

City of Piqua, Ohio
Analysis of Impediments to Fair Housing Choice
Report
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Prepared By:
Karen R. Dickey
Fair Housing Advocate
Pure Flow Fair Housing and Community Development, LLC.

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INTRODUCTION / METHODOLOGY

This Analysis of Impediments to Fair Housing Choice Report (AI) has been conducted to identify impediments to Fair Housing that exist in the City of Piqua and to develop strategies to eliminate or mitigate these impediments.

According to the United States Department of Housing and Urban Development (HUD) Fair Housing Planning Guide-Volume I, the Analysis of Impediments to Fair Housing Choice Report should assist in building public support for Fair Housing efforts. Additionally, HUD provides that:

"The principles embodied in the concept of 'fair housing' are fundamental to healthy communities and communities must be encouraged and supported to include real effective fair housing strategies in their overall planning and development process, not only because it is the law, but because it is the right thing to do" ¹

In addition to analyzing and identifying current impediments to fair housing choice, this report serves to re-educate or remind all public and private citizens of the City of Piqua of what a diverse and dynamic force they have provided for this region in the area of Civil Rights and recaps efforts that the community has made in affirmatively furthering fair housing choice. Housing choice is critical for citizens to meet basic human needs and to pursue personal, educational, employment and other goals. Current data and facts as well as historical data provided will hopefully encourage the continuation of this legacy as well as provide a basis for which hope, faith and determination set future efforts into motion.

This report was compiled through research and study of the sources listed within the appendices and also through interviews and relationships established within common effort and concern to further well being of this community. Directives and policies set forth by the United States Department of Housing and Urban Development (HUD) as well as the Ohio Department of Development Office of Housing and Community Partnerships (OHCP) have guided the content analyzed for this report. This Advocate has specifically studied relevant data, facts and reports regarding this region since 2002, and has resided near or in this region since 1990.

An impediment to fair housing choice is a barrier or hindering factor that exists due to actions, omissions or decisions: public or private, that restrict or have the effect of limiting or diminishing equal access, availability and treatment concerning residential housing for members of protected classes.

The community of the City of Piqua boasts a solid heritage of the advocacy of, and the practice of embracing diversity and promoting equal opportunities. This Advocate has full faith that any impediments outlined to be addressed in this report are or will be addressed with full effort.

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity, *Fair Housing Planning Guide, Volume I*. Washington D.C.: March 1996. p. 1-3.

The community of the City of Piqua, "Where Vision becomes Reality" is not only made up of dynamic leaders, but of truly valued citizens who have unique opportunities to be included in the process of fashioning a vision for the future of the community as well as being part of efforts to bring into reality a continuously better community inclusive of all members. From providing outreach to local neighborhoods, providing a local city newsletter entitled the "Spirit", to literally holding "City Hall in the Park" at the local Pitsenbarger Sports Complex Park in Summer months, this Advocate has not seen or experienced a community more dedicated to valuing and mobilizing its greatest asset; its citizens, for positive community improvement.

What is the Fair Housing Act?

The Fair Housing Act, Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents of legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability). Further descriptions of the "protected classes" are provided below.

The Federal Fair Housing Act is codified at 42 USC Sections 3601 – 3619, and for the State of Ohio in Chapter 4112 of the Ohio Revised Code. The following are protected classes under each codification:

Familial Status: - Including children under the age of 18 living with parents or legal custodians; pregnant women and people in process of securing custody of children under the age of 18.

Disability Status: An individual person or a household that includes a person with a mental or physical impairment, disability or handicap.

Race: Refers to an ethnic group with which a person identifies.

Color: Refers to skin tone.

National Origin / Ancestry: Refers to an individual's heritage or lineage.

Religion: Refers to an individual's spiritual affiliation or attitude.

Sex or gender: This status refers to the human biological classification; male or female.

*****New for Ohio only- Military Status-** including regular active duty service members and reservists or National Guard members who have been activated for service or who must report for training. (Ohio Sub. H.B. 372- the "Ohio Veterans Package")

The Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

The Fair Housing Act and its enforcement and implementation is directly related to these additional laws and executive orders:

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973

Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990

Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

Fair Housing-Related Presidential Executive Orders:

Executive Order 11063

Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246

Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892

Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898

Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166

Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally-assisted and federally conducted programs and activities.

Executive Order 13217

Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

What is Prohibited?

In the Sale and Rental of Housing: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting) or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

In Mortgage Lending: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

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

In Addition: It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Additional Protection if You Have a Disability

If you or someone associated with you:

- Have a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities
- Have a record of such a disability or
- Are regarded as having such a disability

Your landlord **may not**:

- Refuse to let you make reasonable modifications to your dwelling or common use areas, at your expense, if necessary for the disabled person to use the housing. (Where reasonable, the landlord may permit changes only if you agree to restore the property to its original condition when you move.)
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.

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

Example: An apartment complex that offers tenants ample, unassigned parking must honor a request from a mobility-impaired tenant for a reserved space near her apartment if necessary to assure that she can have access to her apartment.

However, housing need not be made available to a person who is a direct threat to the health or safety of others or who currently uses illegal drugs.

Requirements for New Buildings

In buildings that are ready for first occupancy after March 13, 1991, and have an elevator and four or more units:

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

If a building with four or more units has no elevator and will be ready for first occupancy after March 13, 1991, these standards apply to ground floor units.

These requirements for new buildings do not replace any more stringent standards in State or local law.

Housing Opportunities for Families

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under 18 live with:

- A parent
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under 18.

Exemption: Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a Federal, State or local government program or
- It is occupied solely by persons who are 62 or older or
- It houses at least one person who is 55 or older in at least 80 percent of the occupied units, and adheres to a policy that demonstrates intent to house persons who are 55 or older.

A transition period permits residents on or before September 13, 1988, to continue living in the housing, regardless of their age, without interfering with the exemption.

Ohio's Standard Fair Housing Program

The Ohio Department of Development (ODOD) Office of Housing and Community Partnerships (OHCP) provides oversight of all jurisdictions within the State of Ohio to ensure said jurisdictions are in compliance with federal Fair Housing Act mandates. As a recipient of federal Community Development Block Grant (CDBG) funds, in addition to federal and state Community Housing Improvement Program (CHIP) funds when awarded, the City of Piqua certifies to Affirmatively Further Fair Housing and to conduct the minimum requirements set by the State of Ohio's "Standard Fair Housing Program" established in 1993.

Components of Ohio's "Standard Fair Housing Program are:

- 1) Provide a local Fair Housing Contact and Intake Process
- 2) Conduct an Analysis of Impediments to Fair Housing Choice (AI) within the jurisdiction; take appropriate actions to overcome the effects of any impediments identified through the analysis and maintain records reflecting the analysis and actions in this regard. The AI Report is to be updated and submitted to the state with the jurisdictions CDBG Formula Allocation Application annually.
- 3) Provide a Fair Housing Training Program
- 4) Provide a Fair Housing Informational Material Outreach Program

CITY OF PIQUA FAIR HOUSING COMPLAINT STATUS

The U.S. Department of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity (FHEO) administers the Fair Housing Act and jointly enforces it with the United States Department of Justice (DOJ). In Ohio, it is the responsibility of the Ohio Department of Development (ODOD) Office of Housing and Community Partnership (OHCP) to oversee that mandated Fair Housing requirements be carried out by each jurisdiction. The Ohio Civil Rights Commission (OCRC) is the lead enforcement agency in the State of Ohio.

The City of Piqua provides its Community Development Department Manager, William Lutz, as its local fair housing contact. Mr. Lutz also serves as Chairperson for the Miami County Fair Housing Committee. The City of Piqua contracts services with the Miami County Economic and Community Development Department to provide an intake and referral service for citizen complaints. This Fair Housing Advocate served in the role of Miami County Fair Housing Program Coordinator providing the aforementioned intake referral process within the Miami County Economic and Community Development Department for FY'02 throughout FY'06 and partially in FY'07.

Below is a summary of calls for assistance in FY'06:

Calls by jurisdiction: Miami County – 65; City of Troy – 74; City of Piqua-68

Types / nature of calls:

Landlord/Tenant Other: 36

Landlord /Tenant Utility Shut Offs (to in effect, illegally evict): 15

Landlord / Tenant Repair / Health & Safety Issues: 46

Foreclosures/Predatory Lending / Other Homeowner Assistance Requests: 40

Landlords seeking advice or assistance: 14

Agency Calls (in direct relation to conciliating complaints): 45

Mobile Home Park Issues: 7

State Officials seeking assistance (not including Ohio Dept. of Development): 4

No complaints have been filed to the Ohio Civil Rights Commission or the United States Department of Housing and Urban Development concerning Fair Housing violations in the City of Piqua for calendar years surveyed; 2002 through the present.

JURISDICTIONAL BACKGROUND

The community of the City of Piqua boasts a solid heritage of advocacy for and the practice of embracing diversity. This unique heritage of diversity acceptance, advanced primarily through relationship building, remains evident in the essence of the present day community; and as in its past, remains foundational in fostering this area for growth in the future.

This region was initially occupied by Native Americans. A band of the Miami Tribe and a group of east coast colonial traders established Fort Pickawillany in 1747, a trading post which served over fifty traders and frontiersmen. This Fort was later destroyed in 1752 by French troops and their allies of another Miami tribe. The second Native American settlement period in the area began in 1780 with the creation of two separate Shawnee tribal village communities.

Sometime around 1793, General Anthony Wayne built Fort Piqua at Upper Piqua which was garrisoned until late 1795. After the defeat of the Native Americans, a group of several different tribes, at the final battle of the Northwest Indian War; the Battle of Fallen Timbers near Maumee, Ohio and the signing of the Treaty of Greenville, in Greenville, Ohio, southwestern Ohio was virtually opened to settlers.

The first structure in the present City of Piqua was built in 1796. The first child born was in the jurisdiction in May of 1800 and by the end of 1804, the first grist mill was in operation.

Colonel John Johnston - farmer, public official, and United States Indian Agent for Western Ohio from 1812 to 1829 moved to Upper Piqua (adjacent to the northern or upper settlement village of Shawnees) with his family in 1811. John Johnston, whose birth family emigrated from Ireland to the United States when he was about eleven (11) years of age, provided numerous contributions to the growth of early Ohio and settlement of frontier America. At the beginning of the War of 1812, all the neutral tribes were placed under his supervision. Johnston was considered an ally and a great influence for and to Native Americans. He attended all the councils held at Piqua between the tribes and U.S. government commissioners. Native Americans trusted Johnston, regarded him with more reverence and perceived him to have more genuine concern and interest than any other white man. While an obvious task was at hand to reallocate lands as a result of the Treaty of Greenville, Johnston tempered this task by providing a voice that demanded the task be undertaken with mutual respect within the sanctity and privilege of the human condition.

One account that illustrates this mutual relationship is as follows; in August of 1812, the northern Indians under the influence of Tecumseh laid siege to Fort Wayne (Indiana). Johnston knew the danger this posed to that post, so he asked for volunteers to bring the women and children from Fort Wayne to Piqua. The Shawnee Chief, Captain Logan, who was living at Upper Piqua at this time, responded to his friend's request, and with a small band of selected Indians, brought the women and children of Ft. Wayne to safety of Piqua.

Johnston fostered this climate of mutual respect and respect for human life between Native American tribes and American European settlers as transitions occurred through the result of the

Treaty of Greenville. Despite isolated incidences such as the Dilbone Massacre on August 18, 1813 which occurred in current Springcreek Township, hostility remained minimal.

Tecumseh's War and The War of 1812 further strained peaceful relations between various Native American tribes and the United States which reverberated and even occurred very near this region. Johnston exerted full and fruitful effort toward the task of keeping peaceful relations.

Part of an account relating what the Wyandot Indians provided to President James Monroe in November of 1819 regarding John Johnston's actions during the War of 1812 is as follows:

"Great Father, during the late war our brother Johnston's advice and council kept our young men your friends - the task was arduous and but few white brotheren would have kept us together as he did."

- Source: Ohio Historical Society

Today, Johnston's former homestead, now a 200 acre park on the North West edge of Piqua, is the site of the Piqua Historical Area State Memorial, which was established as Ohio's 47th state historic site in 1965. The site showcases history from prehistoric Indians to Ohio's canal era. Citizens and visitors may enjoy the home and farm much as it appeared in 1829. Furnished preserved structures include Johnston's two-story mixed Dutch Colonial/Georgian style farmhouse, a novel two-story spring house, and a cider house. Costumed interpreters and craft demonstrators provide farm tours and display activities in the summer kitchen and fruit kiln areas. A double-penned log barn, constructed in 1808, is reputed to be the oldest and largest of its type in Ohio, and is still in use on the grounds. A ring-shaped mound earthwork on the property that was discovered and preserved by Johnston was constructed by people of the Adena culture over 2,000 years ago. In 2001, the museum was renovated with updated exhibits that trace the story of the Eastern Woodland Indians of Ohio and feature a reconstructed replica of the Fort Pickawillany site. Artifacts from Ohio's canal era are also on exhibit. Restroom facilities, snacks, and a gift shop that are handicap accessible are located within the museum. It is open to the public April through October and is the site of the annual Piqua Heritage Festival.

Ohio was incorporated as a State of the United States Union in 1803. Official incorporation of the City of Piqua occurred in 1807 with its name provided as Washington Township; however, in 1816 the State Legislature was petitioned to restore the town to its original Indian name; Piqua. George C. Johnston, a trader for many years among the Indians and a member of the Shawnee tribe, explained the origin of the name Piqua herewith. He was advised by a member of the tribe, that many years ago the whole tribe was assembled at an annual feast of thanksgiving. They were all seated around a large fire, which having burned down to embers, a great puffing was observed in the ashes. Suddenly, a full formed man sprang up from the remains of the fire and the tribe exclaimed in astonishment "Otaht-he-wagh-Pe-Qua." (He has come out of the ashes) And from that time, that place was called Piqua which is a name that continues to mark the uniqueness of the city today.

By the year 1823, the village formed a city government and boasted a newspaper, several mills, a post office, and a population of over 350 people. The village re-incorporated in 1835 and elected its first mayor, none other than the aforementioned John S. Johnston.

The city and region continued to develop and become populated with the spirit of embracing diversity and opportunity.

Some Piqua and Miami County residents can actually trace their roots to the early Randolph former slave group. The Randolph former slaves acquired their name from John Randolph, a plantation owner in Charlotte County, Virginia. At his death in 1833, Mr. Randolph freed his slaves and provided \$8,000 for the purchase of land for their use in a free state, a hefty sum in especially in that day and age. Judge William Leigh of Virginia was appointed to carry out the will's provisions. Following lengthy litigation in the Virginia courts, Judge Leigh purchased 2,000 acres of land in Mercer County. Leigh then arranged for the transport of over 300 former slaves down the Ohio River to Cincinnati, then northward by canal boat to Minster in Auglaize County from which location they could travel to settle and prosper upon the lands which were purchased on their behalf. Unfortunately, a group of armed farmers refused to allow the slaves to disembark. After being forced to turn back the boat in the direction from which it came, they were permitted to unload at Piqua, Ohio.

The July 25, 1846 Piqua Register carried the following account of the "Randolph Negroes":

"These unfortunate creatures have again been driven from lands selected for them. As we noted last week, an effort, which it was thought would be successful, was made to settle them in Shelby County, but like the previous attempt in Mercer, it has failed. They were driven away by threats of violence. About one third of them, we understand, remained at Sidney, intending to scatter, and find homes wherever they can. The rest of them came down here to-day (Thursday) and are now at the wharf in boats. The present intention is to leave them wherever places can be obtained for them. We presume, therefore, they will all remain in the State, as it is probable they will find situations for the whole of them between this and Cincinnati. The necessity which now separates and scatters them over the whole country (connected as they are by ties of kindred, being as it were, but one family,) is a hard one, but it is probably the best thing that can be done."

-Source: Miami County Genealogical Society

A suit, later filed in Mercer County to recover their lost purchased lands, was decided against the Randolph former slave group. Neither the land, nor the price and money conveyed within the purchase, has ever been recovered.

Meanwhile, efforts to make known the plight of this group by concerned Piqua Citizens and others resulted in the availability of the purchase of local lands. A sizable group settled in the Knowles Addition just east of the Village of Rossville in Springcreek Township, which is now annexed to the City of Piqua. It is quite significant to note that the 1850 census of Springcreek Township cites that four black men owned property worth a combined total of \$950. This is of even more significance when compared to the value of white property ownership in Rossville (of

Springcreek Township) which totaled only \$1,100. The black population did not increase substantially in comparisons of the 1850 and 1860 censuses; however, the group was clearly prosperous. Property and cash values increased from \$1,100 in 1850 to \$3,530 in 1860. Land ownership had increased from four black owners of property to fourteen owners. By 1860, nearly one third of the original group, 93 Randolph Former Slaves were still living as a group within the township. (See Appendix A for photo).

It is noteworthy to reinforce the fact that the aforementioned account provided occurred prior to the Civil War of the United States of America which raged from 1861 – 1865.

Today, the Rossville Museum and Cultural Center is open to the public from Summer through October Tuesdays and Thursdays from 1:00 p.m. to 4:00 p.m.

Although Ohio was established in 1803, and did not permit slavery within its Constitution, it directly bordered Kentucky, and the Virginias; states legal to own slaves. Some people within these jurisdictions had freely migrated and become members of this state and were somewhat oblivious to that fact that slave ownership was illegal. Ohio's Official State Motto is "With God All Things Are Possible"; the State Bird is Cardinal, and the State Tree is the Buckeye. The general populous of the State today can recite the designated bird and tree, but not the motto. However, within the City of Piqua, as this advocate has interviewed and assessed this community, and it has become clear that the motto, regardless of source, is known of and; has been, is and will be consistently conceived in practice.

For decades prior to the Civil War, local Piqua Citizens who believed that the internment of fellow human citizens regardless of race was wrong had started and realized the fruition of the Abolitionist Movement. The Underground Railroad became a hope and relief for many Americans of African decent who were not only just indentured servants, but wholly placed as property or chattel under the ownership of other human beings.

A well traveled course of these people, former slaves, seeking simply freedom of self ownership and opportunity through this established Underground Railroad was perpetuated only through efforts of other human beings who believed that "All men are created equal" and "posses certain unalienable rights" as stated within the United States Constitution. This route was made available for travel through Piqua, Ohio. Accounts suggest the route went from at or near Cincinnati, Ohio (as depicted in Harriet Beecher Stowe's "Uncle Tom's Cabin"), and went through Hamilton, Troy, and deposited freedom seekers for routing to John Scudder in Piqua, Ohio. Scudder, an Abolitionist, then assisted in further travel to Sidney and northward towards Canada. Today, Scudder Street still exists in the heart of Piqua.

The accomplishments of that movement are sparsely documented at best due to the fact that although Ohio was a free state; any effort in assisting a slave to escape from slavery, bondage or otherwise ownership from a member of those states where slavery was legal was illegal and severely punishable especially in border states. To assist in any fashion in directly obstructing a legal right to practice slavery could result in the seizing of personal assets and/or property and / or even up to a capital punishment verdict.

Another population which was genuinely welcomed within the Piqua community was of German decent. In the 1830's whereas prior Irish, English and Italian immigrants had and were established, yet roughing though internal struggles on the East Coast, another group added into the mix was not particularly welcomed. Many German immigrants by passed the East Coast, traveling directly from Virginia to Ohio, and found a place to call home in Piqua. The largest wave of German immigration lasted from the 1830's through the onset of the Civil War in 1861. Four German speaking churches of various denominations were established along with other businesses such as a newspaper, breweries, and construction businesses.

The Canal reached Piqua in 1837 and the city remained the canal's terminus until 1842. During the most active period of the canal during the 1850's, produce and passengers arrived into Piqua from as far as Cincinnati in the south and Toledo in the north on a regular basis. While canal traffic dwindled in the 1860's, the Miami and Erie continued to support a heavy traffic load of such commodities of coal, lumber, and stone until 1912. The insurgence of the steam locomotive replaced the use and importance of the canal system.

From 1835 through 1930 the City of Piqua operated under a mayor/city council form of government. The city voted in 1929 to change to the city manager/city commission form of government and the city hired its first city manager in 1930.

The City of Piqua has prospered socially and economically throughout many years. Another of the Cities major accomplishments in the area of promoting diversity and acceptance, that is/was nationally and globally acclaimed, was provided by City of Piqua citizens in assessing and addressing the needs of individuals again on a humanistic level. The Mental Hygiene Association of Miami County, now doing business as the Mental Health Association of Miami County, became an associated group in 1945 and incorporated in 1951. This group conducted meetings and business in the basement of what was then the City of Piqua Hospital. The group with the assistance of community teachers, nurses and many other concerned and caring citizens collaborated with the Ohio State University in compiling a survey which established that the need for counseling and other mental health services were equally relevant in rural communities just as they are in urban settings. The end result of the study was published in a 1947 TIME MAGAZINE article titled "NEUROUS OUT OF TOWN". The article itself was brief, approximately 450 words, yet had an instant and resounding impact worldwide. A picture of post war Queen Elizabeth was on the cover fueling the circulation of the issue, which completely sold out of newsstands worldwide. The Mental Hygiene Association of Miami County was the first Mental Health Association established in the State of Ohio and applied for and received a state grant that established the first mental health center in rural Ohio. The initial center called the Upper Valley Guidance Center was based in Piqua and branched out to Troy. It served not only Miami County, but also Darke, Shelby, Preble and Champaign Counties.

Another Piqua Citizen who made incredible progress in the area of Civil Rights that reverberates today was William Moore McCulloch (1901-1980). Upon graduating from the Ohio State University, he was admitted to the bar and established residency and a law practice in Piqua, Ohio in 1925. He was elected by this region and served in the Ohio House of Representatives from 1933 to 1944. In November of 1947, he was elected by the region as a Republican to serve as a Congressional Representative. He served there for five terms. As ranking Republican on the

House Judiciary Committee, he and Democratic Chairman Emmanuel Celler pushed the Civil Rights Act of 1964 through the House of Representatives. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Subsequently, the Fair Housing Act was created through Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, and prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status, and disability. In 1972, he returned to the practice of law in Piqua, Ohio and died while in Washington D.C. in 1980.

Today, the community of the City of Piqua, "Where Vision becomes Reality" is not only made up of dynamic leaders, but of truly valued diverse citizens who have unique opportunities to be included in fashioning the vision and being part of efforts to bring into reality a continuously better community inclusive of all members. From providing outreach to local neighborhood associations to literally holding "City Hall in the Park" locally at the local Pitsenbarger Sports Complex Park in Summer months, this Advocate has not seen or experienced a community more dedicated to valuing and mobilizing its greatest asset; its citizens for positive community improvement.

CITY OF PIQUA FAIR HOUSING RELATED DATA FACTS

(Based on the 2000 U.S. Census, American Communities Survey 2005 Data, U.S. Department of Housing and Urban Development (HUD) FY2008 data, The National Low Income Coalition and Policy Matters, Ohio 2008 data and Miami County Metropolitan Housing Authority 2008 data)

As per the 2000 Census, there are 20,738 citizens in the City of Piqua making up slightly over one fifth of the residents of Miami County.

Approximately 3701 people in the City of Piqua over the age of five, who do not reside in an institutionalized setting, or roughly 18% of the total population, have a mental or physical disability. Of the population of residents over the age of 65; nearly 40% are disabled.

The 2000 U.S. Census 2000 reports that there are 5,492 children under the age of 18 residing in the City of Piqua, making up over 26% of the City's total population indicating a significant number of "familial status" households.

A majority of City of Piqua Citizens, 18,242, identified a specific ancestry about themselves for the 2000 Census. The largest groups were; "American", "German", "Irish" and "Other" – including Native American.

The majority race / color in the City of Piqua is "Caucasian / white"; 94.2%.

According to 2000 U.S. Census Data, there are 9,905 male citizens and 10,833 female citizens in the City of Piqua.

The 2000 U.S. Census did not tabulate religious preference, however, through observation and confirmed by local telephone directories, it is concluded that an active and diverse religious base exists in this community.

Housing Facts

The median home value in the City of Piqua in 2000, was \$84,000; a full 23% lower than the median home value of Miami County which was \$109,600. The median home value in Miami County in 1990 was \$65,000; by 2000 the median home value had increased by 70% to \$109,600. According to the American Communities Survey 2005 tabulated by the U.S. Census Department for Miami County, but not for the City of Piqua individually; Miami County's median home value had increased another full 27% to \$139,300, indicating that the median value of a City of Piqua home in 2005 was approximately \$107,261. However, corrections within the inflated housing market of the United States in general including this region is currently taking place. If applying a more traditional increase in median value of 3% per year rather than the 6.5% per year increased average from 2000 to 2005, the median home value in the City of Piqua increased value would equate to approximately \$97,379; a figure which seems to better represent true current values.

The majority of housing units in the City of Piqua, 87.1% or 7739 units, were built before 1979. The largest age range of housing units are units that were built in 1939 or earlier (38.1%). This indicates a potential presence of lead paint and need for potential maintenance and repairs.

According to the 2000 Census, there are 8886 total housing units in the City of Piqua, with approximately 623 vacant and 5229 or 63.3% of the housing stock utilized by owner/occupants and 3034 or 36.7% utilized by renters. Current indications that the number of owner occupants has increased will be reflected in the 2010 Census.

Ohio is currently ranked number three (3) in the nation for the increase of foreclosure filings / sheriff sales. Miami County had 81 foreclosure filings in 1995, 427 foreclosure filings in 2005, and 578 in 2007. Appendix G illustrates the graduated increase of foreclosure filings in Miami County between those dates.

Educational Attainment Profile

The following information is based on people over the age of 25 in Piqua, Ohio, surveyed for the U.S. Census 2000, broken down by percentages of population.

- Graduate or Professional Degree – 3.3%
- Bachelors Degree or higher – 6.6%
- Associates Degree – 5.2%
- High School Graduates with some college, but no degree – 18.2%
- High School Graduates (including GED) – 41.4%
- No High School Diploma – 25.3%

Income / Labor

In 2000, the population of City of Piqua residents at or over the age of 16, in the labor force was 10,641.

Per capita income or median individual income in per 2000 Census = \$18,719 compared with Miami County per capita or median individual income of \$21,669.

The number of individual citizens living in poverty in 2000 within the City of Piqua was 2,489 or 12.2 % of the population, with the total number of individuals living in poverty in the entirety of Miami County being 6,531 or 12.4% of the population. The number of families living poverty in 2000 within the City of Piqua was 548, or 9.6%, with the total number of families in poverty in the entirety of Miami County being 1,429 or 9.2% of the population.

The median household income in 2000 within the City of Piqua was \$35,681, with the median household income of Miami County in entirety being \$41,109.

According to the U.S. Census 2000, male full time year round wage earners in the City of Piqua earned a median dollar amount of \$31,808; while female full time year round wage earners of the City earned a median dollar amount of \$22,241; a full 30% less than their male counterparts.

**IMPEDIMENTS TO FAIR HOUSING CHOICE / RESULTS OF ACTIONS
UNDERTAKEN BY THE CITY OF PIQUA TO REMEDY IDENTIFIED
IMPEDIMENTS**

With careful analysis, observation and consideration, the following items are identified as impediments to Fair Housing Choice:

1. Lack of safe, decent, affordable housing for people within protected classes
2. Predatory Lending / Foreclosures
3. Lack of Financial Education Initiatives or Programs including but not limited to Foreclosure Intervention, Credit Repair/ Counseling, Homebuyer Counseling
4. Lack of resources to consistently provide Fair Housing Program Education / Initiatives above minimum requirements
5. Lack of Economic Opportunity / Transportation Issues

Lack of safe, decent, affordable housing for people within protected classes – Impediment One (1)

The City of Piqua is one of the most affordable jurisdictions in Miami County; however, affordability issues are still a concern and are outlined herein. Additionally, challenges concerning the condition of aging housing stock are prevalent and explained.

The City of Piqua has and continues to vigorously address these problems in a wide variety of ways. Outlined below is an explanation of the extent of the problems followed by examples of how the City continuously provides substantial effort to address them.

Out of 8,886 total housing units (apartments and single family homes), 87.1% or 7739 units have the potential to contain lead based paint as they were built over 30 years ago. Approximately 38.1% or 3,381 units were built prior to 1939. Given the age of most existing housing, there is a relatively high rate of substandard housing, much of which is owned or rented by low to moderate-income families and individuals. Generally in housing at or prior to the age of thirty years maintenance issues expand far past mowing grass and cleaning gutters to replacing major housing systems such as roofs, heating / cooling systems, electric, windows, paint or siding and more making the affordability of safe decent sanitary housing even less likely for low to moderate income owners and renters.

Accessible accommodation features are also rarely found in units built prior to 1990, and may be impossible to safely and adequately provide in many units. For example, widening doorways and hallways may cause structural deficiencies in a significant number of units.

The U.S. Department of Housing and Urban Development (HUD) defines housing “affordability” as paying out only 30% of one’s gross income on housing expenses including utilities. This 30% figure applies to both renters and owners. Within this section, rental housing and owner occupied housing will be analyzed separately.

Rental Housing

HUD established for FY2008, Miami County Fair Market Rents including utilities as:
1 bedroom- \$551; 2 bedrooms - \$678; 3 bedrooms - \$913; & 4 bedrooms- \$1089

Whereas the City of Piqua has a lower housing value than the average set for Miami County as whole, actual prices for rental units are generally lower. However, due to age and condition of said units, average utilities are generally higher especially in the winter time making the averages set forth by HUD realistic and applicable for actual use by the City.

According to the United States Census of 2000; 38.2% of City of Piqua renters were paying over 30% of their income in rent alone excluding utility costs. Considering an addition of just 10% of income for use on housing related utilities such as electric, gas and water; 59.6% of renters would be paying over 30% of their income on housing costs.

In Miami County, the HUD Fair Market Rent (FMR) for a two-bedroom apartment is \$678. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$27,120 annually. Assuming a 40-hour work week, 52 weeks per year, and this level of income translates into a Housing Wage of \$13.04 per hour. A minimum wage worker earns an hourly wage of \$7.00. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 75 hours per week, 52 weeks per year. Or, a household must include 1.9 minimum wage earner(s) working 40 hours per week year-round in order to make the two bedroom FMR affordable. For a three bedroom unit at the HUD Fair Market Rent (FMR) of \$913, a household must earn \$36,520 annually.

According to the 2000 Census, City of Piqua citizens have a per capita income of \$18,719 and a median household income of \$35,681. The 2000 Census cited the median household income in Miami County as \$44,109, nearly 25% higher than the City of Piqua.

In Miami County, the estimated mean (average) wage for a renter is \$10.58 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 49 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.2 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable.

Monthly Supplemental Security Income (SSI) payments for an individual are \$637 in Miami County. If SSI represents an individual's sole source of income, \$191 in monthly rent is affordable, while the FMR for a one-bedroom is \$551.

The Miami County Community Action Council/Metropolitan Housing Authority owns and operates 127 total housing units (public housing) 40 of which are family units located in Piqua where rent/utilities are set at 30% of household income. There are over 300 individuals or families currently on the "waiting list" equivocating to over a year wait.

The forty (40) family units located in the City of Piqua owned and operated by the Miami County Community Action Council/Metropolitan Housing Authority are located in the Washington Commons Complex. It is interesting to note that some residents of Washington Commons due to their income capacity are paying full rent requiring no subsidized assistance.

The units are well maintained and are located adjacent to an area of well maintained homes built in the late 1960's / 1970's. They are within walking distance to two City of Piqua Parks and Recreational facilities. When these residents are asked why they choose to remain in a subsidized housing complex paying full rent rather than renting on the open market, responses vary from job insecurity, to feeling safe within the neighborhood, and also due to the inability to find comparably priced maintained units and space.

The Miami County Community Action / Metropolitan Housing Authority also manages 975 Section 8 rental assistance vouchers, where rent is based on 30 % of household income, and units rented from the open market are subsidized. Currently, all Section 8 vouchers are in use and there are over 800 individuals or families waiting to apply for this assistance equivocating to an approximate two (2) year wait for assistance. The number of vouchers utilized within the City of Piqua varies.

In Miami County there are 671 Project Based Section 8 units (448 for elderly and 223 for families), and 382 Tax Credit units (304 family, 78 elderly). Some base rent on income.

Below is a chart of these units available within the City of Piqua.

PRIVATELY OWNED SUBSIDIZED HOUSING
(The tenant normally pays 30% of their income
for rent and utilities.)

SITE	ADDRESS	PHONE	UNITS	
			Total No.	Bedroom Size
FAMILY UNITS		Area Code (937)		
Piqua Village	1345 Covington Ave. Piqua, OH. 45356	773-9537	35	2,3,4
ELDERLY / DISABILITY UNITS				
Piqua Village	1345 Covington Ave. Piqua, OH. 45356	773-9537	30	1
Roosevelt Manor Hours: 8-12 noon, M-F	500 S. Roosevelt Ave. Piqua, OH. 45356	778-8037	30	1
Sunset Square	1851 W. Grant Piqua, OH. 45356	778-0806	30	1
Westgate Villas	1851 W. Grant (Office) Piqua, OH. 45356	778-0806	10	1
FAMILY UNITS				
Washington Commons operated by Miami Metro Housing Authority	950 McKinley Ave. Piqua, OH. 45356	335-7921	40	1,2,3,4

TAX CREDIT HOUSING (Rents are set, not a percent of income)				
ELDERLY UNITS				
Piqua Senior Housing	316 N. College St. Piqua, OH. 45356	615-0215	78	0,1,2
FAMILY UNITS				
Bent Tree Apartments	1240 Garbry Road Piqua, OH. 45356	778-9155	84	2,3

Owner Occupied Housing

HUD defines housing costs as causing a “cost burden” status when over 30% of a household’s gross income is expended on rent or mortgage payments and housing utility costs.

According to the 2000 U.S. Census, out of 4,963 owner occupied residences in the City of Piqua; 31% or 1,536 are owned free and clear of a mortgage. Additionally, for 37.4% or 1,854 owner occupants, mortgage or housing cost equated to less than 15% of their income. However 17.2% or 852 owner occupants were expending over 30% of their income on their mortgage. Adding a modest 10% of income as utility costs such as gas, electric and water, an additional 1085 (21%) owner occupant households are rendered cost burdened bringing the total of cost burdened owner occupants to 39%.

With the rise in utility costs, insurance and property taxes since 2000, in addition to the very active home refinance market over the past eight years; the figures stated above may have drastically changed.

Additionally, home maintenance is in no way tabulated here. As stated earlier, the majority of housing units in the City of Piqua, 87.1%, were built before 1979. The largest age range of housing units were built in 1939 or earlier (38.1%). Given the age of most existing housing, there is a relatively high rate of substandard housing, much of which is owned by low to moderate-income families and individuals. Extensive costly repairs are necessary to maintain housing stock of this age including major housing systems such as roofs, heating / cooling systems, electric, windows, paint or siding.

A list of appendices of maps further illustrates the City of Piqua’s housing circumstance:

- Appendix B- Map City of Piqua Location/Density of Occupied Rental Units
- Appendix C- Map City of Piqua Shaded indicating Median Home Values
- Appendix D- Map City of Piqua Location/Density of Owner Occupied Units
- Appendix F- Map City of Piqua Percentage of Families Below Poverty Level
- Appendix G- Map City of Piqua Percentage of Individuals Below Poverty Level

City of Piqua's Actions to ensure the choice of safe, decent affordable housing

The City of Piqua continuously strives to improve the condition and availability of safe decent and affordable housing for its citizens in a variety of ways.

The City of Piqua Community Development Department applies for competitive Community Housing Improvement Program (CHIP) grants through the Ohio Department of Development and has been successfully awarded \$1,636,000 since FY2001. These funds are used to provide owner occupied rehabilitation as well as rental rehabilitation, emergency housing assistance, and other necessary infrastructure updates. Another CHIP grant has been applied for and by October of 2008, hopefully another round of funding will be awarded. The City of Piqua Housing Advisory Committee, a panel of required participants assembled to provide input throughout the grant application process did provide a suggestion to concentrate dollars into specific areas of greatest need.

The City of Piqua has stepped up its Code enforcement efforts over the past few years to ensure that violations are promptly addressed. Additionally, the City utilizes Community Development Block Grant dollars for community and housing improvement.

The City of Piqua organizes outreach to neighborhood groups or associations to ensure inclusion in the processes of rejuvenating the City partially through providing opportunities to rehabilitate housing stock. In 2005, the City of Piqua recognized the need for a new approach to assist neighborhoods that were facing serious economic, social, and physical issues and created the Neighborhood Improvement Team (NIT). City Police and Fire Departments are involved in the efforts alongside Code enforcement and Community Development staff. For one 2005 outreach initiative, the City's Community Development Department organized a session with a local landlord association providing Fair Housing information as well as speakers from the City Fire Department and Code Enforcement and Law Department concerning the necessity of repairing and / or maintaining properties.

The City of Piqua also runs a "Renew Piqua" Program; providing paint and supplies to area residents who qualify for assistance. The program also has a component to match volunteers to service projects including painting area homes for those unable to accomplish the task alone.

The City of Piqua adopted its Updated Consolidated Plan in 2008, called "Plan It Piqua". A Steering Committee of Piqua Citizens and City Staff identified areas where public and private investment could be concentrated and promoted and set forth a vision or map for progress.

A general consensus seems to be to not to necessarily attract additional units of lower income housing, but to vigorously put forth effort to rejuvenate existing housing stock.

If new legislation such as the Housing and Economic Recovery Act of 2008 passes, additional opportunities may arise for the City to utilize to ensure the provision of safe decent housing choice especially with the assistance of a nonprofit community development corporation.

Foreclosures/ Predatory Lending – Impediment Two

With the passage of Ohio HB185 providing a means to prosecute predatory mortgage lenders under the Consumer Sales Practice Act and through concerted efforts of the Ohio Attorney General, Ohio Treasurer, Ohio Department of Commerce and the Ohio Governor, adding the necessity for mortgage brokers to be licensed and appraisers to be evaluated; new predatory mortgage lending is currently being curtailed. However, the effects of the past several years of a completely unregulated sub-prime mortgage industry will take several more years unravel.

It is important to recognize that foreclosures result in limiting housing choice in a variety of ways. Future housing choice is compromised due to the fact that the parties sustain harsh, if not irreversible, damage to their credit report and scores. A family coping with foreclosure faces not only the loss of their home, but also ruined credit, which may affect their opportunities to borrow money at a reasonable interest rate for several years to come. Damaged credit may even restrict employment opportunities, the ability to rent, and have an effect on insurance rates. The emotional strain can also be just as unbearable if not even more serious than the economic strain.

The broader impact of foreclosures on a community is equally troubling. Foreclosures affect the value of surrounding properties, and may impede others from selling their own homes even though they have been maintaining their property and mortgage payments. A community with multiple foreclosures will generate less property tax revenue to support all aspects of local government such as schools, social programs and fire and safety services and will many times be drained of additional resources in payments for mowing, boarding up and providing additional policing of the property.

In the City of Piqua, a significant number of severely derelict rental properties have been foreclosed in close proximity causing a situation of blight in specific areas of town.

As early as 2003, this Advocate and others observed factors that seem to be repetitious in certain loans that that end up in foreclosure. These factors were further confirmed at a “Foreclosure Solutions Workshop” facilitated by Miami Valley Fair Housing in May 2006. Some of these practices are predatory particularly when orchestrated with each other. These are the characteristics:

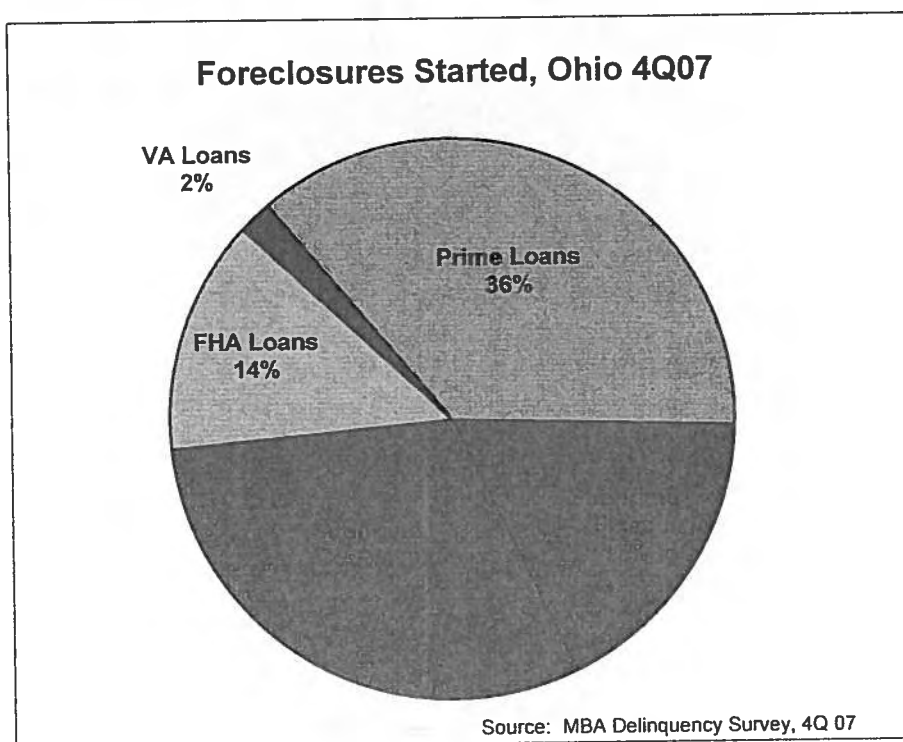
1. Loans have an adjustable rate or a balloon payment
2. The home is over appraised for the mortgage transaction
3. The home is actually worth substantially less than the mortgage payoff
4. Loan has a prepayment penalty
5. Loan is not serviced by a company that is easy to work with on making payment arrangements or modifications
6. Loan had very high fees and commissions
7. Loans were misrepresented by loan officer, or misunderstood by the consumer

Initially, foreclosures seemed to take place predominantly in refinanced or second mortgages, but by 2004, the trend of foreclosures encompassed first time home buyers as well.

Foreclosures are also prevalent not only because of predatory lending practices, but also because of life's "hiccups" such as job loss, divorce or illness. As the current housing market has been substantially inflated; throughout the next few years as it takes a correction, people who face these circumstances may not have any chance of selling their home and getting what is owed on it if they purchased it after FY2000.

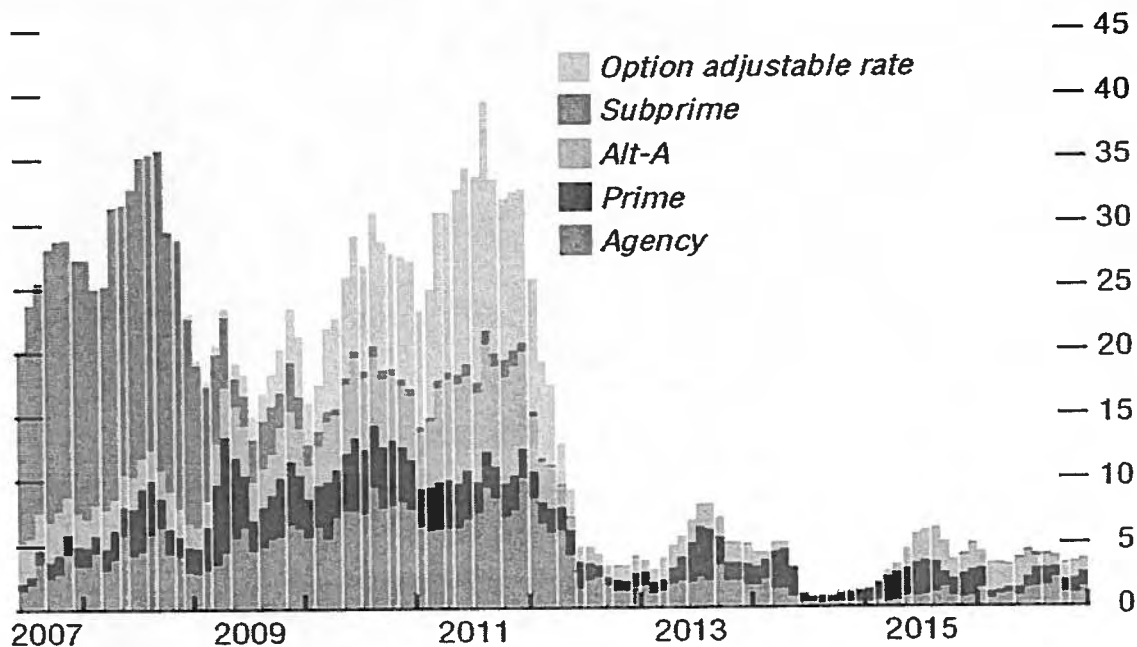
There is no doubt that misuse and/or improper issuance of credit in not only the housing industry, but in the credit card industry has played a significant role in this foreclosure / financial crisis. There has been a general attitude among many that basically these people were all using their homes as if they were ATM machines and are reaping the consequences. However, as more and more people are directly or indirectly touched by the foreclosure crisis, additional dimensions are perceived within the community.

With impending rate resets looming in the sub-prime as well as the prime markets, lack of good jobs and spikes in costs of food and gas; this foreclosure crisis will get far worse before it gets better and will not significantly wind down for at least four to five years. As the melt down of the entire United States housing and financial industries occurs, foreclosures have graduated to not just being limited to sub- prime loans. Below is a chart illustrating how both people with Sub Prime Market loans and people with Prime Market loans are faring.



As mortgage interest rate resets begin to conclude on sub-prime loans, a wave of rate resets will begin to occur for other premium / prime market loans. Many variables remain uncertain as to how this will affect foreclosure rates. If the housing market recovers enough value, if the borrowers credit remains excellent or very good, if the borrower is not overextended, if the borrower didn't go into negative amortization through exercising an interest only payment option, etc., these factors will determine if the borrower can refinance out of the loan.

Figure 1.7. Monthly Mortgage Rate Resets
(First reset in billions of U.S. dollars)



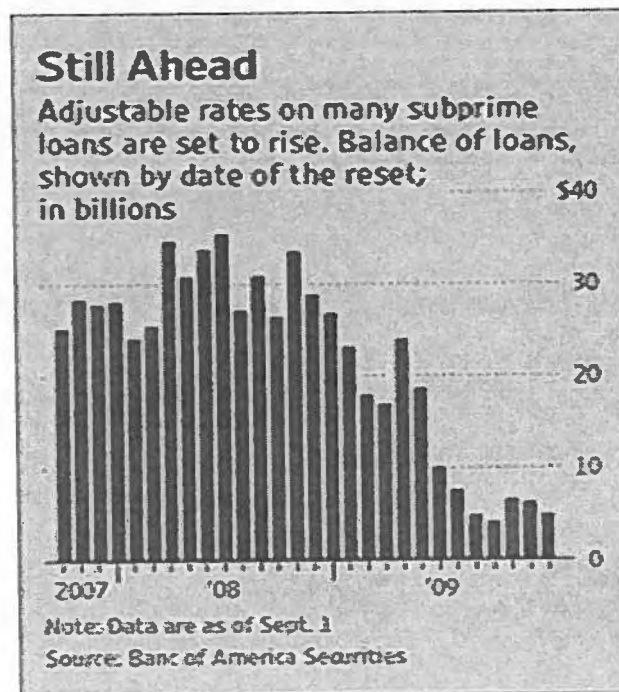
Source: Credit Suisse.

The listed appendices additionally illustrate the location and increase of Ohio Foreclosure filings:

- Appendix G – Ohio Foreclosures 1994- 2005
- Appendix H – Ohio Foreclosures 2007

It is of particular importance to note the saturation of foreclosure filings in Montgomery County (Appendix H); as an agency in that county is responsible for managing and distributing Ohio Home Rescue Funds for Miami County on a first come, first serve basis.

The graph below provides a dollar figure in billions for the value of sub-prime loans scheduled to be reset nationally. It is estimated that over the course of the next five years, Ohio will have a minimum of 14 billion dollars in loan resets. This includes **sub-prime** resets **only**, not prime.

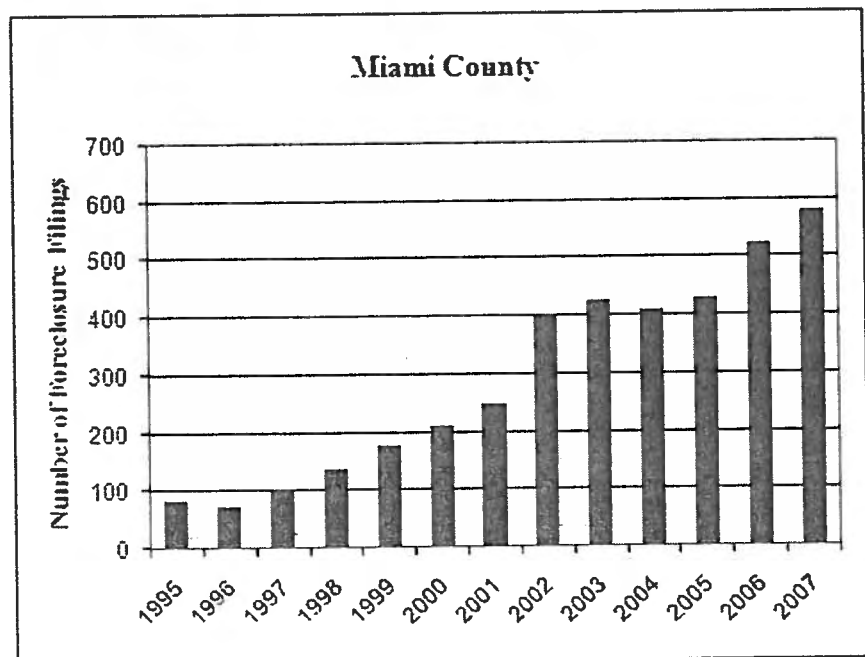


MIAMI COUNTY FORECLOSURE FILINGS 1995-2007

These figures are estimated to triple within five years.

Source: Ohio Supreme Court compiled by Policy Matters Ohio

Year	Miami Filings
1995	81
1996	71
1997	96
1998	134
1999	174
2000	208
2001	247
2002	402
2003	423
2004	406
2005	427
2006	521
2007	578



Lack of Financial Education Initiatives or Programs including but not limited to Foreclosure Intervention, Credit Repair/ Counseling, Homebuyer Counseling- Impediment Three (3)

The effect of Ohio SB 185's passage a year ago Spring, may be to curtail new cases of predatory lending practices that have occurred in the past, however, in the case of a substantial number of Piqua Citizens, especially elderly citizens, remaining equity rich and income poor, educational efforts concerning Home Equity Reverse or Conversion Mortgages, and other types of mortgage loans will be necessary to preserve, protect or enhance homeownership.

There is an immediate need for foreclosure intervention assistance for City of Piqua Citizens. This need will continue to increase as illustrated in the previous section.

There are no HUD approved homebuyer counseling or foreclosure intervention agencies operating within Miami County for the City of Piqua Citizens to utilize. There are no credit education or counseling programs in Miami County. This is important because as federal and or state funding becomes available for assistance, local agencies are not lined up to respond. See appendix J for a map illustrating the availability and proximity of service for City of Piqua Citizens facing potential foreclosure.

The Senate Banking, Housing and Urban Affairs Committee passed the Federal Housing Finance Regulatory Reform Act of 2008, a bill that in addition to providing greater oversight of Fannie Mae and Freddie Mac, would establish a national housing trust fund dedicated to the creation, rehabilitation and preservation of affordable housing units for low-income and initially a large portion of foreclosure assistance.

An agency must operate a housing counseling program according to HUD specific guidelines for an entire year before it can apply to become an approved HUD Homebuyer Counseling Agency. With HUD approval, the agency would be eligible to apply for direct HUD Homebuyer Counseling Agency funding. Meanwhile, public awareness and community support including financial contributions will need to be garnered in order for the agency to launch and run a program for approximately one to two years, prior to gaining HUD approved status.

It is important to stress that an impediment to fair housing choice is a barrier or hindering factor that exists due to actions, omissions or decisions: public or private, that restrict or have the effect of limiting or diminishing equal access, availability and treatment concerning residential housing for members of protected classes. Every Citizen of the City is a member of one or more protected classes. The previous section outlined how housing choice is virtually diminished through foreclosure, but it is also diminished through simply making other bad financial decisions especially concerning the care and handling of credit.

Providing a source of accessible continuous credit and financial education is imperative for community well being and will effectively promote fair housing choice. Education geared not only as crisis intervention but as a preventative tool, is a responsibility that must be undertaken in this jurisdiction and surrounding communities. By 2010, all high school seniors within the

State of Ohio will be required to complete a number of financial education hours in order to graduate.

Previously, the Miami County Fair Housing Committee provided a "Housing Rights, Facts and Options" educational tool outlining rights under the fair housing act, credit basics, an explanation of and examples of compound interest, banking basics, household cost scenarios and numerous related web and phone resources to access for high school seniors, however, this has been discontinued.

Certain budget counseling/ mentoring is offered through faith-based and nonprofit groups, however it is provided on an as needed basis only.

The Ohio State University Extension Miami County Office provides a basic financial literacy class to residents who are undergoing bankruptcy. The class is required to be completed by citizens prior to a bankruptcy being granted and is provided in a two hour group session with no one on one review of credit scores, etc. It is provided "after the fact" in a generic fashion and is not currently open to the public.

Many more incredible advances this year have been made in the area of consumer advocacy that have the effect of promoting fair housing choice.

An end to present day payday loans as we know them is right around the corner; Ohio HB 545, the Short-Term Lender Law, was just signed into law. It caps interest rates that payday lenders can charge at 28% APR. Lenders have until the end of August 2008 to comply with the new law. Many are closing. Whereas many were realizing well over 400% APR, 28% is not lucrative to remain in business in Ohio anymore.

It will be interesting to see what the effects of basically the loss of this multibillion dollar financial services industry in Ohio. It is obvious that there is a need for short term "stretch to payday" loans. The only alternative this Advocate sees is that people will either use credit cards more, or bounce more checks at traditional financial institutions. At the cost of \$20 to \$40 per bounced check and sometimes a \$5 per day overdraft fee, the payday lenders may not appear as predatory as before. Some Ohio Counties such as Greene County have actually developed payday lending services through their Department of Jobs and Family Services PRC funding that actually generate program income. It is highly doubtful that would be replicated in Miami County, but the possibility of nonprofits or the City partnering with a local bank to institute such a program may be a solution.

City of Piqua's Actions to address predatory lending/ foreclosures (impediment two) and the lack of consumer education/ intervention services (impediment three)

The City of Piqua has provided substantial creative efforts to address impediments numbers two and three. In 2003, the City Community Development Department teamed up as a partner through the Miami County Fair Housing Committee and developed and presented a first time home buyer series of presentations that took place at the Piqua City Hall and the Troy Public Library. Andy Burner of the City's Community Development Department arranged for a taping of the second presentation. Two local bankers, realtors, an investor as well as the County Fair Housing Program Coordinator, Karen Dickey, presented along with Mr. Burner. The program aired on the City of Piqua Public Access channel throughout the year and videotaped copies of the program were made available at local libraries. Subsequently, the City of Piqua and Miami County jointly received the Ohio Department of Developments Office of Housing and Community Partnerships Annual Fair Housing Month Award in 2003. These innovative efforts to affirmatively further fair housing were chosen over the efforts of 88 Counties and approximately the same number of CDBG Formula Entitlement Cities.

Additional highlights also include partnering again with through the Miami County Fair Housing Committee to host a presentation by Jayme Brown of the Ohio Department of Commerce in 2004 entitled, "Beware of Predatory Lending – Know What You Are Signing". Once again, Andy Burner of the City's Community Development Department arranged for a taping of the presentation and arranged for the program to be aired on the City of Piqua Public Access channel throughout the year as well as provided videotaped copies of the program to local libraries.

A bold move to provide relief for City of Piqua residents facing potential foreclosure was also made through utilizing FY2004 Community Housing Improvement Program dollars. A provision for emergency assistance to catch up mortgage payments capped at a reasonable specific dollar amount was made available for eligible citizens. As the dollars were a federal source, clear documentation was to be provided ensuring that the grantee would be able to maintain the mortgage after the initial "catch up" funds were distributed. This proved to be a catch 22 to the initiative and did serve to enlighten this community as to the complexity of foreclosure issues. Adjustable rates, certain inflated appraisals, inability to quickly regain job loss and the reality of the effect of damaged credit were realized to be factors in hindering the initiatives success. Many potential grantees could not provide assurance of maintaining their mortgages after the initial catch up infusion without loan modifications or refinancing. Subsequently, part of the CHIP grant funds were amended to reallocate the funds for emergency housing assistance to renters.

The most recent effort to address impediments two and three was the participation of key City of Piqua professionals at an initial "Save Our Homes Taskforce" meeting held on June 20, 2008 facilitated by Scott Brown of the State of Ohio's Treasurers Office and arranged by this Advocate. City of Piqua Area United Way Executive Director Ginny Koons, Deputy Assistant City Manager Andy Burner, City of Piqua Development Program Manager William Lutz, and a Piqua based Unity Bank representative. Additionally numerous other participants from the region attended. Ideas were shared and the importance of putting in place additional assistance and education locally was stressed.

Lack of resources to consistently provide Fair Housing Program Education / Initiatives above minimum requirements- Impediment Four (4)

The City of Piqua consistently meets its obligations to affirmatively further fair housing and provide minimum State of Ohio standard programming. Examples listed within this report show that these minimum obligations have been exceeded on many occasions in numerous ways.

Currently, the City of Piqua Development Manager, William Lutz is serving as Chairperson of the Miami County Fair Housing Committee. Staff and citizens of the City of Piqua are also becoming active in other specific regional efforts that will affirmatively further fair housing described in this report.

The City will utilize every opportunity address impediments to fair housing choice listed herein and will continue to enlist other members of the Piqua community to assist with this effort. Resources in the form of effort will be prevalent, regardless of funding. It has been recognized that through partnering with people and agencies within the region working for a common goal, delivery is most successful.

Lack of Economic Opportunity / Transportation Issues – Impediment Five (5)

Throughout the process of analyzing this community and particularly through interviewing local social services providers and residents, it was suggested and became evident that due to lack of economic opportunity and viable transportation options; housing choice was substantially limited particularly for members of certain protected classes.

Per capita income or median individual income in per 2000 Census in Piqua equaled \$18,719 compared with Miami County per capita or median individual income of \$21,669 a 13% difference. The median household income in 2000 within the City of Piqua was \$35,681, with the median household income of Miami County in entirety being \$41,109 about a 13% difference. This difference is generally offset by a lower cost of housing and is not of huge significance.

However, there is a vast disparity in income of males compared to females. According to the U.S. Census 2000, male full time year round wage earners in the City of Piqua earned a median dollar amount of \$31,808; while female full time year round wage earners of the City earned a median dollar amount of \$22,241; a full 30% less than their male counterparts.

Updated figures reflecting all Miami County wages per the U. S. Census 2005 American Communities Survey show an even higher disparity in gender wages county wide: the Male average wage for full time (40 hours) employment yearly was \$37,357, while Female average wage for full time (40 hours) employment yearly was \$25,493. This income disparity of 45% is substantially higher than both the State of Ohio and United States National Average.

The Piqua Y.W.C.A. provides an annual financial planning workshop designed specifically for women. Numerous faith-based organizations have also recognized the need for financial education, assistance, and support specifically for single women with children and have

responded by providing services on various levels. Piqua Compassion Network, Salvation Army, Miami County Right to Life and many local churches provide assistance and/or support on various levels from classes to direct mentoring for single female parents.

Many social service providers also advised that although there are good paying jobs in the City of Piqua, there are not enough. Piqua is fortunate to retain a good manufacturing base that employs a little less than one third of its workers. Another approximate third of positions are split between the retail industry and the health care social service industry. All three of the industries mentioned generally operate with a substantial second and third shift group of positions making the current public transit system an option that is simply not available or adequate.

The average mean commute time listed in the 2000 U.S. Census for City of Piqua residents was 17.2 minutes indicating that there are a substantial number of residents who commute out of the City for employment.

Continuously, through interviews with community / social service providers and residents; transportation was cited as a major factor impeding fair housing choice. Obviously, one can only live within a reasonable distance from employment and necessity shopping. Careful consideration must be placed on the means of this commute whether the commute consists of walking, riding a bike, utilizing public transportation or operating a motor vehicle. Reliable means for timely transportation is also a must to keep gainful employment to meet basic needs.

When employment opportunities cannot be accessed due to lack of adequate transportation, the individual, their family, and the community are adversely affected in a variety of ways.

As an impediment to fair housing choice is a barrier or hindering factor that exists due to actions, omissions or decisions: public or private, that restrict or have the effect of limiting or diminishing equal access, availability and treatment concerning residential housing for members of protected classes. Lack of adequate transportation is an impediment to fair housing choice.

Current Transportation Situation

As of January 1, 2007, the Miami County Transit Service provides all public transit services to the people of Piqua as well as all public transit for the entirety of Miami County.

The City of Piqua owned and operated a curb-to-curb, demand responsive public transit service from 1981-2007. Federal and state public transit authorities that provide the funding sources or grants needed to feasibly operate a public transit prompted the Piqua and Miami County Transit to consolidate and provided that Miami County would deliver all of Piqua's public transit services. The City of Piqua now additionally contributes to the county's funding of public transit from the City's general fund.

Initially in 2007, Miami County provided the public transportation system at the cost of \$1.00 per ride within a city or town and \$2.00 per ride between jurisdictions. This public transportation system has not and does not go out of the county. Transportation to places such as the Veterans

Administration Hospital or Children's Medical Center Hospital located in Dayton, Ohio must generally be arranged through the Veterans Association and/or local faith based organizations and other entities.

Currently, a **one way** trip anywhere in Miami County is **\$4.00**. Children under age of seven (7) ride free when accompanied by an adult. However, a stop to drop off a child of any age at a daycare service then an additional stop to the adult's destination is counted as two one way rides and charged accordingly (\$8.00). It is not uncommon for parents of children to spend \$16.00 per day getting back and forth to work and even more than that if they have children over the age of seven (7).

Limited assistance is available upon determination of eligibility through the Miami County Department of Jobs and Family Services. The Title XX or PRC program funds provide an "Orange Card" option. The "Orange Card" provides only **two roundtrips or four one way trips per person per month**. There are a limited number of "Orange Cards" available for distribution. Additional assistance options include a "Blue Card" which provides half price rides (\$2.00 each way) to citizens over the age of 65 or for those who have a documented disability and a "Yellow Card" for Medicaid recipients for medical trips only.

The hours of operation for the Miami County Public Transit System are from 5:00 a.m. to 8:00 p.m. Monday through Friday, 6:00 a.m. through 7:00 p.m. Saturday, and 8:00 a.m. through 2:00 p.m. Sunday.

Obvious problems with the current system include the price especially for people with children, the hours of operation, and the reliability of timely pick-ups and drop offs has repeatedly been noted. With soaring gas prices, this public service program will certainly face additional challenges.

Below is a breakdown of the number of riders on the Miami County Transit System in 2005 and in 2006. As of 2007, the system has absorbed the Piqua Transit Service.

2005

Card Color	Number of Rides
Yellow	655
White	9257
Blue	14043
Orange	4035

2006

Card Color	Number of Rides
Yellow	1470
White	7559
Blue	14030
Orange	4038

City of Piqua efforts to address impediment five (5): Lack of Economic Opportunity /
Transportation Issues

After discussion and planning for approximately two years, in April 2006, "Grow Piqua Now" came into existence. The organization brings private and public sectors of the community together to strategically plan collaborative efforts that will serve to enhance and encourage economic development in the Piqua area. The Piqua Area Chamber of Commerce, the Piqua Improvement Corporation and the City of Piqua as well as key community member partners all are on board to work together at the task of improving economic opportunity for the City of Piqua and its citizens.

The City of Piqua Manager serves on a public transit steering committee established in 2007 to advise the Miami County Commissioners on the issue of long-term funding of public transit in Miami County. The City of Piqua also has membership on the Miami County Transit Advisory Committee.

SUMMARY OF SEVEN (7) ADDITIONAL AREAS RECOMMEND BY THE OHIO DEPARTMENT OF DEVELOPMENT OFFICE OF HOUSING AND COMMUNITY PARTNERSHIPS TO BE ANALYZED FOR ACTIONS, OMISSIONS, OR DECISIONS THAT RESULT IN LIMITING HOUSING CHOICE

Area 1 Provision of financing assistance for residential real property purchases, construction, improvements, repair or maintenance of a dwelling

The current national housing, credit and financial crisis has created a vastly different lending climate than just this time last year and even more dramatically different than the year before that.

The effect of Ohio SB185 resulted in many of the sub prime mortgage lenders / brokers to completely cease business in Ohio. There is not nearly the variety of mortgage loan products available to City of Piqua Citizens; however this is not necessarily a bad thing right now.

The entire lending industry seems to be in flux right now. All banks and mortgage companies seem to be extremely cautious in this present climate when it comes to lending money. Realtors this Advocate has interviewed advise the market is "crazy"! There are incredible buys for people but banks have tightened lending restrictions and they may not have the equity they thought they have if they need to sell an existing property. Realtors have recounted numerous accounts where deals have fallen through at the last minute where supposedly "pre-approved" buyers were rejected by bank or mortgage company underwriters unless they could come up with additional cash for the down payment of the purchase.

During this housing / economy crisis, banks and mortgage companies simply have tightened up restrictions and are requiring buyers to put generally at least 10% down on the purchase of property, and sometimes requiring 15% or 20% even with stellar credit. This was actually the rule of thumb or norm as little as twelve or so years ago unless the purchaser qualified for specific government backed first time home buyer programs.

A comprehensive housing legislation bill called the **Housing and Economic Recovery Act of 2008** was approved to be submitted for Congressional consideration on May 20, 2008 by the Senate Committee on Banking, Housing and Urban Affairs. This bipartisan piece of legislation was introduced to the Senate floor by Senators Chris Dodd (D-CT) and Richard Shelby (R-AL), Chairman and Ranking Member of the Senate Committee on Banking, Housing and Urban Affairs on June 20, 2008 and may begin to be debated as early as June 23, 2008. It contains measures from the Foreclosure Prevention Act, which passed the Senate in April as well as solutions to put the industry on path. The legislation to be considered contains the following provisions:

- **The HOPE for Homeowners Act:** Creates an initiative within the Federal Housing Administration (FHA) to prevent foreclosures for hundreds of thousands of families at no estimated cost to American taxpayers. (Internally funded with program income)
- **Affordable Housing Fund:** A permanent, new fund that will help create more affordable housing for millions for Americans in communities across the country. (a National Housing Trust Fund)

- **Assistance for Communities Devastated by Foreclosures:** To ensure that communities can mitigate the harmful effects of foreclosures, \$3.92 billion in supplemental Community Development Block Grant Funds will be provided to communities hardest hit by foreclosures and delinquencies. (Direct Formula Allocation provision – especially good for State of Ohio and all grantees therein such as the City of Piqua)
- **Foreclosure Counseling for Families in Need:** To help families avoid foreclosure, the bill provides \$150 million in additional funding for housing counseling.
- **Preserving the American Dream for Our Nation's Veterans:** This bill contains several provisions to help returning soldiers avoid foreclosure, including lengthening the time a lender must wait before starting foreclosure from three months to nine months after a soldier returns from service.
- **GSE Reform:** Creates a world class regulator for the government-sponsored enterprises (GSEs) so that these vital institutions can safely and soundly carry out their important mission of providing our nation's families with affordable housing.
- **FHA Modernization:** A provision to modernize, streamline and expand the reach of the FHA allowing families in all areas of the country to access secure and affordable mortgages through FHA. (Previously and continuously blocked by lobbyists in the sub prime mortgage industry over the last several years)
- **Enhancing Mortgage Disclosure:** Ensuring that consumers know the exact amounts of their mortgage payments, including the maximum possible payment under the terms of the loan and changes in payments associated with adjustable rate mortgages, lenders will be required to provide borrowers with timely and meaningful mortgage disclosures on all home purchase loans, loans that refinance a home, and loans that provide a home equity line of credit.

It is unknown what will happen to this piece of legislation or what it will actually include after debate, however, it is certain that this nations housing lending industry will be overhauled in one way or another. Meanwhile, members of protected classes, many of whom are in the low to moderate income range in the city of Piqua, will need to become educated about the mortgage process, products and must work hard to keep their credit clean, and save up money if they hope to purchase a home.

The need for home buyer education / counseling is more necessary than ever in providing assurance for both banks and potential homeowners to acknowledge borrowers are capable of maintaining all financial and other responsibilities involved in homeownership. Citizens must understand that their home is the largest single investment they will ever make.

Additionally, the need for Fair Housing Education and Programming is greater than ever. The potential for housing lending discrimination is real especially in this tightened lending climate. Members of protected classes have been identified by numerous U. S. Department of Housing and Urban Development (HUD) studies as being disproportionately affected by or even targeted for predatory mortgage loans and other predatory lending practices. In this lending climate where stellar credit and large down payments are the becoming basic criteria / norm, assistance in preparation prior to applying for a home mortgage may assist in discouraging lending institutions from discriminating on the basis of gender, race, religion, color national origin, familial status disability status and in Ohio, military status.

Home Mortgage Disclosure Act Data (HMDA), which generally has bank specific information, and not complete sub-prime mortgage company information, is generally available only for Miami County with the Dayton – Springfield Metropolitan Service Area (MSA) information intertwined. The data does not reflect any trends of banks specifically operating within the City of Piqua. A review of HMDA data available through the Federal Financial Institutions Examinations Council did not reveal any discernable trends of housing lending discrimination in the City of Piqua.

The potential need for more Home Equity Conversion Mortgage (HECM) packages to be offered at a larger variety of locations could be addressed as well as ensuring the provision of education for seniors in this area.

Since the Community Reinvestment Act is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate including the needs of low to moderate income individuals and families; an examination of actual Community Reinvestment Act (CRA) performance of entities operating in the City of Piqua could provide examples of what actual everyday services, practices and efforts entities undertake that serve to complete their mandated requirements. Congress enacted the Community Reinvestment Act in 1977 (12 U.S.C. 2901). Implemented Regulations 12CFR parts 25, 228, 345, and 563e were revised in May of 1995, and could be referred to as a tool to assist in determining which institutions are in fact, meeting credit needs for members of protected classes in the City of Piqua.

Area 2 Terms, conditions, or privileges of sale or rental of a dwelling

At times there are different terms and conditions imposed for mortgage loans, such as requiring automatic withdrawal of mortgage payments, that can benefit the consumer, but have had the most negative effect for some. Additionally, in the instance of a “short sale” of properties, lease purchases and “deeds in lieu of foreclosure”, the actual ramifications of the terms and conditions are not realized by the homeowner.

Relating to the “privilege” to rent or purchase a dwelling, it is acknowledged that credit status can act as a possible vehicle for discrimination. Many members of protected classes, by virtue of lower incomes or socioeconomic status, may have poor or no credit and very little opportunity to significantly change that without proper guidance. Even with acceptable credit, families with children and other protected class members may be denied housing for the reason of “credit” although the actual reason for the denial pertains to their protected class status.

Additionally, many members of protected classes do not have access to any legal representation regarding housing matters. Legal funding has been drastically cut over several years and is virtually nonexistent for most basic housing issues encountered by those who have moderate or low incomes. In 1995, Miami County had a Rural Legal Aid Office located within the City of Troy staffed by two attorneys and two support staff. In 2005, there was no office located within Miami County. Some legal representation is provided by Western Ohio Legal Services based in Springfield, Ohio, but is not generally available for basic, common housing issues. Therefore, it has become common standard practice for landlords to not refund security deposits to tenants, regardless of “normal wear and tear” and to even unlawfully shut off utilities instead of following the lawful eviction process. On the occasion that tenants have to initiate small claims actions, landlords simply utilize their retained attorney and generally win the claim. Legal representation makes a significant difference.

Other than previously noted, there are no proven discernable trends that are discriminatory that have been observed.

Area 3 and Area 4 -Advertising with respect to sale or rental of housing and Realtor Practices

Although there are no formal local testing programs to confirm or disprove any discriminatory real estate practice in the sale or rental of housing, this Advocate relied on checking a variety of publications in print and on-line including, but not limited to, the *Piqua Daily Call*, and Realtor.com.

In the past private landlords on occasion have advertised a rental unit listed with the condition of "no children". These individuals were advised of the Fair Housing Act and Laws by the Miami County Fair Housing Coordinator, and retracted and revised their advertisements. No advertisement placed by a licensed Realtor has been noticed that contained unlawful language or assertions. The Midwestern Ohio Association of Realtors (MOAR) consisting of realtors and brokers in the City of Piqua, Miami County, and surrounding counties, has their own Fair Housing Committee to assist them in the practical application of and knowledge of the Fair Housing Act. This Advocate serving as Miami County Fair Housing Program Coordinator presented updated program information to the group in 2004, 2005, 2006, and 2007. MOAR contracts with Miami Valley Fair Housing based in Dayton for regular offerings for training and CEU credits.

Although service and advertising varies with the firm and realtor, listings in moderate to low income or minority concentrated areas appear to receive the same service and advertising as other areas. No complaints have been made to the Miami County Fair Housing Office concerning any realtor, broker or real estate firm in Miami County from 2002 – July 2007.

Area 5 Appraisal Practices

Local appraisers have voiced dissatisfaction in the inability to gather honest, actual, true value comparisons due to the excessive amount of inflated appraisals. Those appraisers most familiar with the City of Piqua and Miami County housing market are aware of differences in resale values even from one block to another and have seen properties appraised by out of county appraisers at 50% over the actual re-sale value of the property at times.

Tightened requirements and oversight of the industry as well as corrections in the housing market have required all working appraisers to offer a more realistic if not conservative assessment of properties.

No other trends that are discernable as discriminatory that have been observed.

Area 6 Access to any multiple listing service, real estate brokers association, or facility relating to the business of selling or renting dwellings

Through analyzing Areas 3 and 4, it has been surmised that access to services is the same for all people in the City of Piqua.

Area 7 Administrative policies concerning community development and housing activities, site selection policies, local code requirements, local zoning requirements, and other local housing requirements

The City of Piqua operates its Community Development and Housing Activities in strict accordance of Fair Housing Act requirements.

Through reviewing City of Piqua Zoning Code and Policies relating to land use, no discernable discriminatory practices been observed.

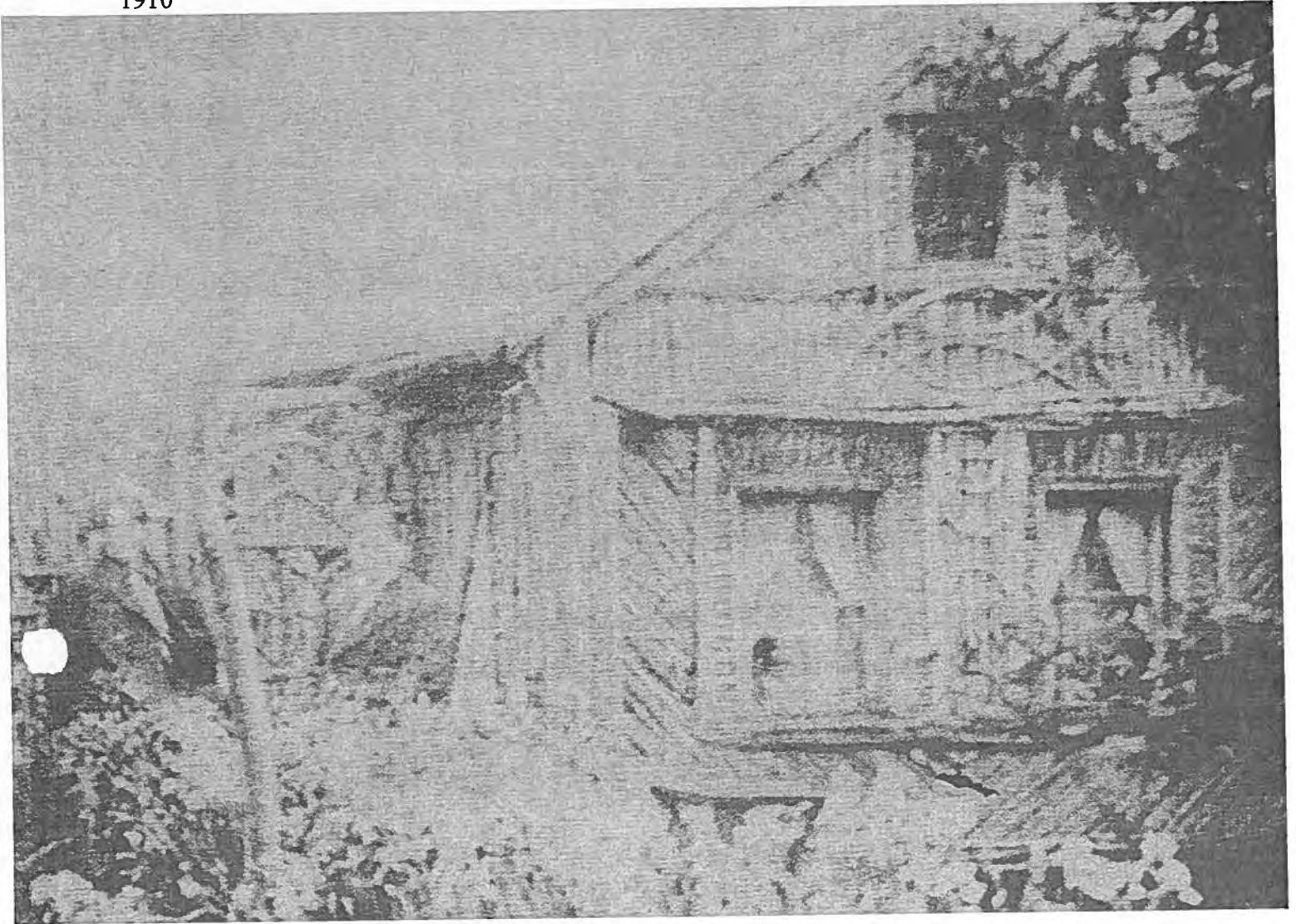
Additionally, in review of “Plan It Piqua”, the City’s updated comprehensive plan adopted in early 2008, the City strives for inclusion of the best interest of all protected classes in planning improvements for the community. The plan advocates for encouraging public and private development to embrace a “walk able community” theme in regard to layout and placement of future development and rehabilitation activities with features making these improvements accessible for people with disabilities.

ACTION PLAN

The action plan below is to provide Fair Housing Act Information and Program Services that are customized to the needs of the City of Piqua Community with excellence.

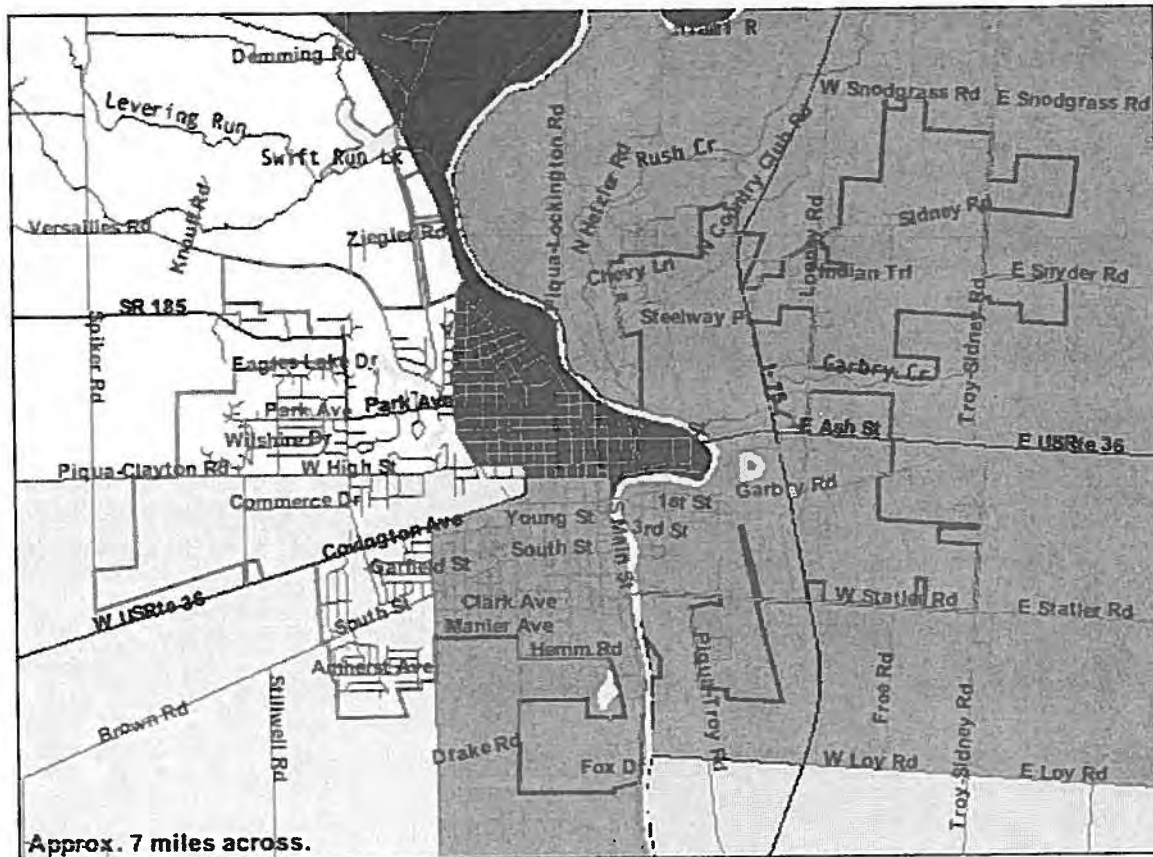
Impediment	Action - FY 2008	Action- FY2008- beyond
Lack of safe, decent, affordable housing for people within protected classes	Continue to focus on the rehabilitation of owner occupied and renter occupied housing stock which serves members of protected classes, many of whom are in the moderate to low income range. Continue focused efforts of Neighborhood Improvement Team (NIT) initiative.	Ongoing Encourage opportunities for the establishment of a community development corporation to at least, act as an intermediary organization to continue to improve condition of housing stock and expand housing options for members of protected classes
Foreclosures / Predatory Lending	Seek and facilitate options for relief for the Citizens of Piqua including foreclosure intervention education and services.	Ongoing- Education and relief and consider / explore all opportunities to mitigate the circumstance for individuals as well as the Piqua Community as a whole.
Lack of Financial Education Initiatives or Programs including but not limited to Foreclosure Intervention, Credit Repair/ Counseling, Homebuyer Counseling-	Advocate for financial education/ counseling, and homebuyer education /counseling with a home mortgage default counseling component to be established for citizens of the City of Piqua.	Ongoing- Continue to encourage and/or facilitate a variety of financial education programs or initiatives for both adults and youth.
Lack of resources to provide Fair Housing Program / Initiatives above minimum requirements	Continue to strive for excellence in provision of the four standard component programs and continue to facilitate community partnerships in reaching Fair Housing related goals and initiatives.	Advocate for and encourage Programming and Initiatives above and beyond minimum requirements
Lack of Economic Opportunity Transportation Issues	Continue to cultivate "Grow Piqua Now" organization and efforts. Continue to provide guidance and representation for transportation issues on behalf of City of Piqua Citizens.	Ongoing

APPENDIX A – THE WILLOW TREE COTTAGE - ROSSVILLE /SPRINGCREEK /PIQUA
Picture provided by the Miami County Genealogical Society- The Willow Tree Cottage est. circa
1910



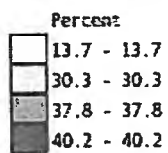
The cottage was located in the Rossville Randolph former slave settlement. Although many of the homes were built with traditional materials, this one was made entirely from willow tree branches and surrounded with a vibrant garden (irises in forefront of picture); a testament to the vision and ingenuity of its owners.

APPENDIX B-CITY OF PIQUA OCCUPIED RENTAL UNITS



Source: U.S. Census Bureau, Census 2000 Summary File 1, Matrix H4.

Data Classes



Features

- Major Road
- Street
- Stream/Waterbody
- Stream/Waterbody

Source: U.S. Census Bureau, Census 2000 Summary File 3, Matrix P76.

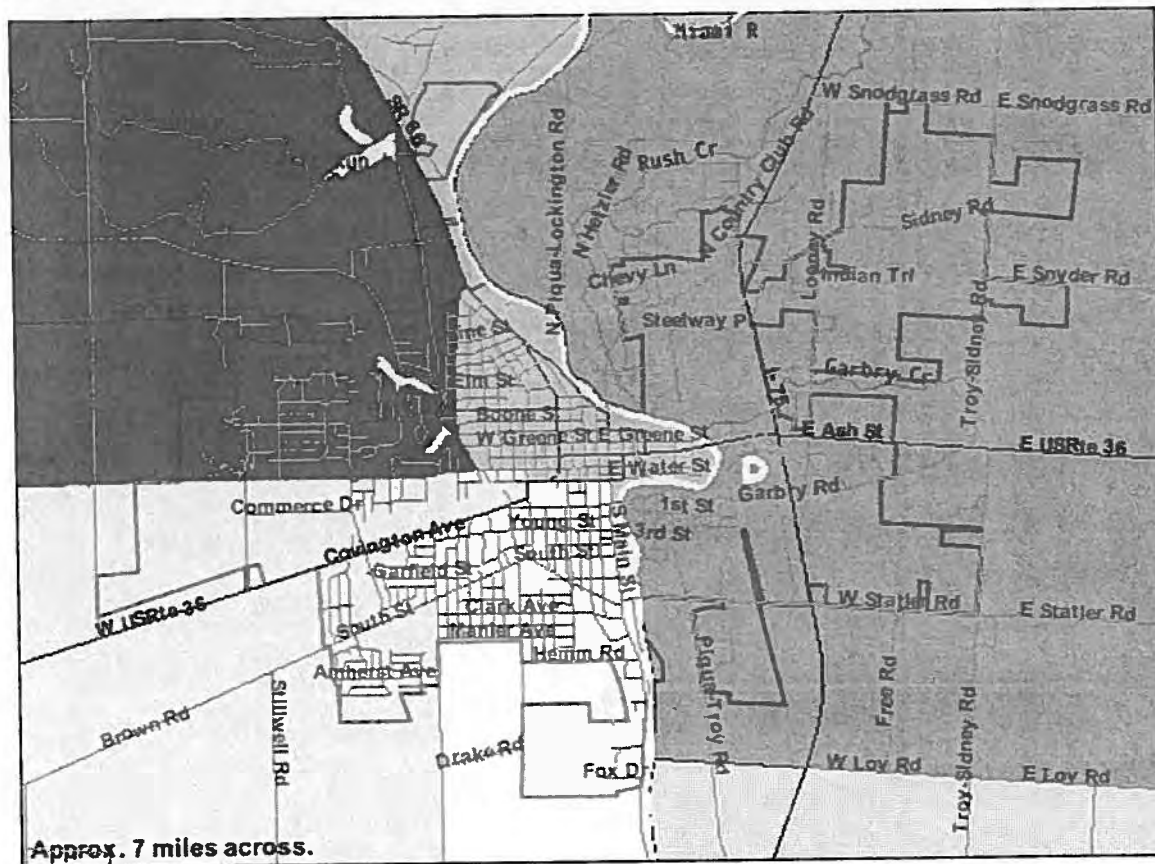
TM-H027. Median Value of Specified Renter-Occupied Housing Units: 2000

Universe: Specified renter-occupied housing units

Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data

Appendix C

MAP OF CITY OF PIQUA – SHADING INDICATING MEDIAN HOME VALUES (year 2000)



Data Classes

Dollars
72100 - 82400
82400 - 90600
90600 - 99500
99500 - 131300

Features

- Major Road
- Street
- Stream/Waterbody
- Stream/Waterbody

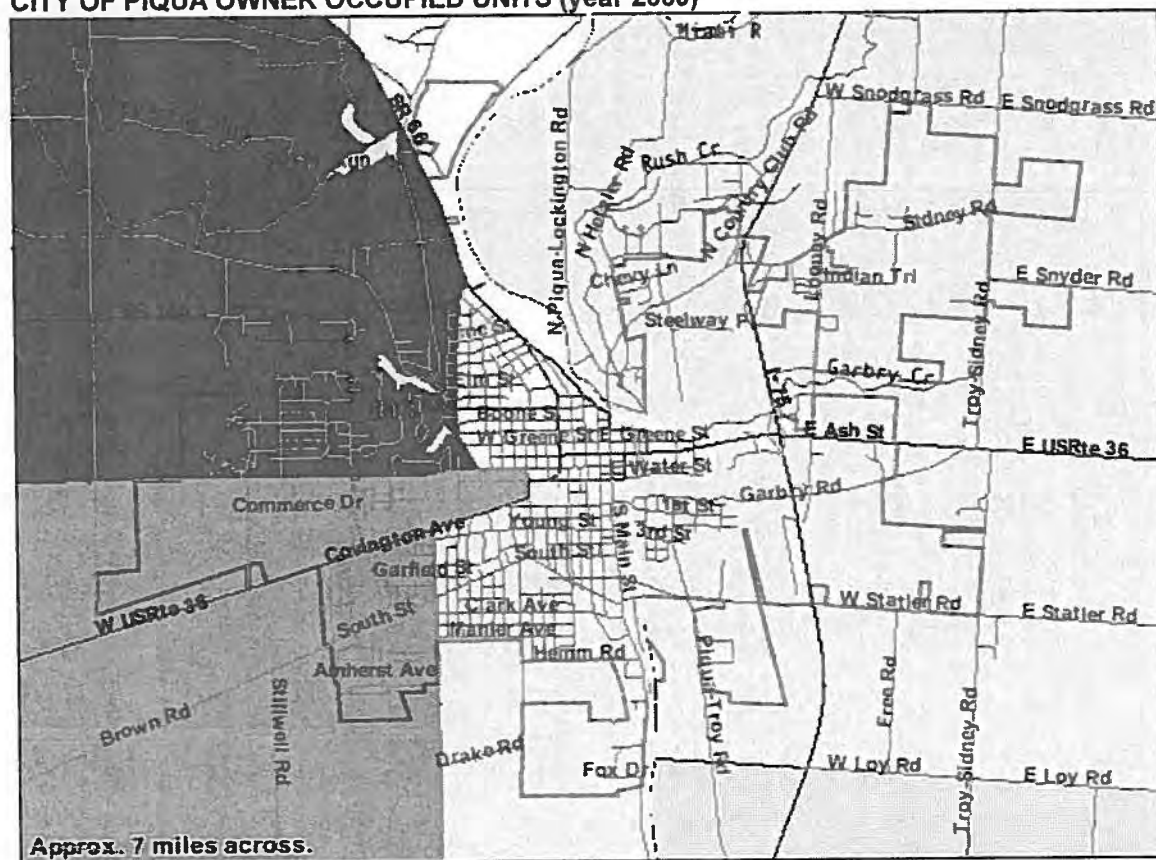
Source: U.S. Census Bureau, Census 2000 Summary File 3, Matrix P76.

TM-H027. Median Value of Specified Owner-Occupied Housing Units: 2000

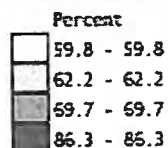
Universe: Specified housing units

Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data

Appendix D
CITY OF PIQUA OWNER OCCUPIED UNITS (year 2000)



Data Classes



Features

- Major Road
- Street
- Stream/Waterbody
- Stream/Waterbody

TM-H004. Percent of Occupied Housing Units That Are Owner-Occupied: 2000

Universe: Occupied housing units

Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data

Piqua city, Ohio by Census Tract

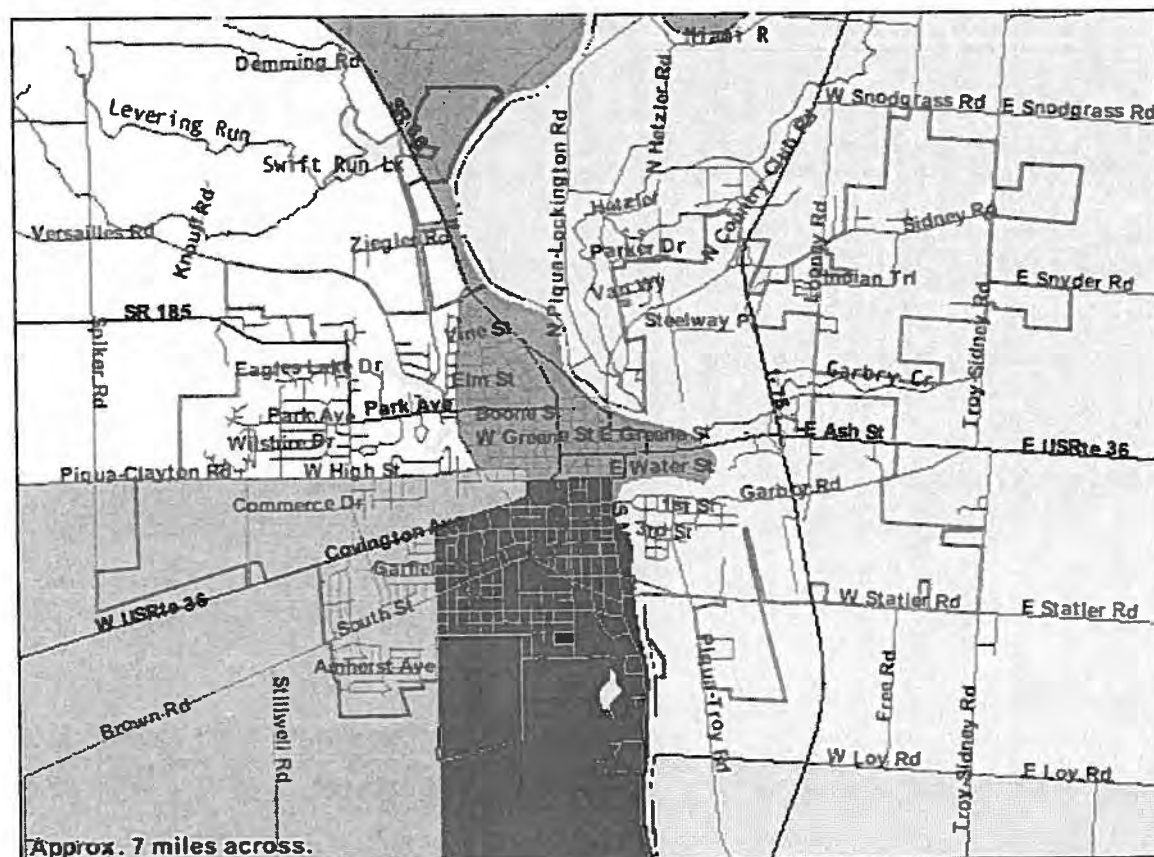
APPENDIX E- FAMILIES BELOW POVERTY LEVEL

TM-P069. Percent of Families Below the Poverty Level in 1999: 2000

Universe: Families

Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data

Piqua city, Ohio by Census Tract

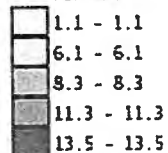


Source: U.S. Census Bureau, Census 2000 Summary File 3, Matrix P90.

Legend

Data Classes

Percent

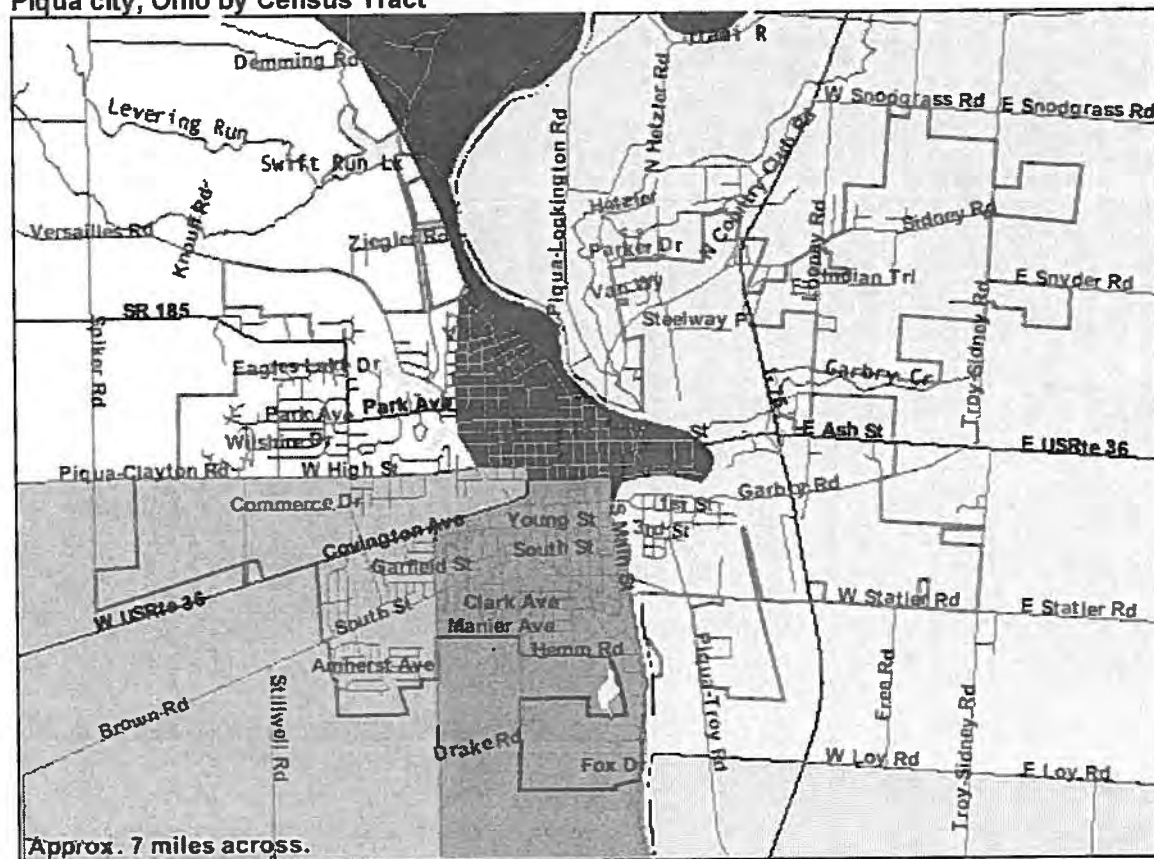


Features

- Major Road
- Street
- Stream/Waterbody
- Stream/Waterbody

APPENDIX F – CITY OF PIQUA Percent of Persons Below the Poverty Level in 2000

Piqua city, Ohio by Census Tract



Source: U.S. Census Bureau, Census 2000 Summary File 3, Matrix P87.

Legend

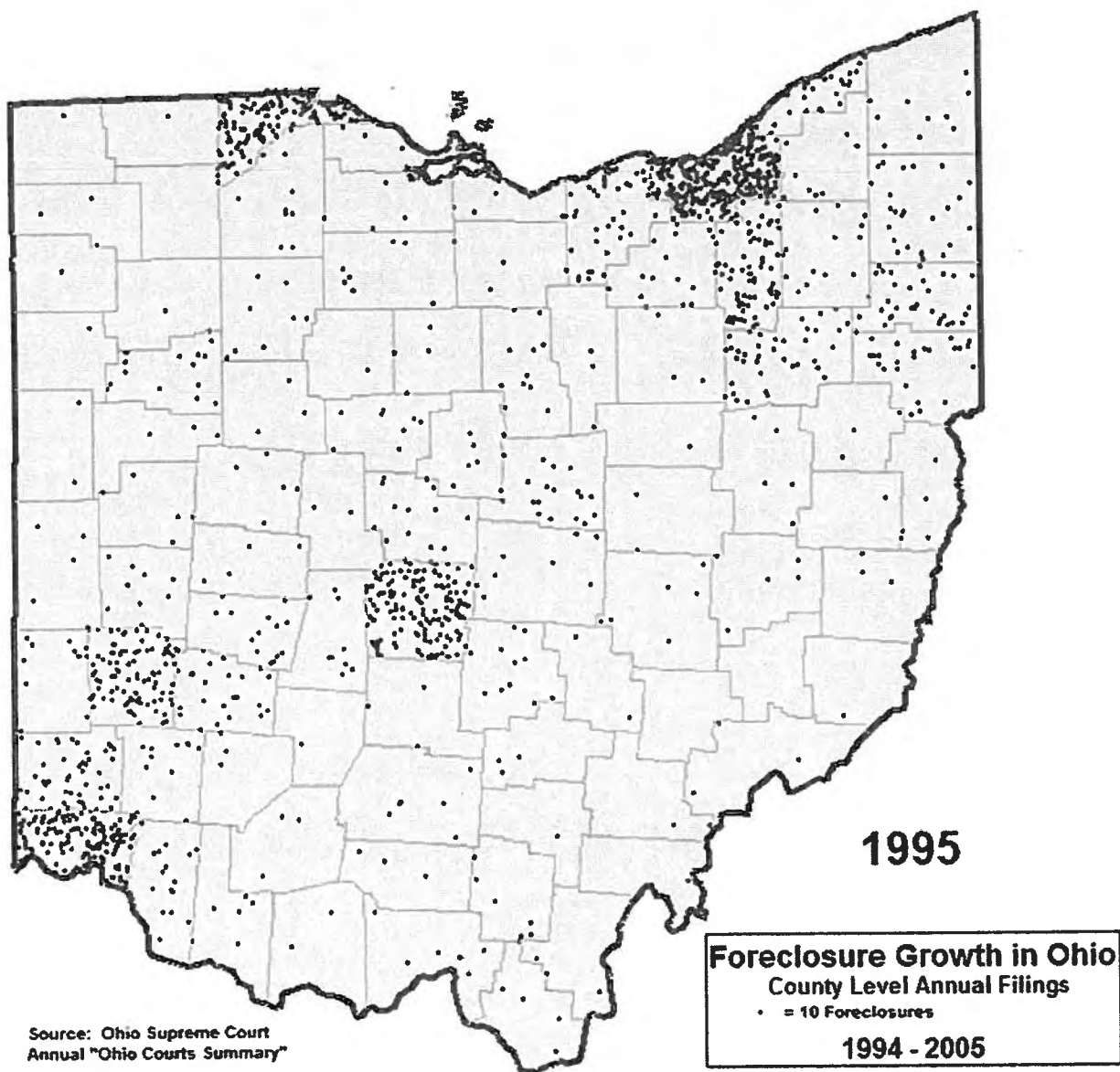
Data Classes

Percent
2.3 - 2.3
8.5 - 8.5
10.2 - 10.2
14.8 - 14.8
15.1 - 15.1

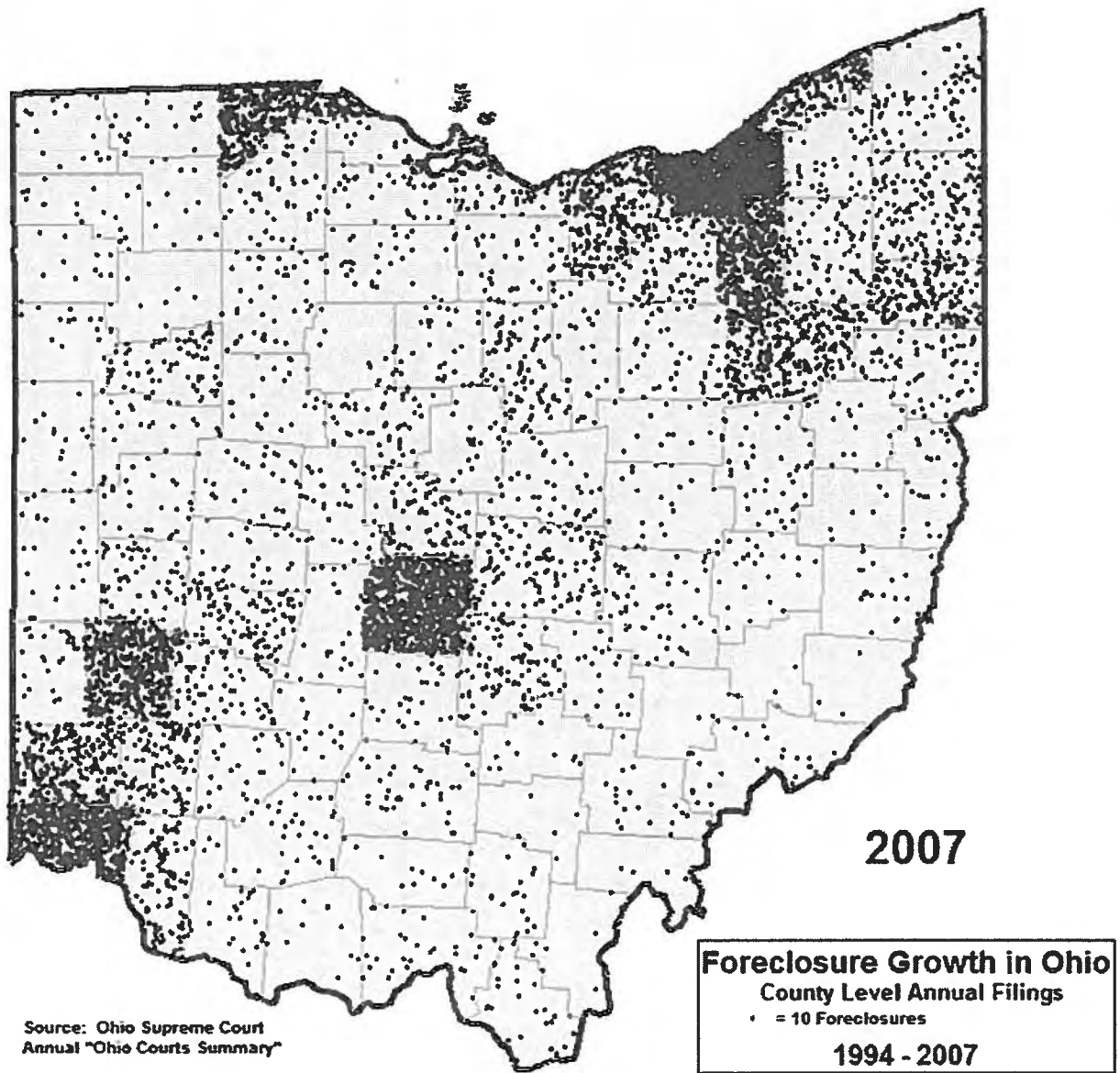
Features

- Major Road
- Street
- Stream/Waterbody
- Stream/Waterbody

APPENDIX- G: OHIO FORECLOSURES 1994- 2005



APPENDIX H – OHIO FORECLOSURES MAP 2007



This Advocate thanks all of the following people, organizations and City of Piqua Departments and Staff for their direct or indirect contribution to this report and for assisting to affirmatively further fair housing in the Piqua Community.

Fredrick Enderle
City of Piqua Manager

William Lutz
City of Piqua Community Development
Manager / Chairperson of the Miami County
Fair Housing Committee

James Oda
City of Piqua Municipal Historian
Flesh Public Library Director

Lisa Whitaker
Piqua Area Chamber of Commerce Director

David Bollinger
Housing Rehabilitation Specialist
Bollinger Enterprises /HAC member

Thomas Hudson
City of Piqua Mayor

City of Piqua Commissioners;
John Martin
Bill Vogt
Judy Terry
Lucy Fess

Leesa Baker
YWCA of Piqua Director

Jeannie Bates
Realtor / Piqua HAC member

All Staff and Volunteers of
The Piqua Compassion Network
The Salvation Army Piqua
Access Piqua Television Association
Miami County Ohio Genealogical Researchers
The Ohio Historical Society

Andy Burner
City of Piqua Deputy Assistant City Manager /
Renew Piqua Director

Harry Bumgarner
City of Piqua Assistant City Manager /
Economic Development and Grow Piqua Now
Director

Ginny Koon
Piqua Area United Way Director

Jack Baird
Miami Metropolitan Housing Authority /
Community Action Council Director

Phil Sullenberger
Sullenberger Properties/ HAC member

Jan Koon
Access Piqua Television Association Director

Dorothea Burton
Miami County Fair Housing Committee

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And Assistant Fire Chief Mike Rindler,
specifically for their work on the City of Piqua
Neighborhood Improvement Team (NIT) and
the Miami County Continuum of Care

**All Civic and Business Leaders involved in
the continuous success and improvement of
the Piqua Ohio Community and scores of
Piqua Citizens too numerous to list.**

**UPDATE TO FAIR HOUSING ANALYSIS OF IMPEDIMENTS
IMPEDIMENT 5 – LACK OF ECONOMIC OPPORTUNITY AND
TRANSPORTATION ISSUES
APRIL 2009**

As part of the annual update to the City of Piqua's Fair Housing Analysis of Impediments to Fair Housing Choice, the City of Piqua has chosen to address the fifth impediment that was identified in the complete Analysis of Impediments last year, dealing with lack of economic opportunity and transportation issues.

It was previously reported that housing choice was severely limited for certain protected classes due to lack of economic opportunity and transportation issues that existed within the City of Piqua. A current analysis of the trends presented in the original report remains with the community in 2009.

The previous census stated that the per capita income in the city was estimated to be \$18,719, well below the county's average of \$21,669. The median household income for the community in 2000 was reported to be \$35,861 while the county amount was reported to be \$41,109. In both instances, the city's average was 13% below the county's average. While the difference in income may appear to be significant, it should be reported that housing costs in the city of Piqua are generally lower than that of the county, taken as an entire entity. Therefore, residents of the community enjoy a comparable quality of life with residents of the entire county.

Over the year, more attempts have been made to increase fair housing opportunities by addressing economic issues faced by the community's households. Primarily, through the City of Piqua's Community Housing Improvement Program, the City of Piqua has re-introduced the popular Emergency Housing Assistance Program. The program, individuals and households that are at or below eighty percent of the area median income are allowed to receive assistance up to \$1,200 for housing payments. The program is only designed for homeowners at this time in order to keep homes out of foreclosure. A review of the clients of the program show that roughly 33% of all awardees have female head of households and 17% of all awardees are African-American. There has been some discussion on increasing the assistance that is available to those that rent properties; however, a final decision has yet to be made as the main thrust of the program is to assist those facing foreclosure.

Economically, the city has struggled over the past year, repeating a story that is not unique among other communities in Western Ohio. There have been many jobs in the community that have been lost due to layoffs in the manufacturing sector and the community has received official WARN notices from the Ohio Department of Job and Family Services about these closings. The community is having a very difficult time trying to deal with these layoffs since many of these factors that caused these layoffs are out the community's control.

The city also saw the establishment of its first Ohio Benefit Bank location at the Bethany Center. The Ohio Benefit Bank uses volunteers to confidentially access and apply for state and federal benefits at a location that is convenient for the applicant, rather than trying to access such services from a central location in the county. Currently the Bethany Center offers the service on an appointment basis and efforts are underway to increase the number of Ohio Benefit Bank locations within the community. The Salvation Army, the Piqua Compassion Network, Piqua Council of Churches and other organizations have again seen the needs of the community many time surpass their available resources.

Many social service providers have indicated that there are not enough well paying jobs within the community and many of those jobs are becoming more and more at risk, since many of these jobs are in the dwindling manufacturing sector. The health care and social service industry also employee a large number of individuals, however, one of the county's largest employers, the Upper Valley Medical Center, recently announced that one hundred fifty support staff members were being laid off. Again, this community is being hit hard economically.

The average mean commute time for residents in the city is 17.2 minutes and it should be noted that there are a substantial number of residents who commute out of the city for employment. More over, with the advent of \$4.09 gallon gasoline last summer, transportation has become a large issue that needs to be addressed. Reliable transportation is often cited as industry as an absolute precursor in order to gain and retain employments.

As of January 1, 2007, the Miami County Transit System provides all public transit services to the citizens of Piqua as well as Miami County. Prior to that date, the City of Piqua owned and operated a curb-to-curb demand response public transit service. Federal and state public transit authorities that provided the funding to the city's system pulled funding in favor of the Miami County system. The City of Piqua, along with Troy and Tipp City provide some operating support to the public transit system to the county.

Initially in 2007, Miami County provided the public transit service at a cost of \$1.00 per ride within a municipality and \$2.00 per ride between jurisdictions. The public transportation system also began limited trips outside of the county to the Dayton International Airport or a Dayton Regional Transit Authority hub to help with transit issues to Dayton. Transit to specialized locations such as the Veterans Administration Hospital or Children's Medical Center, must be arranged through those service providers or local churches.

Currently, a one way trip anywhere in Miami County is \$4.00. Children under age seven are free when accompanied by an adult. However, a stop to drop off a child of any age would incur an additional \$4.00 fee. Conceivably, an individual

using public transit to go to a job and drop off children at child care could pay as much as \$16.00 per day. Additionally, the transit system, citing increased cost, has cut Saturday and Sunday service and now operates on a more limited schedule.

There are some forms of assistance available upon the determination of eligibility through the Miami County Department of Job and Family Services. The Title XX and PRC program funds provide special cards that entitle riders to two free roundtrips or four one way trips per person per month. There are a limited number of these special cards for distribution. A second card provides half price rides to senior citizens or those with disabilities. A third card provides Medicaid trips that the transit service can be reimbursed for.

Obvious problems with the service include the cost of the service, especially for those individuals with children, the reduced hours of operation, reliability of timely pick-ups and drop-offs and the unprofessional behavior of drivers. Most astoundingly, in the face of higher gas prices, the Miami County Commissioners, instead of trying to provide more service to meet greater need, cut service for citizens.

After discussion and planning for approximately two years, in 2006, "Grow Piqua Now" came into existence. The organization bring private and public sectors of the community together to plan for collaborative economic development efforts. Currently, the group is undertaking efforts in retaining and expanding existing businesses while recruiting new businesses to the area. The community has experienced positive impacts of Grow Piqua Now's efforts.

Additionally, the community serves on a public transit steering committee to advise the County Commissioners on the issue of long-term funding of the public transit in Miami County. Hopefully, with the new influx of federal stimulus funds for public transit, the county may be able to restore the Miami County Transit Service to full capacity before the end of 2009.