



the  
**FAIR HOUSING**  
center

# THE FAIR HOUSING CENTER

Opening doors to opportunity since 1975

Analysis of Impediments to Fair Housing Choice



# SINCE 1975

## MISSION

The Fair Housing Center is a nonprofit civil rights agency that promotes housing choice, the creation of inclusive communities of opportunity, and the protection and expansion of fair housing rights to support strong communities free from housing discrimination.



# SINCE 1975

Housing—where you live—powerfully impacts every aspect of your life—job opportunities, education transportation, health, safety. Fair Housing ensures every person can find a home regardless of

race, color, national origin, sex, religion, familial status, disability, military status, sexual orientation, gender identity, source of income, or immigration status.

A large red heart and a white house silhouette are positioned on the left side of the image. The heart is a solid red color and is significantly larger than the house. The house is a simple white silhouette with a chimney on the left side and several small black squares representing windows. Both are set against a background of light-colored, horizontally-oriented wooden planks. The right side of the image is a solid black background with white text.

# SINCE 1975

## OUR IMPACT

Since its founding, the Center has operated as one of the most progressive and effective proponents of fair housing, leading national efforts and setting precedents that have markedly improved the quality of life for millions of Americans.

It started with one complaint, and now the Center has investigated more than 13,500 complaints of discrimination and recovered more than \$35 million, reinvested back into the community.





# SERVICES

## Free for:

- Victims of housing discrimination
- Anyone seeking information about fair housing law
- Tenants in Lucas County experiencing housing conditions issues

**Service area: Lucas and Wood Counties**

**326 N. Erie St., Toledo, Ohio 43604**

**419-243-6163**

**toledofhc.org**

**Mon. – Thur.: 9a – 5p; Fri.: 9a – 3p**



# **SERVICES: 5 POINTS**

- 1. Information and referral**
- 2. Assistance for victims of housing discrimination**
- 3. Education and outreach**
- 4. Assistance for tenants with housing conditions**
- 5. Research and policy advocacy**

# 1 INFORMATION & REFERRAL

*“Thank you so much for the information about how to get my security deposit back.”*

More than 2,000 intakes per year.

Providing educational materials, information, guidance, and referrals to the right resources.

Information gathered helps inform our work and policy advocacy.

# **2 ASSISTANCE FOR VICTIMS OF HOUSING DISCRIMINATION**

**Thousands are impacted by our fair housing services each year.**

**We are the only agency in Northwest Ohio dedicated to providing free assistance to victims of discrimination and enforcing their civil rights.**

**We are the only agency in Northwest Ohio that conducts fair housing testing.**

**Process: (a) meet with client and educate them on the law and their rights, (b) investigate and gather information, (c) contact housing provider and/or file complaint.**



# 3 EDUCATION & OUTREACH



Trainings for the public and housing professionals

Ode to the Zip Code

Committees, educational materials and brochures

# 4 HOUSING CONDITIONS ISSUES

One of the most common calls we receive

Since Nov. 2022, hundreds of tenants assisted

Housing stabilized

Homelessness prevented

More than \$100,000 recovered for tenants



# 5 RESEARCH & POLICY ADVOCACY

Examples:

City of Toledo Analysis of Impediments to Fair Housing Choice

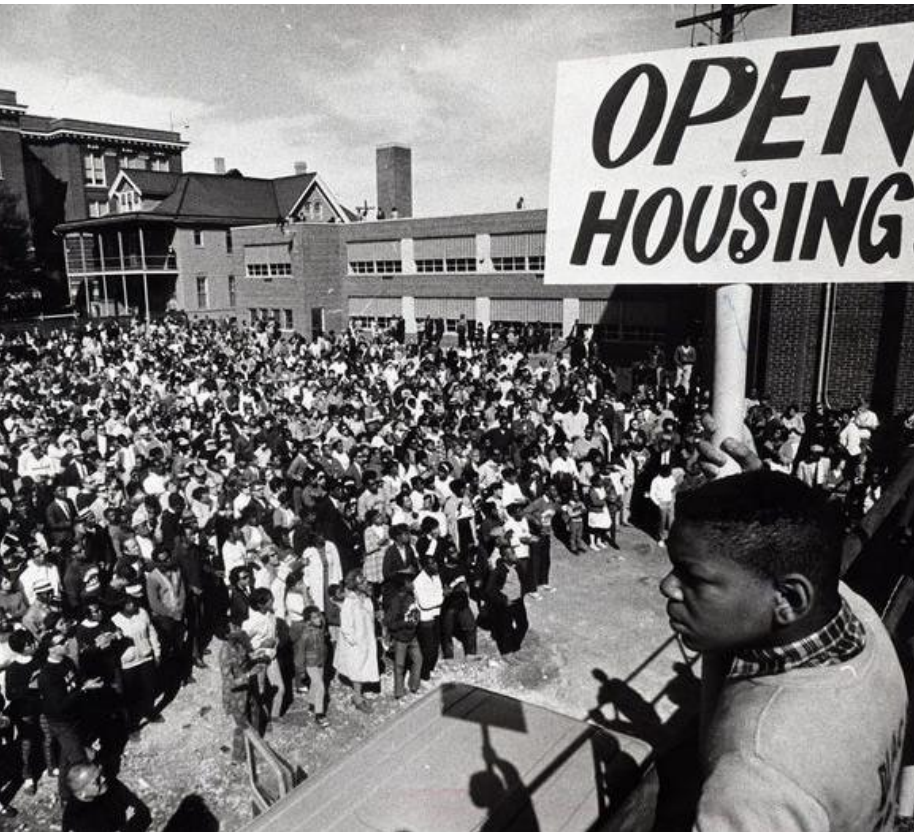
- **Impact:** Changes to local laws and policies to remove barriers to fair housing choice

Eviction rates in Toledo, Ohio

- **Impact:** Changes to policies and more support for services to tenants facing eviction



# ANALYSIS OF IMPEDIMENTS BACKGROUND

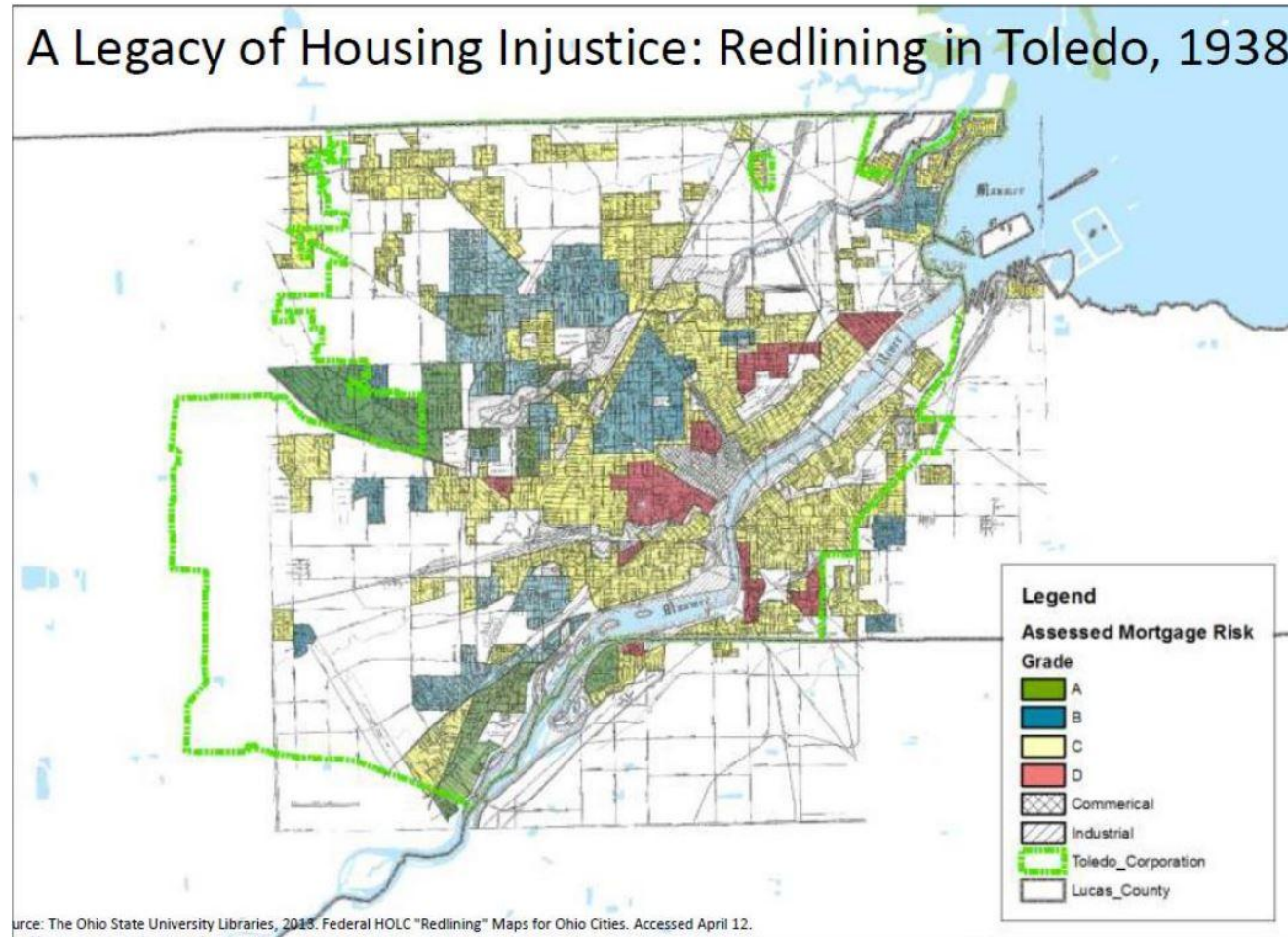


An important part of the solution is punishing discrimination when we can uncover it. But merely reacting to discrimination has never and will never be the full solution.

We must also affirmatively further the goals of the fair housing act.



## A Legacy of Housing Injustice: Redlining in Toledo, 1938





# BEYOND REDLINING

"THE REFUSAL OF FEDERAL AGENCIES TO ISSUE MORTGAGES TO THOSE NEIGHBORHOODS IN THE 1930S AND 40S — THAT'S ONE OF MANY POLICIES THAT WERE FOLLOWED, BUT IT DOESN'T ENTIRELY DETERMINE TODAY'S LANDSCAPE, AND THERE ARE MANY, MANY OTHER POLICIES THAT GET IGNORED THAT ARE EQUALLY IMPORTANT." RICHARD ROTHSTEIN, AUTHOR OF "THE COLOR OF LAW"



# EXAMPLE: OTTAWA HILLS

At no time shall any of the land included in said Tract, or any building erected thereon, be occupied by any negro or person of negro extraction, or any Chinaman or person of the Mongolian race, but this prohibition is not intended to include or prevent occupancy by such person as a domestic servant or while employed in or about the premises by the owner or occupant of any land included in said Tracts.

Plan No. 1 or Ottawa Hills, an addition to Washington Township, Lucas County, Ohio, is defined as follows: ... [Detailed legal description of the property boundaries and easements]

Office of Lucas County Commissioners, Toledo, Ohio  
Approved and accepted by us this 27th day of August 1916  
[Signature]

Office of Lucas County Recorder, Toledo, Ohio  
Received for record this 29th day of August 1916  
[Signature]

Office of Lucas County Auditor, Toledo, Ohio  
This plan has been submitted to me for the purpose of recording  
[Signature]

The undersigned, The Ottawa Hills Company, on this corporation of  
Toledo, Ohio, the owner of the above described premises, submits this subdivision  
of said premises into blocks and lots as shown herein, being Plat No. 1 of Ottawa Hills.

The first of the premises shown herein as Bancroft Street and the semi-circular grade of the  
intersection of Bancroft Street and Bancroft Street is hereby dedicated to public use, and no other part of  
said premises shown herein as streets, roads, walks, alleys, public utility, right-of-way, reservations or  
other purposes shall be granted to public use, except as hereinafter provided, the title therein being reserved by the  
undersigned.

20<sup>th</sup> Aug '16  
**PLAT NO 1**  
**OF**  
**OTTAWA HILLS**

**LUCAS COUNTY, OHIO.**  
SCALE  
JUNE 1916  
BUILT BY THE OWNER

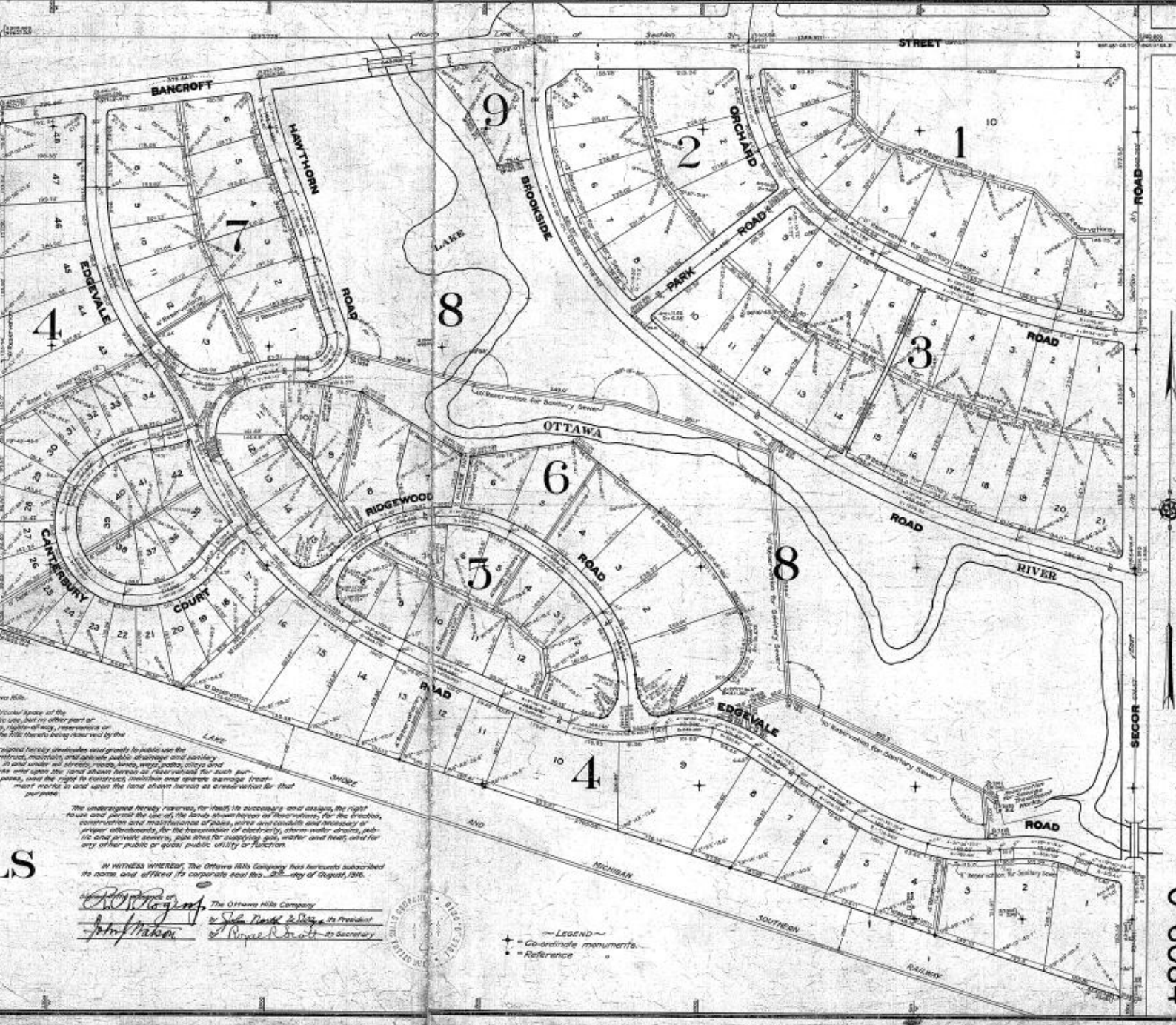
The undersigned hereby reserves and grants to public use the  
right to construct, maintain and operate public drainage and sanitary  
sewers in and under all streets, roads, lanes, ways, paths, alleys and  
parkways and upon the land shown herein as reserved for such pur-  
poses, and the right to construct, maintain and operate sewage treat-  
ment works in and upon the land shown herein as reserved for that  
purpose.

IN WITNESS WHEREOF, The Ottawa Hills Company has hereunto subscribed  
its name and affixed its corporate seal this 27th day of August 1916.

*[Signature]*  
**The Ottawa Hills Company**  
President  
Secretary



LEGEND  
+ Coordinate monuments  
• Reference



0-6084

# PRESENT DEMOGRAPHICS

OTTAWA HILLS:

WHITE: 80.43%

ASIAN: 10.71%

TWO OR MORE RACES: 4.14%

OTHER RACE: 2.74%

BLACK OR AFRICAN AMERICAN: 1.99%

NATIVE AMERICAN: 0%

NATIVE HAWAIIAN OR PACIFIC ISLANDER: 0%

BY COMPARISON,  
COUNTYWIDE, 70% OF  
THE POPULATION IS  
WHITE, 20% IS BLACK,  
AND LESS 2% IS ASIAN.



# IMPACTS

- Health/access to healthcare
- Educational opportunities
- Risk/effect of climate change



# PERPETUATION OF DISINVESTMENT

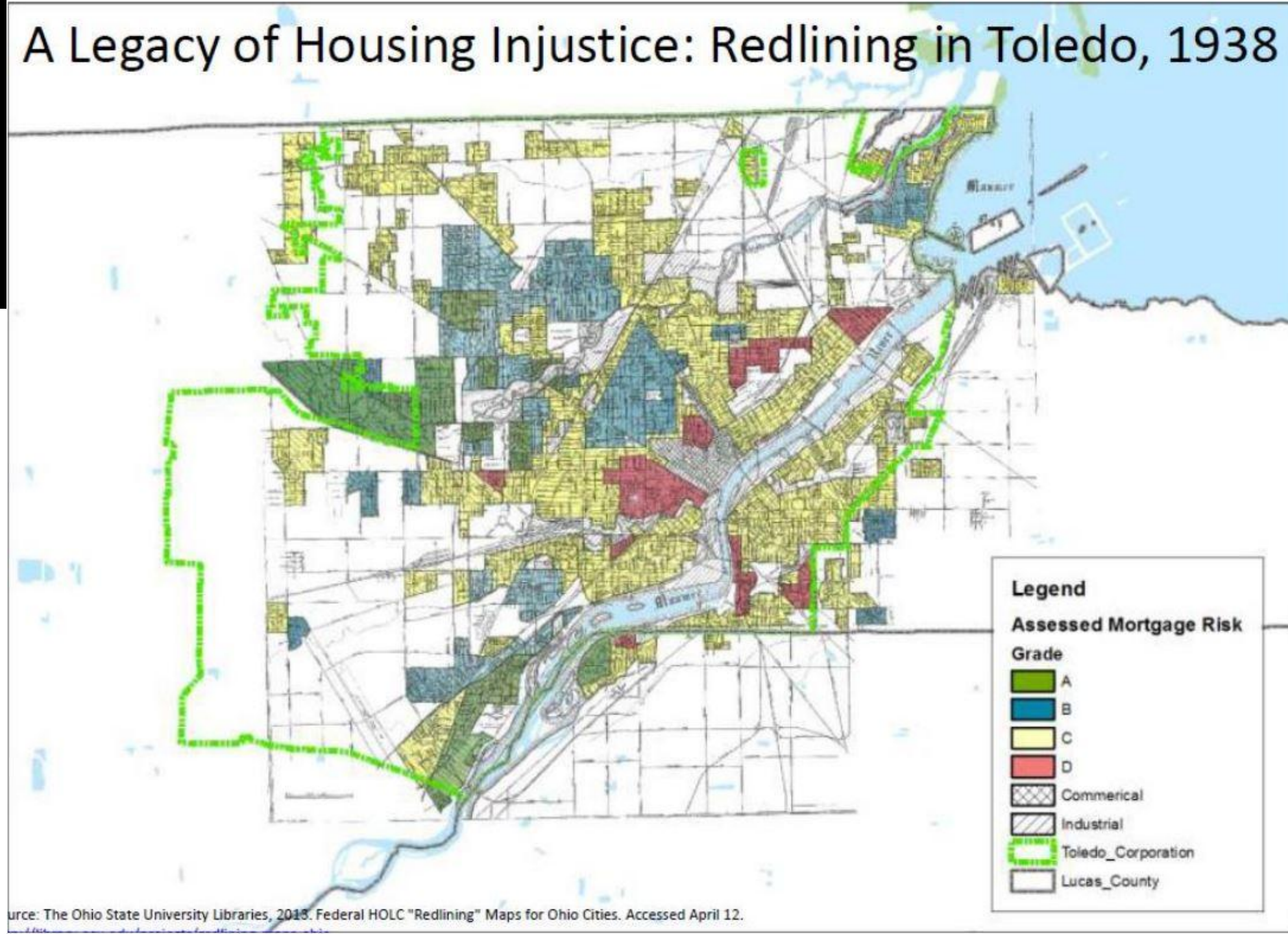
AREAS ARE VIEWED AS LOWER VALUE WHICH PERPETUATES DISINVESTMENT.

LACK OF CAPITAL INVESTMENTS.

MORE DIFFICULTY ACCESSING CREDIT OPPORTUNITIES INCLUDING HOME LOANS.



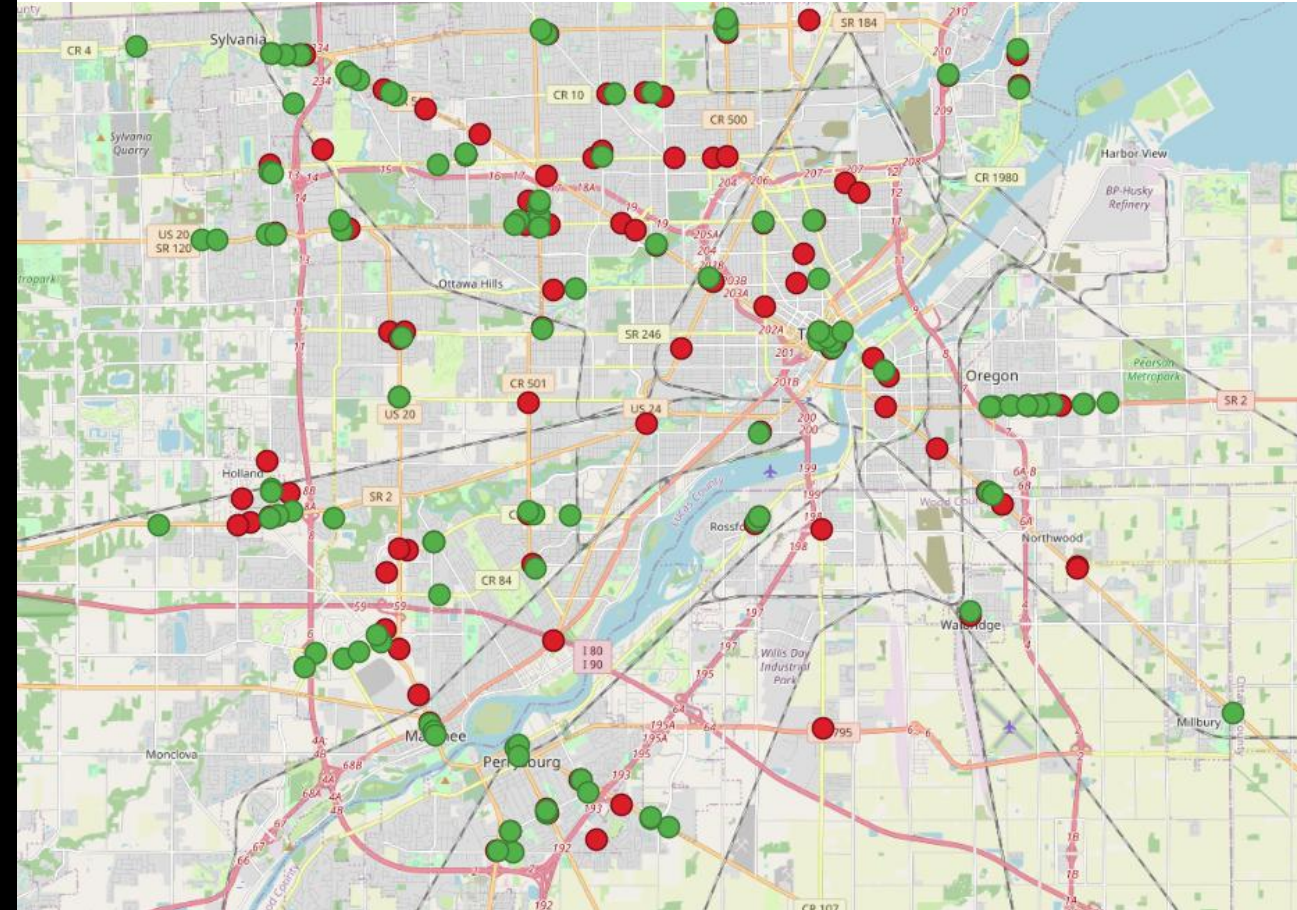
# A Legacy of Housing Injustice: Redlining in Toledo, 1938





Loss of FDIC-insured bank branch locations from 1994 to 2022.

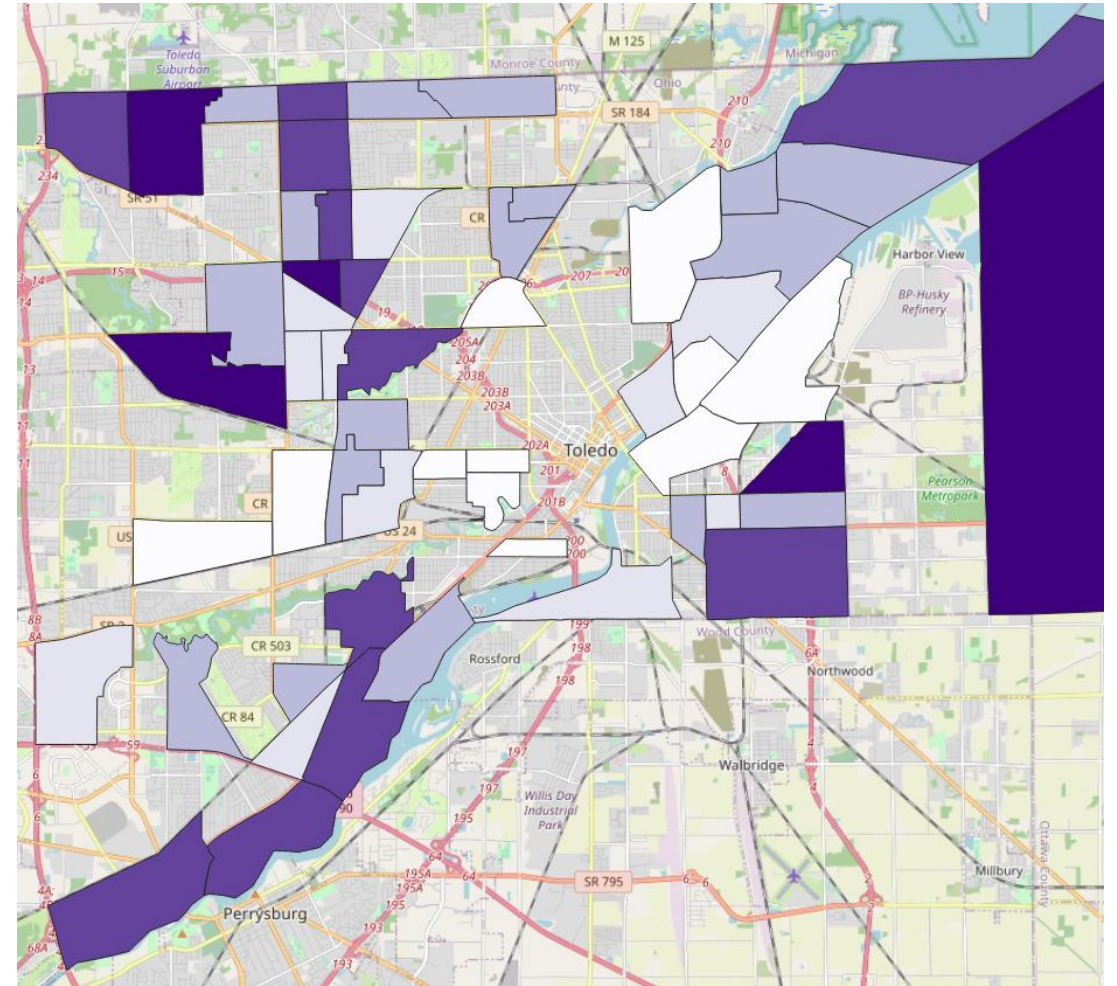
Red dots represent branches lost.



# HUNTINGTON LUCAS COUNTY, 2022 HOME MORTGAGE LOANS ORIGINATED OR APPROVED

Darkest areas have 6 to 11 loans originated.

Pattern of more home loans further away from urban core neighborhoods.

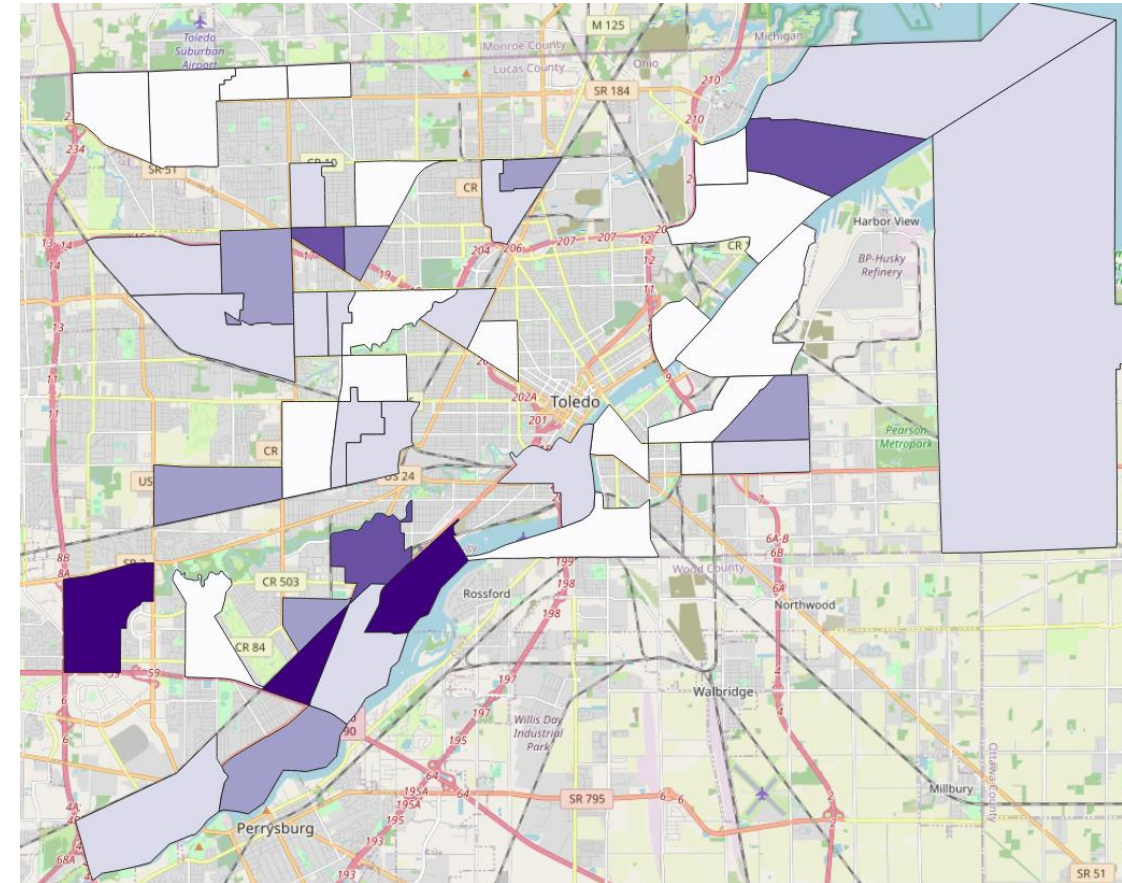




# FIFTH THIRD LUCAS COUNTY, 2022 HOME MORTGAGE LOANS ORIGINATED OR APPROVED

Darkest areas have 4 to 6 loans originated.

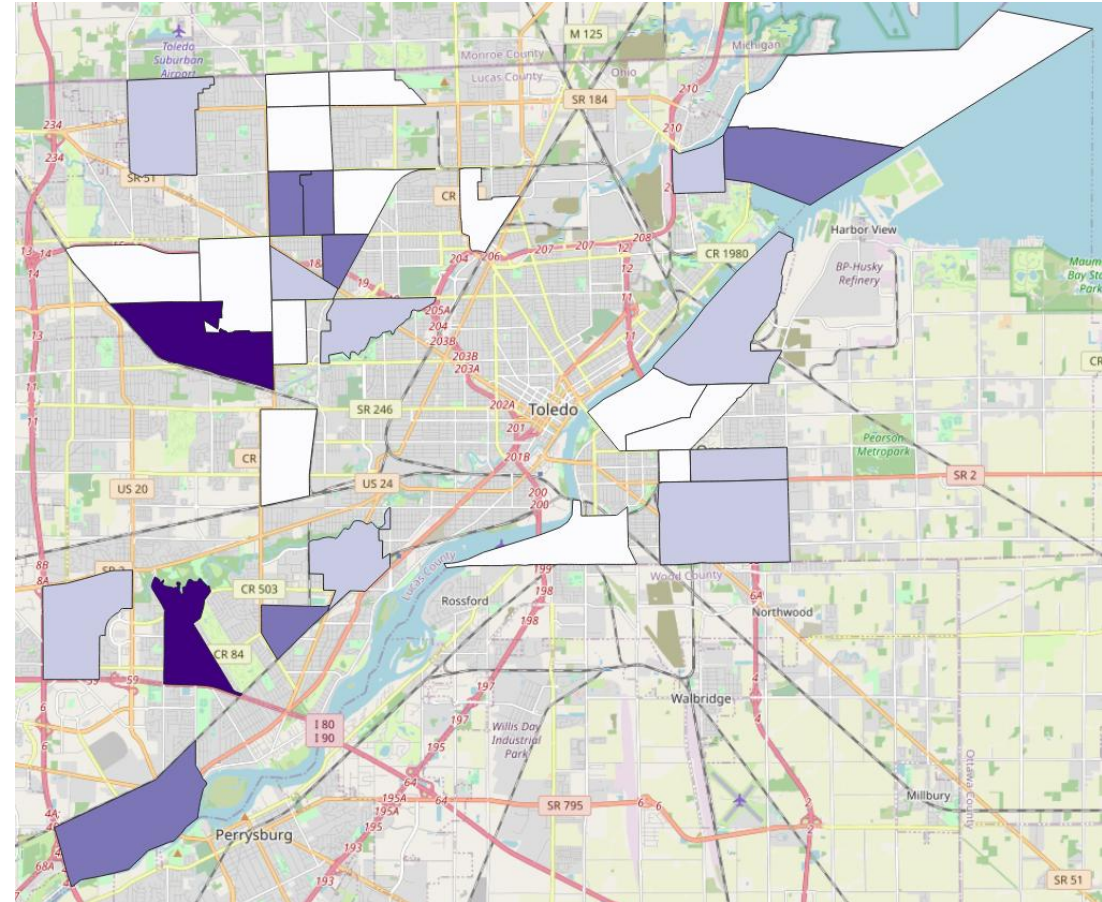
Pattern of more home loans further away from urban core neighborhoods.



# KEYBANK LUCAS COUNTY, 2022 HOME MORTGAGE LOANS ORIGINATED OR APPROVED

Darkest areas have 3 to 4 loans originated.

Pattern of more home loans further away from urban core neighborhoods.



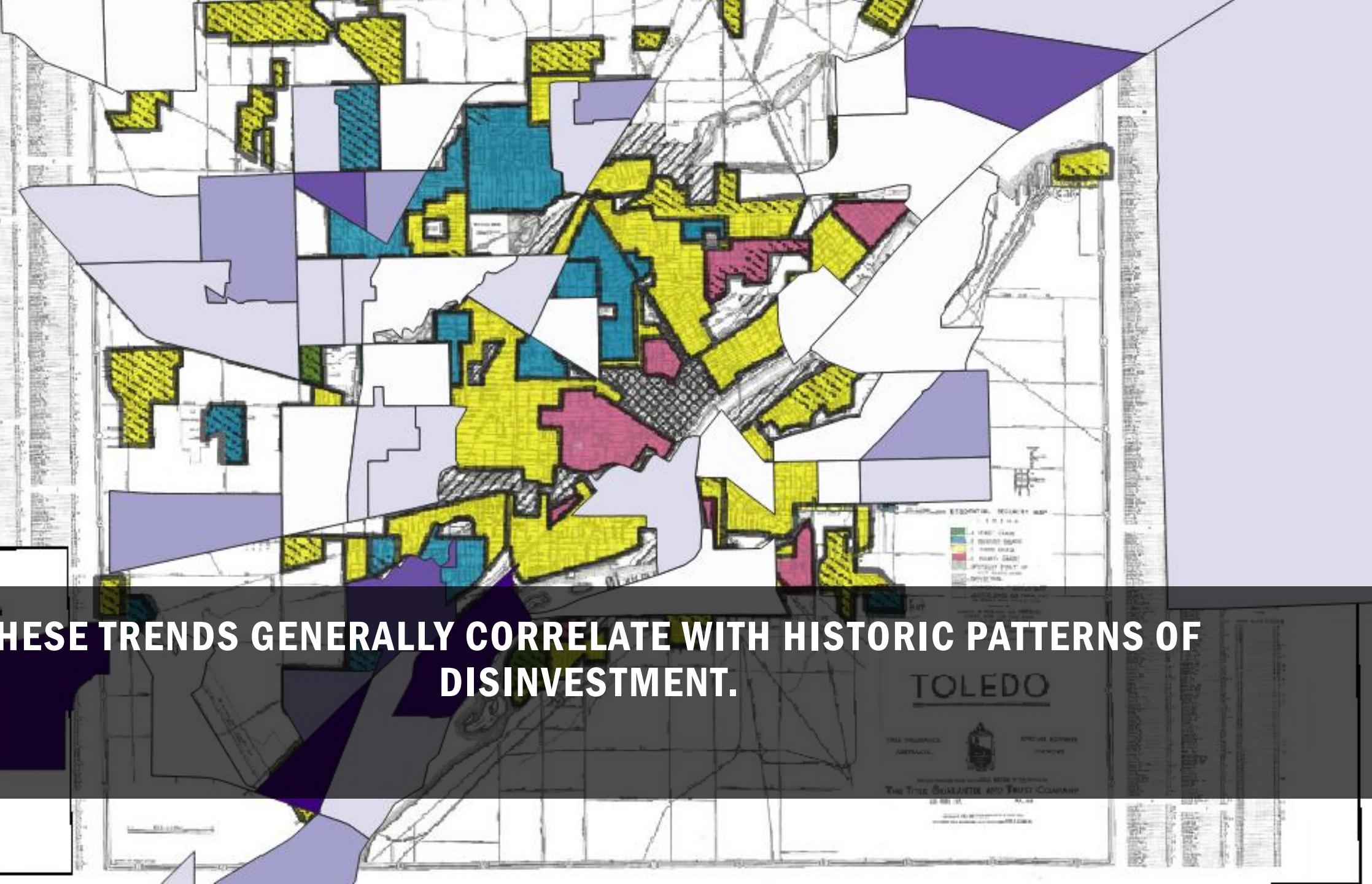


**Legend**

**Security Ratings**

- Commercial
- Industrial
- Spare
- A
- B
- C
- D

**THESE TRENDS GENERALLY CORRELATE WITH HISTORIC PATTERNS OF DISINVESTMENT.**



# HEALTH OUTCOMES

Lower life expectancy at birth

Increased prevalence of poor mental health

Higher incidence of chronic diseases, including those

that put individuals at higher risk for poor outcomes of

COVID-19 (COPD, chronic kidney disease, diabetes, obesity)

Increased incidents of a wide range of adverse health

outcomes, from preterm birth to late-stage cancer

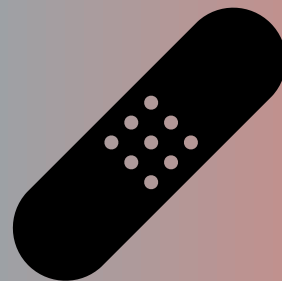


# FACTORS IN POOR HEALTH OUTCOMES

ACCESS TO  
HEALTHY FOOD /  
GROCERY STORES

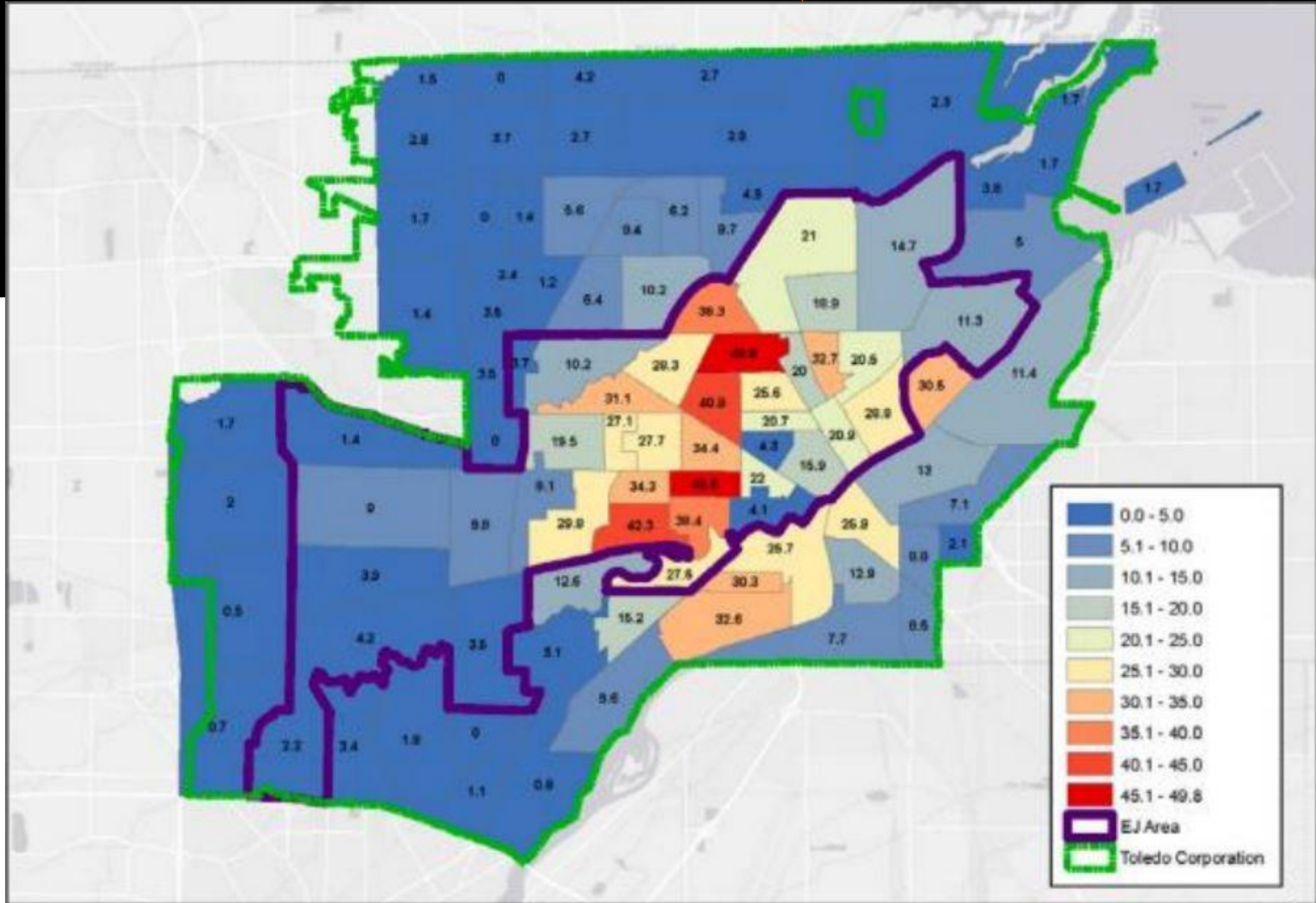


ACCESS TO  
HEALTHCARE

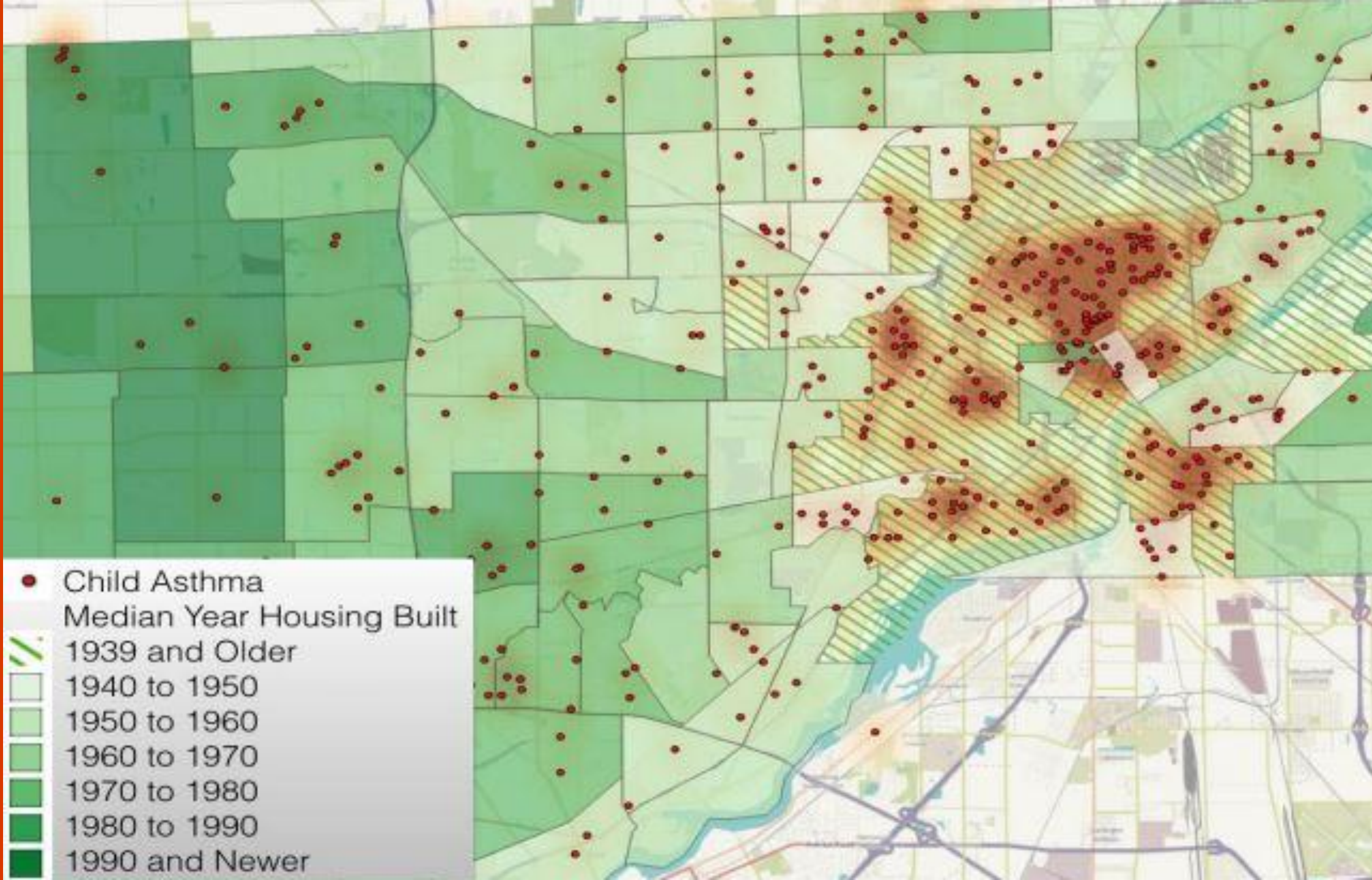


ACCESS TO  
OUTDOOR / GREEN  
SPACES



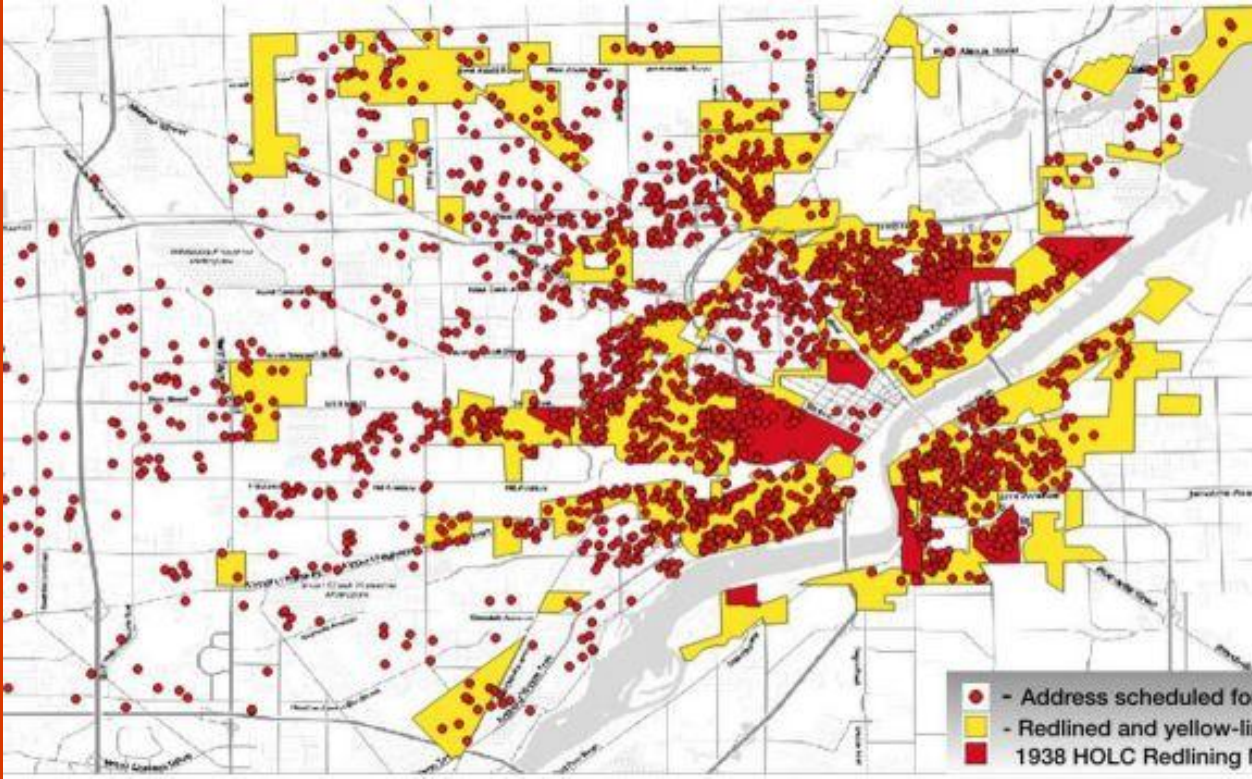
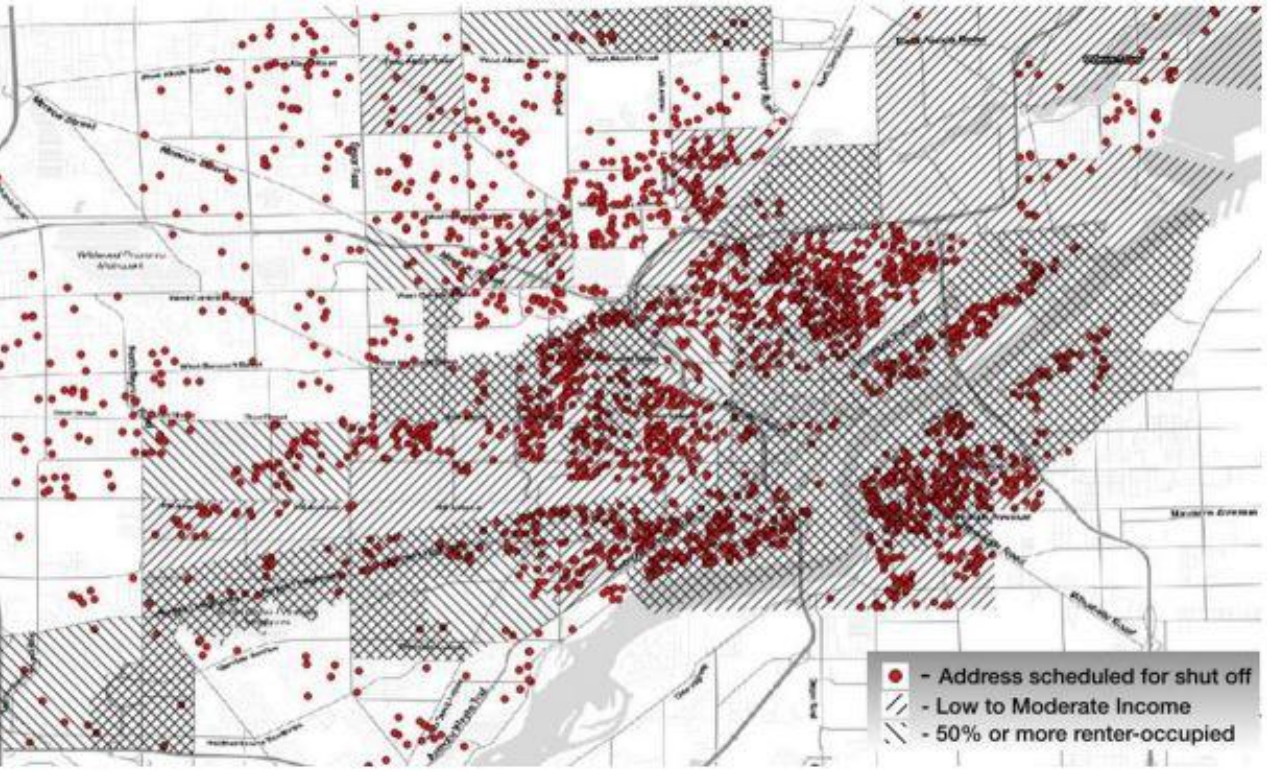








# Access to Water

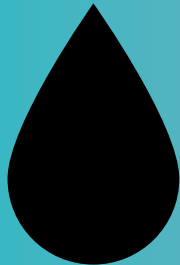


# EDUCATION

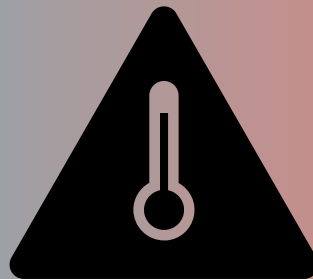
Studies have shown that schools and school districts located in areas that received a “D” grade from the HOLC have less district per-pupil total revenues, less diverse student populations, and worse average test scores relative to those that are in neighborhoods that were graded A, B, and C.

# ENVIRONMENTAL EFFECTS

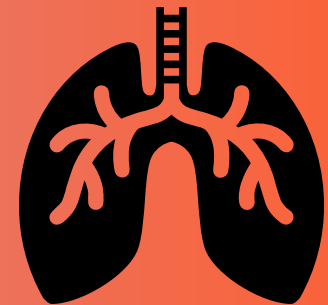
FLOODING



EXTREME HEAT



AIR POLLUTION





# THE AI PROCESS

1. Begins with community outreach—surveys and focus group meetings.
2. Reviews local history and demographics, drawing on census data and other studies.
3. Identifies barriers to fair housing choice.
4. Provides an Action Plan to eliminate or alleviate the identified barriers.

# **BARRIERS IDENTIFIED**

- 1. Criminal history screening**
- 2. Access to Homeownership**
- 3. Accessible housing for persons with disabilities**
- 4. Source of income discrimination**
- 5. Voucher mobility**
- 6. Zoning**
- 7. Enforcement of protections for LGBT+ community**
- 8. Homelessness and affordable housing**
- 9. Local laws that create barriers or eliminate access to housing services**
- 10. Substandard housing conditions**
- 11. Public transportation**
- 12. Discrimination in rental housing**
- 13. Access to water services**
- 14. Public awareness**

# CRIMINAL HISTORY SCREENING ACTION PLAN

Take advantage of new  
CQH program and build  
this process into local  
systems.





# ACCESS TO HOMEOWNERSHIP ACTION PLAN

- Homeownership fairs to educate the community on access to homeownership.
- Incentivizing banks to increase access to home loans through better marketing and product offerings.
- Encourage banks to better disclose their commitments to the Toledo area. This should include an explanation of how banks are meeting Community Reinvestment Act requirements in the area more specifically.
- To accomplish these goals, the City should consider reviewing how local laws can provide incentives to banks.
- Develop a program to help local residents with tangled title problems that prevent families from inheriting title from a deceased relative.
- The City should also undertake a more thorough analysis and study of the available HMDA data and lending patterns in the area to better understand these issues.



# ACCESSIBLE HOUSING FOR PERSONS WITH DISABILITIES

- Ensure enforcement of the existing state building code regarding accessibility, especially as it relates to renovations of existing older buildings, such as buildings downtown now being converted to housing.
- Ensure enforcement of the City's local visitability laws.
- Build more accessible affordable housing. The homelessness rate in the area is particularly plagued by chronically long-term homeless persons who highly likely have significant disability, which is also addressed in the section covering homelessness.



# SOURCE OF INCOME DISCRIMINATION ACTION PLAN

Enforce the adopted source of income discrimination law. The City has already been working with The Fair Housing Center to discuss enforcement of the local law. Next steps should include development of processes to accept complaints, process investigations, and make recommendations to the law department and/or the prosecutors office.





# VOUCHER MOBILITY ACTION PLAN



**Encourage and help LMH to increase mobility for voucher holders.**

The background of the slide features several rolled-up architectural blueprints. The blueprints are white with black lines and text, showing various floor plans and site layouts. Some dimensions and numbers are visible, such as 2380, 3510, 2650, 5940, 810, 820, 2180, 150, 220, 740, 970, 1385, 990, 330, 810, 760, 830, 40, 1030, 1480, 150, 380, 890, 155, 1780, 890, 155, 1250, 710, 250, 2560, 2810, 1185, 270, 425, 3175, 3100, 1010, 5, 6, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100. The blueprints are arranged in a way that they appear to be unrolled from the top left towards the bottom right.

# LAND USE AND ZONING ACTION PLAN

- **Change its local zoning restrictions regarding group homes for persons with disabilities. As described above, the City should adopt the changes previously suggested by The Fair Housing Center.**
- **Adopt local zoning restrictions on small box stores that contribute to food deserts in disinvested areas.**
- **Adopt local zoning laws that incentivize the development of healthy food providers.**
- **Ensure neighborhood plans that have included resident involvement are enforced and adopted as part of the City's zoning processes, such as plans developed by the Toledo Design Collective or other entities that have worked to ensure neighborhood resident involvement.**

# LGBT+ ACTION PLAN



The City should ensure enforcement of its local laws regarding nondiscrimination in housing. This will help reduce concerns of discrimination considering recent developments nationally that have been hostile to LGBT civil rights. This can be accomplished with enforcement of the same laws that protect against discrimination based on source of income, Chapter 554 of the Toledo Municipal Code.



# HOMELESSNESS AND AFFORDABLE HOUSING ACTION PLAN

Development of more affordable housing should be a key priority for the City. The City has expended these efforts in recent years and must continue to do so. The City should include funding for services for residents and develop projects that specifically help the chronically homeless that need services to successfully remain housed.



# LOCAL LAWS THAT LIMIT OR ELIMINATE ACCESS TO HOUSING SERVICES, AND HOUSING DEVELOPMENT ACTION PLAN

Local laws that have created difficult and sometimes impossible processes for the use of City funds to help low-income and minority neighborhoods must be eliminated as soon as possible. The City must remove laws described above that require a project labor agreement and other processes and requirements even for nonprofit small projects to help low-income families with roofs or small repairs.





# SUBSTANDARD HOUSING CONDITIONS ACTION PLAN

- Ensure enforcement of local codes, such as the lead poisoning prevention law.
- Increase the budget and staffing for code enforcement as described above.
- Continue programs that help address housing conditions issues with direct assistance to tenants facing substandard conditions in rental units. This includes The Fair Housing Center's Housing Conditions and Neighborhood Reinvestment program.

## HOUSING CONDITIONS EXAMPLES - BEFORE







## **PUBLIC TRANSPORTATION ACTION PLAN**

- **Study how to increase and improve its services specifically for families most reliant on its services, especially low-income persons with disabilities and Black families.**
- **Increase paratransit services county-wide as discussed above.**

# **IMPEDIMENTS IN RENTAL HOUSING ACTION PLAN**



**Many of the actions listed above will address impediments in rental housing. Considering that an increasing number of Toledo homes are rentals, the City should prioritize this work with continued outreach events, as well as fair housing services such as those provided by The Fair Housing Center.**





# **PUBLIC AWARENESS OF RIGHTS AND RESPONSIBILITIES UNDER FAIR HOUSING LAWS ACTION PLAN**

**During the period of the last Analysis from 2020-2025, the City adopted several important changes to local laws to help address barriers to housing related to water services. These changes had a positive impact. However, as described above, one of those changes — protecting against abusive water reselling practices — has not been enforced as required. Through the period of this new Analysis from 2025 through 2030, the City should prioritize enforcement of the water reselling rules.**





# **PUBLIC AWARENESS OF RIGHTS AND RESPONSIBILITIES UNDER FAIR HOUSING LAWS ACTION PLAN**

**The City should continue ongoing efforts to support education and outreach work by The Fair Housing Center. Potential new projects may include joint events and presentations in coordination with the City.**

**THANK YOU!**

