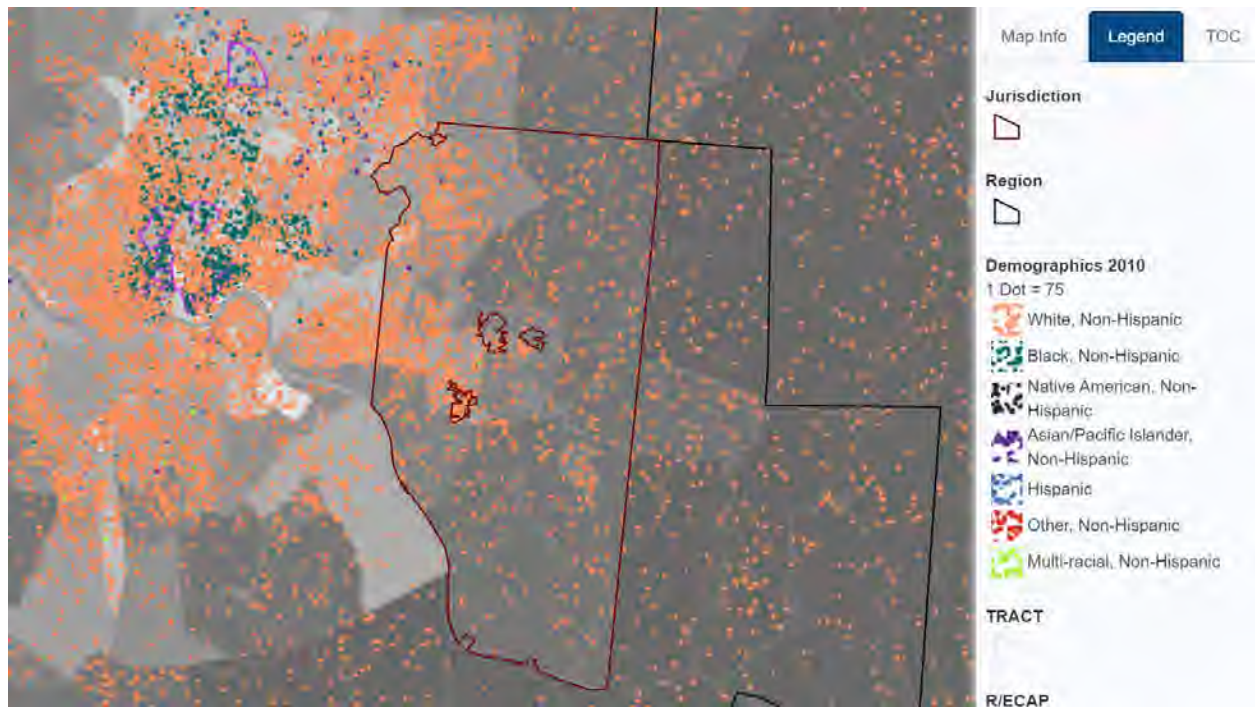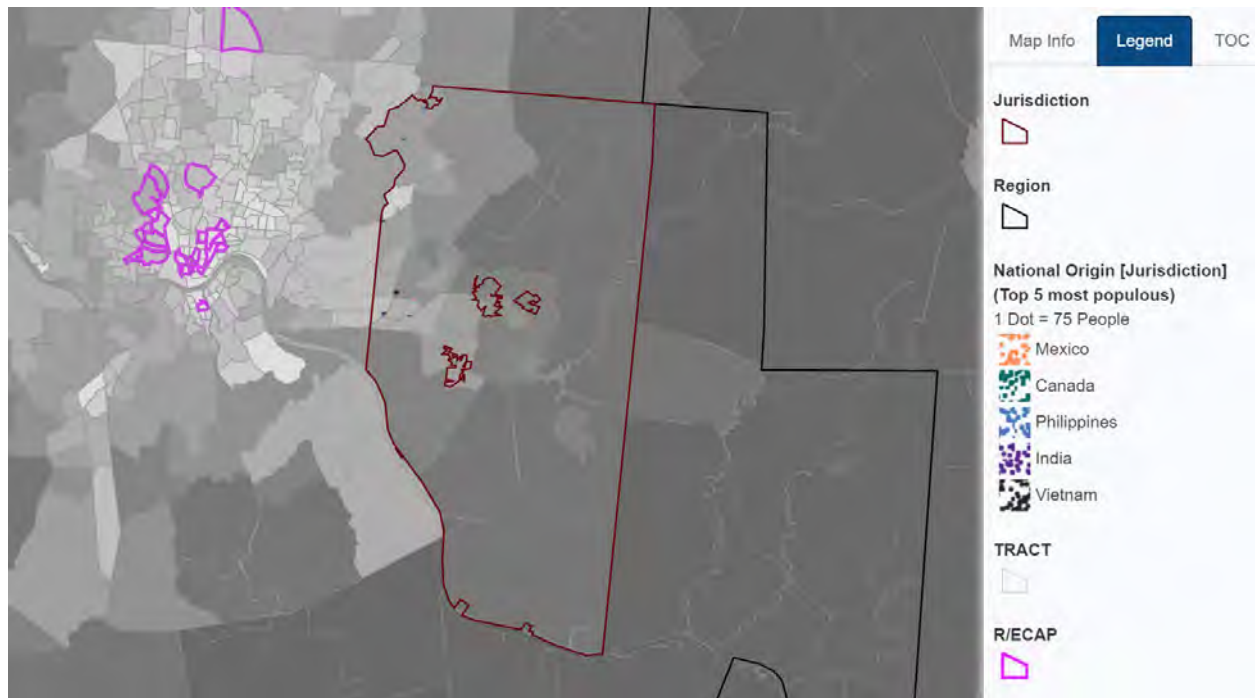Local knowledge suggests that there are three major environmental health hazards of concern within the County:

- **Ohio River Flood Plain.** Floods of the Ohio River are a hazard in all of the County's riverfront communities, most notably New Richmond, Moscow, Neville, and Chilo. Flooding hazard disproportionately impacts households with incomes below the poverty rate, both because these communities are among the County's poorest, and also because residents in the flood plain tend to be low-income.

- **Interstate 275 Freeway.** I-275 is a busy freeway the runs through the western part of the County, causing noise and air pollution concerns. While most the communities it runs through are not concentrations of poverty, the land use pattern along the freeway includes a lot of multiple-family housing, which has created small concentrations of poverty. The most glaring example is the heavily concentrated poverty near I-275's interchange with Highway 450 in Milford.

Other Adverse Community Factors - Deteriorating Infrastructure
In some parts of the County, especially the southern portion, older, deteriorating infrastructure has become an adverse community factor of serious concern. Deteriorating roads make commuting difficult, aging sewer, water, or septic systems pose health hazards, and a lack of modern communications infrastructure leaves some households with poor Internet or cellular phone service.

Determinants of Disparities in Access to Community Assets and Adverse Community Factors

Presence and Location of Proficient Schools: Highly Significant
The County's most proficient schools are located in areas of affluence, with lower-performing schools in areas of poverty.

School Assignment Policies: Not Significant
Within districts, children from all races, ethnicities, and income levels are generally assigned to schools of similar quality. The concern is across districts, where districts that serve lower-income families have not performed as well as those that serve higher income families.

The Availability, Type, and Frequency, and Reliability of Public Transportation: Highly Significant
The County's lack of reliable public transportation disproportionately impacts lower-income households due to lack of service and lack of options. Fixed Metro or CTC routes do not serve the poorer parts of the County; as lower-income individuals are less likely to have access to reliable automobile transportation, they are more impacted when public transportation is not available.

The Location of Employers in the Jurisdiction: Highly Significant
Most major employers in the County are located in the western part of Clermont, especially near I-275. This creates long and difficult commutes for poorer residents in the southern and eastern parts of the County.

Patterns of Public Investment: Moderately Significant
Public investment in infrastructure has been concentrated in the more populated communities in the western part of the County. As a result, the infrastructure in the poorer, more rural areas is deteriorating and in disrepair.

Private Investments: Moderately Significant
Private investments in housing, retail, and job centers have mainly been located in the affluent, populated, western part of the County. Communities in the south and east, like Felicity and Chilo, have seen very little private investment in the past several decades.

Foreclosure Patterns: Moderately Significant
Clermont County is still feeling the effect of the Great Recession, in the form of lingering foreclosure issues. Foreclosures hit the County's poorer communities harder than the richer communities, leading to a widening of the gap in quality of life between the western and eastern/southern portions of the county.

Lack of Regional Collaboration: Moderately Significant
A lack of regional collaboration is most notable in public transportation funding, where SORTA's Metro bus service is funded almost entirely by the City of Cincinnati and does not serve outlying communities, such as Clermont County, very effectively.

Other – None

9. Disability and Access

Population Profile

Table 18: Persons with Vision, Hearing, Cognitive, Ambulatory, Self-Care, and Independent Living Difficulties, Clermont County and Metropolitan Cincinnati

Disability Type	Clermont County		Metropolitan Cincinnati	
	Number	Percent (%)	Number	Percent (%)
Hearing Difficulty	8,417	16.27%	71,514	14.33%
Vision Difficulty	4,357	8.42%	47,118	9.44%
Cognitive Difficulty	10,879	21.03%	105,195	21.08%
Ambulatory Difficulty	13,256	25.62%	132,760	26.60%
Self-Care Difficulty	5,296	10.24%	51,156	10.25%
Independent Living Difficulty	9,531	18.42%	91,397	18.31%

Source: HUD AFFH version AFFH0004a released February 2018

Map 15A: Population Density of Persons with Disabilities – Persons with Vision, Hearing, Cognitive, Ambulatory
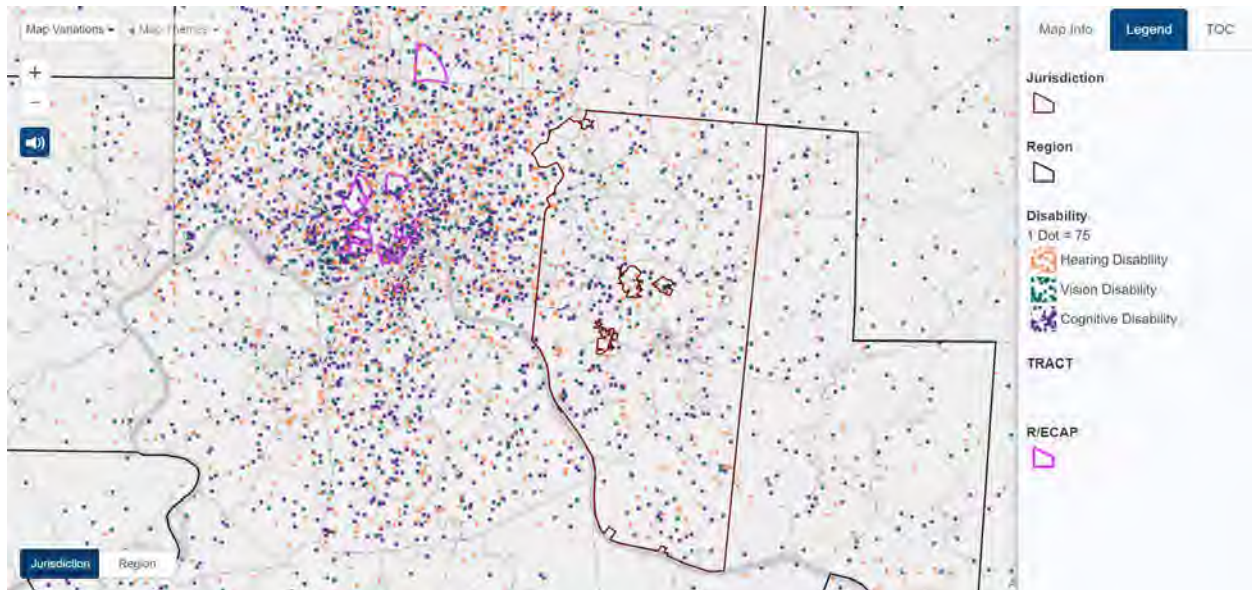
Map 15B: Population Density of Persons with Disabilities – Ambulatory, Self-Care, and Independent Living Difficulties, Clermont County and Metropolitan Cincinnati
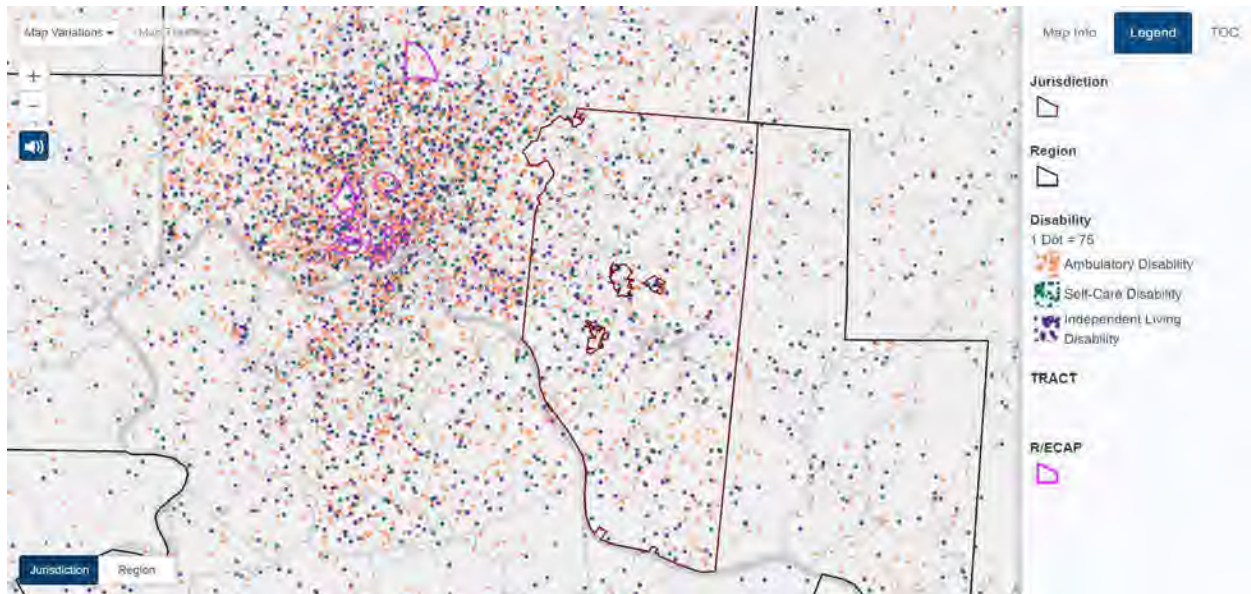
Geographic Distribution of Persons with Disabilities.

Table 19: Persons with Disabilities by Age Range

Age of People with Disabilities	Clermont County		Metropolitan Cincinnati	
	Number	Percent (%)	Number	Percent (%)
5-17	2,446	6.8%	28,081	6.28%
18-64	14,950	12.07%	251,296	10.69%
65+	9,620	31.94%	195,529	33.20%

Source: HUD AFFH version AFFH0004a released February 2018

Map 16: All Persons with Disabilities by Age Range
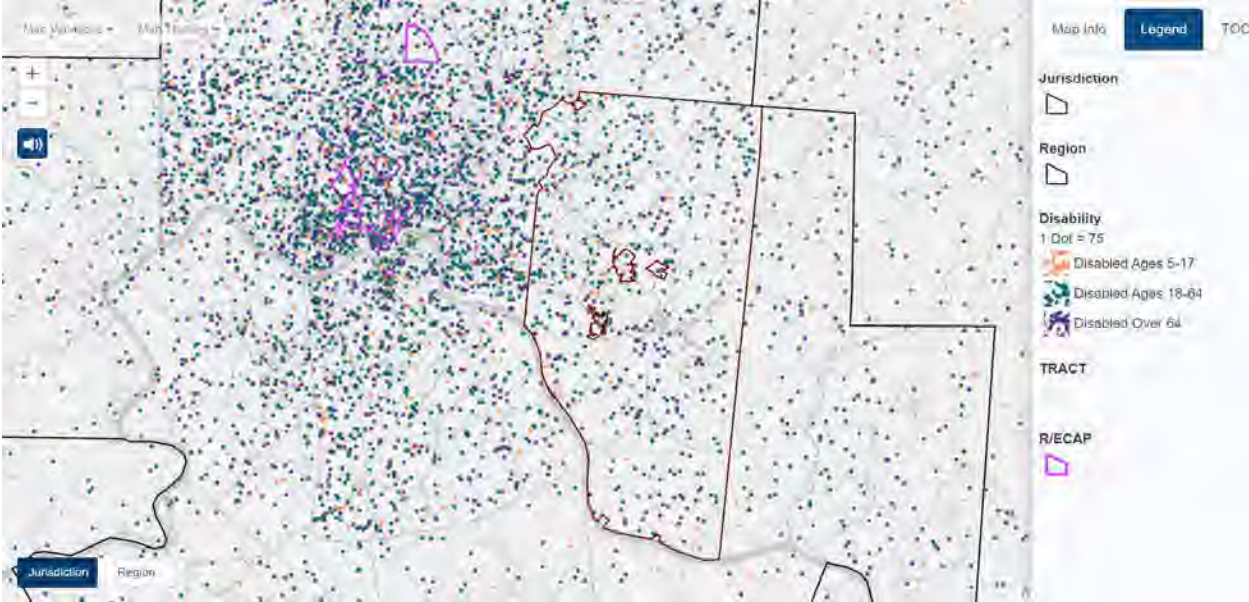
Geographic Distribution of Persons with Disabilities by Age.
The distribution of disabilities by age in Clermont County is approximately the same as in Metropolitan Cincinnati as a whole.

Housing Accessibility

Availability of Accessible Housing
The Clermont Metropolitan Housing Authority reported that while there is sufficient accessible housing for seniors, it could be difficult to find accessible housing for those under 65. Senior housing is specifically built or retrofitted to be accessible, but other housing is not and younger individuals with disabilities are not eligible to live in senior facilities.

Geographic Distribution of Accessible Housing
Accessible housing, both publicly supported and privately developed, is generally well-distributed around the County, and is not concentrated in areas of poverty or R/ECAPs.

	Households including a member with a Disability	
Clermont County	**Number**	**Percent (%)**
Public Housing	195	7.8%
Project-Based Section 8	1010	40.6%
Other Multi-Family	362	14.6%
HCV Program	919	37.0%
Metropolitan Cincinnati		
*Public Housing	7823	21.05%
*Project-Based Section 8	10116	27.22%
*Other Multi-Family	1217	3.27%
*HCV Program	18014	48.46%

Source: HUD AFFH version AFFH0004a released February 2018

* Data for all individuals was not available. Data for available races/ethnicities (i.e. Whites, Blacks, Asians, and Hispanics) has been totaled and included instead.

Ability of Individuals with Different Disabilities to Find Appropriate Publicly-Supported Housing
The Clermont Metropolitan Housing Authority works to find suitable publicly-supported housing for all households including a member with a disability. Sometimes, the authority has difficulty finding housing for people under 65 that have mobility disabilities or are deaf or blind, because of a lack of available options for non-seniors.

Impact of Land Use Laws on Housing for Persons with Disabilities
The Zoning Ordinances in the County generally encourage or even require design that meets the standards of the Americans with Disabilities Act, helping to ensure that additional accessible housing is being constructed.

Integration and Olmstead: Enabling Persons with Disabilities to Live in Apartments and Houses instead of Institutions and Other Segregated Settings

Persons with Disabilities in Segregated Institutions
Overall data for the County is not available, but the Clermont Metropolitan Housing Authority works to provide housing for individuals with disabilities outside of segregated facilities and institutions.

Local and State Laws Discouraging Placement of Persons with Disabilities into Integrated Settings
No local or state laws have created barriers to the Clermont Metropolitan Housing Authority located persons with disabilities in integrated settings.

Options for Services and Housing for People with Disabilities
People with Disabilities in Metropolitan Cincinnati have a wide range of options for housing and service providers. In addition to the Housing Authorities in each County and various publicly supported and privately developed housing options, LADD (Living Arrangements for the Developmentally Disabled), the City of Cincinnati, and Cincinnati Children's Hospital Medical Center all offer services and housing for the disabled.

Ability of Persons with Disabilities to Access the Following Facilities

- **Public Buildings and Facilities.** In general, public buildings and facilities in Clermont meet ADA requirements.

- **Public Infrastructure.** Throughout Clermont County, and especially in rural areas and older villages, public infrastructure is not accessible. Substantial investment is needed in sidewalks and crosswalks to make moving through the County's communities more accessible for those with disabilities.

- **Government Services.** Government services are provided with those with disabilities in mind, and are available to all residents, including those with disabilities.

- **Public Transportation,** including Paratransit. Where available, public transportation vehicles are equipped to serve riders with disabilities. However, public transportation is very limited in much of the County.

- **Taxi Services.** The accessibility of taxi services is dependent on the taxi company and the driver. Many taxi services are not accessible for those with disabilities. In addition, large portions of the County are not served by taxi service.

- **Proficient Schools and Education Programs.** The County's school districts provide transportation vehicles and educational facilities that meet the needs of students with disabilities. However, students living in some parts of the County may be in school districts with less proficient schools.

- **Jobs.** Employers within the County make reasonable accommodations for employees with disabilities. However, because jobs are not evenly distributed across the County, persons with disabilities living far from job centers may experience difficulty getting to work.

Processes for Requesting Reasonable Accommodations
Persons with disabilities may inquire with their local municipal government about improvements to public infrastructure to better serve those with disabilities. They may also inquire to the County. While such inquiries are usually met with sympathy, funding is not always available for the desired upgrades.

Barriers to Housing Choice
The largest barrier to housing choice for persons with disabilities is the lack of affordable accessible housing for people under 65 in Clermont County. Other major barriers include the lack of public transportation, outdated and inaccessible public infrastructure, and the clustering of jobs in the western portion of the County.

Additional Information
No additional information has been included.

Disability and Access Issues Determinants

Lack of Affordable Accessible Housing in Range of Unit Sizes: Highly Significant
The Clermont Metropolitan Housing Authority reports that there is a lack of affordable accessible housing for persons fewer than 65 with disabilities.

Siting of Accessible Housing in R/ECAPs and Other Segregated Areas: Not Significant
While much of the affordable accessible housing that exists is designated for seniors, is it located throughout the County, and not in any segregated areas.

Lack of Assistance for Housing Accessibility and Modifications: Moderately Significant
Clermont County uses CDBG and Senior Services funds to assist with accessibility modifications, but additional funding has not been a priority.

Restrictive Land Use and Zoning Laws, Policies, and Practices: Not Significant
The review of the Zoning Ordinances in the County did not determine that any zoning laws have a detrimental impact on housing for those with disabilities.

Lack of Access to Public Housing, HCV Program, LIHTC Housing, or Supportive Housing: Moderately Significant
The Clermont Metropolitan Housing Authority attempts to ensure access to housing for all applicants. However, affordable accessible housing for those under 65 is undersupplied in the County.

Lack of Assistance for Transitioning from Institutional Settings to Housing: Not Significant
Several entities in the County and metropolitan area offer transition services.

Lack of Affordable, Integrated Housing for Individuals who need Supportive Services: Moderately Significant
Affordable housing for those that need supportive services but are not seniors is undersupplied in Clermont County.

Lack of Affordable In-Home or Community Based Supportive Services: Not Significant
While in-home care is expensive, there are several programs in the metropolitan area that assist individuals with disabilities in getting the care they need.

Lack of Access to Proficient Schools: Moderately Significant
All school districts in the County provide accessible facilities and transportation. However, not all school districts are considered "proficient."

Public Transportation and/or Private Transportation is Not Accessible and/or Paratransit Services are Not Available: Highly Significant
Most of Clermont County is not served by fixed-route service. Paratransit is available, but due to lack of resources, CTC is not able to provide adequate service to all passengers at all times.

Lack of Access to Government Services: Not Significant
Government services are available to all persons with disabilities.

Inaccessible Public Buildings, Sidewalks, Pedestrian Crossings, and Other Infrastructure: Highly Significant
Older infrastructure that does meet ADA standards is common throughout the County, especially in rural areas and smaller or poorer villages.

Other: None

VII. Fair Housing Compliance and Infrastructure

A. Fair Housing Complaints

The chart below shows the fair housing complaints received by Housing Opportunities Made Equal of Greater Cincinnati (HOME) in Clermont County since 2015. The most common type of complaint relates to landlords who fail to provide accommodations for tenants with disabilities.

The most common form of race/ethnicity complaint in Clermont County relates to Hispanic individuals and households being asked to provide proof of legal US residency above and beyond what would be required for any other group. Another common complaint is landlords and real estate agents assuming African-American individuals or households cannot afford housing in certain areas, regardless of the household's actual income.

Type of Complaint	Number of Complaints
Race/Ethnicity	19
Religion	0
Sex	11
Family Status	2
National Origin	1
Disability	124
Family Status	9
Other	10
Total	174

Source: HOME

B. Fair Housing and Civil Rights Organizations

Housing Opportunities Made Equal (HOME) of Greater Cincinnati provides Fair Housing services to the Metropolitan Cincinnati region. HOME's activities in Clermont County are funded through the County's CDBG funds.

C. Resources for Fair Housing Organizations

HOME receives funding through Clermont County CDBG for their fair housing enforcement activities in the county.

D. Fair Housing Compliance and Infrastructure Determinants

1. Unresolved Violations of Fair Housing or Civil Rights Laws: Not Significant
HOME receives funding through Clermont County CDBG for their fair housing enforcement activities in the county.

2. Patterns of Community Opposition: Not Significant
While troubling incidents of community opposition to multiple-family housing, publicly supported housing, and new minority residents have occurred in neighborhoods throughout the County, there is little public opposition to fair housing enforcement.

3. Support or Opposition from Public Officials: Not Significant
Clermont County officials have decided to directly fund HOME's fair housing enforcement activities in the county.

4. Discrimination in the Housing Market: Highly Significant
HOME has received several reports of discrimination and steering by landlords and real estate agents, especially with regard to African-Americans, Hispanics, and people with disabilities. While not widespread, these issues occur often enough to create a barrier to housing choice in Clermont.

5. Lack of Fair Housing Education: Not Significant
HOME has active training programs in the County and the percentage of landlords that have received fair housing training has increased since 2015.

6. Lack of Resources for Fair Housing Agencies and Organizations: Moderately Significant
HOME receives funding through Clermont County CDBG for their fair housing enforcement activities in the county. However, funding levels could be increased to further achieve the County's Fair Housing goals.

7. Other - None

VIII. Fair Housing Goals and Priorities

Determinants of:	Level of Influence:
Segregation and R/ECAP's: • Land Use and Zoning • Occupancy Restrictions • Residential Real Estate Steering • Community Opposition • Economic Pressures • Major Private Investments • Municipal and State Services • Foreclosure Patterns • Other – Flood Plains	 • Moderately Significant • Not Significant • Moderately Significant • Highly Significant • Moderately Significant • Moderately Significant • Moderately Significant • Moderately Significant • Highly Significant
Publicly Supported Housing Location and Occupancy: • Land Use and Zoning • Siting Decisions for Public Housing • Siting Decisions for LIHTC Housing • Siting Decisions for Other Publicly Supported Housing • Community Resistance to Public Housing • Regional Collaboration or Lack Thereof • Other – None	 • Moderately Significant • Not Significant • Not Significant • Not Significant • Highly Significant • Moderately Significant
Mobility: • Lack of Housing Choice Voucher Program • Admission or Residency Preferences • Quality of Mobility Counseling Programs • Lack of Support for Voucher Mobility • Lack of Landlord Participation • Landlord Refusal to Accept Sources of Income • Other – None	 • Not Significant • Not Significant • Not Significant • Not Significant • Not Significant • Not Significant
Disproportionate Housing Needs: • Land Use and Zoning • Occupancy Restrictions • Economic Pressures • The Availability of Two+ Bedroom Affordable Units	 • Not Significant • Not Significant • Highly Significant

• The Availability of Two+ Bedroom Publicly Supported Units • Housing Stock Deterioration • Foreclosure Patterns • Private Investments • Other – Flood Plains	• Not Significant • Not Significant • Highly Significant • Highly Significant • Moderately Significant • Highly Significant
Disparities in Access to Community Assets/Exposure to Adverse Community Factors • Presence and Location of Proficient Schools • School Assignment Policies • Availability and Reliability of Public Transportation • Location of Employers • Patterns of Public Investment • Private Investments • Foreclosure Patterns • Lack of Regional Collaboration • Other – None	 • Highly Significant • Not Significant • Highly Significant • Highly Significant • Moderately Significant • Moderately Significant • Moderately Significant • Moderately Significant
Disability and Access Issues • Lack of Affordable Accessible Housing • Siting of Accessible Housing • Lack of Assistance for Modifications • Restrictive Zoning Laws • Lack of Access to Publicly Supported Housing • Lack of Transition Assistance • Lack of Supportive Services • Lack of Access to Proficient Schools • Lack of Public Transportation • Access to Government Services • Inaccessible Public Infrastructure • Other – None	 • Highly Significant • Not Significant • Moderately Significant • Not Significant • Moderately Significant • Not Significant • Not Significant • Moderately Significant • Highly Significant • Not Significant • Highly Significant
Fair Housing Compliance and Infrastructure • Unresolved Violations • Community Opposition • Support from Public Officials • Housing Discrimination • Lack of Fair Housing Education • Lack of Resources • Other – None	 • Not Significant • Not Significant • Not Significant • Highly Significant • Not Significant • Moderately Significant

A. Fair Housing Goals by Determinant

1. Segregation and R/ECAPs

• Land Use and Zoning: Moderate Significance

Goal: Amend Zoning Ordinances throughout the County to eliminate barriers to fair housing choice.
Timeline: 1-2 years
Priority: High

• Residential Real Estate Steering: Moderate Significance

Goal: Improve fair housing education programs for real estate agents and landlords.
Timeline: 1-2 years
Priority: High

Goal: Continue to use CDBG funding to enforce of fair housing laws regarding steering.
Timeline: 1-2 years
Priority: High

• Community Opposition: High Significance

Goal: Execute robust information campaigns for major new publicly supported housing developments to build community support and dispel myths.
Timeline: 1-2 years
Priority: Moderate

• Economic Pressures: Moderate Significance

Goal: Develop new publicly supported housing in the southern part of the County where there is an unmet need for affordable housing.
Timeline: 3-4 years
Priority: Moderate

• Major Private Investments: Moderate Significance

Goal: Work with private developers to build LIHTC projects in the southern part of the County where there is an unmet need for affordable housing.
Timeline: 3-4 years
Priority: Moderate

• Municipal and State Services: Moderate Significance
Goal: Invest in municipal infrastructure in small, poor communities such as Felicity, Chilo, and Moscow to improve municipal services.
Timeline: 3-4 years
Priority: Moderate

- **Foreclosure Patterns: Moderate Significance**

  Goal: Continue programs to assist foreclosure victims and prevent foreclosures.
  Timeline: 3-4 years
  Priority: Low

- **Other – Flood Plains: High Significance**

  Goal: Create a County program to help relocate households from housing in the Ohio River flood plain.
  Timeline: 3-4 years
  Priority: Moderate

2. Publicly Supported Housing Location and Occupancy

- **Land Use and Zoning: Moderate Significance**

  Goal: Amend Zoning Ordinances throughout the County to eliminate barriers to siting publicly supported housing.
  Timeline: 1-2 years
  Priority: High

- **Community Resistance to Public Housing:** High Significance

  Goal: Execute robust information campaigns for major new publicly supported housing developments to build community support and dispel myths.
  Timeline: 1-2 years
  Priority: Moderate

- **Regional Collaboration or Lack Thereof: Moderate Significance**

  Goal: Collaborate with other communities in the region on affordable housing issues.
  Timeline: 1-2 years
  Priority: Moderate

3. Mobility

No determinants were considered significant barriers to mobility.

4. Disproportionate Housing Needs

- **Economic Pressures: High Significance**

  Goal: Develop new publicly supported housing in the southern part of the County where there is an unmet need for affordable housing.
  Timeline: 3-4 years
  Priority: Moderate

- **Housing Stock Deterioration: High Significance**

  Goal: Use both public and private funds to invest in the housing stock in older, poorer communities in the County.
  Timeline: 1-2 years
  Priority: Moderate

- **Foreclosure Pattern: High Significance**

  Goal: Continue programs to assist foreclosure victims and prevent foreclosures.
  Timeline: 3-4 years
  Priority: Low

- **Private Investments: Moderate Significance**

  Goal: Work with private developers to build LIHTC projects in the southern part of the County where there is an unmet need for affordable housing.
  Timeline: 3-4 years
  Priority: Moderate

- **Other – Flood Plains: High Significance**

  Goal: Create a County program to help relocate households from housing in the Ohio River flood plain.
  Timeline: 3-4 years
  Priority: Moderate

5. **Disparities in Access to Community Assets/Exposure to Adverse Community Factors**

- **Presence and Location of Proficient School: High Significance**

  Goal: Invest in lower performing school districts to make school proficiency more consistent across the County.
  Timeline: 5-6 years
  Priority: Low

- **Availability and Reliability of Public Transportation: High Significance**

  Goal: Increase collaboration between CTC and SORTA to improve public transportation in Clermont County.
  Timeline: 3-4 years
  Priority: Low

  Goal: Develop a dedicated regional funding source for public transportation in the Cincinnati region outside Hamilton County.
  Timeline: 5-6 years
  Priority: Low

- **Location of Employers: High Significance**

  Goal: Increase economic development efforts and infrastructure investment in the southern and eastern parts of the County to induce more employers to move to that area.
  Timeline: 5-6 years
  Priority: Low

- **Patterns of Public Investment: Moderate Significance**

  Goal: Increase public investments in the southern part of the County.
  Timeline: 5-6 years
  Priority: Moderate

- **Foreclosure Pattern: High Significance**

  Goal: Continue programs to assist foreclosure victims and prevent foreclosures.
  Timeline: 3-4 years
  Priority: Low

- **Regional Collaboration or Lack Thereof: Moderate Significance**

  Goal: Collaborate with other communities in the region on affordable housing issues.
  Timeline: 1-2 years
  Priority: Moderate

6. **Disability and Access Issues**

- **Lack of Affordable Accessible Housing: High Significance**

  Goal: Develop additional affordable accessible housing for non-seniors.
  Timeline: 3-4 years
  Priority: High

- **Lack of Assistance for Modifications: Moderate Significance**

  Goal: Expand programs that provide assistance for accessibility modifications.
  Timeline: 3-4 years
  Priority: Moderate

- **Lack of Access to Publicly Supported Housing: Moderate Significance**

  Goal: Develop additional affordable accessible housing for non-seniors.
  Timeline: 3-4 years
  Priority: High

- **Lack of Access to Proficient Schools: High Significance**

  Goal: Invest in lower performing school districts to make school proficiency more consistent across the County.
  Timeline: 5-6 years
  Priority: Low

- **Lack of Public Transportation: High Significance**

  Goal: Increase collaboration between CTC and SORTA to improve public transportation in Clermont County.
  Timeline: 3-4 years
  Priority: Low

  Goal: Develop a dedicated regional funding source for public transportation in the Cincinnati region outside Hamilton County.
  Timeline: 5-6 years
  Priority: Low

- **Inaccessible Public Infrastructure: High Significance**

  Goal: Invest in accessibility improvements for public infrastructure.
  Timeline: 5-6 years
  Priority: High

7. Fair Housing Compliance and Infrastructure

- **Housing Discrimination: High Significance**

  Goal: Improve fair housing education programs for real estate agents and landlords.
  Timeline: 1-2 years
  Priority: High

  Goal: Increase enforcement of fair housing laws regarding steering.
  Timeline: 1-2 years
  Priority: High

- **Lack of Resources: Moderate Significance**

  Goal: Continue to fund HOME's fair housing enforcement from Clermont County CDBG to ensure the most effective enforcement.
  Timeline: Immediately
  Priority: High

B. Reasons for Not Addressing Certain Determinants

All determinants were addressed with goals.