

# 2019 City of Wooster Analysis of Impediments to Fair Housing Choice

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*A review of Recent Fair Housing Concerns and a Course of Action to Ensure Fair Housing Choice for Wooster*

*Adopted  
July 2019*

Performed By:  
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## Executive Summary of Analysis

### About the 2019 Analysis of Impediments to Fair Housing Choice

The 2019 Analysis of Impediments to Fair Housing Choice study serves to comprehensively review the community's access to fair housing choice for all residents and prospective future residents. The City's Fair Housing Program serves to protect the public from illegal housing discrimination, which is the denial of the equal opportunity to rent, purchase, finance, or insure homes due to a persons' race, color, religion, national origin, gender, familial status, disability, ancestry, or military status. Fair housing is a basic consumer protection for individuals engaged in the housing market. It is also essential to the foundation of healthy economic and community development for the community as a whole.

A vibrant and free housing market is essential for any community seeking to grow in prosperity. discrimination restricts economic freedom within a community while stymieing its growth. When individuals take it upon themselves to deny a family the opportunity to acquire housing within the City due to illegal discrimination, they not only impact the economic and civic well-being of that family, but also deny the greater community the economic impacts and civic contributions the household would have brought. Through ensuring ongoing educational opportunities and also providing a resource for those facing illegal discrimination, the City of Wooster's Fair Housing Program works to ensure equal housing opportunities for the community's current and future residents.

The study itself, conducting approximately once every five years, provides a detailed review of demographic data, housing inventory information, and the availability of social and civic resources that support fair housing as well as affordable housing opportunities and job creation and education within the community. Local and regional complaint data is assessed to determine what specific fair housing issues have threatened the community. With an understanding of current resources coupled with identified specific fair housing concerns, the study is able to recommend a course of action for the City to ensure the affirmative advancement of fair housing choice and better position the community for future economic prosperity.

### Methodology

The 2019 Wooster Analysis of Impediments to Fair Housing Choice was conducted by the City of Wooster's Fair Housing Officer who also serves as the Community Development Block Grant Administrator. The format of the study was prescribed by the Ohio Development Services Agency as part of the City of Wooster's participation in the State of Ohio's Small Cities Community Development Block Grant program, with some minor modifications to reflect locally available data. The Analysis was completed as an in-kind service by the City of Wooster at an estimated value of \$8,500.

The Analysis started with a review of annual analysis of impediment updates and complaint data, compiled annually as part of the City of Wooster's Fair Housing Program's activities. Data used to conducted in establishing demographic, income, employment, and housing profiles was obtained through the United State Department of Commerce's Census Bureau (Census), the Ohio Development Services Agency Office of Research, the United State Justice Department, the Federal Financial Institutions Examination Council, the Ohio Civil Rights Commission, the Ohio Department of Commerce Division of Real Estate, the Wayne County (Ohio) Auditor's Office, and the City of Wooster's Department of Engineering Geographic Information System.

The Analysis included a presentation and solicitation of comment from the Wayne County Housing Coalition, a consortium of area governments and non-profits with a focus on coordinating housing needs throughout the county. The study also launched an online community survey to obtain public comment on local fair housing concerns, which is contained in the Evaluation of Jurisdiction's Current Fair Housing Profile section.

## Summary of Findings and Actions Needed

**Overview:** The City of Wooster provides a strong suite of resources to ensure unlawful discrimination remains rare and that equal opportunity for housing is affirmatively advanced. The City government and community nonprofits have pro-actively established a series of programs and collaborations to address impending community development concerns, with a focus toward growing a stronger and safer affordable housing inventory, expanding transportation opportunities with a focus on supporting low-to-moderate income households, and the development of several programs to foster residential and commercial real estate rehabilitation as well as job creation. In addition to its ongoing Fair Housing Program that promotes education and fields complaint, the City maintains a Property Maintenance Program that rapidly responds to building safety and repair concerns, funds a Taxi Pass program that extends free fixed-route bus service and steeply discounted door-to-door transportation services to low-income residents, and manages a Community Reinvestment Area (CRA) program that has led to the rehabilitation or creation of nearly 100 housing units in the past decade.

**Demographics:** With 26,723 residents as of 2017, Wooster's population has grown slightly at a time where the several regional communities are experiencing losses. Some notable demographic highlights include Wooster's relatively stable and gently growing population base. A total of 45% of Wooster's population is defined as being low-to-moderate income. Family income in Wooster is lower than elsewhere in Wayne County, but per capita income is essentially identical. Some disparity exists in racial income characteristics, but these are trending toward normalization and substantially more normalized than state averages. Wooster's population of children and elderly are disproportionately larger than state averages. Rates of disability also trend slightly higher than state averages, even when accounting for age. The use of public assistance is higher than average, owing in part to lower incomes among an elderly population with a higher incidence of disability, and a larger younger family population which is more frequently challenged with lower incomes.

**Local Complaint, Survey, and Regional Data:** A total of 175 complaints were fielded by the City's Fair Housing Program over the last period, which extended from January 2016 through the second quarter of 2019. Complaints predominantly centered about property maintenance concerns and landlord-tenant issues. The most common fair housing complaints involved discrimination concerning disability and familial status. Discrimination against sex and race were also described. Affordable housing proved the community's most prominent concern in a review of complaint and survey data, along with the quality of existing housing, and access to transportation. Regional data similarly suggests ongoing concerns with regard to accommodating individuals with disabilities, among concerns with illegal discrimination pertaining to familial status, race, and sex. Local and regional data also show that education and outreach have been very effective at reducing the incidence of illegal discrimination.

## Key Concerns:

### **Unintentional discrimination against individuals on the basis of disability**

- Addressing this concern: Continue fair housing education and outreach efforts with a focus on fair housing rights for disabled persons

### **Willful Discrimination Against Individuals on the basis of disability, familial status, race, and sex**

- Addressing this concern: In addition to education efforts focusing on most common concerns, the City's Fair Housing Program should continue to offer complaint intake services.

### **Lack of Housing Affordability and Availability**

- Addressing this concern: The City of Wooster and its economic and community development partners should continue to evaluate opportunities to encourage new housing development.

### **Lack of Rental Housing Quality**

- *Addressing this concern:* The City of Wooster should continue its Property Maintenance program.

### **Lack of Mobility and Transportation Options for Low-Income Wooster Residents:**

- *Addressing this concern:* The City of Wooster should continue investing in its popular Taxi Pass program and continue to be an active participant with the Transportation Coalition.

## Recommended City Actions and Program Enhancements:

### **Continue City of Wooster Fair Housing Program**

- Focus outreach materials on discrimination risks against disability, familial status, race, and sex. Publish metrics to enhance community awareness of fair housing and resources. But
- Continued Partnership with Wayne County Housing Coalition.
- Share information on the City's Property Maintenance Program.
- Update Fair Housing Legislation to reflect current resources.

### **Property Maintenance Program**

- Maintain Ongoing Inspection and complaint response services.
- Continue enforcement and prosecution for noncompliance.

### **Continued Partnership with Wayne County Housing Coalition**

- Continue assessing housing needs for the community.
- Continue engagement and provide supportive care for homeless residents.

### **Continued Partnership with Transportation Coalition:**

- Evaluate transportation needs with area transportation partners and potential infrastructure improvements to aid transportation.
- Explore opportunities and partnerships for connecting Wooster's transportation network to new services beyond city limits as those options become available.

### **Continued Investment In Alternative Transportation:**

- Provide continued support for low-to-moderate income transportation through the City's Taxi Pass Program to ensure ongoing mobility.

- Build links within the existing Wooster Loop System to improve ease of access between residential neighborhoods and employment centers.
- Evaluate sidewalk infrastructure and pursue opportunities to fund needed repairs or new construction.

**Evaluation of Existing Community Reinvestment Area Program (CRA) and Real Estate Incentives**

- The City should evaluate all neighborhoods for their appropriateness for CRA designation.
- The City should continue supporting its local CHIP Partnership with Wayne County, the City of Orrville, the city of Rittman, and the Wayne Metropolitan Housing Authority in providing funding resources for preserving existing housing for low-to-moderate income families.
- The City should continue fostering Downtown redevelopment to support job and housing creation.
- The City should continue to explore the viability of other state development programs to support future development and housing creation, including the use of tax incremental financing, new community authorities, and land banks.

**Site Marketing:**

- The city should continue to coordinating with its economic development partners to identify sites and engage potential developers to increase Wooster's housing inventory.

## Jurisdictional Background Data

### Demographic Data

The following provides general demographic data for the City of Wooster as of the latest 2017 American community survey by the United States Census Bureau. On average, the City of Wooster has a relatively similar to have demographic makeup to that of the state of Ohio.

**Table 1: Population Pyramids – Distribution by Age**

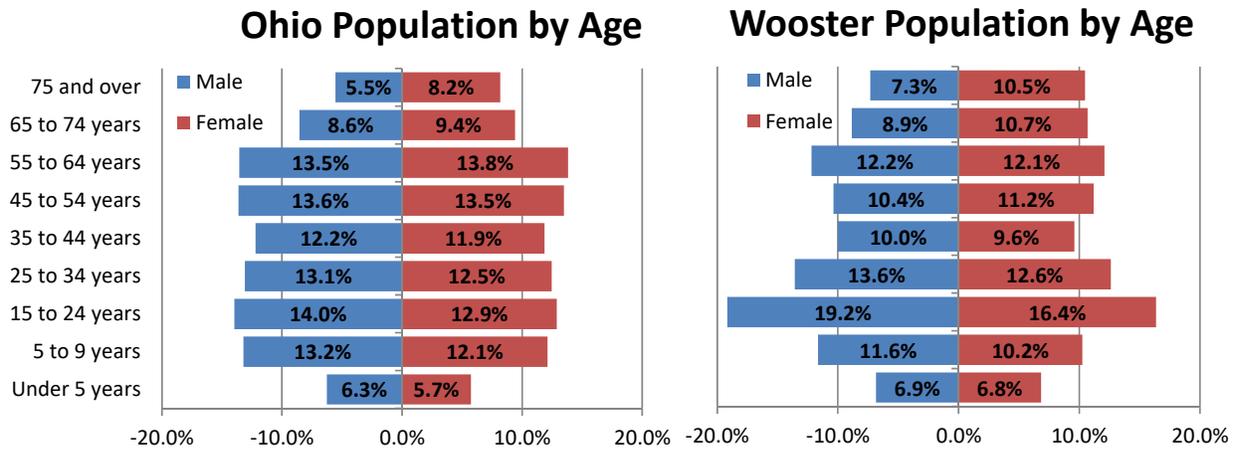


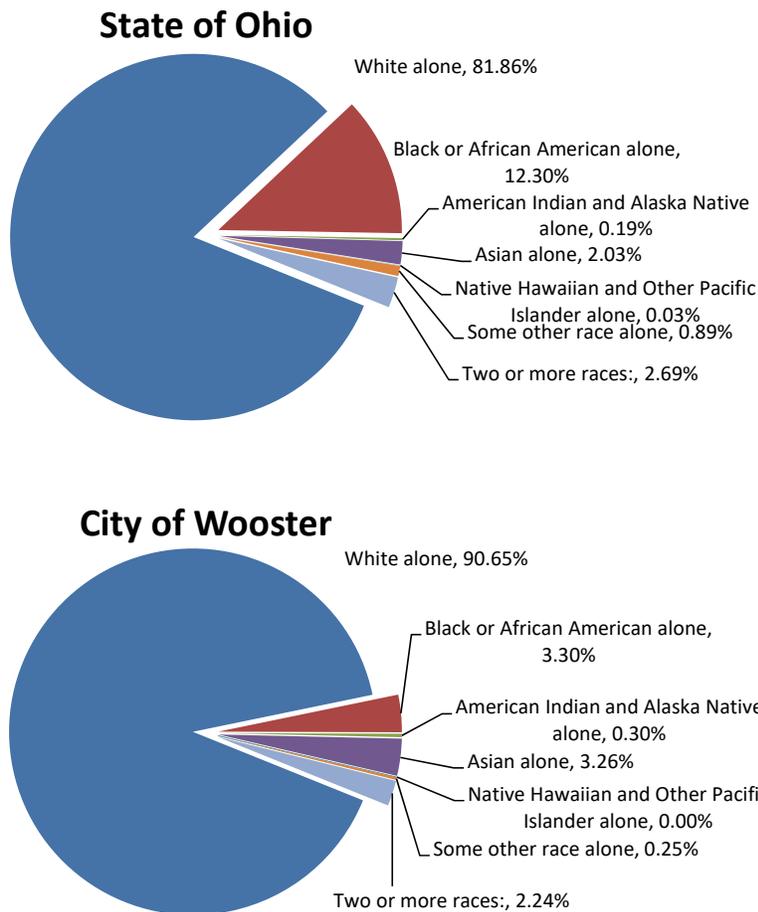
Table S1810, 2013-2017 American Community Survey 5-Year Estimates

Wooster has a total population of 26,723 people according to the 2017 estimate, a slight increase over 26,119 persons counted in 2010. While quite anemic, and contrary to the growth that Wooster has experienced in the number of its new service accounts for utilities, these numbers are unique given Wooster’s northeastern Ohio location, where many communities are experiencing a population loss.

**Table 1** above shows population pyramids for the State of Ohio in comparison with the City of Wooster, highlighting that Wooster has slightly larger populations of younger households and elderly in comparison to the State of Ohio, which has a more even distribution.

Located in a rural county, Wooster and its few neighboring cities and villages are uniquely positioned to provide affordable housing opportunities in comparison with many other areas throughout the county. Municipal water systems and utilities, which are scarce throughout much of Wayne County’s geography, are able to support higher density developments, which can be built at a lower cost per unit than individual homes on single-acre lots. With a variety of apartment complexes and condominium communities, Wooster offers the most affordable opportunities for new young households as well as older households seeking to downsize. Development much anywhere else generally requires the construction of a single home on at least one acre of land for on-site septic systems. While highly desirable for its level of space and privacy, single-family rural housing is economically out of reach for many families starting out, for households struggling with lower incomes, and for older households with income earners seeking to lower costs as they prepare for retirement. For some, apartment or condominium living is also more convenient as it lacks the extensive maintenance and unforeseen costs associated with owning a traditional home.

**Table 2: Racial Composition**



**Tables 2 and 3** share the community's racial makeup in comparison with state averages. While minority groups are underrepresented in comparison with state averages, Wooster's racial diversity has been increasing as the City grows.

**Map 1** presents Wooster's raw population by census block group (the most detailed level available). This map provides a reference for future block group maps. Certain block groups, such as Wooster's southwestern-most block group with 300 residents, show up routinely as outlier's in later maps. Part of the reason for this, is due to very small sample sizes, particularly south of downtown Wooster. Other areas, such as Wooster's northwestern-most block group, extend beyond city limits and encompass additional residential areas, though the majority of residents reside within the city.) Wooster's block groups ranged in size from as few as 300 people to as many as 2,242.

Table S1810, 2013-2017 American Community Survey 5-Year Estimates

**Table 3: Wooster and Ohio Racial Makeup**

	Ohio		Wooster city, Ohio	
	Estimate	Percent	Estimate	Percent
Total:	11,609,756	100.00%	26,723	100.00%
White alone	9,503,779	81.86%	24,224	90.65%
Black or African American alone	1,428,230	12.30%	882	3.30%
American Indian and Alaska Native alone	21,872	0.19%	81	0.30%
Asian alone	235,878	2.03%	871	3.26%
Native Hawaiian and Other Pacific Islander alone	3,499	0.03%	0	0.00%
Some other race alone	103,726	0.89%	67	0.25%
Two or more races:	312,772	2.69%	598	2.24%
Two races including Some other race	25,907	0.22%	0	0.00%
Two races excluding Some other race, and three or more races	286,865	2.47%	598	2.24%

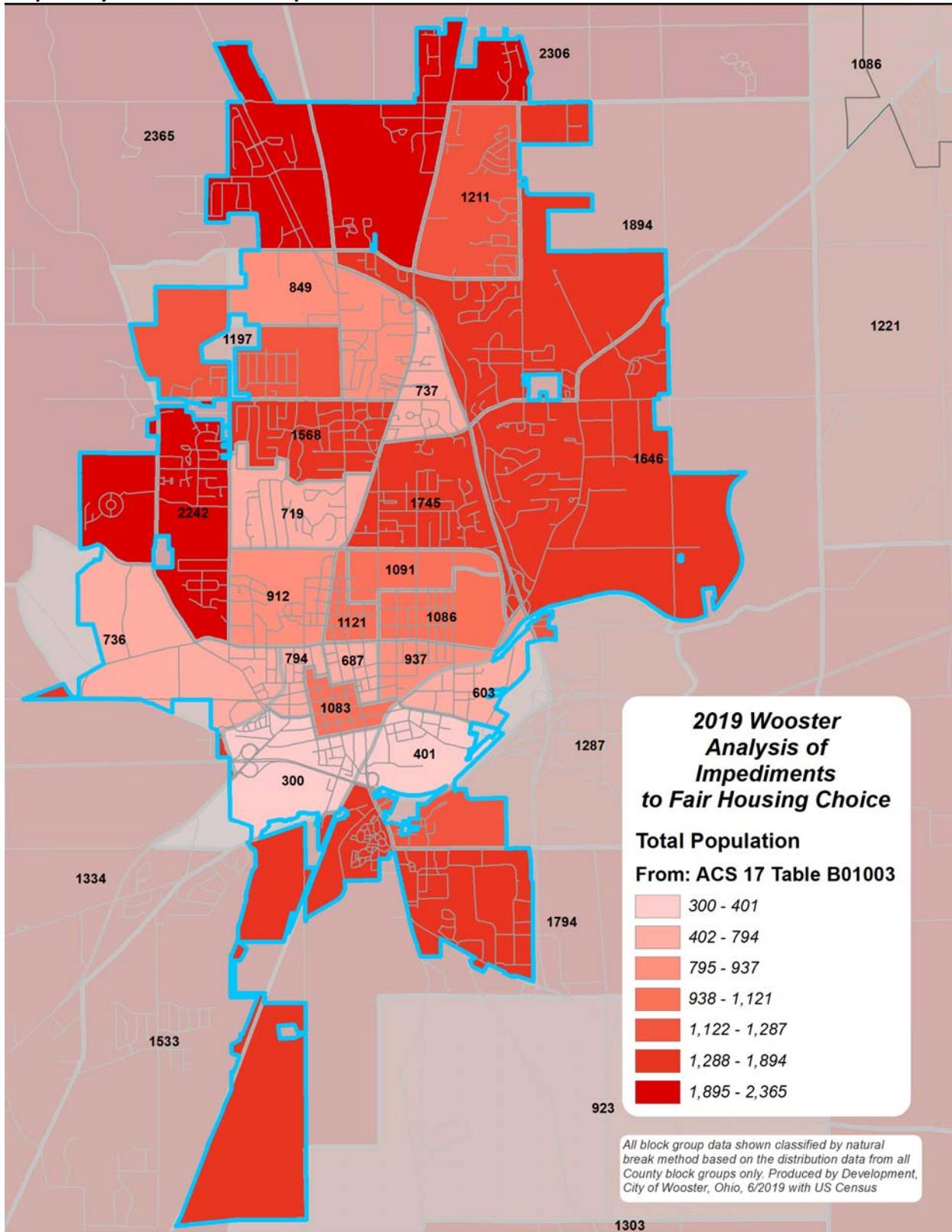
Table S1810, 2013-2017 American Community Survey 5-Year Estimates

**Map 2** shows how population is concentrated by block group. This map is created by dividing the number of people within the block group by the territory's square miles. Downtown Wooster and points north show the greatest concentration of individuals. One outlier to consider is the city's North End, which is a very large census tract with a very small, but highly populated section within the city limits. To illustrate growth and change, **Map 3** highlights how population has shifted since the US Census' 2013 American Community Survey (ACS). Wooster's southwest downtown neighborhood experienced the greatest loss (keeping in mind this represents only about 120 people). The greatest increases were observed along the city's north east end, which experienced new housing development.

**Map 4** shares the average household size per block group. On average, Wooster has 2.18 persons per housing unit (versus 2.44 statewide). Approximately 72.5% of individuals lived in the same location the previous year, indicating a relatively high turnover rate of 27.5%, compared with 14.9% statewide. These dynamics may be influenced by Wooster's high composition of rental units, with 43.9% of properties occupied by renters.

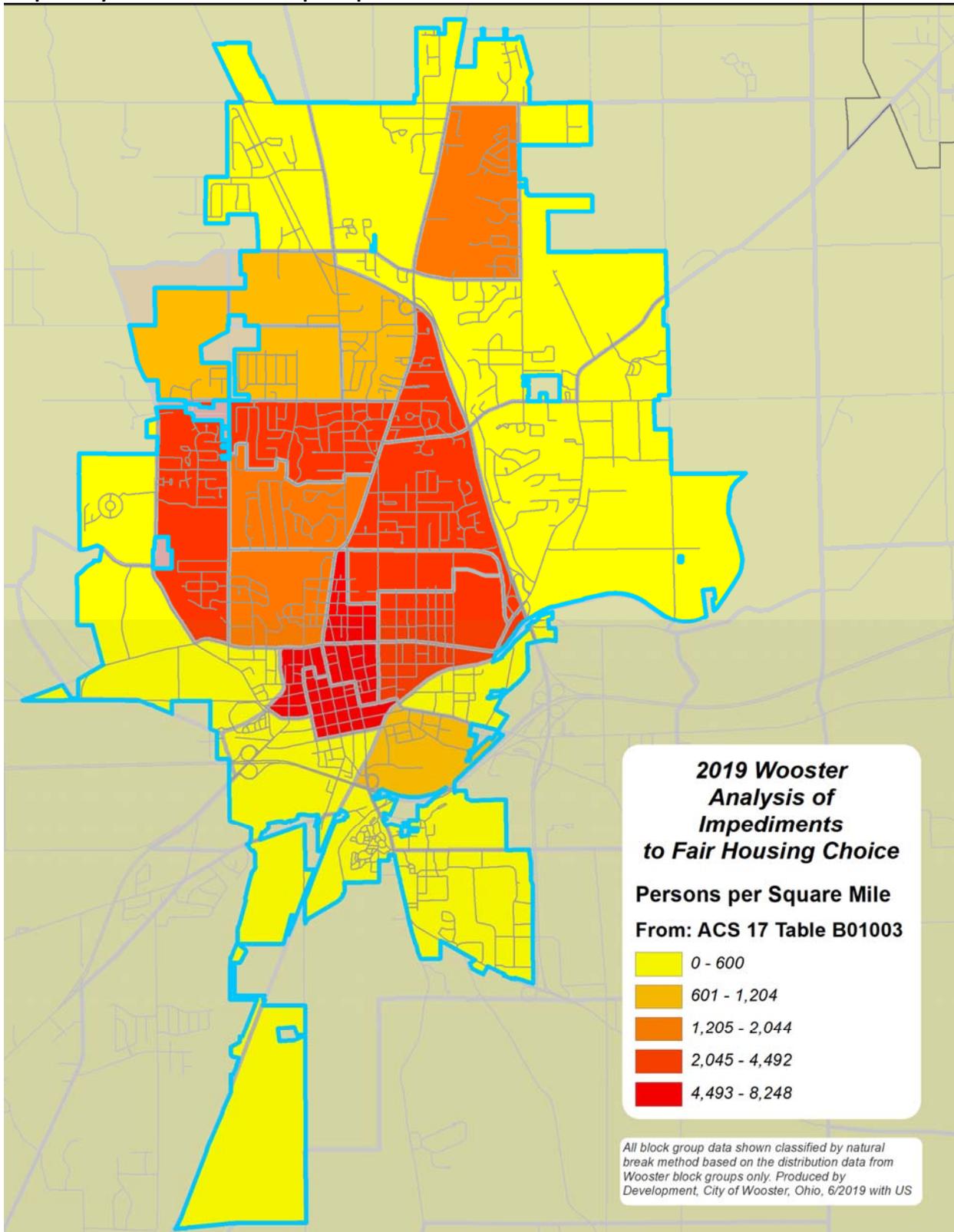
Lastly, **Map 5** provides a picture of Wooster's actual land uses and how its neighborhoods are connected together through its road network and its newer mass transit system. Wooster's development pattern shows a center of residential activity surrounded by industrial districts and commercial districts. (Included in the commercial districts are the College of Wooster, the Wooster country club, and Wooster City school district properties, each of which provides abundant green space.)

**Map 1: City of Wooster Raw Population**



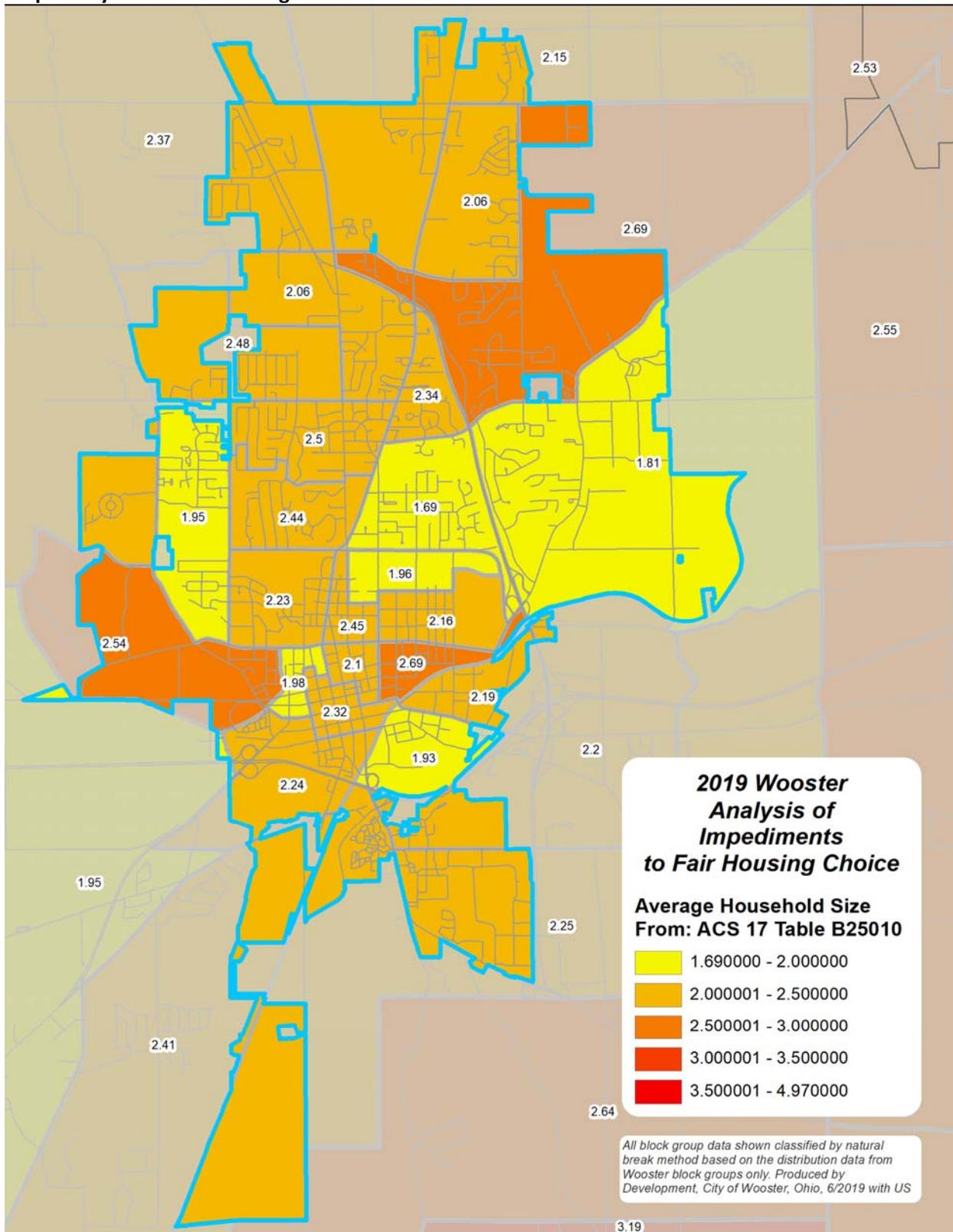
US Census Bureau, 2017 ACS Data Table B01003

**Map 2: City of Wooster Persons per Square Mile**



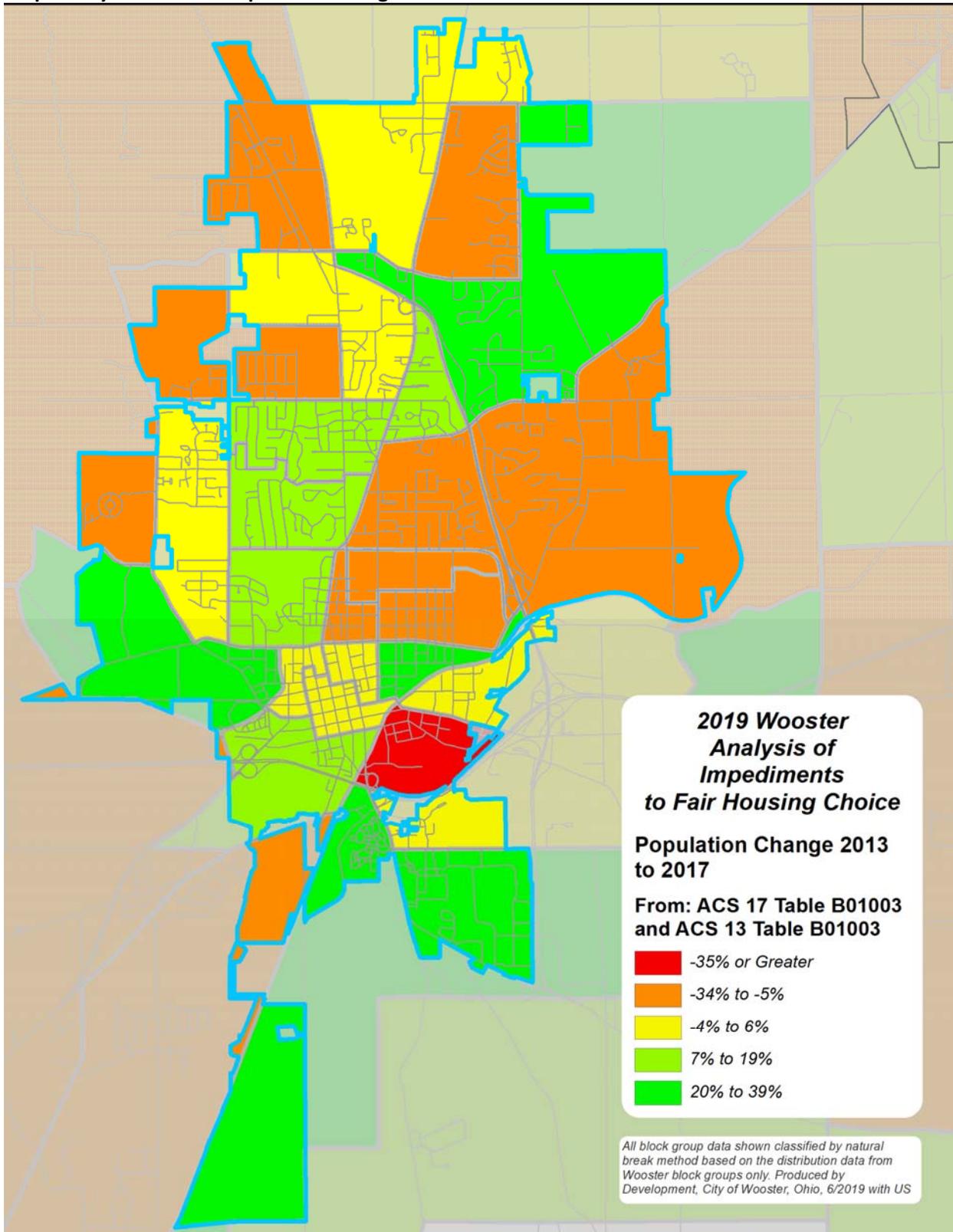
US Census Bureau, 2017 ACS Data Table B01003

**Map 3: City of Wooster Average Household Size**



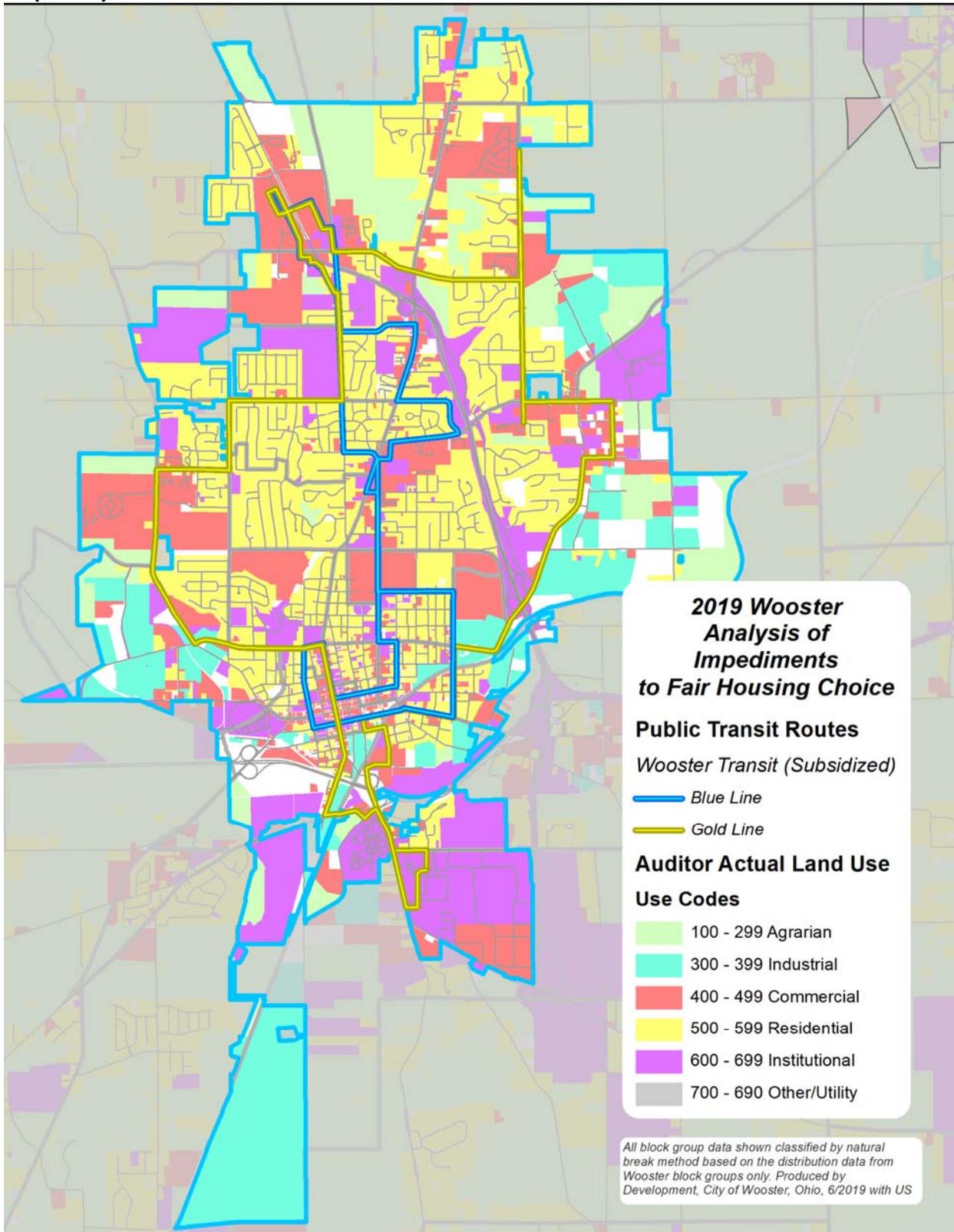
US Census Bureau, 2017 ACS Data Table B25010

**Map 4: City of Wooster Population Change 2013 to 2017**



US Census Bureau, 2017 ACS Data Table B01003 and 2013 ACS Data Table B01003

**Map 5: City of Wooster Auditor Actual Land Use**



US Census Bureau, 2017 ACS Data

\*\*\*\*\*Jonathan – Look at the Other/Utility in the Legend. Is 690 right? It seems like it overlaps with Institutional

**Table 4** highlights Wooster’s racial makeup by average age. Later tables and the income profile section will show changing income patterns among racial groups. Younger populations will generally have lower incomes as individuals wrap up educations, enter job markets for the first time, and begin to start their careers at the lower end of the pay scale. The same populations, while having limited incomes, are also most likely to be starting families, which places additional strain on an individual household’s financial circumstances. Middle age populations can anticipate seeing income gains as careers mature and pay grows with more advanced job opportunities. Older populations will experience income loss as individuals leave work to enter retirement, while also facing increased expenses for health care and encounter greater occurrences of disability.

**Table 4: Median Age by Race**

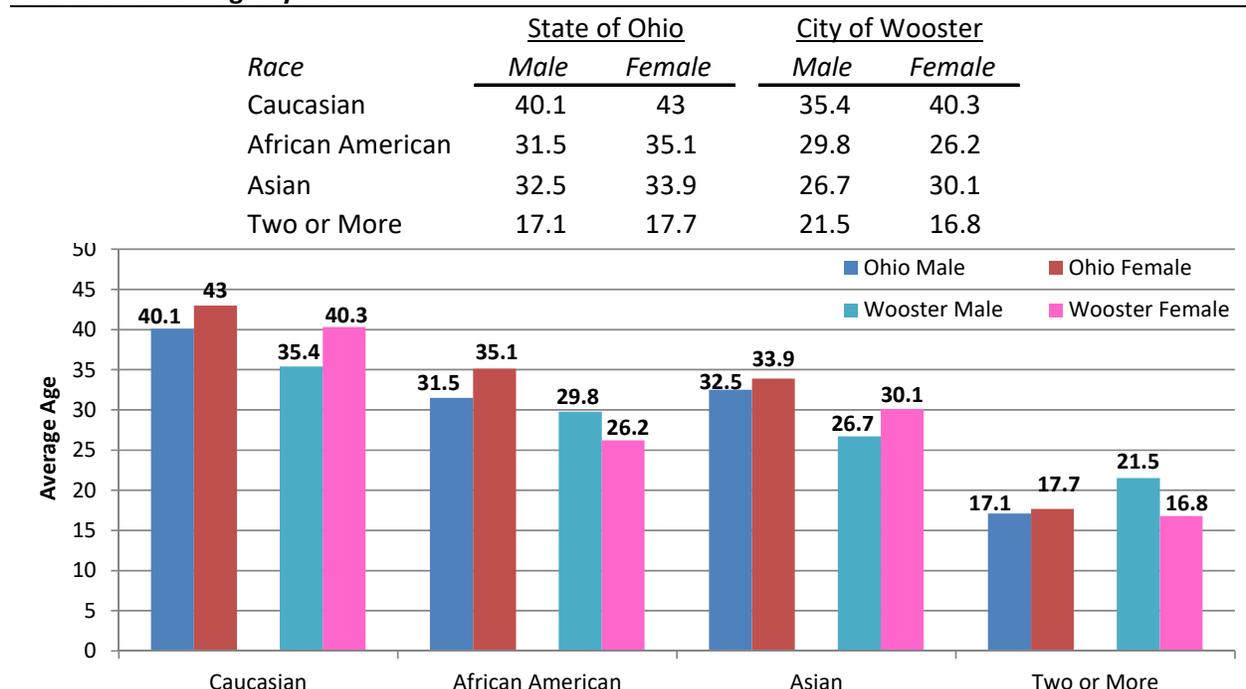
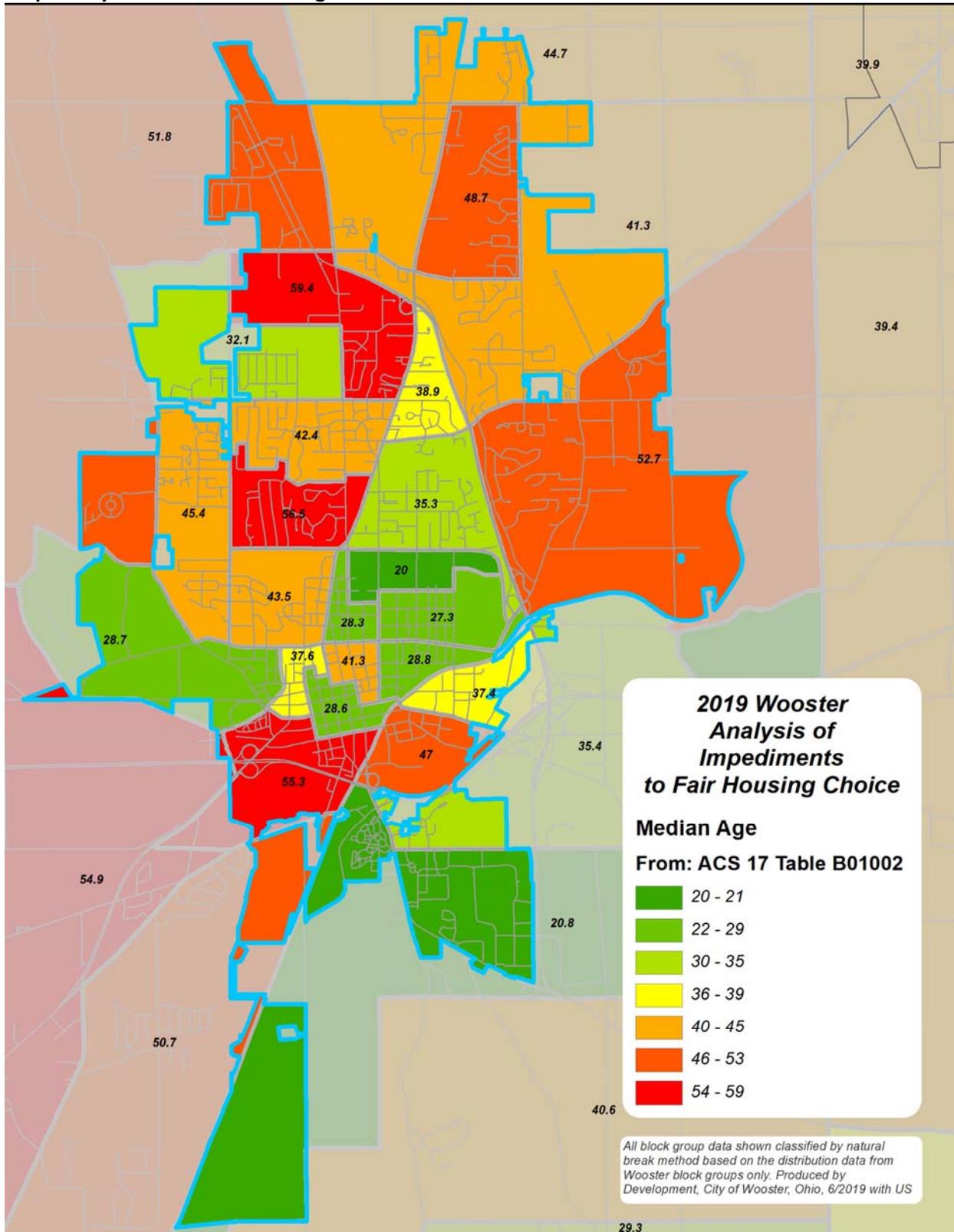


Table S1810, 2013-2017 American Community Survey 5-Year Estimates

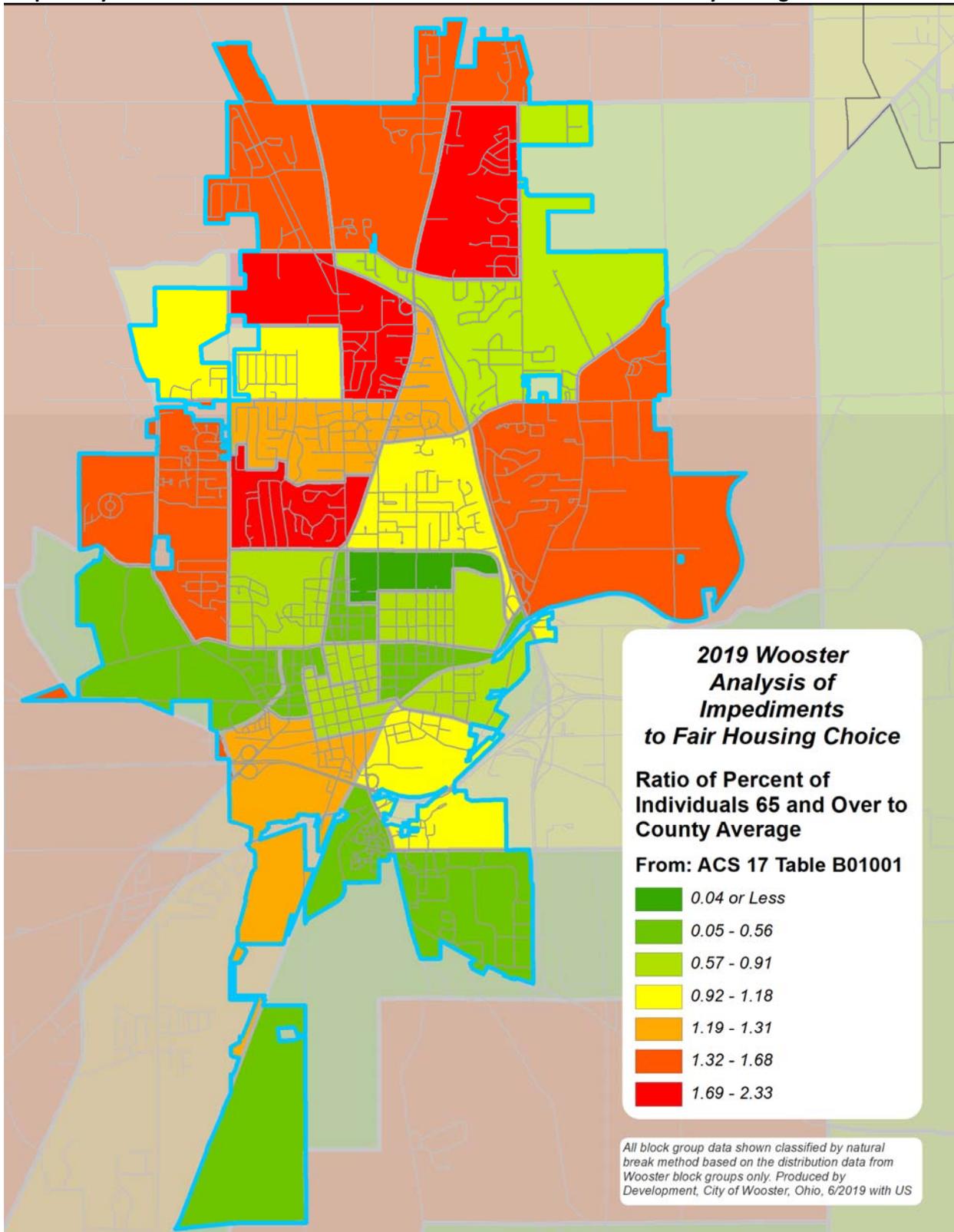
**Map 6** highlights Wooster’s median age by block group, which ranged from as young as 20 years of age on average to as high as 59.4 years in age. The oldest section of the city is near the North End, and includes several condominium communities. **Map 7** shows how Wooster’s 65 and over community is apportioned, using a ratio of each block group’s proportion of 65 and up populations in comparison to the City’s average. Similarly, **Map 8** shows where Wooster’s youngest residents tend to cluster the same ratio, only for populations 21 and under.

Map 6: City of Wooster Median Age



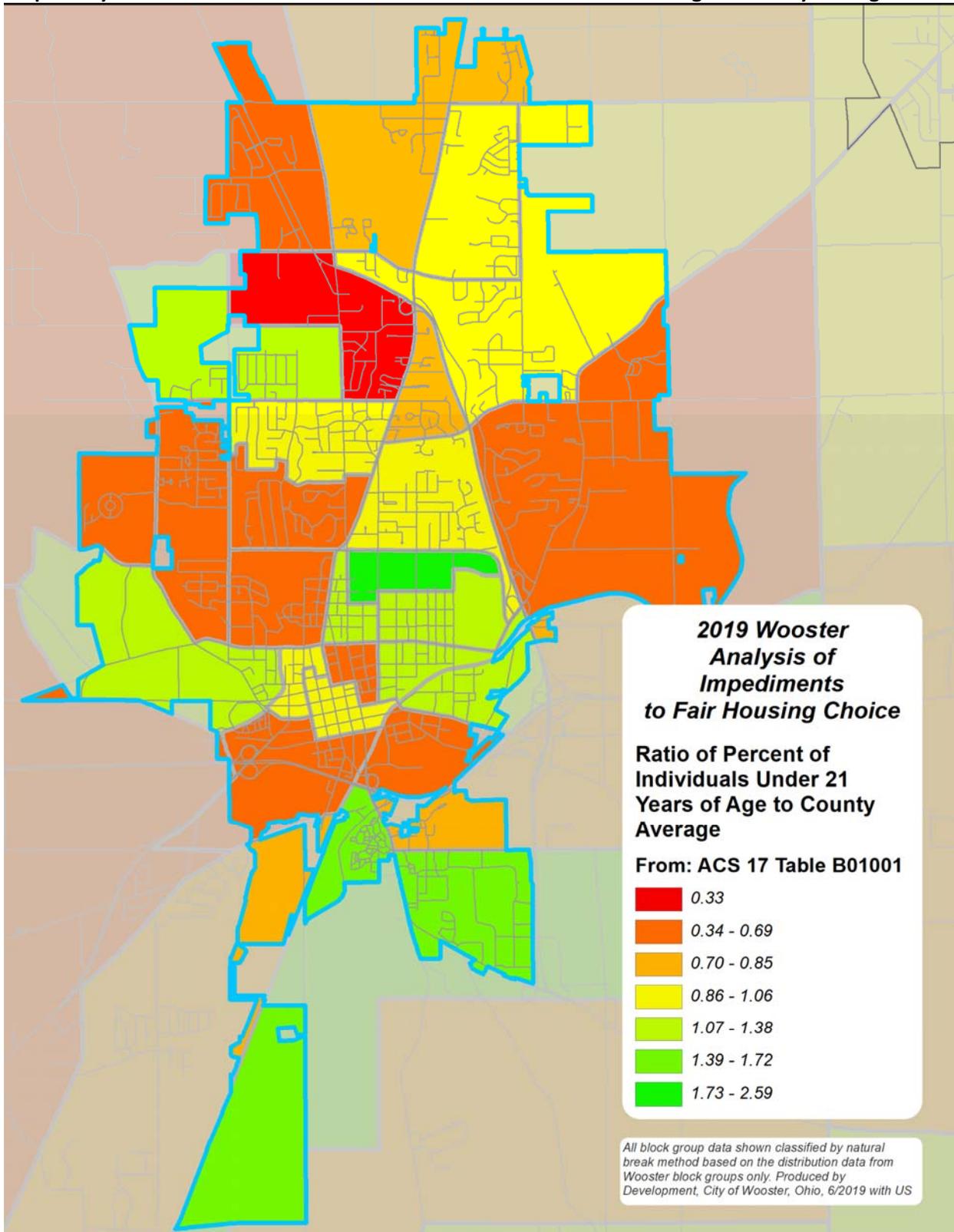
US Census Bureau, 2017 ACS Data Table B01002

**Map 7: City of Wooster Ratio of Percent of Individuals 65 and Over to County Average**



US Census Bureau, 2017 ACS Data Table B01001

**Map 8: City of Wooster Ratio of Percent of Individuals Under 21 Years of age to County Average**



US Census Bureau, 2017 ACS Data Table B01001

**Table 5** outlines the percentage of the population with a specific disability. While distribution patterns are similar to the those of the State average, Wooster’s populations experience elevated occurrences of disabilities. Over 8% of Wooster residents to struggle with an ambulatory, or walking, disability. Nearly as many struggle with an independent living difficulty. The most significant difference in disability distribution is that 7.2% of Wooster residents struggle with cognitive difficulties, in contrast with 5.7% statewide.

**Table 5: Percentage of Population by Disability Type**

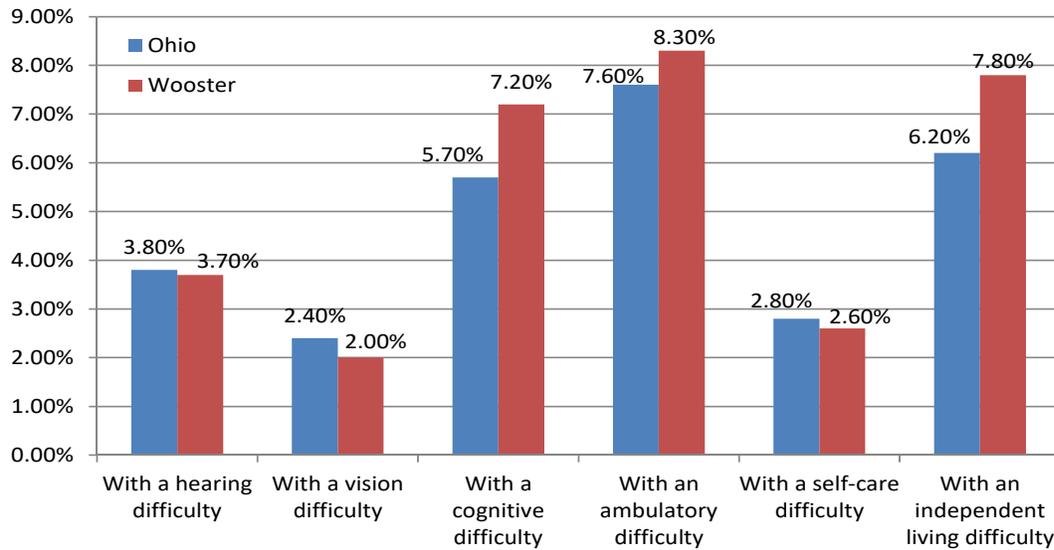


Table S1810, 2013-2017 American Community Survey 5-Year Estimates

**Table 6** shows how the occurrence of disability increases with age between Wooster and the State overall. While having an older population naturally lends to a higher occurrence of disability, Wooster residents still struggle with a slightly higher rate of disability even when taking age into account.

**Table 6: Percentage of Population with Disability by Age**

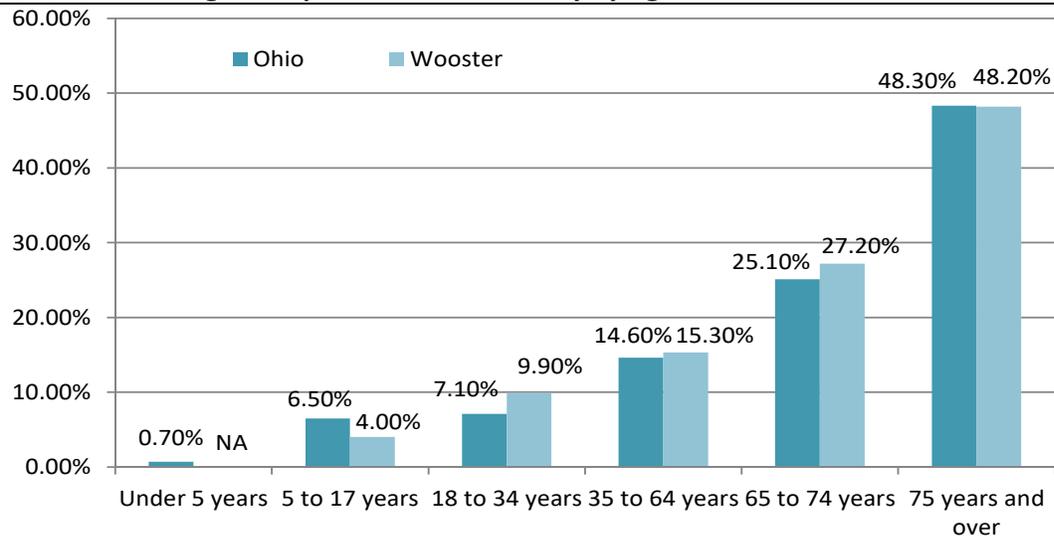


Table S1810, 2013-2017 American Community Survey 5-Year Estimates

## Income Characteristics

The median household income in Wooster in 2017 was \$43,946. This is despite a comparable cost of living in relation to other Ohio communities, generally within 5%<sup>1</sup>. A total of 45.3% of the population is classified as low-to-moderate income<sup>2</sup>. At the same time, Wooster enjoys in very high level of educational attainment and very low unemployment. This dynamic may be influenced by having both a disproportionately larger younger population and disproportionately larger elderly population. The City has also been able to support a strong network of infrastructure as well as civic resources thanks in large part to a vibrant business-friendly economic ecosystem and a vibrant philanthropic community.

**Table 7** outlines how Wooster household incomes are comprised. Household income was largely comprised of direct earnings, social security, and retirement income as well as income from investments. 6.7% of households rely on supplemental Social Security income, with a total of 18.6% of households relying on cash public assistance and or food stamps. In comparison, the State of Ohio averaged 5.9% of households relying on supplemental Social Security income and 14.9% of households relying on cash public assistance and or food stamps.

**TABLE 7: City of Wooster Income and Sources**

	<u>Households</u>	<u>Percent</u>	<u>Mean Income</u>
All Wooster Households	10,967	100.0%	\$60,148
...With earnings	7,856	71.6%	\$58,979
...With wages or salary income	7,639	69.7%	\$55,093
...With self-employment income	1,125	10.3%	\$37,766
...With interest, dividends, or net rental income	2,522	23.0%	\$20,293
...With Social Security income	4,075	37.2%	\$17,583
...With Supplemental Security Income (SSI)	731	6.7%	\$9,461
...With cash public assistance income or Food Stamps/SNAP	2,035	18.6%	No Data
...With cash public assistance	475	4.3%	\$1,922
...With retirement income	2,367	21.6%	\$22,328
...With other types of income	1,186	10.8%	\$10,789

1. Table C02003, Detailed Race, 2013-2017 ACS 5-Year Estimates.

2. (Adjusted) indicates 2010 per capita income figures multiplied by a factor of 1.1747 to reflect inflation.

**Map 9** presents how median family income varies across the City. Wealth is strongest in the North End followed by northern residential neighborhoods. Wealth weakens in the periphery of the downtown area, not dissimilar from other income-patterns including poverty status and capita income, and inversely related to the use of public assistance. **Map 10** provides an overview of how Wooster's wealth distribution contrasts with that of Wayne County, which trends higher with an average median household income of \$54,037, or \$57,454 excluding Wooster<sup>3</sup>, but is essentially the same in terms of per capita income with a value of \$25,762 in Wooster and \$25,777 in Wayne County alone<sup>4</sup>.

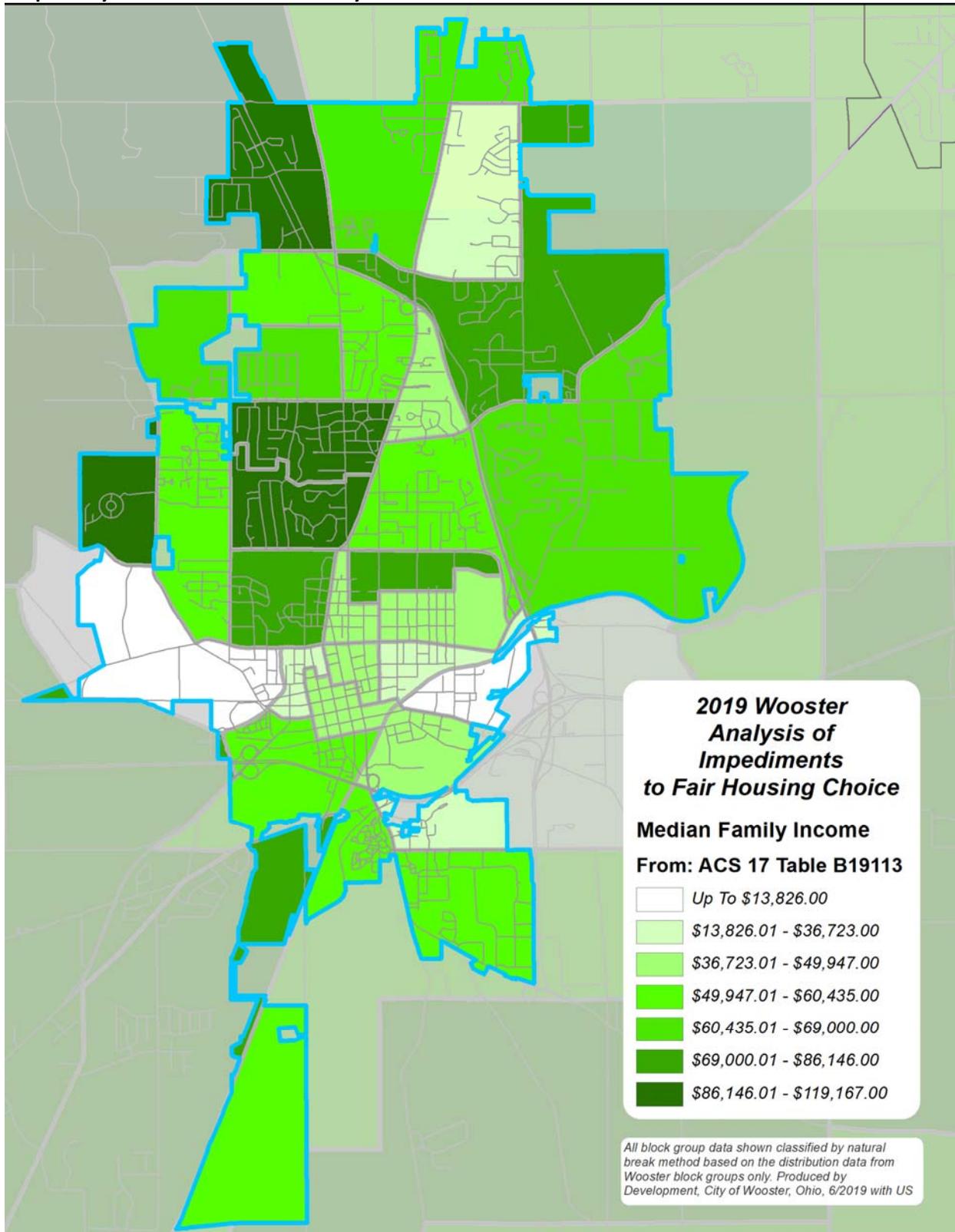
<sup>1</sup>Figures from the Wayne Economic Development Council and with cost of living index data from the Council for Community and Economic Research.

<sup>2</sup> Published Ohio Development Services Agency LMI Universe Figure for Wooster, Ohio, utilizing 2015 ACS data. Source: <http://odsa.maps.arcgis.com/apps/webappviewer/index.html?id=0f77ef01628141529713743d8c819735>

<sup>3</sup> Most areas outside of Wooster and Wayne County trend higher with family size, 2.73 versus Wooster's 2.18 (Table DP04, 2017 Selected Housing Characteristics, 2013-2017 ACS 5-Year Estimates, US Census)

<sup>4</sup> Table B01003, 2017 Total population, 2013-2017 ACS 5-Year Estimates, US Census.

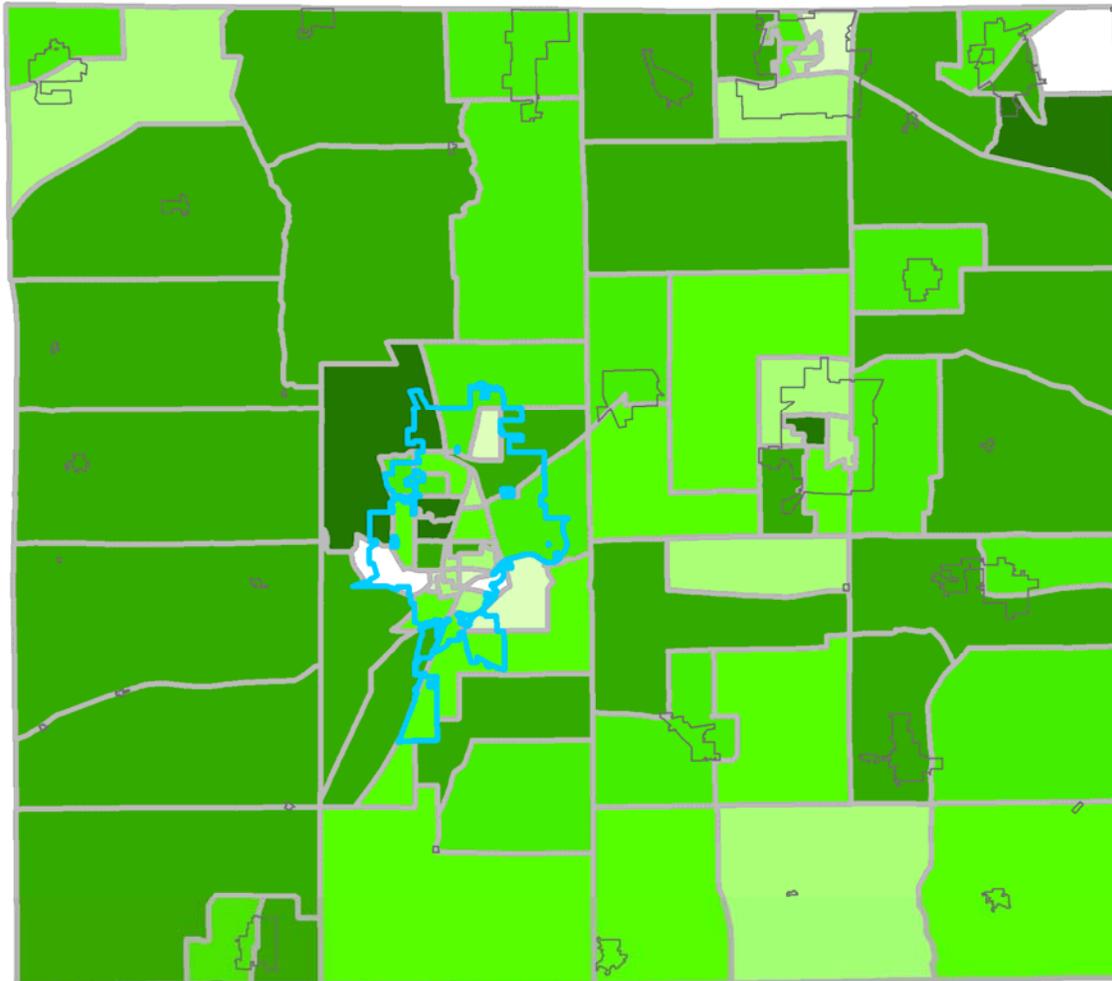
**Map 9: City of Wooster Median Family Income**



US Census Bureau, 2017 ACS Data Table B19113

**MAP 10: Wayne County Median Family Income**

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**2019 Wooster  
Analysis of  
Impediments  
to Fair Housing Choice  
Median Family Income**

**From: ACS 17 Table B19113**



*All block group data shown classified by natural break method based on the distribution data from Wooster block groups only. Produced by Development, City of Wooster, Ohio, 6/2019 with US Census Bureau data.*

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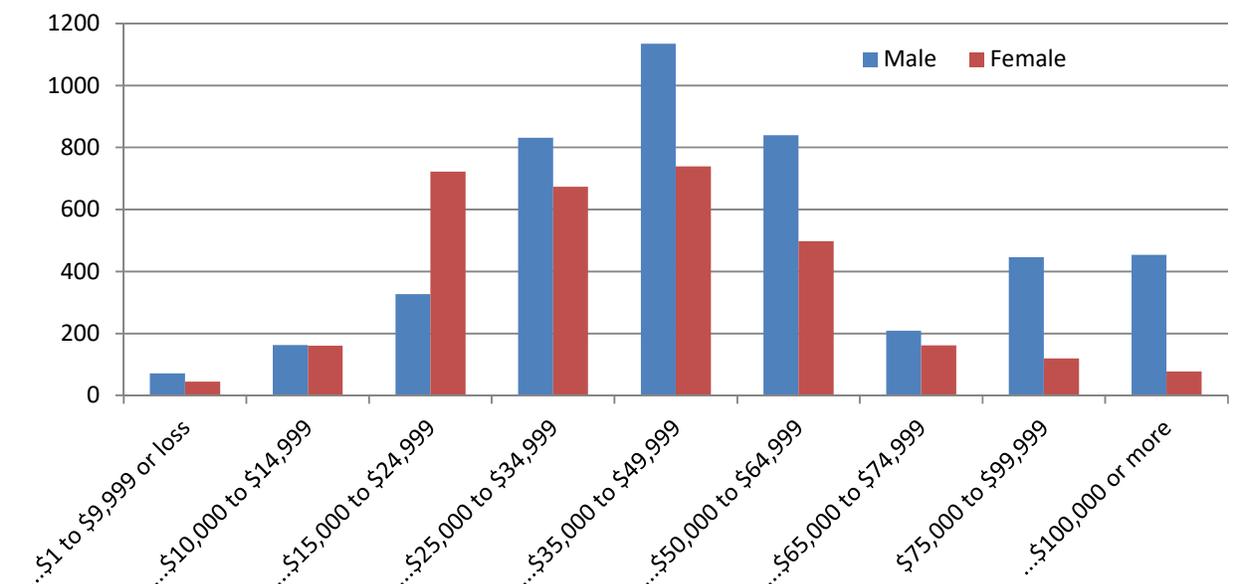
US Census Bureau, 2017 ACS Data Table B19113

Note: While family income is higher in areas outside of Wooster, income per capita is effectively the same between Wooster and Wayne County alone.

*Wooster Income Trends for Protected Classes:* The following series of tables and maps explore income patterns and trends across protected classes, including age, sex, race, and disability. **Table 7** below shares the most recent earnings data for the population by sex. Full-time workers earned a median annual income of \$41,367. The average full-time wage was \$52,970 annually. Notably, female full-time workers earned a median salary 20% less than male workers, with mean earnings 36% less, a difference equating to about \$91,359,652 in annual local earnings. The figures are for all jobs worked and do not evaluate differences between actual specific jobs worked between male and female workers.

**TABLE 7: City of Wooster Income by Sex**

	<u>Population Total</u>		<u>Male Population</u>		<u>Female Population</u>	
Population +16 years with earnings	14,192		7,292		6,900	
Median Earnings	\$23,391		\$31,920		\$16,552	
Median for full-time, year-round workers	\$41,367		\$45,581		\$34,930	
Mean for full-time, year-round workers	\$52,970		\$62,411		\$39,743	
Full-Time, Year-Round Workers	7,667	100.0%	4,474	100.0%	3,193	100.0%
...\$1 to \$9,999 or loss	115	1.5%	71	1.6%	44	1.4%
...\$10,000 to \$14,999	322	4.2%	162	3.6%	160	5.0%
...\$15,000 to \$24,999	1,049	13.7%	327	7.3%	722	22.6%
...\$25,000 to \$34,999	1,504	19.6%	831	18.6%	673	21.1%
...\$35,000 to \$49,999	1,874	24.4%	1,135	25.4%	739	23.1%
...\$50,000 to \$64,999	1,337	17.4%	839	18.8%	498	15.6%
...\$65,000 to \$74,999	370	4.8%	209	4.7%	161	5.0%
...\$75,000 to \$99,999	565	7.4%	446	10.0%	119	3.7%
...\$100,000 or more	531	6.9%	454	10.1%	77	2.4%



1. Table S2001, Earnings in the Past 12 Months, 2013-2017 ACS 5-Year Estimates

**TABLE 8: City of Wooster Income by Educational Attainment**  
**Median Earnings by Educational Attainment**

Population 25 years and over with earnings	\$32,433
Less than high school graduate	\$11,424
High school graduate (includes equivalency)	\$28,052
Some college or associate's degree	\$29,191
Bachelor's degree	\$44,722
Graduate or professional degree	\$53,750

1. Table S2001 Earnings in the Past 12 Months 2013-2017 ACS 5-Year Estimates

2. Includes full and part-time workers.

As popularly noted, income is highly correlated with education. Wooster residents with a high school education reported a median income of \$28,052 in 2017, while those with a bachelor's degree reported earning \$44,722, and graduates even more at \$53,750. (See **Table 8.**) Those without high school education managed only a median salary of \$11,424, 34% lower than the annual earnings provided by a minimum wage fulltime job.

Mirroring statewide trends, levels of education have been rising for younger generations of females<sup>5</sup>. Statewide, 36.1% of women aged 25 to 34 years had reported holding a bachelor's or graduate degree in 2017 statewide, compared with 26.4% of their predecessors aged 45 to 64 years. Younger females surpassed their male counterparts in educational attainment, who have also experienced gains over previous generations, but at slower rate. The increasing levels of education hold promise of increasing earning power for households across the State. At the same time, the proportion of men aged 18 to 24 who did not attain a high school diploma over their preceding cohort was slightly elevated. **Map 11** shares the distribution of average education within the community.

Income, of course, is also closely correlated with age and work experience. Younger householders are still expanding their education base and work résumés while older householders with more experience take advanced jobs with higher pay. The oldest cohorts, 65 and over, experience a decline in income as they enter retirement. **Table 9** breaks down average incomes by household in Wooster. Compared with the state, Wooster has a slightly larger proportion of younger and older households than average. Its younger households, however, command a higher average income, though the gain is limited by what appears to be income stagnation going into the 25 to 44 year old cohort.

**TABLE 9: City of Wooster Average Income by Age of Householder**

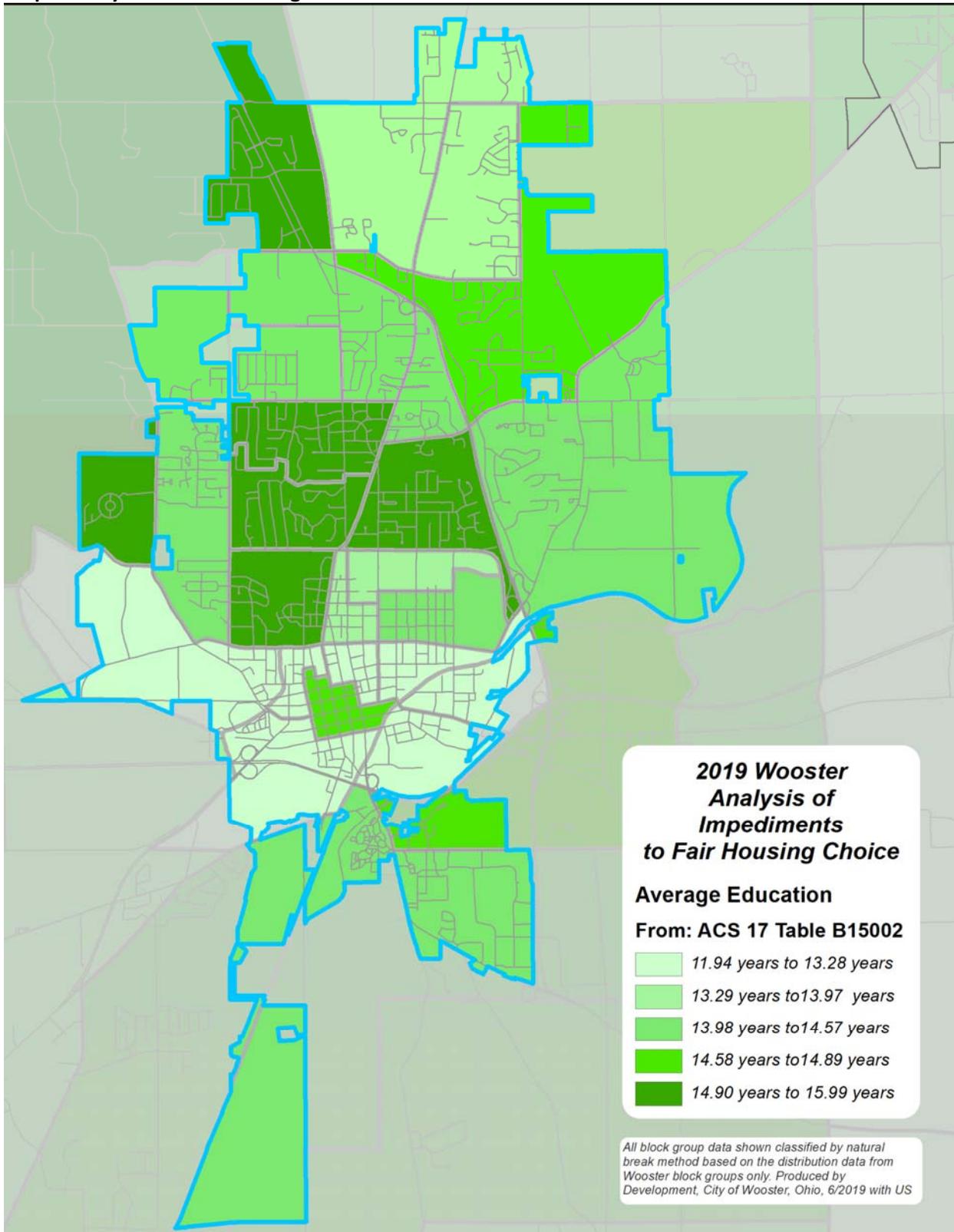
	Wooster		Ohio	
	Average Income	Percent of Total Households	Average Income	Percent of Total Households
<b>15 to 24 years</b>	\$34,871	6.1%	\$21,951	4.6%
<b>25 to 44 years</b>	\$41,040	32.3%	\$52,988	33.7%
<b>45 to 64 years</b>	\$51,413	34.7%	\$58,956	39.5%
<b>65 years and over</b>	\$30,690	26.9%	\$31,472	22.2%

1. Table S1903 Median Income in past 12 Months, 2013-2017 ACS 5-Year Estimates

2. Includes full and part-time workers.

<sup>5</sup> Table B15001, Sex by Age by Educational Attainment, Ohio & Wayne County, 2013-2017 ACS 5 Year Estimates.

**Map 11: City of Wooster Average Education**



US Census Bureau, 2017 ACS Data Table B15002

**TABLE 10: Wayne County and City of Wooster Income Per Capita By Race**

	Population	Per Capita (B19313)	Ratio to Average	2010 Per Capita (Adjusted)	Change Since 2010	Change in Earning Power
<b>Total Wooster Population</b>	26,723	\$25,711	1.00	\$28,194.43	0.00	-\$2,484
White Alone (A)	24,224	\$25,676	1.00	\$29,002.70	-0.03	-\$3,327
Black Alone (B)	882	\$18,270	0.71	\$14,729.44	+0.19	\$3,541
American Indian / Alaska Native (C)	81			\$6,101.39		-\$6,101
Asian Alone (D)	871	\$48,438	1.88	\$48,475.95	+0.16	-\$38
Native Hawaiian other Pacific (D)						\$0
Other Race Alone (F)	67	\$24,497	0.95	\$22,850.40	+0.14	\$1,647
Two or more races (G)	598	\$8,344	0.32	\$5,193.77	+0.14	\$3,150

	Population	State Per Capita (B19313)	State Ratio to Average	2010 State Per Capita (Adjusted)	State Change Since 2010	Change in State Earning Power
<b>Total Ohio Population</b>	11,609,756	\$29,011	1.00	\$29,500.62	0.00	-\$490
White Alone (A)	9,503,779	\$31,106	1.07	\$31,390.23	+0.01	-\$284
Black Alone (B)	1,428,230	\$18,659	0.64	\$19,153.95	-0.01	-\$495
American Indian / Alaska Native (C)	21,872	\$21,418	0.74	\$22,494.93	-0.02	-\$1,077
Asian Alone (D)	235,878	\$34,122	1.18	\$35,919.40	-0.04	-\$1,798
Native Hawaiian other Pacific (D)	3,499	\$28,519	0.98	\$22,465.13	+0.22	\$6,054
Other Race Alone (F)	103,726	\$17,984	0.62	\$16,807.55	+0.05	\$1,177
Two or more races (G)	312,772	\$12,959	0.45	\$12,968.89	+0.01	-\$10

1. Table C02003, Detailed Race, 2013-2017 ACS 5-Year Estimates.

2. (Adjusted) indicates 2010 per capita income figures multiplied by a factor of 1.1747 to reflect inflation per Bureau of Labor inflation multiple for 2017.

**Table 10** above evaluates income by race. Income in Wooster average is \$25,711 per capita, compared with \$29,011 per capita statewide. Wooster's largest racial group, White/Caucasian with over 90 percent of the population, unsurprisingly has a per capita income that matches the average. Its second largest reach racial group, Black or African American realized a per capita income of only 71% of the average (representing over \$6,500,000 dollars less in collective earnings compared with what would have with been earned with an average ratio). This disparity is less than that of the state average, where Black Alone per capita income rests in only 64% of the average. Wooster's second largest minority population, Asian alone, had a per capita income 88% above the average, which was also higher than the state average for Asian alone. Per capita income is only 32% of average for the two or more races population, by far the lowest income for any racial group at the local or state level.

For comparison, 2010 per capita income is provided (adjusted to 2017 values using the Bureau of Labor Statistics inflation multiple) with a change in the ratio to average income observed for each racial category. While disparities are apparent in per capita income among different racial classifications, they have generally improved substantially over the past decade. Also presented is a change in earning power in terms of dollars today. On average, Wooster residents lost buying power (when adjusting for inflation, as opposed to actual dollars which increased), but some of this was gained back as minority populations grew. These changes seem somewhat limited to Wooster, however, as changes in per capita incomes across racial group were relatively stagnant statewide and while buying power declined for minorities rather than grew, earnings declined faster and more significantly for most minorities.

**TABLE 11: Race by Age**

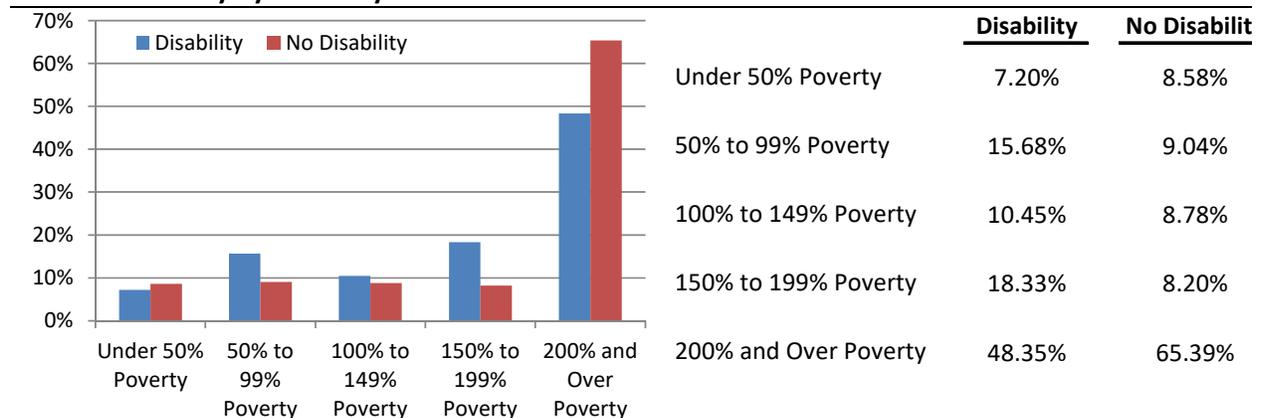
	Median Ohio Age	Median Wooster Age
<b>Total Wooster Population</b>		
White Alone (A)	41.6	38.3
Black Alone (B)	33.4	26.9
American Indian / Alaska Native (C)	40.6	No Data
Asian Alone (D)	33.2	29.1
Native Hawaiian other Pacific (D)	33.7	No Data
Other Race Alone (F)	28.1	27.8
Two or more races (G)	17.4	18.5

**13.** Tables B01002A-H, Detailed Race, 2013-2017 ACS 5-Year Estimates.

Age is a partial factor in evaluating these figures. White households averaged more than 10 years older than Black Alone households in Wooster. Those of two or more races, by far averaging the lowest per capita incomes, are also by far the youngest racial group. Incomes should be expected to *rise* for all Wooster minority groups as young workers gain promotions and enter more advanced positions, while a *decline* should be anticipated for White households with increasing retirements. **See Table 11.**

A little over half of Wooster individuals with disabilities were low-income in 2017. **Table 12** highlights how poverty rates vary between those with disabilities and those without. Other the last five years, this protected class experienced the most frequent concern with regard to fair housing choice and access based on complaint data received by Wooster’s Fair Housing Program. The same class is also a least-likely to have access to financial resources to overcome fair housing problems when they arise.

**TABLE 12: Poverty by Disability**



1. Table C18131, Ratio of Income to Poverty Level in Past 12 Months 2013-2017 ACS 5-Year Estimates
2. Includes full and part-time workers.

**Table 13** outlines how, as of 2017, 28.8% of Wooster households had ended up paying more than 30% of their income for housing. Federal guidelines stipulate housing expenses should not exceed 30% of gross income, with the remainder of a household’s funds being required for necessities including transportation, food and clothing. Only housing at or below 30% of a given household’s income is considered affordable. Renters were far more likely to exceed the 30% or more threshold than homeowners. Nearly 80% of all households earning less than \$20,000 exceeded the Federal maximum guidelines, the vast majority being renters. Households earning between \$20,000 and \$35,000, while more evenly split between rental and owner-occupied units, still encountered excessive housing cost for their income levels. Above \$35,000, 86% of all households experienced affordable costs.

**TABLE 13: City of Wooster Income and Housing Cost**

Housing Cost as a Percentage of						
Monthly Household Income Ranked by Annual Income	Total Occupied Housing Units		Total Owner Occupied Units		Total Renter Occupied Units	
<b>Total</b>	<b>10,967</b>	<b>100.0%</b>	<b>6,157</b>	<b>100.0%</b>	<b>4,810</b>	<b>100.0%</b>
Less than 20 percent	5142	48.6%	3729	60.8%	1413	31.7%
20 to 29 percent	2395	22.6%	1353	22.0%	1042	23.4%
30 percent or more	3,052	28.8%	1,056	17.2%	1,996	44.8%
<b>Less than \$20,000</b>	<b>2,393</b>	<b>21.8%</b>	<b>604</b>	<b>9.80%</b>	<b>1789</b>	<b>37.20%</b>
Less than 20 percent	144	6.0%	55	9.1%	89	5.0%
20 to 29 percent	353	14.8%	94	15.6%	259	14.5%
30 percent or more	1,896	79.2%	455	75.3%	1,441	80.5%
<b>\$20,000 to \$34,999</b>	<b>1,758</b>	<b>16.0%</b>	<b>907</b>	<b>14.70%</b>	<b>851</b>	<b>17.70%</b>
Less than 20 percent	569	32.4%	413	45.5%	156	18.3%
20 to 29 percent	404	23.0%	175	19.3%	229	26.9%
30 percent or more	785	44.7%	319	35.2%	466	54.8%
<b>\$35,000 to \$49,999</b>	<b>1,690</b>	<b>15.4%</b>	<b>938</b>	<b>15.20%</b>	<b>752</b>	<b>15.60%</b>
Less than 20 percent	749	44.3%	455	48.5%	294	39.1%
20 to 29 percent	705	41.7%	303	32.3%	402	53.5%
30 percent or more	236	14.0%	180	19.2%	56	7.4%
<b>\$50,000 to \$74,999</b>	<b>1,977</b>	<b>18.0%</b>	<b>1327</b>	<b>21.60%</b>	<b>650</b>	<b>13.50%</b>
Less than 20 percent	1260	63.7%	782	58.9%	478	73.5%
20 to 29 percent	601	30.4%	462	34.8%	139	21.4%
30 percent or more	116	5.9%	83	6.3%	33	5.1%
<b>\$75,000 or more</b>	<b>2,771</b>	<b>25.3%</b>	<b>2362</b>	<b>38.40%</b>	<b>409</b>	<b>8.50%</b>
Less than 20 percent	2420	87.3%	2024	85.7%	396	96.8%
20 to 29 percent	332	12.0%	319	13.5%	13	3.2%
30 percent or more	19	0.7%	19	0.8%	0	0.0%
<b>Zero or negative income</b>	<b>60</b>	<b>0.5%</b>	<b>19</b>	<b>0.30%</b>	<b>41</b>	<b>0.90%</b>
<b>No cash rent</b>	<b>318</b>	<b>2.9%</b>	<b>(X)</b>	<b>(X)</b>	<b>318</b>	<b>6.60%</b>

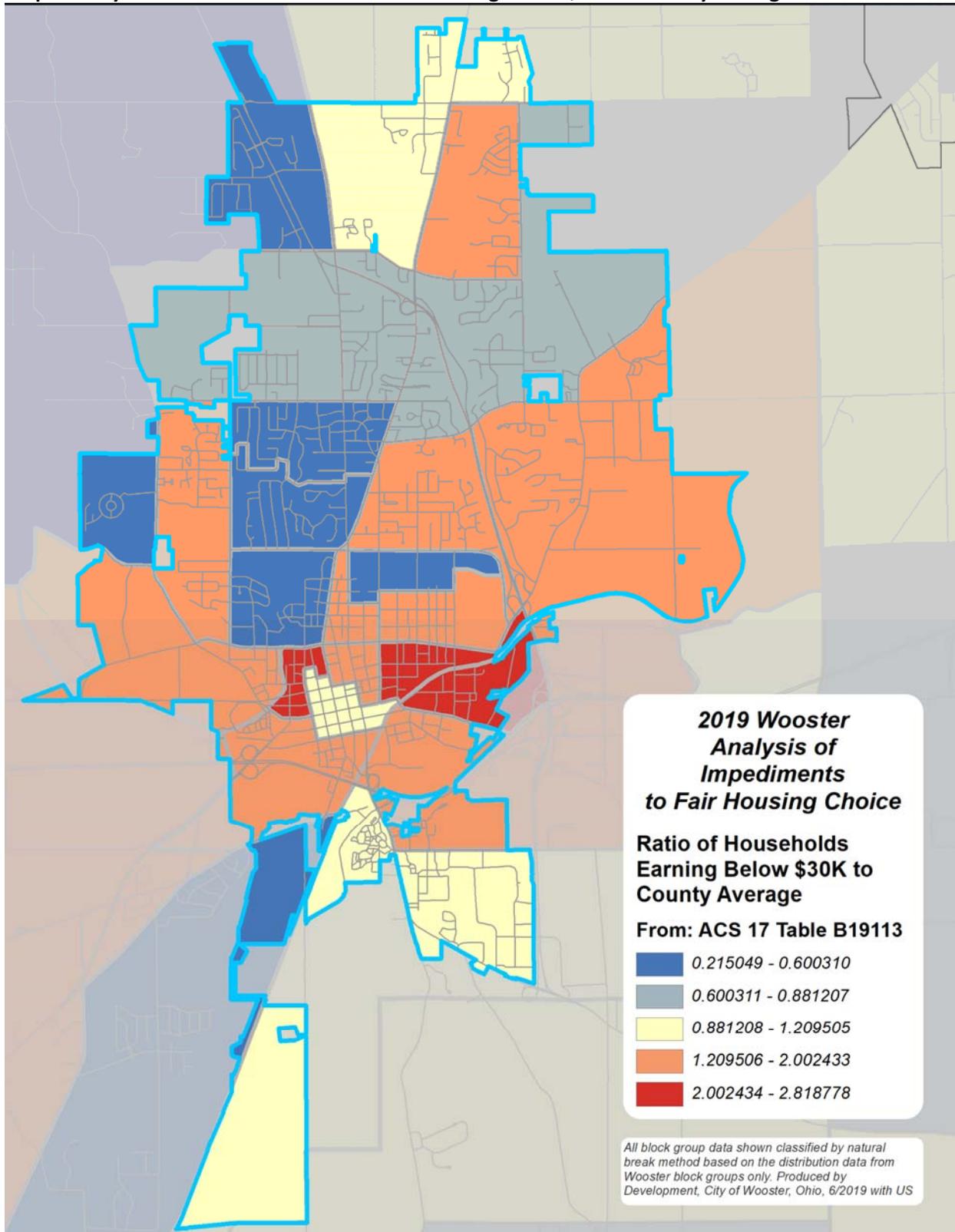
1. 2017 Table S2503 Financial Characteristics 2013-2017 ACS 5-Year Estimates

2. Includes full and part-time workers.

**Map 12** shares census block group data on income, showing the concentration of households falling below \$30,000 in annual income compared to the Wayne County average. The historic neighborhoods immediately surrounding downtown feature the most prominently. The proportion of lower income households dissipates further north of the downtown.

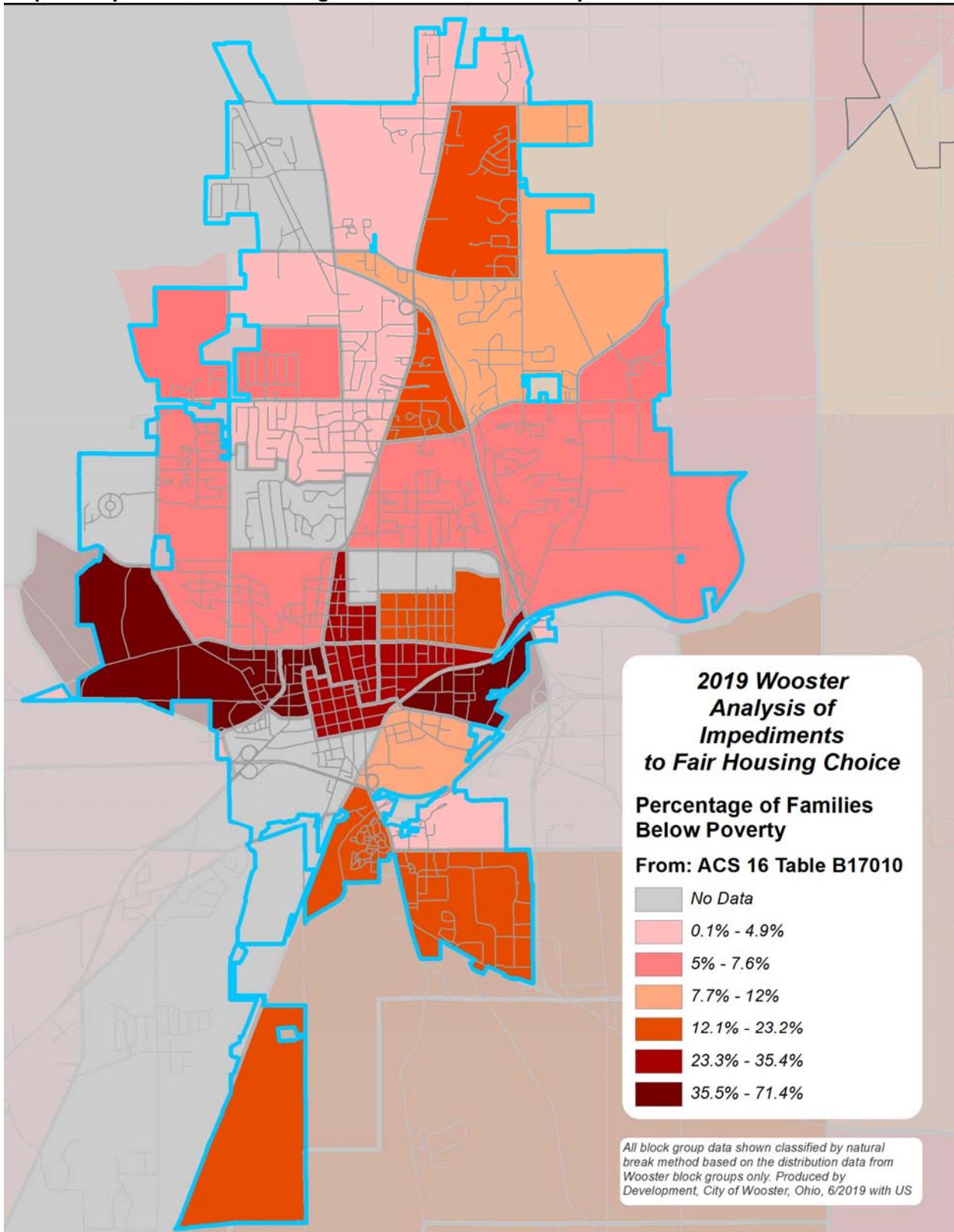
**Map 13** highlights block groups by the prevalence of poverty. Neighborhoods immediately surrounding the downtown core again presents as the most distressed. **Table 14** lists poverty status by age group, providing a comparison with what is observed statewide. While Wooster's poverty rate trends slightly higher than the state average, its pattern exceptionally average.

Map 12: City of Wooster Ratio of Households Earning Below \$30K to County Average



US Census Bureau, 2017 ACS Data Table B19113

**Map 13: City of Wooster Percentage of Families Below Poverty**

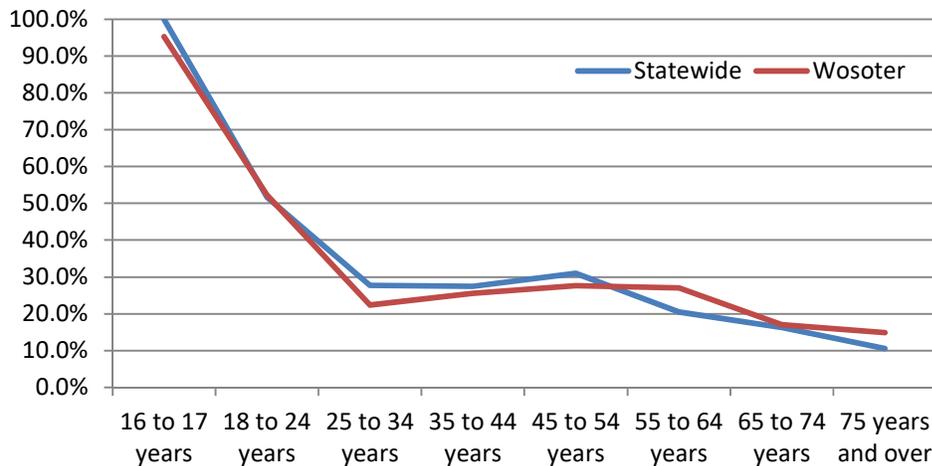


US Census Bureau, 2017 ACS Data Table B17010

**Table 15** further details how public assistance is used in Wooster, and how this compares with the state average. All Wooster has a slightly higher percentage of its households utilizing public assistance, the average assistance provided per household is below the state average. Proportional to total population, the aggregate amount of public assistance received in Wooster is proportional to its total population.

**TABLE 14: Poverty Status by Age**

Poverty Status By Age (Excludes those under 15 years of Age)	Wooster Residents	Percent of Total Pop.	Compared with State
15 years	0	-	99.40%
16 to 17 years	11	100.0%	95.30%
18 to 24 years	592	51.7%	52.30%
25 to 34 years	1,168	27.7%	22.40%
35 to 44 years	614	27.5%	25.60%
45 to 54 years	984	31.0%	27.60%
55 to 64 years	853	20.5%	27.00%
65 to 74 years	717	16.3%	17.00%
75 years and over	964	10.6%	14.90%



1. Table S2001 Earnings in the Past 12 Months 2013-2017 ACS 5-Year Estimates
2. Includes full and part-time workers.

**TABLE 15: Public Assistance**

	<b>Number of Households</b>	<b>Percentage of Households</b>	<b>State Average</b>
Households with public assistance income	475	4.3%	3.1%
Households without public assistance income	10,492	95.7%	96.9%
Avg Public Assistance Per Household	\$1,921.68		\$2,879.54
Households with cash public assistance or Food Stamps/SNAP	2,035	18.6%	14.9%
Households without cash public assistance or Food Stamps/SNAP	8,932	81.4%	85.1%

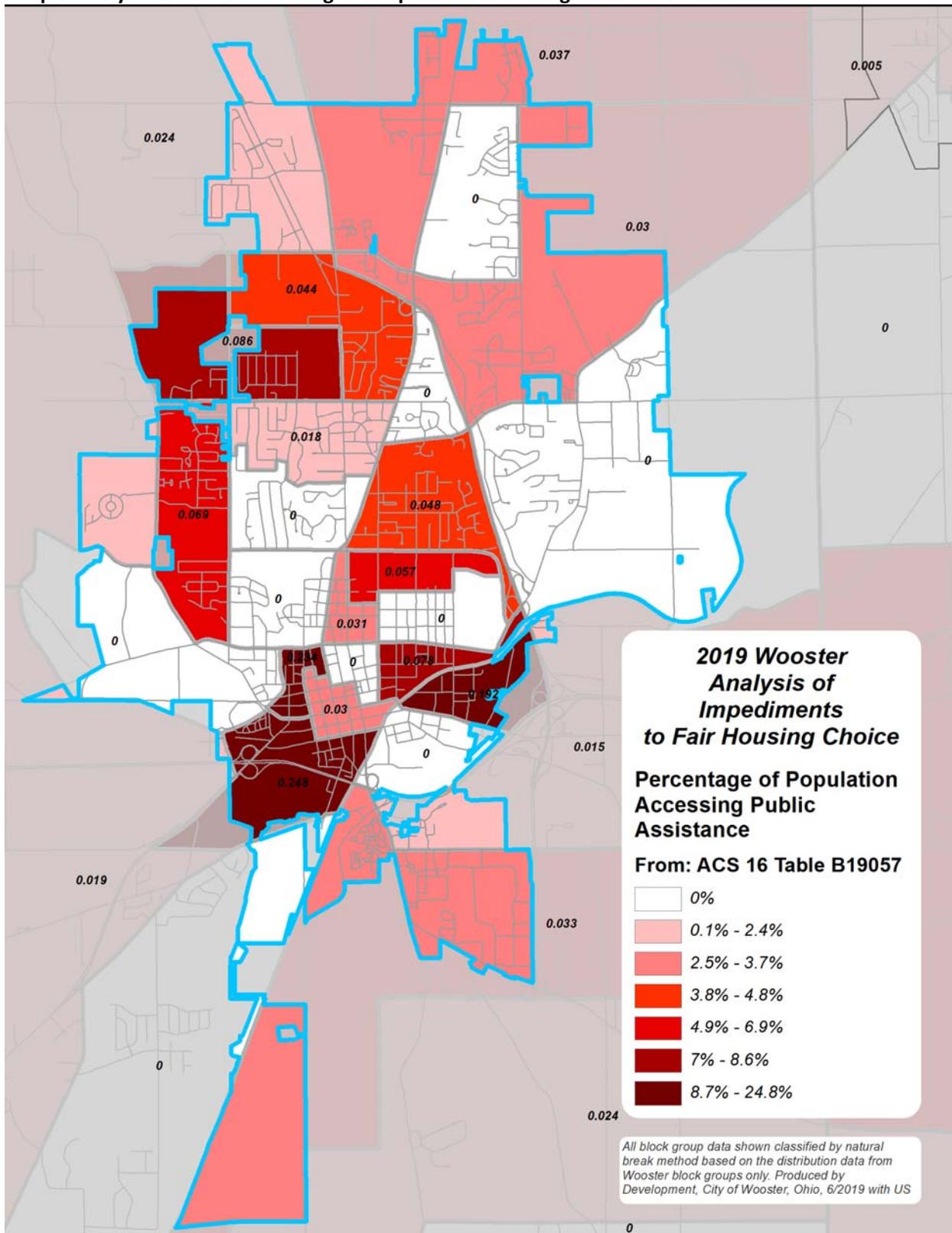
1. 2017 Table B19057 Public Assistance Income in past 12 months for households, 2013-2017 ACS 5-Year Estimates

2. 2017 Table B19058 Public Assistance or Food Stamps / SNAP in past 12 Months for Households, 2013-2017 ACS 5-Year Estimates

3. 2017 Table B19067 Aggregate Public Assistance Income in past 12 months for households 2013-2017 ACS 5-Year Estimates

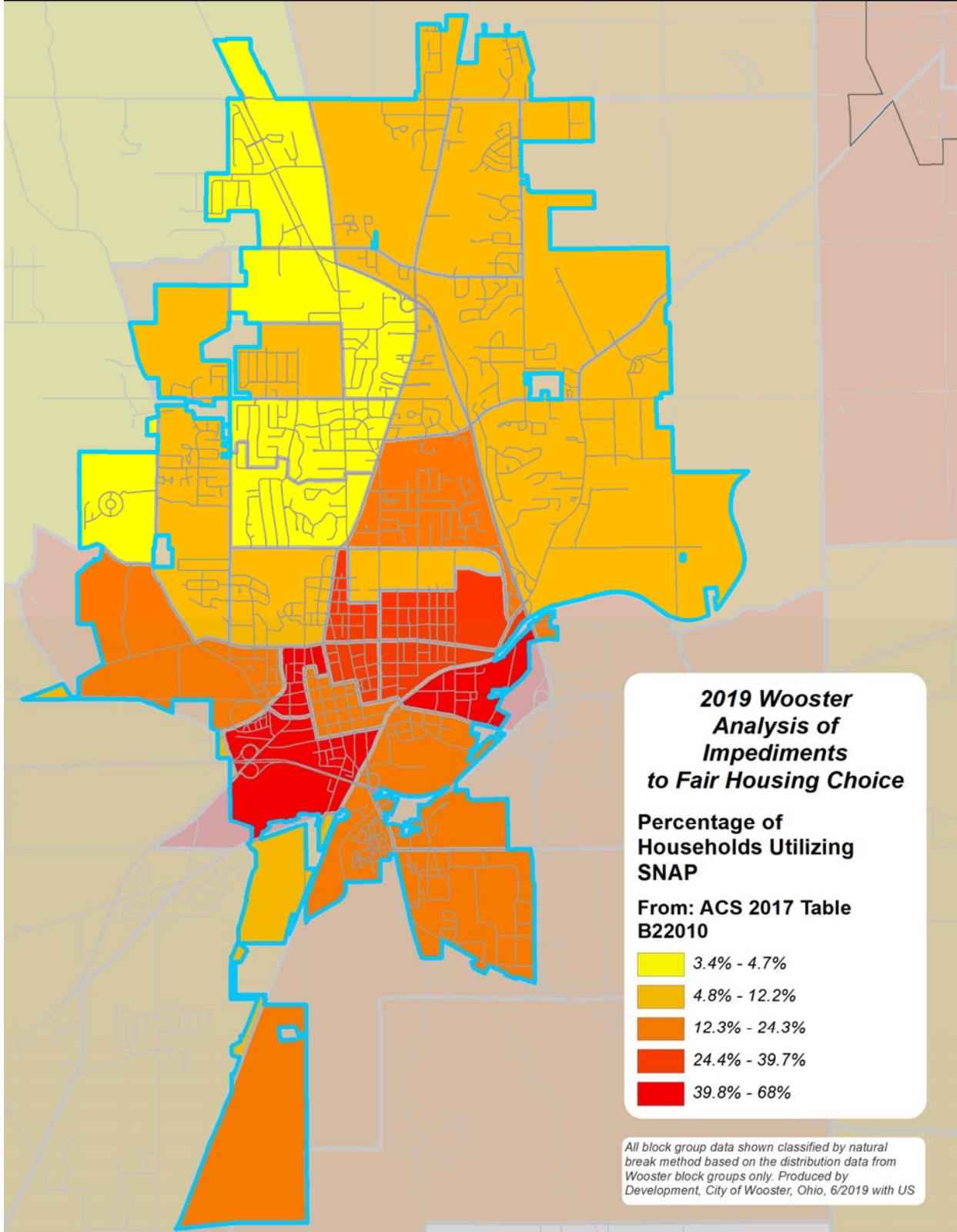
**Map 14** outlines areas with high public assistance utilization. With very small data samples, the map presents several limitations. Wooster's historic neighborhoods as are other higher density residential neighborhoods. **Map 15** shares than percentage of households in each group that utilize to the supplemental nutrition assistance program, or food stamps.

**Map 14: City of Wooster Percentage of Population Accessing Public Assistance**



US Census Bureau, 2017 ACS Data Table B19057

**Map 15: City of Wooster Percentage of Households Utilizing SNAP**

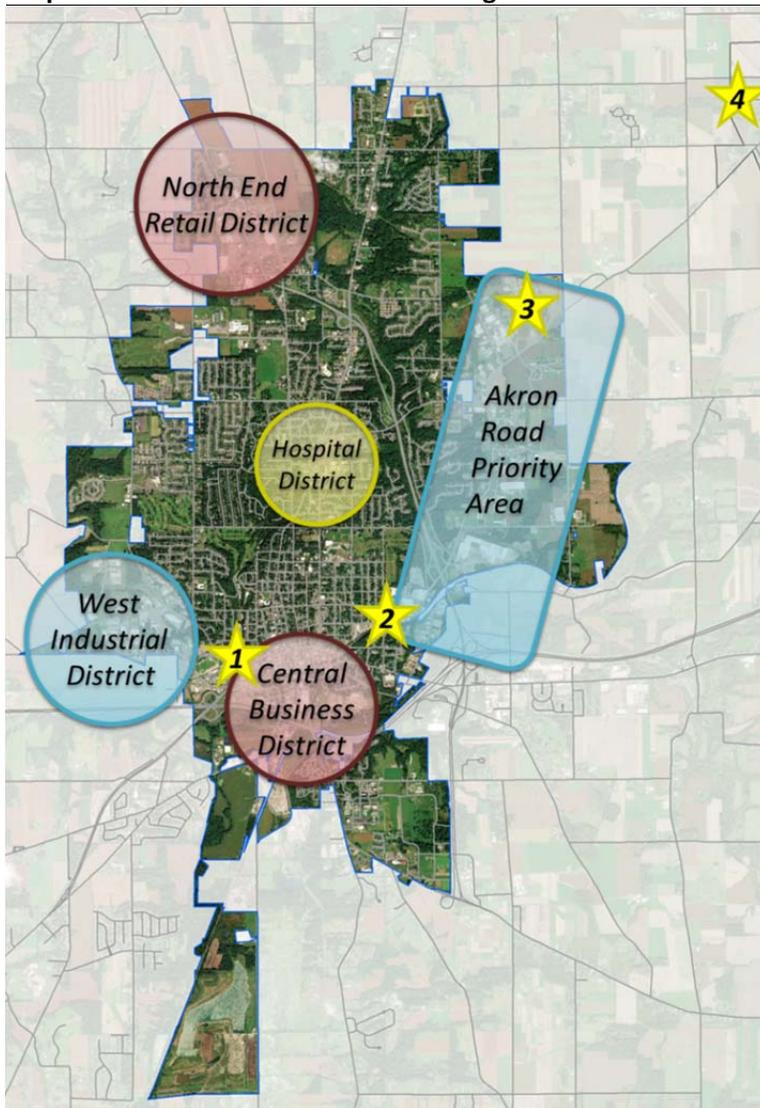


US Census Bureau, 2017 ACS Data Table B22010

## Employment and Transportation Profile

The City of Wooster has a strong and growing employment base that serves the global communities with automotive parts, food products, and building materials. From illuminated stair treads that are placed in the world's tallest structures including One World Trade Center and the Burj Kalifa (Wooster Products), to torque converters powering buses around the world (Schaeffler), the tiny community strives to bring brilliant innovations to the region, state, nation, and the globe. The transportation system is growing more sophisticated with new technology and practices being deployed on roadways along with the introduction of mass transit and an alternative transportation loop system.

**Map 16: Wooster Job Centers & Training**



1. Employment Centers highlighted. Job training locations starred: (1. Ohio Means Jobs, 2. Goodwill Industries Training Center, 3. Schaeffler Academy, 4. Wayne County Schools Career Center.  
2. Wooster GIS, Development, 2019

This section provides an overview of Wooster's employment and transportation profile, including an overview of employment centers within the community and how they are accessed, along with a study of how the workforce is comprised. Individual protected classes under fair housing are also assessed.

With 28,764 jobs<sup>6</sup>, the City of Wooster is responsible for 50.5 percent of Wayne County's jobs. See **Map 16**.

There are five primary job centers:

1. Akron Road Priority Area
2. North End Retail District
3. Central Business District
4. West Industrial District
5. Central Business District

**Economic Makeup:** The City of Wooster has a vibrant economy with a specialized focus on manufacturing. The community's top employers include food manufacturers serving regional and national markets, and an automotive cluster serving a global market. The city also boasts two major medical institutions and two colleges, which power demand for jobs in the education and health services sectors.

The community has received several recognitions for its recent economic

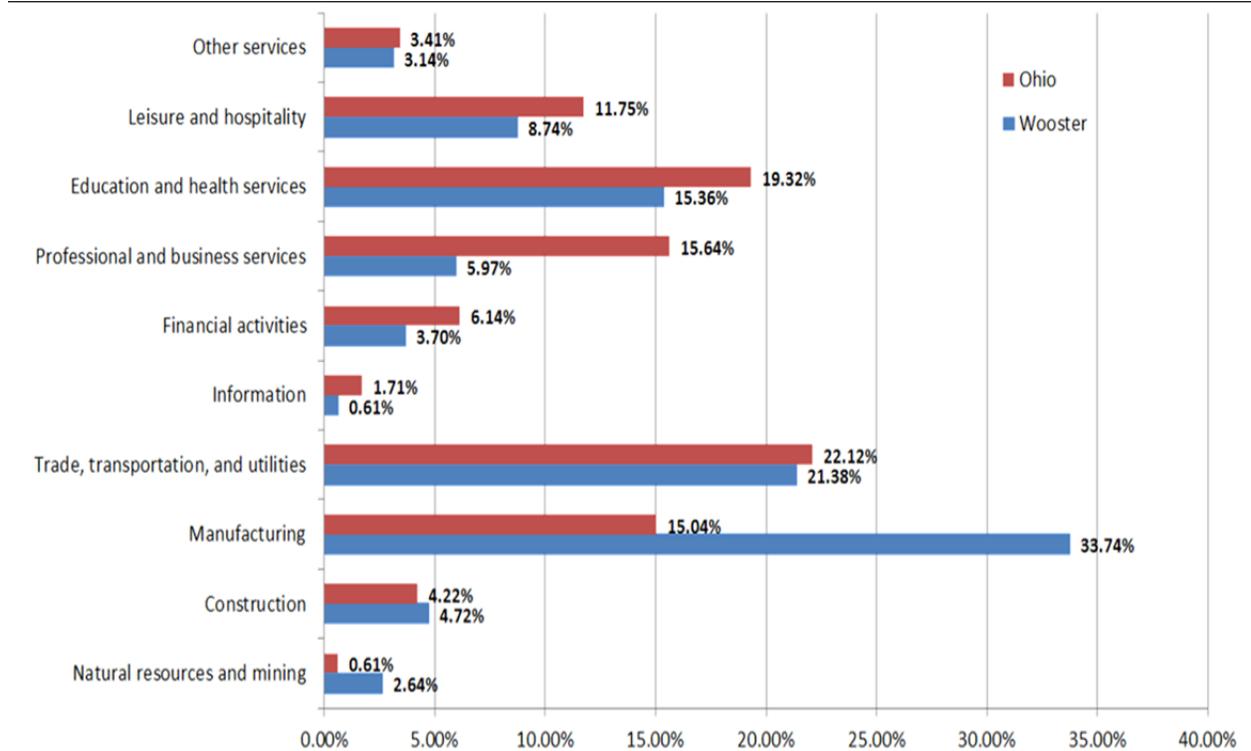
<sup>6</sup> Bureau of Labor Statistics, 2017 / City of Wooster Development - Citizens Government Leadership Academy 2018

gains, including an award from Financial Times, which ranked Wooster as #4 in FDI Strategy for Top Micro American Cities of the Future. Site Selection Magazine ranked the community as the #3 Top Micropolitan in United State for 2018, an independent research firm Policom Corp listed Wooster as the #5 Micropolitan for Economic Strength. The City of Wooster supports a little over half of all jobs in Wayne County, which constitutes the boundaries of the Wooster Micropolitan area.

The rise in economic growth follows a grueling market downturn in the wake of the Great Recession and the 2008 exit of the city's then-largest employer Rubbermaid. Aided with an educated and talented workforce, a relatively low cost of living, and a friendly business climate supported with carefully tailored economic development programs, the city found itself hosting a record number of jobs by the end of 2013. Over the course of the last decade, several long-time and storied firms, including the Wooster Brush company, Western Reserve Insurance Group, Artiflex, Seaman Corporation, and LuK USA (Schaeffler), made strategic investments and bolstered workforce. The city also welcomed new employers including GOJO Industries and Daisy Brand. Neighboring communities within the Micropolitan include Orrville, which welcomed several high-profile expansions by the JM Smucker Company.

**Table 16** and **Table 17** shows a breakdown of how the jobs are apportioned into specific sectors in the Wayne County Micropolitan area by the proportion of residents employed, in comparison with the state of Ohio as a whole. Manufacturing is a particularly bright spot, with the community accommodating over twice as many jobs per capita in base industries than average. National resources and mining activities along with construction also exceeded state averages.

**TABLE 16: Wooster Micropolitan vs. State Location Quotients**



1. 2017 Bureau of Labor Statistics Location Quotients for Wooster Micropolitan (Wayne County).

**Table 17** provides American Community Survey data specific to Wooster, which examines employment sectors by the types of occupations within them. Some differences emerge, as retail trade and

educational services and Health Care assistance take a larger proportion of the workforce. This arises because Wooster itself serves as the County’s center for retail, social services, government, and education. **Table 18** below lists the top 10 employers in the City of Wooster as of 2017. **Map 17** on the following page displays locations of Wooster's largest employers, which cluster around the residential core.

**TABLE 17: Wooster Workforce – Census Statistics**

	Total Employed		Management, Science	Service occupations	Sales and office occupations	Natural resources, construction	Production, transportation
Civilian employed population 16 years and over	12,292	100.00%	37.60%	18.40%	20.90%	6.20%	16.90%
Agriculture, forestry, fishing and hunting, and mining	335	2.73%	19.10%	4.20%	0.00%	66.30%	10.40%
Construction	410	3.34%	14.10%	0.00%	16.30%	58.00%	11.50%
Manufacturing	2,363	19.22%	40.60%	1.70%	11.40%	3.60%	42.70%
Wholesale trade	265	2.16%	26.40%	0.00%	46.40%	5.30%	21.90%
Retail trade	1,612	13.11%	5.50%	6.80%	68.40%	3.50%	15.90%
Transportation and warehousing, and utilities	545	4.43%	8.80%	5.50%	15.80%	4.80%	65.10%
Information	120	0.98%	60.80%	0.00%	35.80%	3.30%	0.00%
Finance and insurance, and real estate and rental and leasing	311	2.53%	47.30%	8.00%	31.80%	12.90%	0.00%
Professional, scientific, and management, and administrative and waste management	723	5.88%	44.50%	20.50%	21.40%	0.00%	13.60%
Educational services, and health care and social assistance	3,594	29.24%	66.00%	21.30%	9.20%	0.00%	3.50%
Arts, entertainment, and recreation, and accommodation and food services	1,342	10.92%	15.10%	69.60%	12.40%	0.40%	2.50%
Other services, except public administration	506	4.12%	24.50%	34.00%	22.70%	7.30%	11.50%
Public administration	166	1.35%	56.60%	14.50%	10.20%	18.70%	0.00%

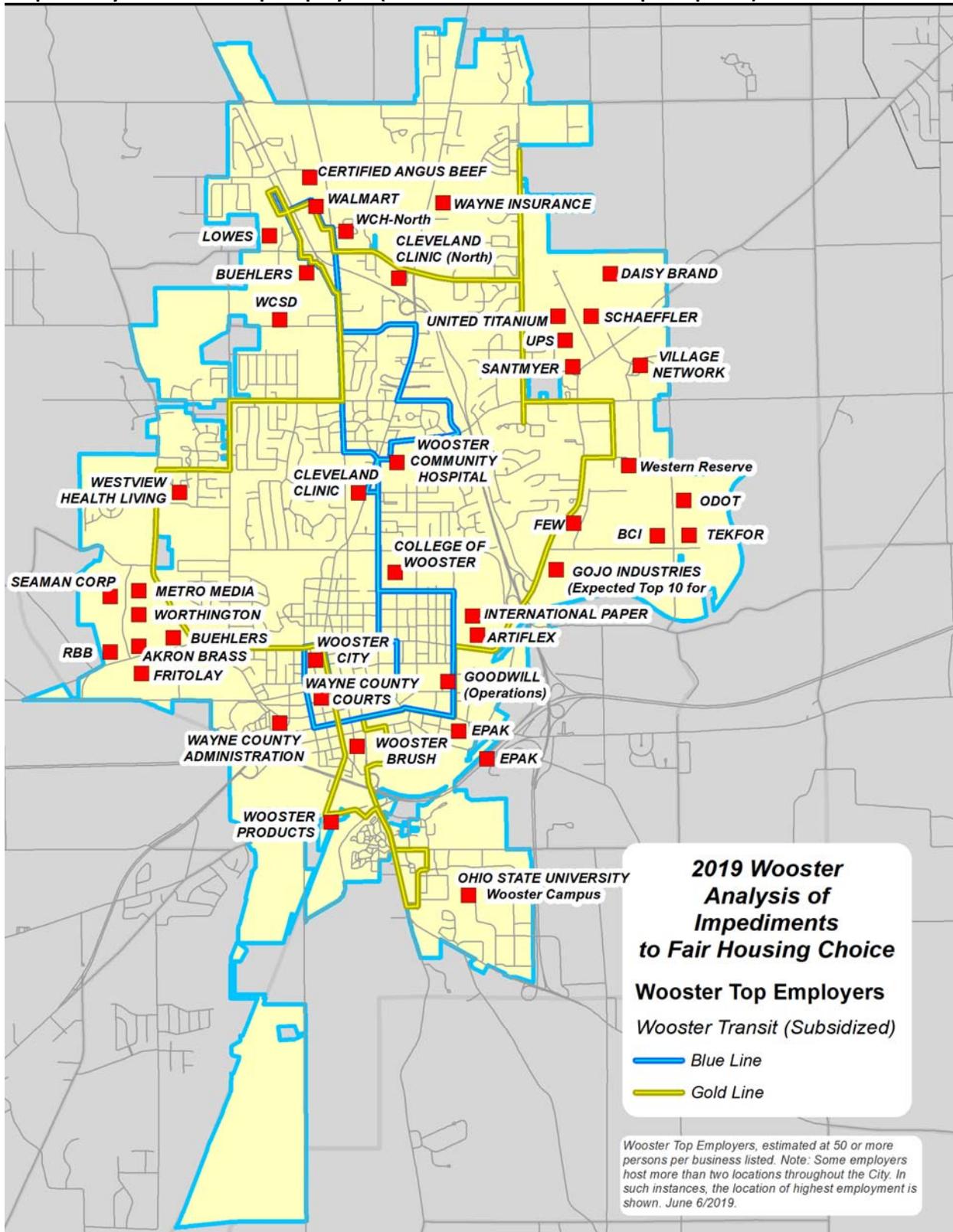
1. Figures summarized from Table S2301, Employment Status: 2013-2017 American Community Survey 5-Year Estimates.

**TABLE 18: Wooster Top Ten Employers and Change Over Time.**

CITY OF WOOSTER, OHIO		Schedule 4.2					
ECONOMIC INDICATORS							
FULL-TIME EQUIVALENTS - TOP TEN EMPLOYERS							
2008 COMPARED TO 2017							
Employer	Nature of Activity	Number of Full-time Equivalent Employees					
		2017			2008		
		Employees	Rank	% of Total Employment	Employees	Rank	% of Total Employment
Luk, Inc	Auto Parts Fabricator	1,713	1	12.7%	1,014	2	7.5%
The City of Wooster	Government/Hospital	1,040	2	7.7%	1,047	1	7.8%
The County of Wayne	Government	780	3	5.8%	837	3	6.2%
Artiflex Mfg (Gerstenslagers)	Auto Parts Fabricator	637	4	4.7%	0	0	0.0%
College of Wooster	Education	596	5	4.4%	686	4	5.1%
Wooster Brush Company	Manuf. Paint Applicators	591	6	4.4%	511	8	3.8%
Frito Lay Inc.	Manuf. Food	482	7	3.6%	342	10	2.5%
Wooster City Schools	Education	430	8	3.2%	650	5	4.8%
The Ohio State University	Education	406	9	3.0%	0	0	0.0%
Cleveland Clinic Foundation	Medical Care	285	10	2.1%	382	9	2.8%
Walmart	Retail	n/a	n/a	0.0%	527	6	3.9%
Worthington Industries	Auto Parts Fabricator	n/a	n/a	0.0%	513	7	3.8%
<b>Totals</b>		<b>6,960</b>		<b>51.6%</b>	<b>6,509</b>		<b>48.2%</b>

1. Comprehensive Annual Financial Report, Fiscal year ended December 31, 2017

Map 17: City of Wooster Top Employers (With mass transit routes superimposed)



City of Wooster Development, 2019.

**Census Data:** The following tables share data for protected classes from the 2017 American Community Survey. Overall Wooster enjoys in a low unemployment rate. Unemployment rates and labor force participation rates vary between protected classes. Some disparities are to be expected, as in the case of individuals with disabilities, many of whom are physically unable to work. As such, the labor force participation among those with disabilities is the lowest rate among all protected classes. Disparities also arise when examining employment by race (Note, caution is required given very small sample sizes and wide margins of error). For instance, individuals of two or more races were factored an unemployment rate of 14.2%, but with less than 350 individuals in the workforce, the margin of error of was +/- 18.8 percent, presenting a very low level of confidence. Therefore, as labeled, the estimated data for small populations should be reviewed as an indicator, not a definitive measure.

**Table 19** Offers a synopsis of the workforce make up between sex and family. Labor force participation among working-age adults varies from 70% for women to 80% for men. Women with children have a labor force participation rate of 75%.

**TABLE 19: Labor Force Participation Rates**

	Wooster city, Ohio			
	Total	Labor Force Participation	Employment /Population Ratio	Unemployment Rate
<b>Total Wooster Population + 16</b>	21,846	59.20%	56.30%	4.90%
<b>Wooster Population 20 to 64 years</b>	14,631	75.00%	72.70%	3.00%
Male	7,130	80.20%	77.60%	3.30%
Female	7,501	70.00%	68.10%	2.70%
With own children under 18 years	2,553	75.20%	72.90%	3.10%
With own children < 6 years only	731	86.00%	84.40%	1.90%
With own children < 6 yrs and 6 < 17 yrs	645	50.20%	50.20%	0.00%
With own children under 6 < 17 years	1,177	82.20%	78.20%	5.00%

1. Figures summarized from Table S2301, Employment Status: 2013-2017 American Community Survey 5-Year Estimates.

**Table 20** details labor statistics by Race. Compared with a citywide unemployment rate of 4.9%, The category of Two or More Races trend at 14.20%, while Asian alone and Black and African American alone trend at 7.90% and 6.50% unemployment. However, in all instances, the margin of error is significantly wide, particularly for the outlier measure.

**Table 21** provides an overview of labor details based on poverty status, disability status, and educational attainment. Those shown below poverty level had a workforce participation rate of only 46.2% and an unemployment rate more than three times higher than those at or above the poverty line. Those with disabilities, while only holding a 35.1% labor force participation rate, had a 6.3% unemployment rate among those engaged in the workforce. Higher education was strongly correlated with lower unemployment rates, with those possessing less than a secondary (high school) education facing a 12.4% unemployment rate compared with 1.1% for those with a four-year post-secondary degree. The caveat remains, however, that the margin of error, particularly for all smaller population groups, is exceptionally wide.

**TABLE 20: Labor Participation by Race**

RACE AND HISPANIC OR LATINO ORIGIN	Wooster city, Ohio			
	Total	Labor Force Participation	Employment / Population Ratio	Unemployment Rate
White alone	19,938	58.60%	55.90%	4.60%
Black or African American alone	721	66.20%	61.90%	6.50%
American Indian and Alaska Native alone	81	0.00%	0.00%	-
Asian alone	718	75.50%	69.50%	7.90%
Native Hawaiian and Other Pacific Islander alone	0	-	-	-
Some other race alone	53	81.10%	81.10%	0.00%
Two or more races	335	54.60%	46.90%	14.20%
Hispanic or Latino origin (of any race)	399	60.40%	60.40%	0.00%
White alone, not Hispanic or Latino	19,588	58.60%	55.90%	4.60%

1. Figures summarized from Table S2301, Employment Status: 2013-2017 American Community Survey 5-Year Estimates.

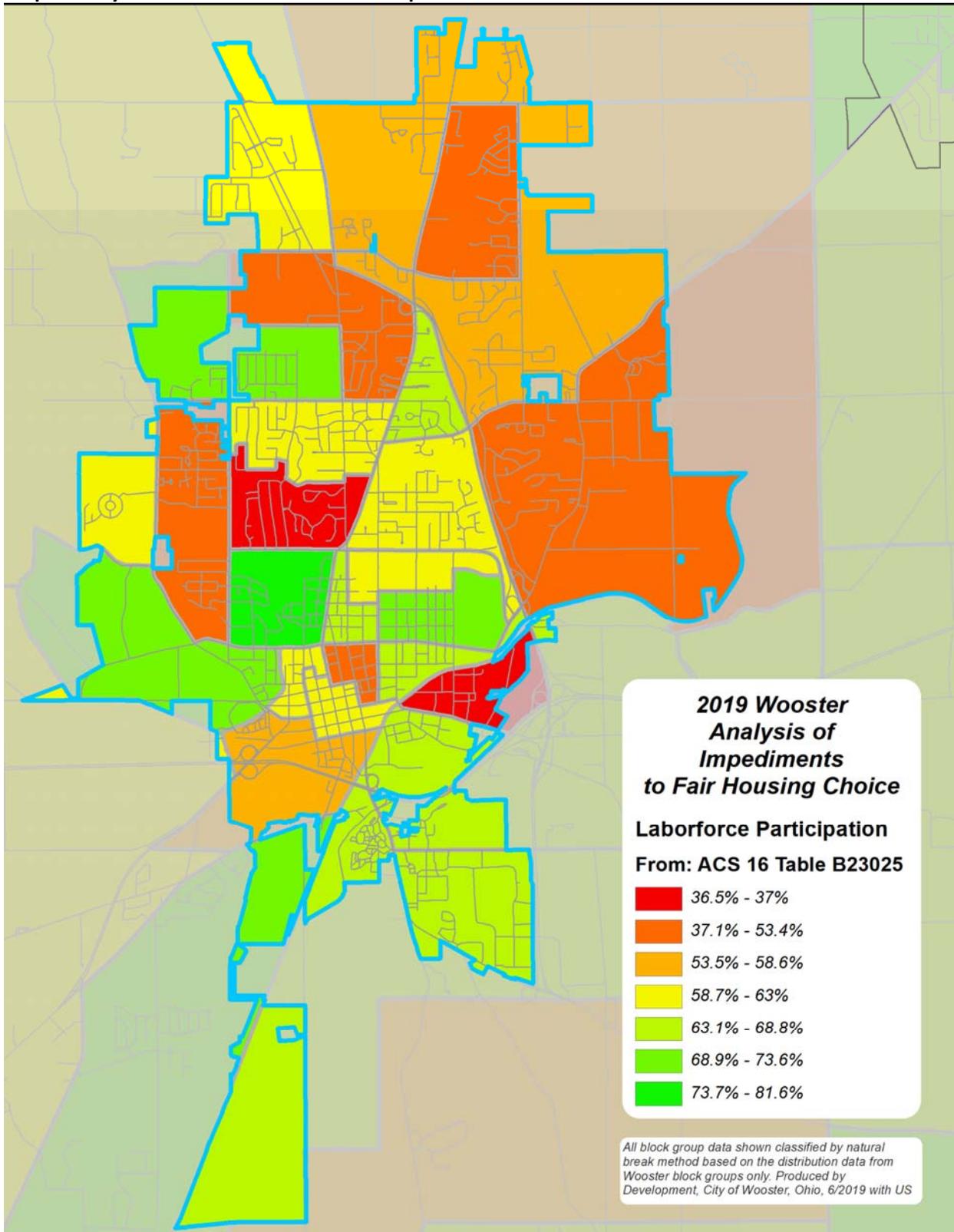
**TABLE 21: Labor Participation by Poverty, Disability, and Educational Attainment**

Poverty / Disability / Education	Wooster city, Ohio			
	Total	Labor Force Participation	Employment / Population Ratio	Unemployment Rate
<b>Poverty (Past 12 mos.)</b>				
Below poverty level	2,461	46.20%	42.80%	7.30%
At or above the poverty level	11,092	82.70%	80.80%	2.30%
<b>Disability Status</b>				
With any disability	1,838	35.10%	32.90%	6.30%
<b>Educational Attainment</b>				
Population 25 to 64 years	12,232	74.90%	72.80%	2.80%
Less than Secondary	965	40.10%	35.10%	12.40%
Secondary or Equivalent	4,277	70.10%	67.80%	3.30%
Associates / Technical / Some College	3,346	76.70%	74.40%	3.00%
4 Year Post-Secondary or Higher	3,644	88.00%	87.10%	1.10%

1. Figures summarized from Table S2301, Employment Status: 2013-2017 American Community Survey 5-Year Estimates.

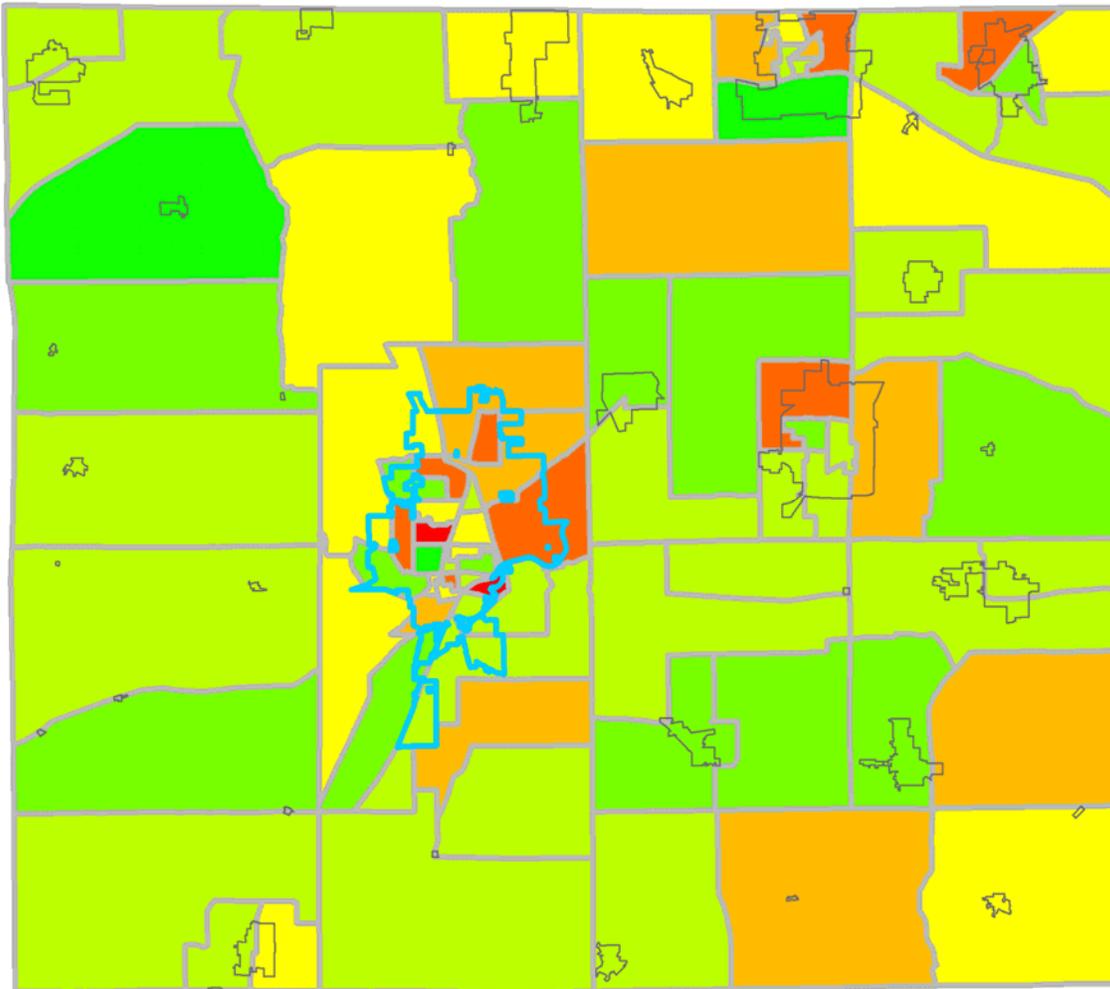
**Map 18** shows the labor force participation rate per block group (shown utilizing the natural break method). The rates vary significantly without discernable correlation to block group incomes. Both wealthy and poor income neighborhoods share high and low workforce participation rates.

**Map 18: City of Wooster Labor Force Participation**

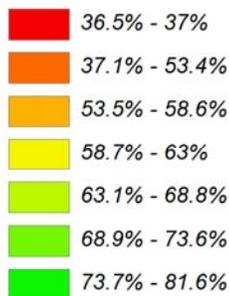


US Census Bureau, 2016 ACS Data Table B23025

**Map 19: Wayne County Labor Force Participation**



**2019 Wooster  
Analysis of  
Impediments  
to Fair Housing Choice**  
**Laborforce Participation**  
**From: ACS 16 Table B23025**

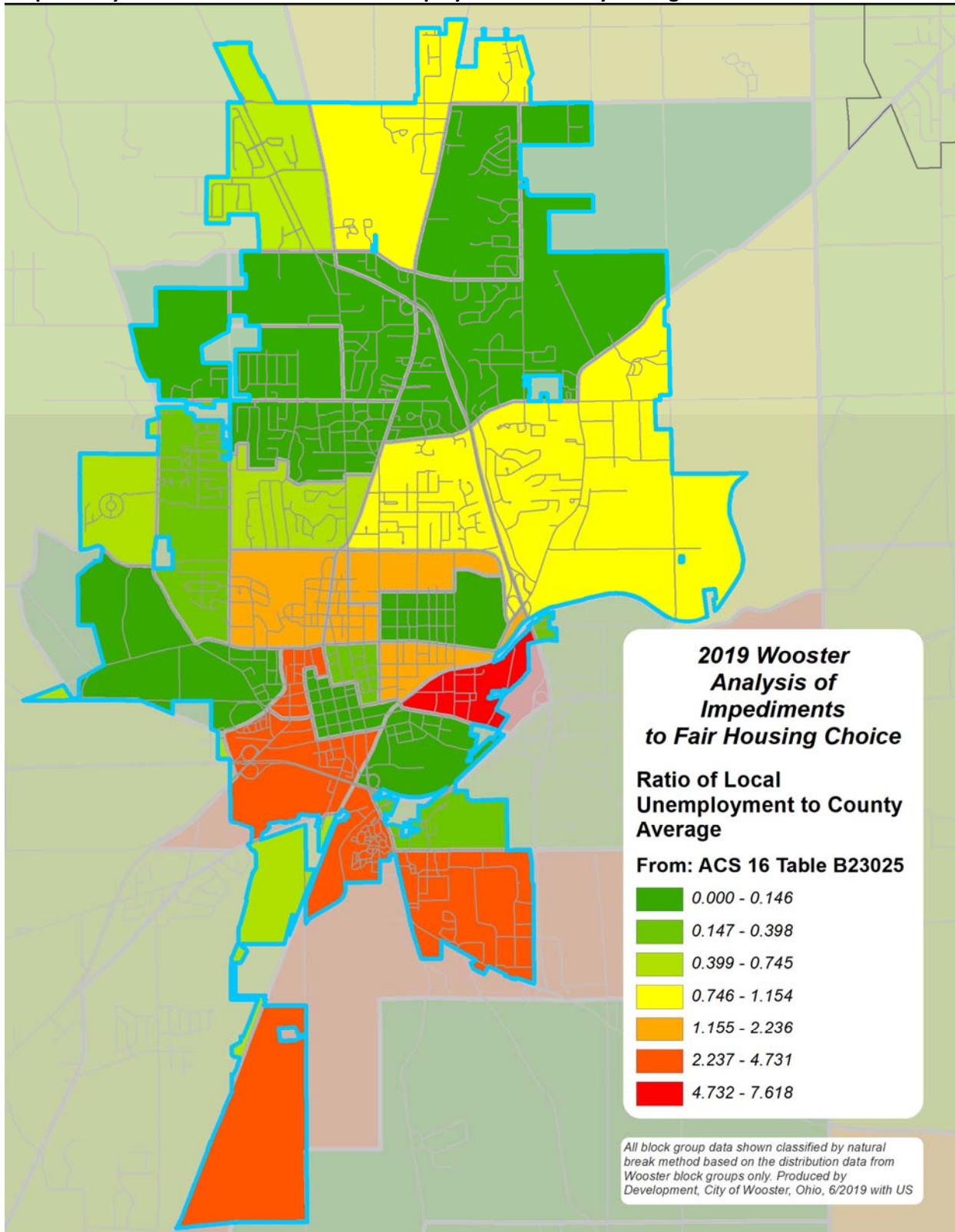


*All block group data shown classified by natural break method based on the distribution data from Wooster block groups only. Produced by Development, City of Wooster, Ohio, 6/2019 with US Census Bureau data.*

US Census Bureau, 2016 ACS Data Table B23025

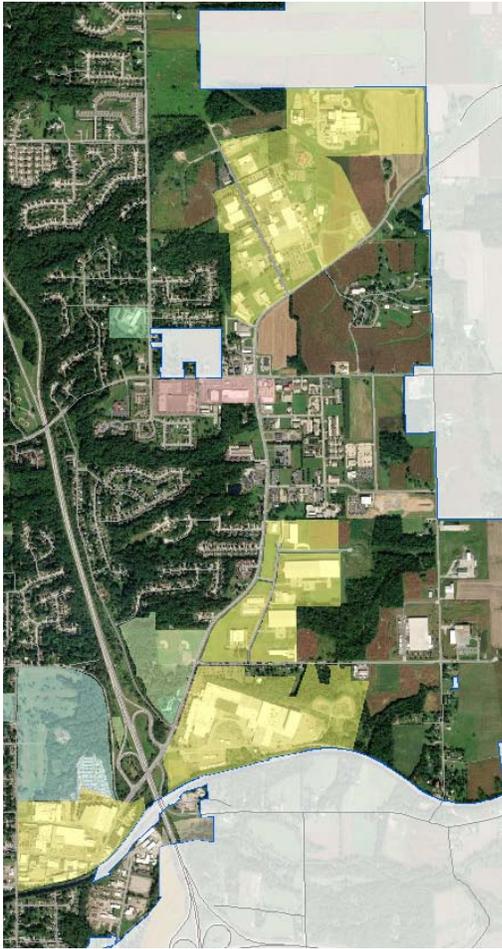
**Map 19** above shows the countywide pattern for labor force participation, where there is some correlation between the lowest participation rates and average income shown earlier in Map X. Ahead, **Map 20** shows how individual block group unemployment rates compare with the countywide rate (a ratio of the individual block group rate divided by the county rate). The northern tier of the City trends under the average county rate, while the bottom half, below Wayne Avenue, trends greater than average. Below average employment is prominent south of Wayne Avenue and even more so South of Bowman Street with exception to Downtown. However, below average unemployment is observed in other neighborhoods with relatively low labor force participation rates.

Map 20: City of Wooster Ratio of Local Unemployment to County Average



US Census Bureau, 2016 ACS Data Table B23025

## Employment Center Profiles:



**1. Akron Road Priority Area:** The community's largest agglomeration of industrial production facilities hosts several of its top employers, including the Artiflex Campus (approximately 700 employees), the GOJO Wooster Campus (approximately 500 employees), and the Schaeffler plant (approximately 1,800 employees). Other notable employers include Daisy Brand, United Titanium, FEW, International Paper, Tekfor, Compak, Goodwill Industries, Buckeye Container, the Ohio Department of Transportation, the Village Network, United Parcel Service, and Santmyer Oil. This district follows Akron Road from near the city's center to its northeast gateway, where the road transitions into State Route 585, the City's primary link to the Akron metropolitan area. The corridor connects with the Dix Highway, which provides four-lane highway access to Canton, Mansfield, Columbus, and State Route 83 (two-lane access to Cleveland). The road also connects to Back-Orrville Road / Portage Road, a heavily travelled regional route that links Wooster to Orrville. The intersection once served as Wayne County's highest grossing retail area for sales receipts. After several years of decline, new investments are being made that have brought a full sized grocery store, several discount retail outlets, and a few small restaurants. A new major grocery store chain anticipates opening its doors in late 2019 in addition to new budget-oriented retail stores.

*On Housing Specifically:* Medium-density housing is dispersed along the corridor. Two sizeable loft-style apartment communities are part of the corridor, while few small neighborhoods, in many cases cul-de-sacs, off Akron Road offer single-family and duplex housing opportunities. Additionally, condominium and small multi-family developments have popped up alongside office and light-industrial on the west end of the corridor. Most recently, the Ohio Housing Finance Authority announced an award to MVAH Development for the creation of a 52-unit Wooster Lofts apartment community project, which will locate immediately south of the Akron Road / Portage Road intersection. The project, intended as a workforce housing project, will dedicate 52 units to low-to-moderate income qualified families, and is expected to break ground in late 2019.

*On Job Access Specifically:* The Akron Road corridor receives dedicated hourly bus service six-days a week between 7:00 am and 9:30 pm<sup>7</sup> as part of the Gold Line route offered by Wooster Transit dedicated bus service, which places all major employers within walking distance. In addition to door-to-door service, available with a City of Wooster subsidy for low-to-moderate income qualified persons, the corridor is also served by a multi-use walking path along with a network of sidewalks, part of the growing Wooster Loop alternative transportation system.

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<sup>7</sup>Wooster Transit dedicated service times vary, with later start and end times on Saturdays. No dedicated service is provided Sundays.



**2. Downtown Central Business District:** Downtown Wooster is the civic, governmental, and commercial heart of the community, and a popular location for small office and retail businesses. After severe economic decline through the 1980's and early and 1990's, with vacancy rates above 60%, downtown has experienced a resurgence in development. Reinvestment championed by the community's downtown business association, Main Street Wooster, the creation of development incentives through the city government, and substantial public infrastructure investment helped to revive older and underutilized buildings. Presently, the Downtown Wooster real estate market is competitive, which has helped to encourage new building construction. Local government offices, including county administration, county courts, and city administration and community services are situated in downtown. Additionally, Wooster Brush, a national manufacturer of painting equipment, employs over 600 people at its downtown plant. This base of workers, in addition to the nearby College of Wooster and the larger business community, provides a strong and consistent market to support a number of small independent retail shops and restaurants.

*On Housing Specifically:* The number of living units has been growing in Downtown, primarily a result of developers converting previously underutilized space into luxury apartments. Two sizeable apartment communities serve the low-to-moderate income community, the first being the Townsview Senior Living apartment community managed by Wayne Metropolitan Housing Authority, and the second being Town Place Apartments, which is privately run but offers rents that are affordable (within HUD 2019 affordability guidelines). Immediately surrounding the downtown is the City's historic residential district, also known as the R-T District. Homes in this location are generally older, requiring careful ongoing maintenance and care. The City employed a Community Reinvestment Area program in 2014 covering this neighborhood, which enables homeowners as well as landlords to make home rehabilitations or build new housing altogether with a 12-year, 100 percent real estate tax abatement on any new improvements. Approximately 40 qualified housing projects have taken place as a result. Habitat for Humanity of Wayne and Holmes County has averaged one home build, or re-build, each year in the neighborhood, while the City's Community Housing Improvement and Preservation program<sup>8</sup> averages two to three major apartment and or home rehabilitations each year. Most recently, a small-scale project has been proposed to bring new affordable single-family housing to a vacant residential lot on Larwill Street.

*On Job Access Specifically:* Downtown Wooster provides a strong base of retail and service-oriented businesses that cater to a base of government, industrial, and office workers located in the district, the greater business community and collegiate institutions, and tourists. From a mix of governmental jobs to small office establishments to food and retail businesses, as well as some opportunities for industrial

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<sup>8</sup> Sponsored through the Ohio Development Services Agency through a highly competitive grant process and funded with Community Development Block Grant and HOME funds through the Department of Housing and Urban Development and the Ohio Housing Trust Fund dollars.

jobs, the Downtown provides a diversity of jobs within walking distance to the southern half of the City. Service-oriented jobs are easily available in 2019, with many employers citing difficulty in finding and retained workers. Many downtown businesses are exempt from the State's minimum wage rate owing to their size<sup>9</sup>, however market forces generally leave most employers offering more competitive rates. The downtown has also been popular for some independent proprietors and self-employed, but such observances have become less common as market rents have increased substantially. The Downtown is served by the Wooster Transit Blue and Gold Lines and signed bus stops with benches have been created to improve ease of access. The Wooster Loop system currently connects to Beall Avenue, where streetscape and bike lanes continue to Liberty Street (and the streetscape continues throughout the downtown). Nine intersections have been improved with pedestrian crosswalks to enhance pedestrian safety and more improvements are planned in the future as funds become available.



**3. Hospital District:** The Hospital District today rests at the center of the City, largely constructed following World War II. The neighborhood is characterized by medical institutions, professional offices, medium-density residential, and scattered retail and drive-thru establishments. At the heart of the neighborhood is the 172-bed Wooster Community Hospital, one of the few remaining local-government owned hospitals in Ohio. With a staff of over 800, and many more independent contractors and private practitioners, the hospital is one of the County's top employers. It has been a five-time recipient of the "100 Top Hospitals" recognition by IBM/Watson Health (formerly known as Thomson Reuters 100 Top Hospitals), most recently in 2019. It was also received recognition for five years through Woman's Choice Award as America's 100 Best Hospitals for Patient Experience. Also established in the district is the Cleveland Clinic's Wooster Family Health and Survey Center and Women's Health Center, which is also responsible for hundreds of jobs in the neighborhood (and coupled with its specialty surgery center closer to the North End, the Cleveland Clinic Foundation also makes the top 10 list of

employers for the city). The Cleveland Clinic Foundation has global recognition and was ranked as the #2 overall hospital in the United States by the US News and World Report. Most specialized services are referred to larger satellite hospitals or the main Cleveland Campus. Needs for reinvestment in the area were identified in the City's 2014 Comprehensive Plan, particularly with road networks. Despite tens of millions of dollars in new investment, both in terms of medical expansion and also new residential development, the most heavily travelled routes provide a view of a tired, old, and disorganized commercial area with small drive-through and retail establishments squeezed along an awkward road layout and several areas visibly underutilized.

<sup>9</sup> Employers grossing under \$314,000 annually are exempt from the State of Ohio's minimum wage rate of \$8.55 an hour, but are instead mandated to pay no less than current federal minimum wage, at this time \$7.25 an hour. Additionally, tipped employees have a state minimum wage rate of \$4.30 per hour. Ohio Department of Commerce, 2019.

*On Housing Specifically:* There are several housing options available in the area including single-family, multi-family, senior-living communities, and multiple apartment communities. Williamsburg Apartments, The Arlington Apartments, Spruce Hill Apartments, and Valley View apartments are sizeable privately-run apartment communities that offer affordable rents (within HUD 2019 affordability guidelines). Almost all of the constructed landscape was created following World War II.

*Job Access Specifically:* This area offers a solid base of career-oriented jobs. While most jobs demand specialized training, there are ongoing opportunities for entry-level positions within medical institutions and also expanding professional offices that require limited education to start but provide opportunities for advancement and quality pay. The area is also within walking distance to all other Wooster employment centers. The area is served by the Wooster Transit Blue Line between 7:00 am and 9:00 pm Monday through Saturday.



**4. North End Retail District:** This district serves as the County’s primary market area for big-box retail and suburban office businesses. Characteristic of typical retail sprawl, the area features a development pattern that extends outward from the City’s developed core along a major thoroughfare, State Route 83, which serves as the City’s main link to Cleveland and points north. The region has experienced slow and steady growth. Most recently, a major retail development has been proposed for the extreme northwest end of the district along State Route 83, which will add approximately 400,000 square feet of new retail space to the community’s inventory, and demand approximately 300 retail-sector jobs to staff. Notable employers in this area include Wal-Mart, Lowes, Kohls, Certified Angus Beef, Bhuelers, and Wooster Community Hospital, along with a variety of local and national chain retailers and restaurants. The area continues to grow, with the construction of a Holiday Inn Express Hotel underway and a new major 400,000-square foot retail project scheduled for 2020.

*Housing Specifically:* Housing opportunities in the North End are relatively limited. The offerings that are available range from middle to upper-income apartment communities to middle-class to luxury homes. Housing construction in this area is substantially newer, larger, and more modern compared to elsewhere in the City. Recent zoning changes and expansion in the area have made room for more high-density residential development, including west of Friendsville Road where a new 160-acre tract of land was recently annexed. A new luxury apartment community has been proposed along the southern extents of the district, and may add substantially to Wooster’s housing inventory. The area continues to attract interest from residential developers, which is buoyed in part with easy access to large-scale commercial and retail locations.

*Job Access Specifically:* The North End Retail District offers the largest concentration of readily-available job opportunities in the community. While many jobs are entry-level, low-skill retail-oriented positions, many retailers provide career employment tracks. The job market has steadily grown more competitive since 2015, and is anticipated to continue to do so with the entry of new major retail in a marketplace

that is underserved<sup>10</sup>. Retailers and restaurants consistently advertise above minimum wage in order to attract and retain workers. While immediate low-to-moderate income housing opportunities are limited, the North End is in walkable distance to the northern half of the city (about 2.5 miles). The City's Wooster Loop trail system is scheduled to connect to this region, with a portion of construction already completed. The area is also served on a half-hour basis with dedicated bus service, provided by the Wooster Transit Blue and Gold lines.



**5. Western Industrial District:** With close access to State Route 30, the Western Industrial District has been an attractive location for manufacturing and logistics. Notable employers include Akron Brass, Frito-Lay, Metro Media, Seaman Corporation, Compak, RBB Systems, Buehler's Fresh Foods, and D&S Distribution. Several employers are known for their community engagement and commitment to creating job opportunities for entry-level workers. This area is zoned for industrial activity and contains shovel-ready sites that could readily accommodate new mid-sized operations. Sidewalk infrastructure is lacking in certain areas of the neighborhood, sections of which have been identified as a potential addition to the Wooster Loop multi-use path system.

*Housing Specifically:* This employment center is within walking distance to Downtown and its historic residential district, as well as Wooster's popular western multi-family neighborhoods. Popular nearby apartment communities include Summit Place Apartments, Willowood Apartments, Redwood Wooster, and a concentration of independent multi-family homes and communities. Wooster's western neighborhoods provide diverse affordable housing opportunities, from apartment communities to condominiums to relatively affordable owner-occupied single-family housing. Much of the housing stock was

constructed in the past 50 years and is relatively affordable without the major maintenance costs needed in older housing. At the same time, the neighborhood has experienced new investment with the addition of new housing and apartments, which target the upper middle-to-high income market.

*Job Access Specifically:* The location of quality jobs for entry-level positions with mainstay companies makes the area an attractive opportunity for low-skilled workers seeking steady job opportunities with career advancement potential. While there is ample sidewalk infrastructure that connects the area with Downtown, the more rural Mechanicsburg Road and parts of Venture Boulevard lack sidewalks, making easy pedestrian access difficult for the highly populated neighborhoods to the northeast. The area has access to the city's bus system (Gold Line) at the intersection of Bowman / Old Mansfield Road and Mechanicsburg.

<sup>10</sup> Wooster Development Proposal Informational Summary, Meijers, Inc., utilizing 2016 Bureau of Labor location quotient statistics for Wooster Micropolitan and surrounding areas. Development, City of Wooster, October 2016.

**Job Training:** The City of Wooster is fortunate to have several educational institutions, both public and private, that support job training and career advancement. Wooster City High School, which the vast majority of the jurisdiction and also offers an open enrollment policy, received a ranking of 89 among Ohio’s 916 high schools by US News and World Report in 2019, the best of any Wayne County secondary institution. (Triway Local School District accommodates residents living south of State Route 30.) The College of Wooster offers certain academic resources free to the community, including library access and free course auditing, while the Ohio State University provides a variety of affordable and free educational programming, including money management and homeownership. The University of Akron’s Wayne College, located in Orrville, provides among the lowest state tuition costs for associates and a limited number of bachelor degrees, while still covering the first two years of most other bachelor degree tracks for students continuing their degrees at the main Akron campus.



**Wayne County**  
A proud partner of the  
American Job Center network

*Ohio Means Jobs:* Part of the Wayne County Job and Family Services, Ohio Means Jobs Wayne County provides a one-stop location for employment assistance that is open weekdays during normal business hours. The center provides career counseling to the general public,

along with job search assistance and an assortment of free educational courses ranging from interview workshops to money management to overcoming legal background for employment. The organization is heavily networked with Wayne County employers, regularly hosting job fairs and assisting employers directly in filling positions. The agency also, in coordination with other governmental and nonprofit organizations, markets and manages training incentives that help growing employers cover the cost of training new low-to-moderate income hires, including covering employee pay during training and pay for company staff engaged in training.



**DONATE STUFF.  
CREATE JOBS.**

Industries of Wayne & Holmes Counties, Inc.

*Goodwill Industries of Wayne and Holmes County:* This nonprofit organization contracts with area governmental agencies and private employers to provide training to income-qualified individuals. The nonprofit also maintains a 50-person training facility that operates as a factory and supports a variety of area businesses with special projects. The company also maintains a network of retail stores to help fund its job training mission, where it also conducts job training activities. Goodwill also provides onsite counseling resources and assistance to area employers to encourage job retention. The organization places well over one hundred individuals into new permanent jobs each year.

**SCHAEFFLER  
ACADEMY**

*Schaeffler Academy:* A private training school, the Schaeffler Academy provides training courses and apprenticeships to prospective and current employees of Wooster’s largest employer. With over 1,800 full-time

employees, Schaeffler’s Wooster Plant, which supports multiple automobile manufacturers, is the City’s top employer. Having struggled to attract suitable talent, the company embraced the German model of company-sponsored training through the creation of the Academy in the early 2000’s. The institution is known for welcoming local unskilled individuals who are committed to learning, equipping them with the ability to manage and operate complex equipment and systems, and placing them into solid jobs. The academy also offers several career-track programs for existing employees.



*Wayne County Schools Career Center:* Located just outside of the City in the Village of Smithville. A countywide school, WCSCC caters to both county secondary school students, and adults. The school offers several affordable education tracks leading to general education certification, professional licenses, and technical certifications. Programming includes adult literacy,

office technology, law enforcement, medical industry, and a suite of trade and industry tracks. The center networks with area employers to create specialized training courses. Notably, the school has established a free adult basic academic improvement program called Aspire, which provides courses in literacy, post-secondary readiness, ESOL (English as a Second Language), and other training to increase employability skills. While the school is not served by mass transit, busing is provided to secondary school students and qualified low-to-moderate income individuals are able to use the City of Wooster’s Taxi Pass program. The Aspire program also conducts classes at the Wayne County Public Library and Central Christian Church, in addition to other locations in Orrville.

**Transportation:** With a rural setting, Wooster and Wayne County’s primary form of transportation is the personal vehicle. Excluding those who work from the home, about 4% of the working population, 88.5% of Wooster residents 16 years and older commuting to work regularly did so with a car, truck, and van according to the US Census Bureau’s 2017 American Community Survey. (See **Table 22**). Another 8.2% reported walking, followed by 1.7% reporting use of a taxi, and 0.7% who used a bicycle.

**TABLE 22: Wayne County and City of Wooster Transportation**

	Wayne County <sup>1</sup>		City of Wooster	
	Estimate	Percent <sup>2</sup>	Estimate	Percent <sup>2</sup>
Total:	54,626	-	11,962	-
Car, truck, or van:	48,582	93.3%	10,187	88.5%
Drove alone	43,709	83.9%	9,396	81.6%
Carpooled:	4,873	9.4%	791	6.9%
Public transit (exc. taxi):	129	0.2%	2	0.0%
Taxicab	372	0.7%	195	1.7%
Motorcycle	78	0.1%	52	0.5%
Bicycle	284	0.5%	86	0.7%
Walked	2,074	4.0%	945	8.2%
Other means	574	1.1%	42	0.4%
Worked at home	2,533	-	453	-

1. Includes Wooster Populations

2. Excludes Work from Home population

3. Figures summarized from Table B08301, MEANS OF TRANSPORTATION TO WORK, Universe: Workers 16 years and over: 2013-2017 American Community Survey 5-Year Estimates

Wooster has a very compact layout with a relatively strong sidewalk infrastructure, which places most governmental, civic, employment, recreational, and retail destinations within walking-distance for much of the population. The City is also at work constructing an alternative transportation system, the Wooster Loop multi-use path, which intends to link the community’s major destinations together with safer pedestrian and bicycle access.

Since the last Census, the community now offers a dedicated bus route service (please see Maps X and X). Hourly to half-hour service is available throughout the City Monday through Saturday from approximately 7:00 AM through 10:00 PM, with rides available to the general public at \$2.00 per ride, \$5.00 unlimited per day, or \$50.00 unlimited per month (Please see Map X). Several private and nonprofit transportation providers offer door-to-door service with support for wheelchairs and other personal mobility equipment. At least four private providers serve the community with door-to-door service.

Public transportation options are limited within Wayne County outside of the City. The County government presently does not fund mass transportation. However, several local service agencies and also employers work to provide limited transportation to their clients, students, and workers who lack vehicle access. Private regional transportation is also available, with service to Mansfield, Cleveland, and Columbus.

**Map 21** shows the percentage of working population commuting by personal vehicle (not excluding the population working from the home). Superimposed are the current public transit bus routes. The lowest rates of vehicle utilization are observed around the College of Wooster, the Hospital District, and Downtown. (The College of Wooster outlier's status is due to the fact that its residents are required to live on campus and there is a limited need for vehicle usage.) Vehicle usage appears lower areas surrounding Downtown, regardless of affluence. Similarly, this trend also appears for neighborhoods near industrial areas. The northern, more modern area of the City tends to rely the most on personal vehicles. The patterns may be explained in part by home offices.

**Map 22** shows how the Wooster Transit routes connect with residential areas. The density shown is based on the Wayne County Auditor's data for housing land uses. The current routing provides service within a city block of all major apartment communities.

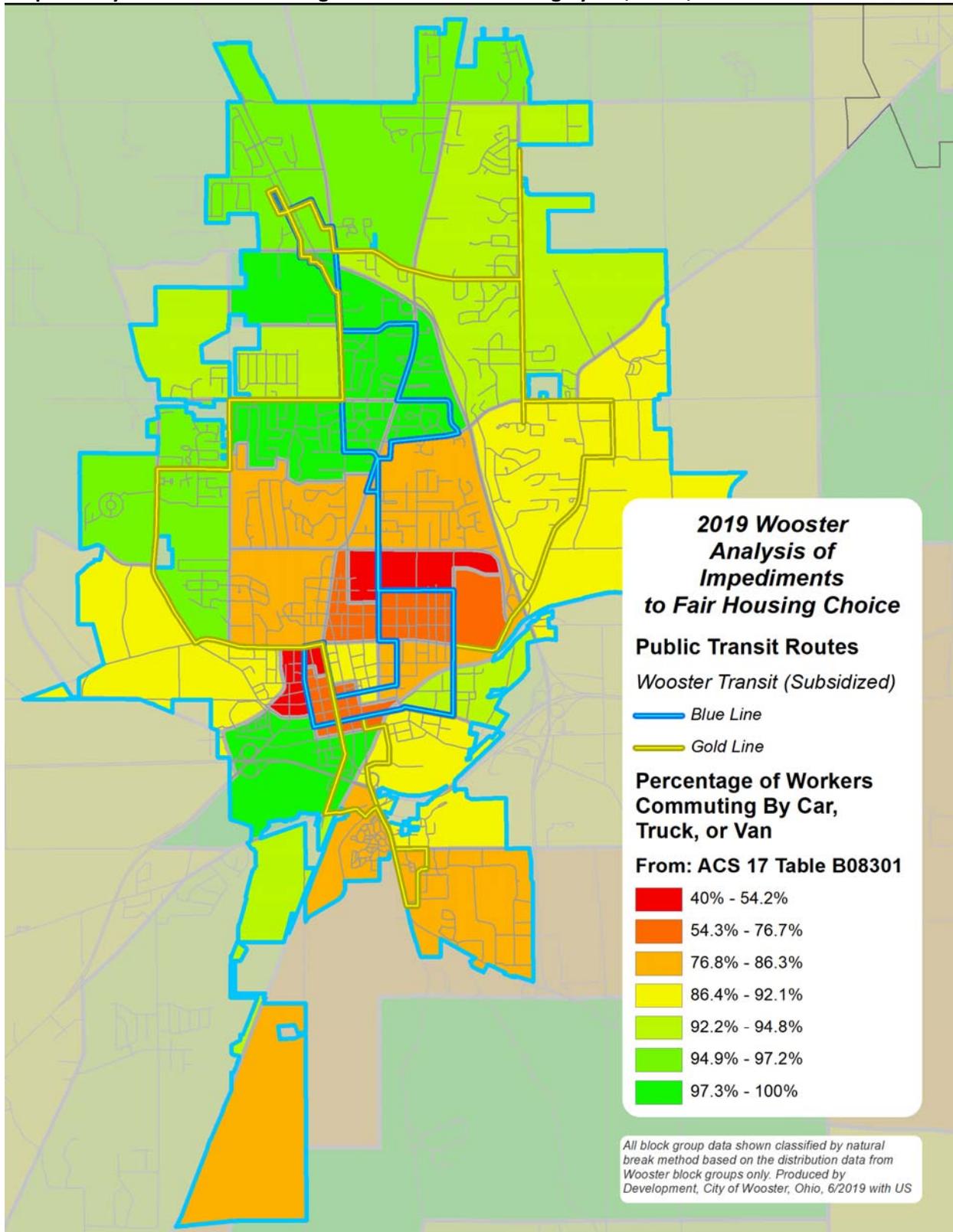
*City of Wooster Taxi Pass Program:* To support residents at 200% or below the poverty limit, the city established a taxi pass program to subsidize the cost of private transportation within the community, including fixed routes and bus transportation, and door-to-door service from qualified providers<sup>11</sup>. The program has grown from a few hundred passes being issued in 2016 to a total of 1,362 users by the second quarter of 2019, with 21,980 rides provided between bus and taxi passes within the first quarter alone. The program's recent popularity follows a partnership between the City of Wooster and community action Wayne Medina, which was tasked with managing the program. At present, the City taxi-pass for door-to-door service is \$2.00 per ride, or \$1.80 for a work-commuting pass, with the Program covering the remaining \$6.00 to \$9.20 of actual private provider charges. Rides on the fixed-route Wooster Transit Blue and Gold lines are free with a program identification badge. Additionally, Wooster residents are able to use the program to reach work and education destinations within a three-mile radius of the City, including the Wayne County Schools Career Center and daycare centers.

*Community Action Wayne Medina Transportation Assistance:* Community Action Wayne/Medina hosts a program that provides a free transportation benefit per month to households at or below 125% of federal poverty guidelines. All round trip rides require a 48-hour notice and are arranged by Community Action Wayne/Medina staff with locally contracted transportation providers, as described previously. Riders may also request one additional stop, if needed, on that same day. Qualifying Wooster City residents are eligible for one free round trip ride with two stops with a locally contracted transportation provider. Wayne County residents living outside of the Wooster City limits are eligible for two round trip rides with two stops with a locally contracted transportation provider.

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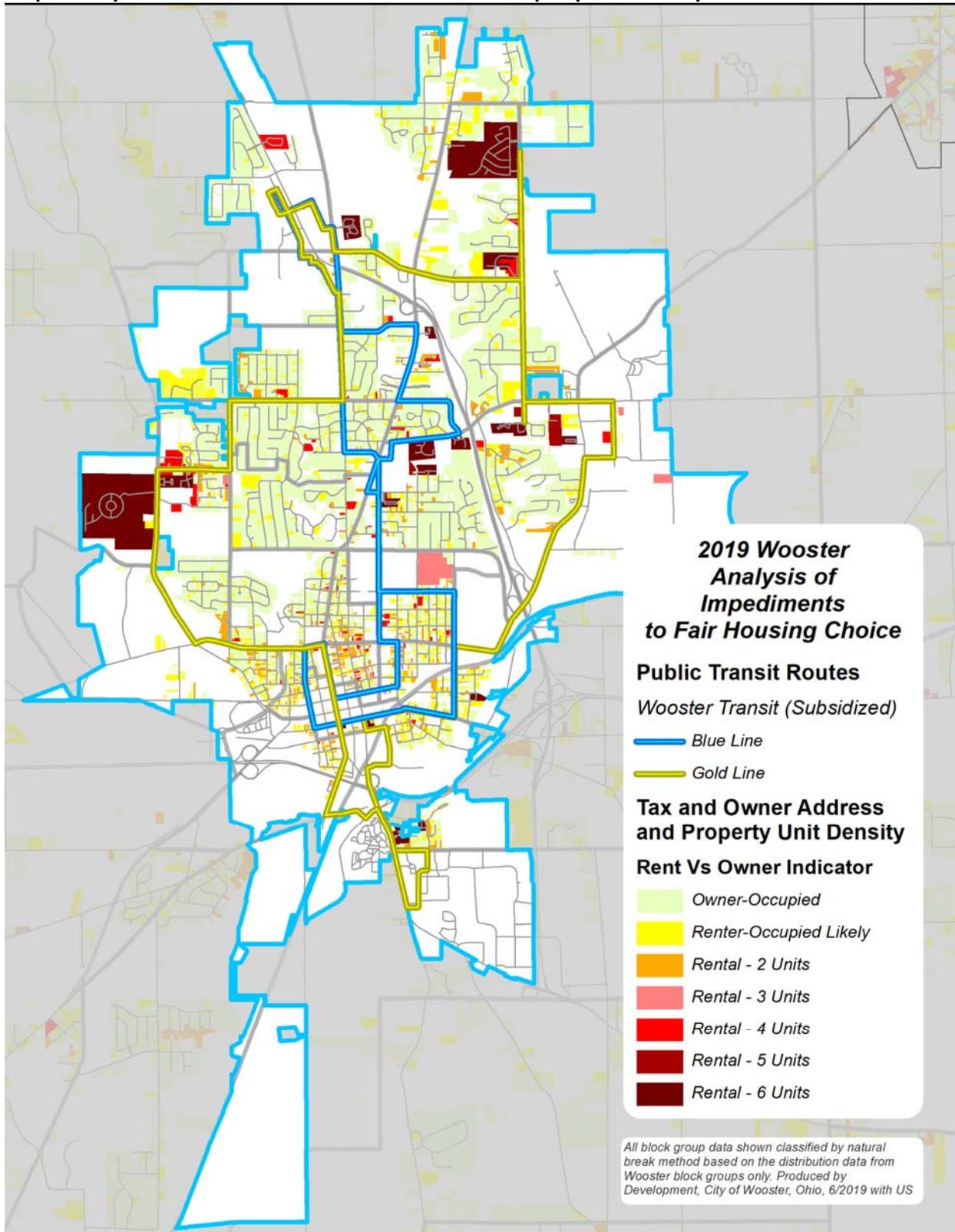
<sup>11</sup> Qualified transportation providers as of 2019 include Precious Angel, Gilcrest Transportation, Wooster Express, Five Star Taxi, Wooster Transit, and Outreach Community Living Services.

**Map 21: City of Wooster Percentage of Workers Commuting by Car, Truck, or Van**



US Census Bureau, 2017 ACS Data Table B08301

**Map 22: City of Wooster Tax and Owner Address and Property Unit Density**



Density based on Wayne County Ohio Auditor's land use classification data by parcel.

*Wayne County Mobility Management:* With project management through Community Action Wayne/Medina, Wayne County Mobility Management is a partnership of local agencies and governments that work to coordinate and optimize transportation resources throughout the county. There is a special focus on assisting older adults, people with disabilities, and individuals with lower incomes. Additionally, the program provides education and training to residents to help them understand how to utilize the community's transportation system, whether in planning travel, managing transportation with a wheelchair, or using technology to arrange services. The program also leads efforts to update regional transportation planning, most recently completing the Wayne County, Ohio Locally Coordinated Transportation Plan 2018 -2023, which was completed with support through the College of Wooster's Applied Methods in Research Experience Program. As part of the plan, 71.86% of survey respondents agreed that there were not enough public transportation options in Wayne County.

*Regional Transportation Options:* Through federal funding, GoBus, in partnership with Greyhound, provides Rural Intercity services through Wooster, with five daily trips to Columbus with a charge of \$18.55 one-way, one via Mansfield (2:00 travel time), and four longer routes (2:50 to 3:35 travel time) via Shreve, Loudonville, Mount Vernon, and Newark. Accessing Cleveland and Akron are more expensive endeavors. Wooster Transit offers roundtrip door-to-door service with minimal notice to Akron-Canton airport for \$138 plus \$20 per additional person and Cleveland Hopkins for \$155 plus \$20 per additional person. Greyhound offers once-daily evening service to Akron and Cleveland with a charge of \$14.00 and \$17.00 respectively (0:40 hr and 3:30 hr travel times, respectively.) Additionally, local taxi providers will provide services to larger communities with varying rates.

*Wooster Loop:* Nearly 9 percent of workers commuting to work report walking (8.2 percent) or bicycling (0.7%), as opposed to driving. The City has invested in the creation of the Wooster Loop System, a 10-ft wide dedicated multi-use path open to walkers and human-powered vehicles linking the community's major destinations together. The project was born out of the 2014 City of Wooster Comprehensive Plan Survey, which utilized scientific phone polling process, 73.8 percent of respondents ranked connectivity by "sidewalks, bike paths, and recreational trails" to be somewhat important (21.9 percent) or very important (51.9 percent). Trail development efforts are strengthened by the Wayne Trails Committee, a consortium of City of Wooster, Wayne County Government, and interested Wayne County citizens and organizations, which meets regularly to plan events and program new routes.

**Map 23** shows the percentage of workers commuting in each block group through walking. A higher concentration of walkers is noted near the center of the City, which includes the College of Wooster Campus, affluent and middle-class neighborhoods, as well as the Downtown and a portion of the City's historic neighborhoods that trend lower-income.

**Map 24** outlines the Wooster Loop system as currently planned. Presently, the system consists of two north-south dedicated trails, one along the Akron Road Priority Area, (2.5 miles with a gap) and a second 2.6-mile route (with a gap) which runs between the North End through the Hospital District and terminates at the College of Wooster, where streetscape and on-street bike lanes leads pedestrians and cyclists into the Downtown. Also shown is County Phase 1, a recently established signed on-road route leading to the Ohio to Erie Trail, a cross-state route running from Cincinnati through Columbus to Cleveland. Routes shown as scheduled are funded planned for completion in 2020, with Phase 3b currently proposed for 2021 pending funding.

**Map 23: City of Wooster Percentage of Workers Commuting Walking**

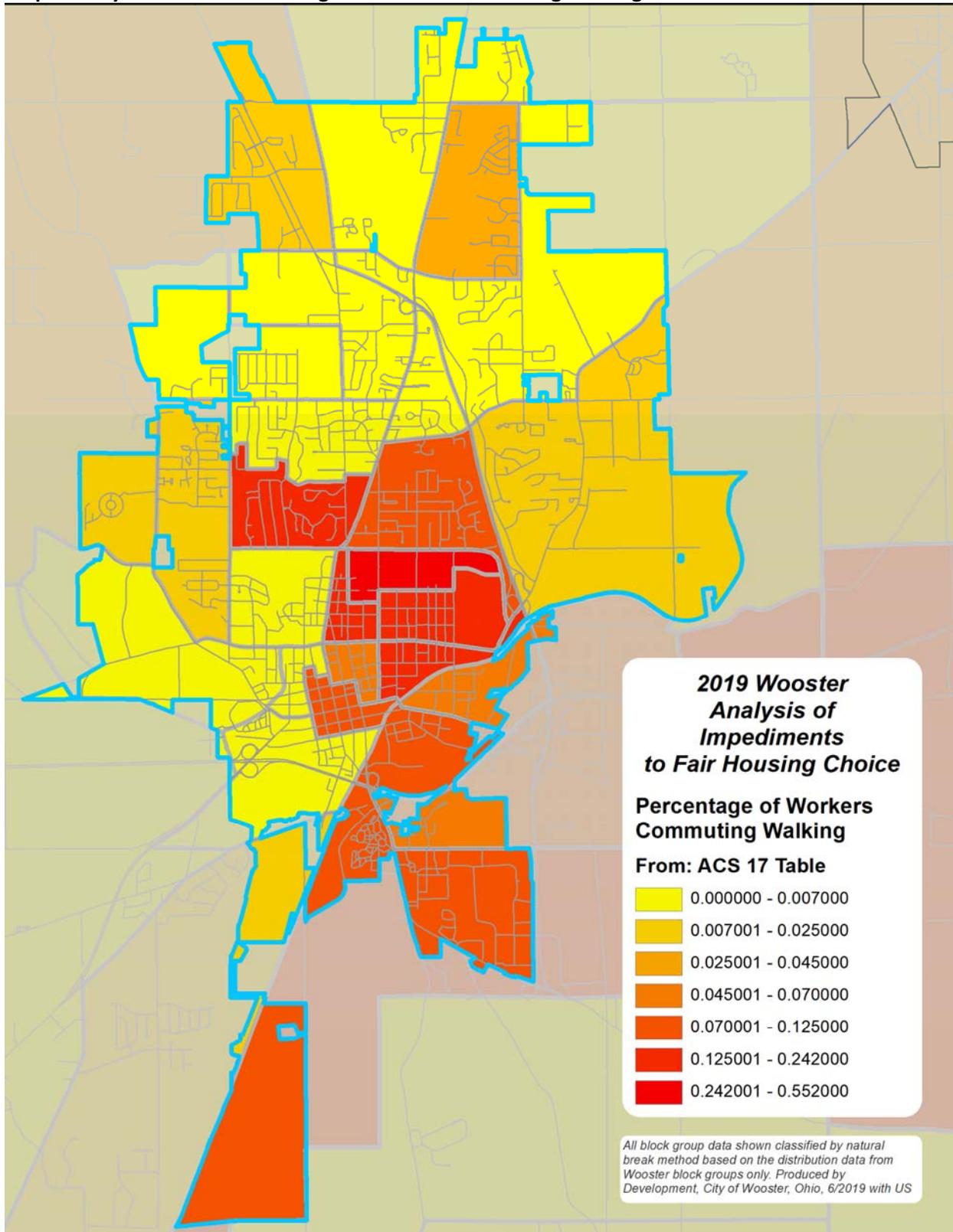
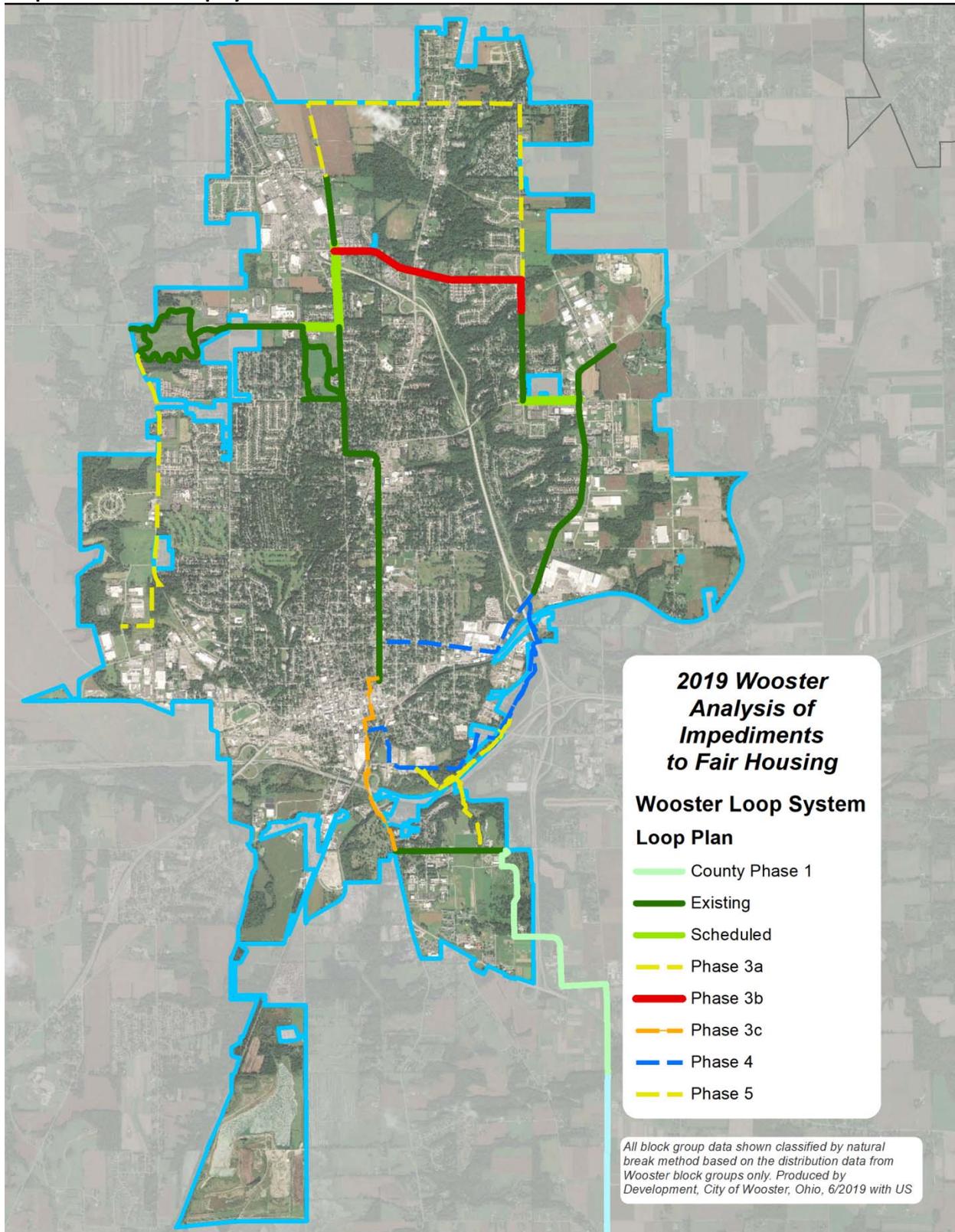


Table B08301, MEANS OF TRANSPORTATION TO WORK, Universe: Workers 16 years and over: 2013-2017 American Community Survey 5-Year Estimates

Map 24: Wooster Loop System



As approved 2019, Wayne Trails Committee.

## Housing Profile

The City of Wooster has 12,016 housing units and is actively working to grow that number as demand has risen with local job growth. While a pressing issue today, it is also a fortunate reversal of fortune. As described previously, Wooster has experienced a firm recovery from the Great Recession, welcoming a record number of new jobs. At the same time, the number of new housing starts had remained very low for more than a decade. With what was then a very low-cost housing market, Wooster struggled to receive attention from a real estate housing market Developers entering the housing market in the wake of the great recession as they placed their efforts and more expensive markets that could churn over quicker sales and higher profits. Even in comparison to larger neighboring metropolitan areas, Wooster still has lower rates for home purchases and apartment rentals. The few new housing starts generated in the community have barely managed to replace the loss of housing units due to neglect and demolition or commercial expansions. At the same time, household size has slowly shrunk as the population has aged and many homeowners have opted to retain larger homes rather than downsize going into old age.

The new housing starts that Wooster has experienced often cater to upper middle income families. For new housing starts to be commercially viable, new homes and apartments generally must target the upper end of the market. Lower-income families benefit when luxury housing dampens demand on older housing, causing rent increases to calm. While prices for older units do not necessarily decline, they also tended not to rise as fast with competition from newer units. Over time, this allows older units to grow more affordable for a larger portion of the population as incomes and other costs of living expenses naturally inflate.

A key problem for the community, however, is then the lack of sufficient housing starts altogether to match the increase in employment. Wooster area employers have expressed concern at the inability for new workers hired from out-of-town to find housing locally. This is particularly problematic for employers looking for workforce housing options to place new entry-level hires.

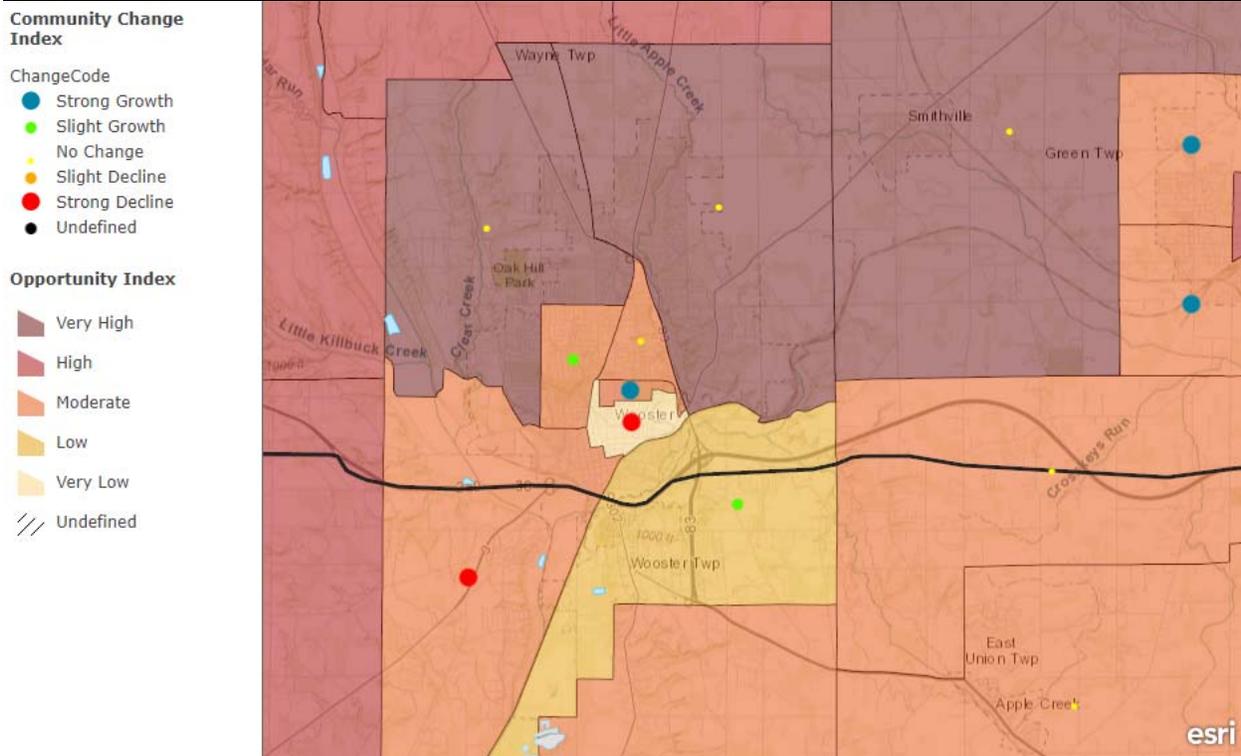
The City of Wooster government, in coordination with the Wooster Area Chamber of Commerce and the Wayne Economic Development Council, has set the creation of housing opportunities as a top community priority. The issue has received attention at City Council meetings, the state of the city presentations, and is an ongoing topic at various community meetings.

As larger metropolitan area housing markets have grown ostensibly more expensive, Wooster has recently begun encountering greater interest from developers and establishing new housing. Most recently, MVAH development announced that it would move forward with the construction of a 52 units workforce housing apartment community and the Akron road corridor. This follows several years of effort from the developer and the City of Wooster to seek your funding through the Ohio Housing Finance Authority. The project will also be supported with a CRA tax abatement rented by the city. **Map 25**, from the Ohio Housing Finance Agency, outlines the best opportunities for new housing development in Wooster, one of the factors considered in deciding to grant funding for the new housing project.

Other active proposals include a luxury apartment community on the city's North End, and a small affordable single-family housing project along Larwill Street in the City's downtown western historic neighborhood. Additionally, over one hundred acres of land have been annexed into the City's North End and zoned commercial, which would support apartments, and also high-density residential, allowing

for a variety of multi-family applications. The city actively works to aid perspective developers with site selection processes with timely delivery of data and utility metrics.

**Map 25: 2018-2019 USR Opportunity Index Map**



1. Ohio Housing Finance Authority Site: Net source 6/20/2019: <http://kirwan.maps.arcgis.com/home/webmap/print.html>.

The 2018-2019 USR Opportunity Index is a new data tool developed by the Ohio Housing Finance Agency and The Kirwan Institute for the Study of Race and Ethnicity to aid developers and advocates in the placement of low income housing.

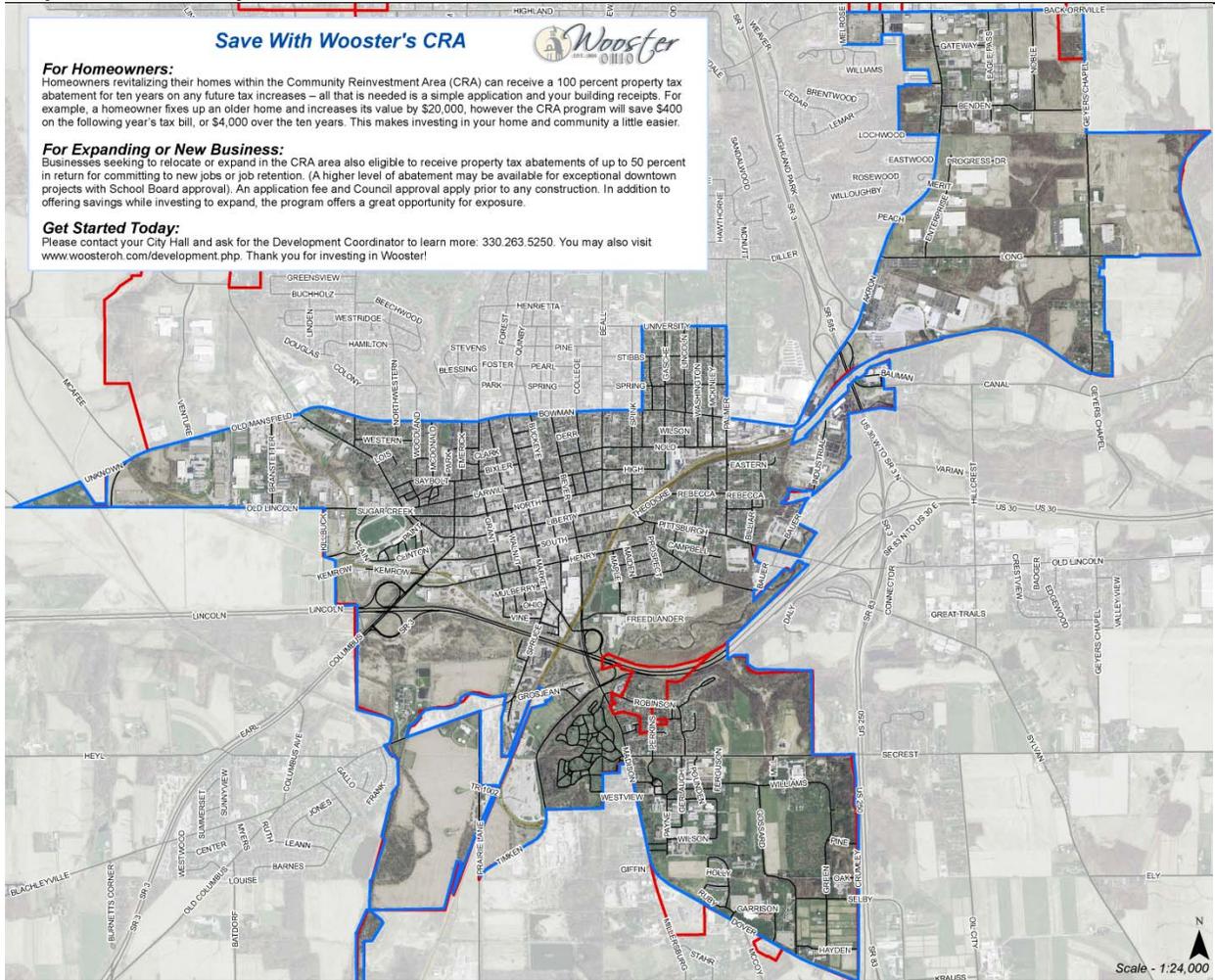
Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS | source: National Hydrography Dataset - USGS | Sources: Esri, Bureau of Transportation Statistics, GeoSystems Global Corporation in association with National Geographic Maps and Melcher Media, Inc.

2018 -2019 USR Opportunity Index is a new data tool jointly developed by the Ohio Housing Finance Agency (OHFA) and The Kirwan Institute for the Study of Race and Ethnicity at The Ohio State University (Kirwan Institute) to help advocates and developers using Low-Income Housing Tax Credits (LIHTC) in their application process. Kirwan Institute developed a tool called Opportunity Mapping more than a decade ago to understand exactly where opportunity exists; or, to visualize opportunity. At its most foundational level, Opportunity Mapping reflects access to the American Dream; access to economic and social opportunity at the neighborhood level. Opportunity Mapping illustrates markets of opportunity for urban, suburban, and rural communities. Building on the Ohio Housing Finance Agency (OHFA) and Kirwan Institute six-county pilot project, the new 2018-2019 USR Opportunity Index allows developers and advocates to play a role in caring for current and future generations of Ohioans by targeting place-based family housing LIHTC investment. By targeting family housing investment, advocates and developers can build and promote Ohio's middle class by enabling housing choice. The new 2018-2019 USR Opportunity Index takes into account developer and advocate feedback to better illustrate differences in opportunity between Cleveland and Clinton County, Blue Ash and Bexley, and Maumee and Marietta. The new 2018-2019 USR Opportunity Index is a state-wide, comprehensive, fair, equitable, inclusive, and stable framework to reduce the complexity in measuring opportunity and empower developers and advocates.

**Local Housing Tools and Resources:** Wooster has created several tools and collaborations to encourage the creation of new housing opportunities while preserving the existing housing stock. The following shares the most popular tools and efforts for accomplishing this:

**Community Reinvestment Area (CRA):** The CRA program was created in 2004 to encourage redevelopment of Wooster's historic neighborhoods and to spur job creation. The program provides an automatic 100% 10-year abatement for the homeowner on their real estate tax bill on any increase in value resulting from their qualified rehabilitation project. Approximately 40 homes have been improved with the program since 2006, which includes several new construction projects performed on vacant lots. **Map 26** shows the extents of the current CRA. The city continues to a value in opportunity's to enhance the program.

**Map 26: Community Reinvestment Area Boundaries**



1. Ohio Housing Finance Authority Site: Net source 6/20/2019: <http://kirwan.maps.arcgis.com/home/webmap/print.html>. The 2018-2019 USR Opportunity Index is a new data tool developed by the Ohio Housing Finance Agency and The Kirwan Institute for the Study of Race and Ethnicity to aid developers and advocates in the placement of low income housing. Esri, HERE, Garmin, USGS, NGA, EPA, USDA, NPS | source: National Hydrography Dataset - USGS | Sources: Esri, Bureau of Transportation Statistics, GeoSystems Global Corporation in association with National Geographic Maps and Melcher Media, Inc.

*Property Maintenance Program:* the City of Wooster's building department manages a property maintenance program that provides residents, homeowners and tenants alike, with inspections upon request to assess violations of the international building code and also the local zoning code. The lack of quality in housing has also been noted as a prime concern in the community, with approximately half of all fair housing complaints received involving a property maintenance issue. When a complaint is made concerning either the condition of the property or zoning, the property maintenance inspector will perform on-site inspections as soon as possible, often even the same day the complaint has received. In the case of tenants, the inspector will visit the unit in question if permitted by the tenant. Safety concerns are documented and the property owner, or the tenant if their actions are responsible for the violation, will receive a letter ordering repairs and specifying a time for a follow-up inspection. Property-owners who do not make repairs timely have their cases forwarded for prosecution. While the city actively prosecutes willfully ignored property maintenance violations vast majority of cases are resolved with the issuance of a citation. Starting in 2015, the program was enhanced with a mandatory exterior inspection program for Wooster's historic neighborhoods, also known as the RT zoning district, for residential tradition. All properties within the district received such an inspection at least once every three years. Property owners were notified in writing of the result of their inspections. Owners of properties represented no maintenance issues receive a thank you card in the mail, while those who have violations receive a written citation which is then handled as any other violation. Properties that show signs of distress, but do not rise to a violation, will receive warning letters detailing the care that is needed to prevent the issue from becoming a formal violation.

*Community Housing Impact and Preservation (CHIP) Program:* The city and also its partner organization, Wayne County, have participated in the Ohio Development Services Agency's CHIP program since 1994. The program provides funds to assist low-income homeowners with grants to perform a merge and CIA repairs, such as replacing our roof or a furnace. It also funds larger home rehabilitation efforts, which include lead-paint remediation and removal. Another element of the program is grant funding for landlords to help cover up to 75% of the cost of rehabilitating an apartment unit in return for rent controls to ensure affordability for low to moderate-income families. To date, over 600 homes countywide have been saved from damage that may have otherwise been alternately led to demolition. The city most recently applied for a new round of funding to conduct additional projects in 2019 through 2021.

*Wayne County Housing Coalition:* The Wayne County housing coalition, of which the City of Wooster is a member, is a consortium of governmental, nonprofit, and private organizations with a focus on coordinating the housing needs of the community. The agency serves to coordinate resources to address housing emergencies, and it works to educate the community on issues facing homeowners, sellers, landlords, and tenants. The organization assists with the point in time homeless counts (108 in Wayne County for 2019) and also comprises the housing advisory committee that helps to advise the city on its chip program.

*Emergency Shelter Resources:* The Salvation Army of Wooster operates an emergency shelter with accommodations for families, men, and women. The organization also offers a hot lunch weekdays for those in need. One Eighty provides emergency housing and operates a domestic violence shelter welcoming women and children. Both agencies serve as a clearinghouse for emergency Housing Resources and referrals with other Wooster area agencies.

**Housing Make-Up:** Founded in 1808, Wooster has a rich history and architecture almost as old. The community is comprised of an estimated 12,016 housing units in the City, divided 56.1% and 43.9% between owner-occupied and rental units respectively. The average occupied housing unit averages 2.43 people (2.29 owner-occupied, and 2.04 for renter-occupied). See **Table 23** and **Table 24**.

**TABLE 23: Wooster Housing Occupancy Figures**

Occupied housing units	10,967	10,967	Total housing units	12,016	12,016
Owner-occupied	6,157	56.10%	Occupied housing units	10,967	91.30%
Renter-occupied	4,810	43.90%	Vacant housing units	1,049	8.70%
Average household size of owner-occupied unit	2.29%	(X)	Homeowner vacancy rate	1.4	
Average household size of renter-occupied unit	2.04%	(X)	Rental vacancy rate	5.3	

1. Figures summarized from Table B02001, Housing Characteristics: 2013-2017 American Community Survey 5-Year Estimates.

Special Note on all proceeding maps: Very small sample sizes for some housing classifications result in mapping that is likely erroneous if interpreted strictly. Additionally, categories are defined by natural break method for the particular population sampled, and vary from map to map.

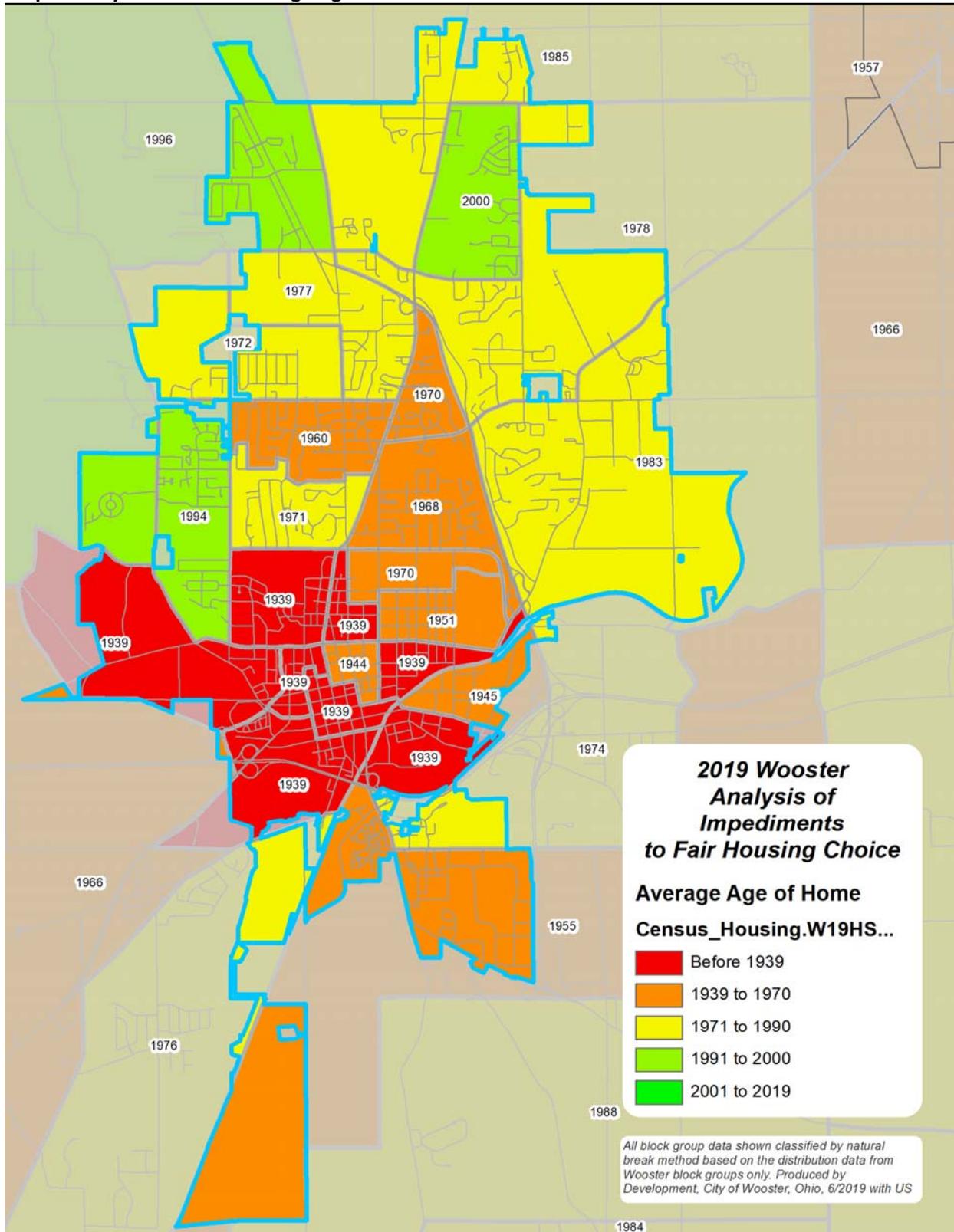
*Housing Age, Use, and Status:* The oldest concentration of homes rest in and immediately around the downtown, the first-settled area of the City. **Map 27** outlines the general age of housing throughout the city, showing a pattern of more recent builds radiating from the downtown core. Wooster’s oldest homes stand near downtown in its historic residential neighborhoods where many have undergone extensive renovations and have proved desirable and safe living opportunities. This reinvestment was buoyed in part by the Howie House project, an effort championed by the City’s downtown business association, Main Street Wooster, which undertook heavy reinvestment into several dilapidated, but structurally sound historical properties. While the majority of housing offers promise, a sizeable number of older homes are beyond repair, having potentially been built with a short-term purpose in mind and with poor quality techniques. Given poor layouts and certain maintenance deferred for decades, these units are highly desired for their affordability, but some have grown far past their useful life or economic solvency even with programs such as the CRA and CHIP. Such properties are frequently candidates for equity bleeding among investors. Radiating from the downtown core is housing that was constructed from the end of World War II through the 1970s. This point in time shares a lot in common in terms of construction techniques and techniques given their mass production. The homes tend to share standardized ceiling heights and more marketable room layouts. They are also strong candidates for harboring lead-based paint, which was not banned until 1978. Surrounding the hospital district and extending northward are homes that were constructed largely from 1971 to 1990. Many of these homes are just now entering the phase where major repairs and upgrades may be

**TABLE 24: Wooster Homes By Age**

Total housing units	12,016	100.0%
Built 2014 or later	49	0.4%
Built 2010 to 2013	218	1.8%
Built 2000 to 2009	1,571	13.1%
Built 1990 to 1999	1,564	13.0%
Built 1980 to 1989	1,194	9.9%
Built 1970 to 1979	1,608	13.4%
Built 1960 to 1969	1,245	10.4%
Built 1950 to 1959	1,439	12.0%
Built 1940 to 1949	599	5.0%
Built 1939 or earlier	2,529	21.0%

1. Figures summarized from Table B02001, Housing Characteristics: 2013-2017 American Community Survey 5-Year Estimates.

**Map 27: City of Wooster Average Age of Home**



2017 Housing Characteristics Data, US Census Bureau, 2017 ACS Data

necessary to maintain modernity and usefulness. These homes are also larger than their predecessors, and relatively abundant in terms of inventory. With the exception of a very small fraction of these homes, lead-based paint is not a concern. This type of housing tends to be old enough to offer affordability and still desirable for many entry-level home buyers. Similarly, apartments constructed in this timeframe also provide a reasonable amount of space and structural reliability without the cost associated with new communities. Largely occurring at the city's northern extents is new construction which took place from 2001 through the present. The majorities of these properties offer the latest in technology and amenities, the largest unit floor spaces, and carry little concern of any major maintenance. These properties also tend to be among the highest priced in the community.

**Map 28** highlights where new housing construction that has taken place in the last two decades. In concert with the previous map, the greatest volume of new construction took place along the city's northern edges. Notably, there is substantial investment observed in the downtown core, where multiple projects have taken place to convert vacant commercial floor space. There has also been investment noted in some of the historic neighborhoods to the north, spurred in part by investment from the College of Wooster, the CRA program, and also Habitat for Humanity. The remainder of neighborhoods surrounding downtown, however, experience the lowest amount, if any, of new housing construction.

**Map 29** displays the distribution of renter-occupied housing. The greatest concentration of renter housing occurs through the downtown core and its historic neighborhoods. Areas near the hospital District the College of Wooster and the Akron Road priority area also show a relatively high volume a renter-occupied housing, owing in part to multiple popular apartment communities in the area. Owner-occupied housing becomes more prevalent to the north and west of the city, which were established as single family neighborhoods.

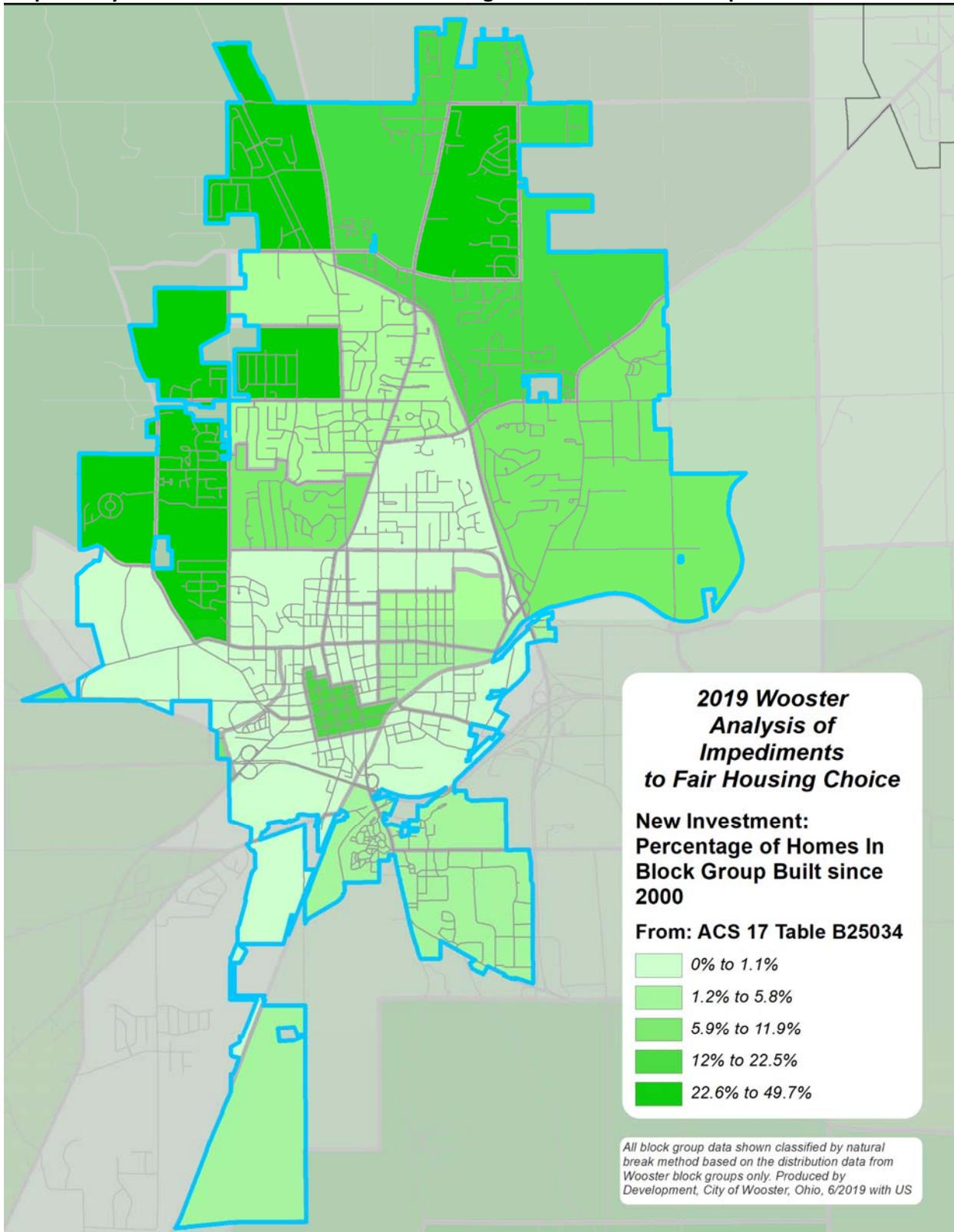
**Map 30** illustrates, in very broad generalization, how Wooster average rents compare to the countywide average. With exception to Downtown, rents in the southern half of the city are generally average to below average. Rents generally increase northward, with the highest being observed in the Northeast and which features among the newest rental housing in the community. **Map 31** shows average housing values for owner-occupied housing, which is also outlined in **Table 25**.

**TABLE 25: Owner-Occupied Valuation**

Owner-occupied units	6,157	6,157
Less than \$50,000	470	7.60%
\$50,000 to \$99,999	1,274	20.70%
\$100,000 to \$149,999	2,055	33.40%
\$150,000 to \$199,999	1,212	19.70%
\$200,000 to \$299,999	875	14.20%
\$300,000 to \$499,999	194	3.20%
\$500,000 to \$999,999	77	1.30%
\$1,000,000 or more	0	0.00%
Median (dollars)	131,600	(X)

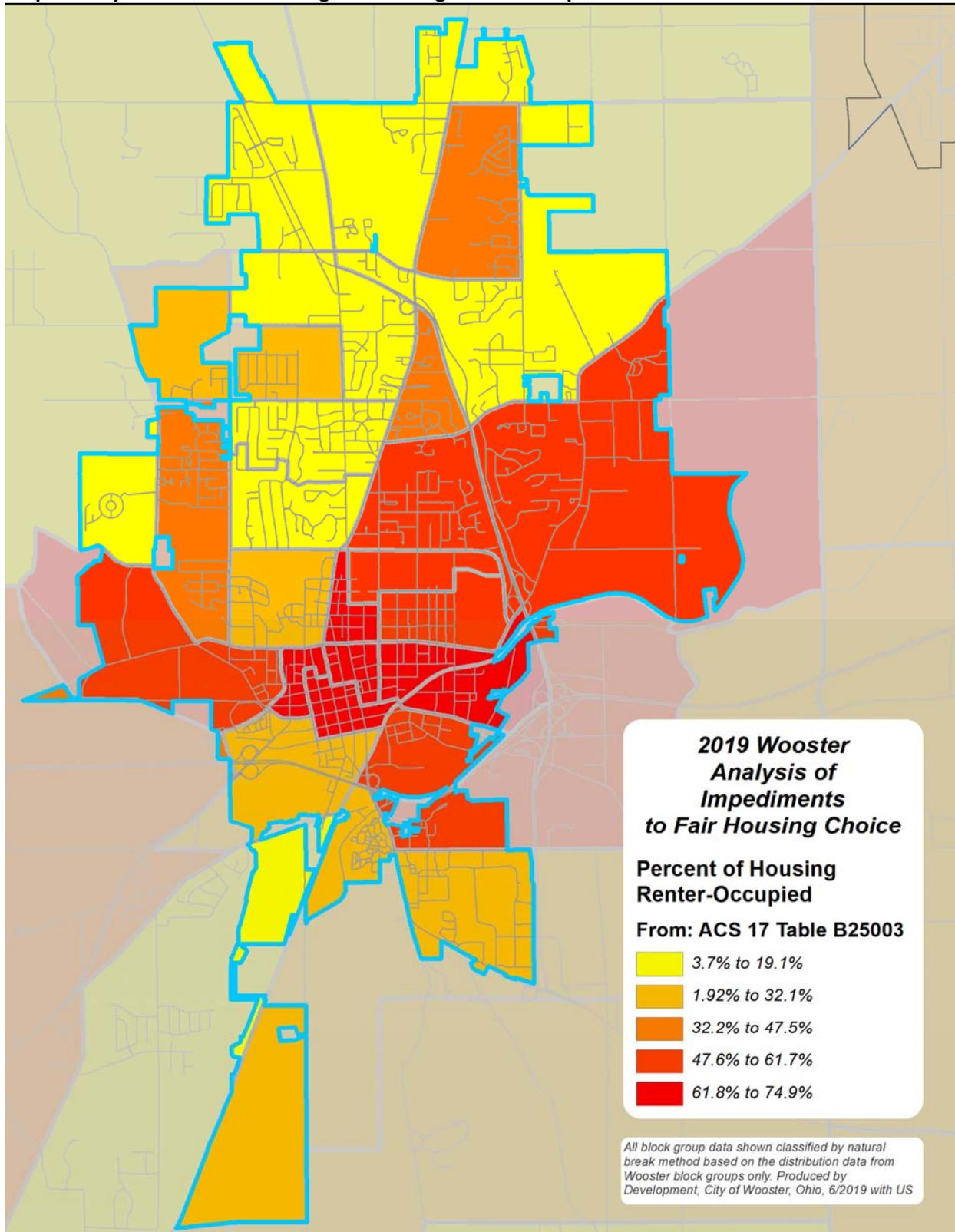
1. Figures summarized from Table S2301, Employment Status: 2013-2017 American Community Survey 5-Year Estimates.

**Map 28: City of Wooster New Investment: Percentage of Homes in Block Group Built since 2000**



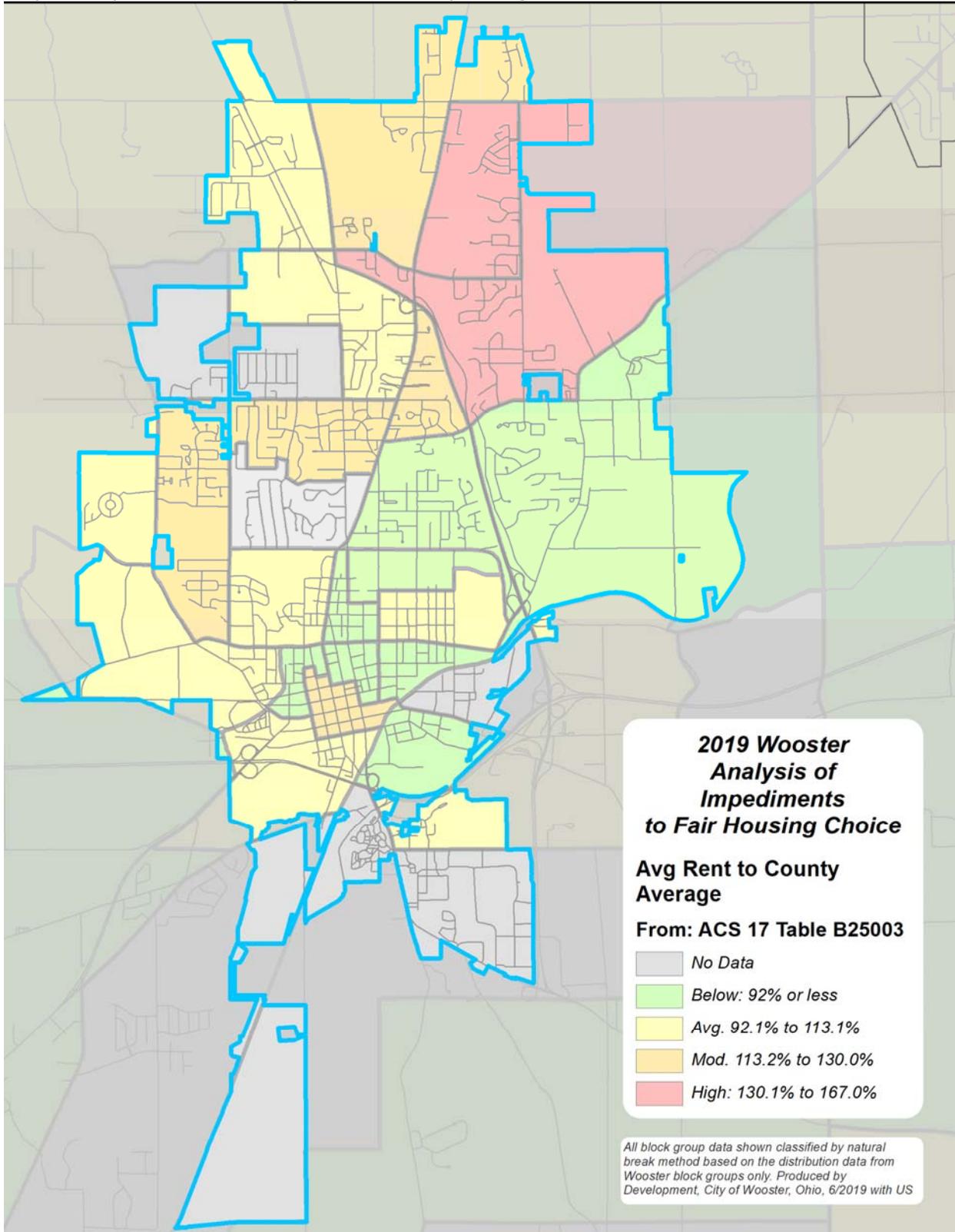
US Census Bureau, 2017 ACS Data Table B25034

**Map 29: City of Wooster Percentage of Housing Renter-Occupied**



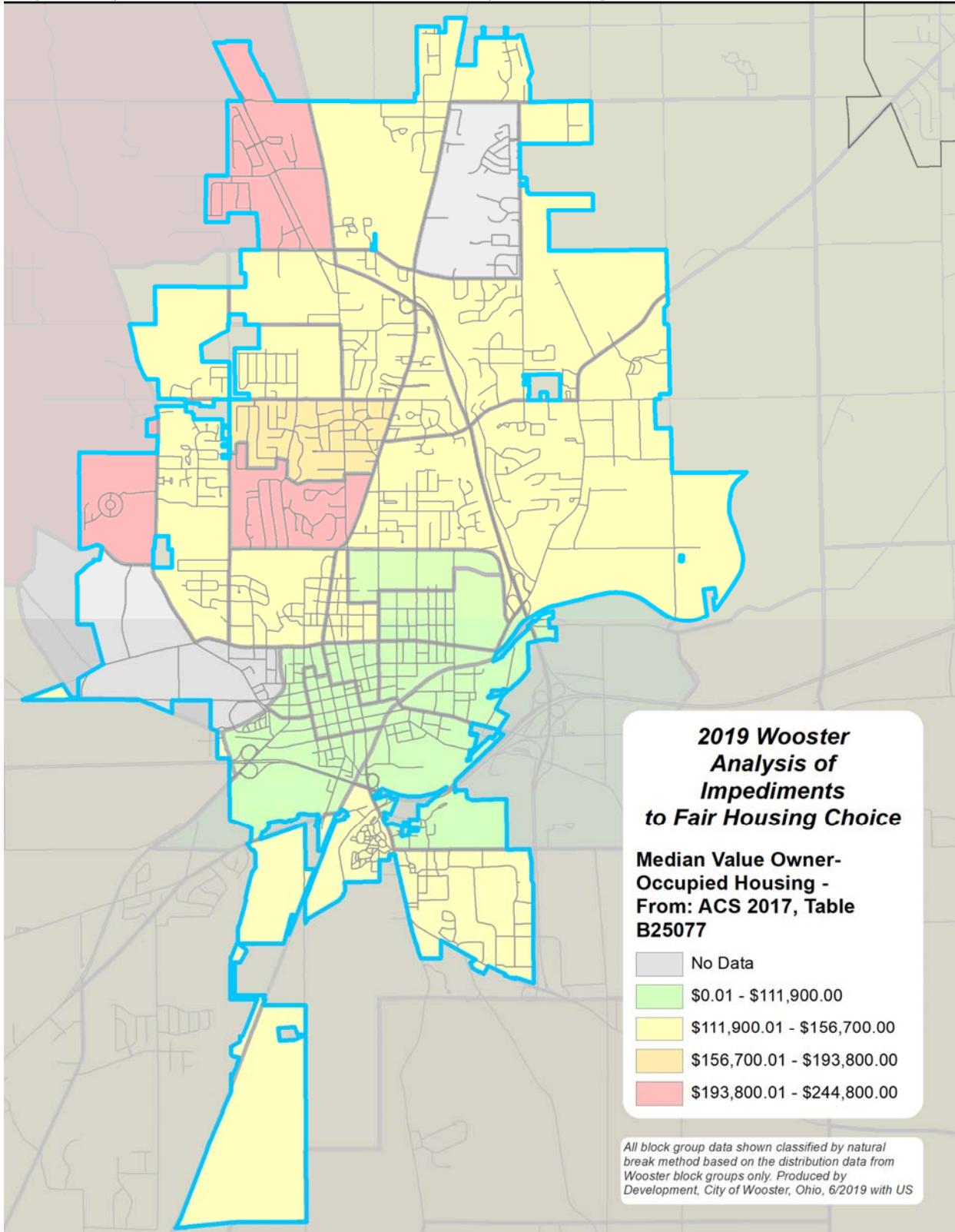
US Census Bureau, 2017 ACS Data Table B25003

**Map 30: City of Wooster Average Rent to County Average**



US Census Bureau, 2017 ACS Data Table B25003

**Map 31: City of Wooster Median Value Owner-Occupied Housing**



US Census Bureau, 2017 ACS Data Table B25077

**Map 32** displays the Wayne County Auditor’s assigned grade by parcel. The grade is a value designed to illustrate the general condition, or desirability, of property and land. Factors impacting grade include the availability of utilities and condition of public infrastructure, as well as the visible quality of the structure itself and its time of assessment. However, grade does not necessarily correspond with value or marketability, though it does suggest the higher proclivity towards tax valuation. Grade is generally shown lower in areas with very small properties, particularly in around the Downtown and also in a few of the City’s Post-War.

**Map 33** highlights delinquent properties in the City of Wooster. Properties owing the equivalent of two to three years’ worth of real estate tax are shown in blue. Properties in red indicate properties where the tax bill is the equivalent of six years of taxes or more. There is a minor disparity observed in delinquent properties in the downtown area in terms of the number of properties.

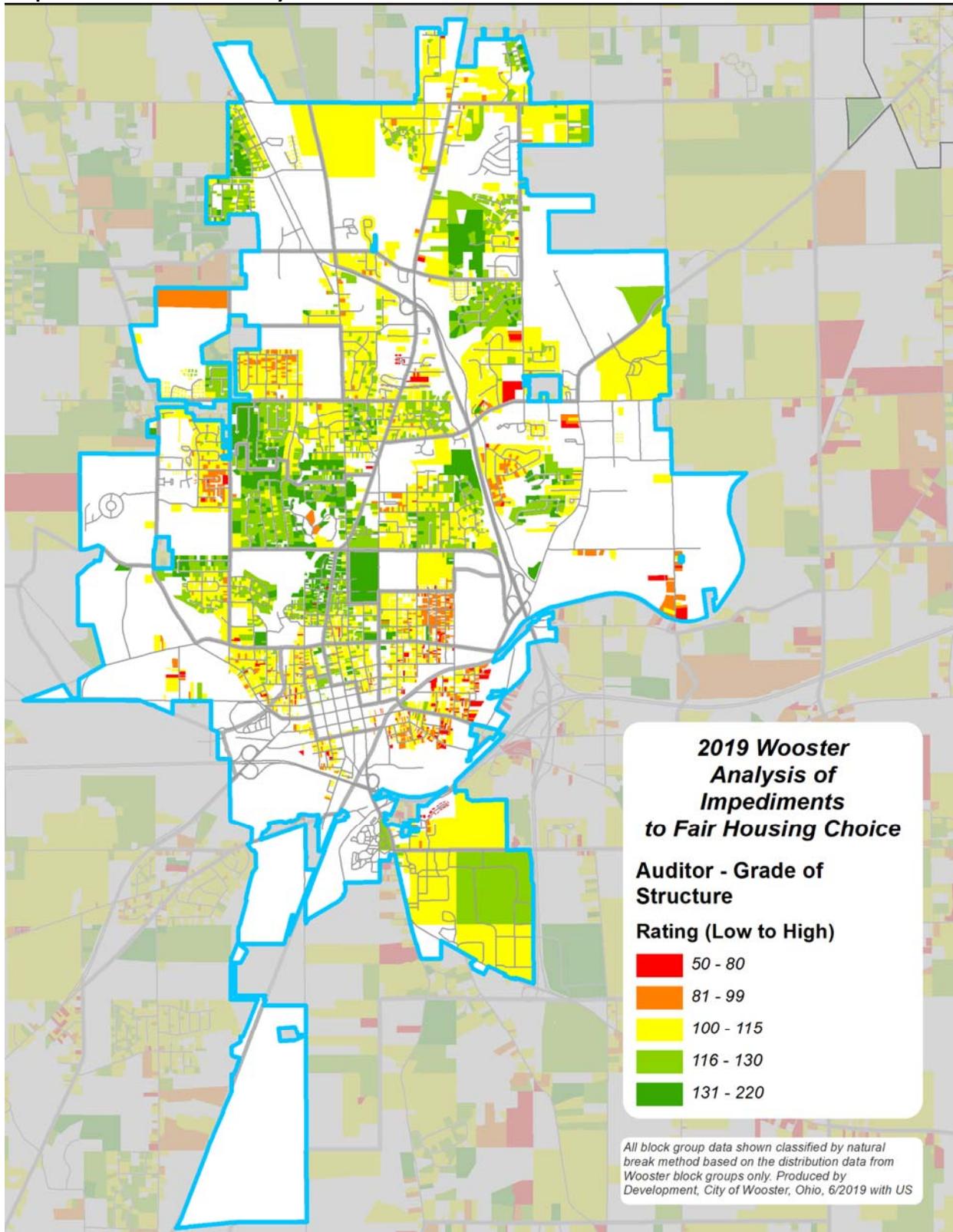
**Map 34** offers a comparison of Wooster tax delinquencies with Wayne County as a whole. While long-term delinquencies occur in almost every setting, they tend to be more common in locations of older housing stock. Long-term delinquency is a strong indication of disinvestment. Nearly a third of homes the City has demolished had been delinquent for several years. Demolitions, required in only the most extraordinary circumstances of disinvestment, costs taxpayers up to \$30,000 per building, a cost that is often never paid back. **Table 26** provides a 2018 summary by parcel of delinquent properties with the amount of taxes owed, the majority having been delinquent for greater than 6 years.

**TABLE 26: 2018 Delinquent Parcels & Taxes Owed**

DELINQUENT PROPERTIES	
Wooster Alone	Wayne County
2 Years = 124 Parcels \$819,892	2 Years = 516 Parcels \$2,747,771
3 Years = 88 Parcels \$711,775	3 Years = 346 Parcels \$2,278,495
4 Years = 74 Parcels \$661,884	4 Years = 277 Parcels \$2,000,682
5 Years = 61 Parcels \$585,959	5 Years = 214 Parcels \$1,610,227
6 Years = 55 Parcels \$553,644	6 Years = 178 Parcels \$1,373,269

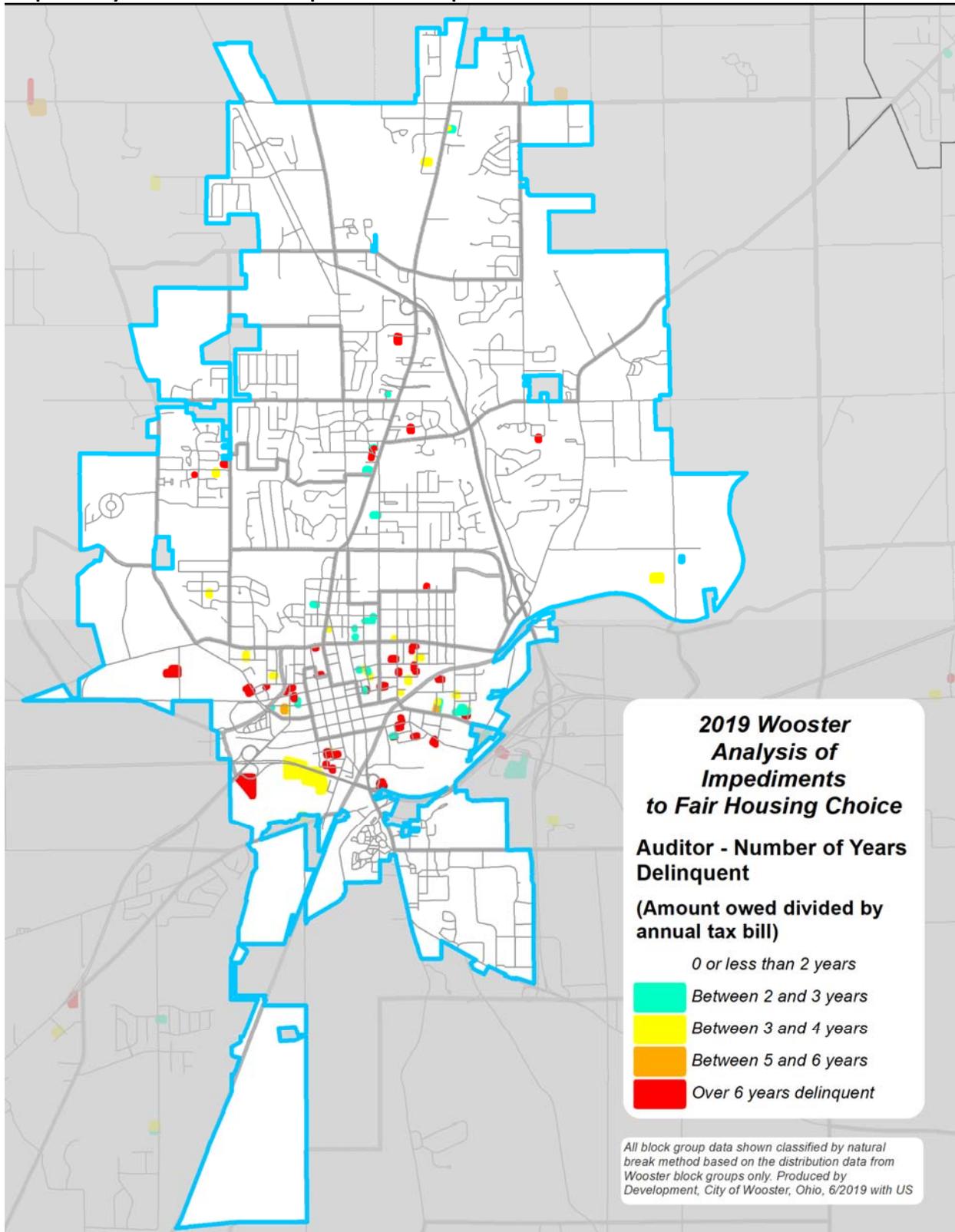
1. City of Wooster Development Analysis, 3/2018.

**Map 32: Grade of Structure by Auditor Assessment**



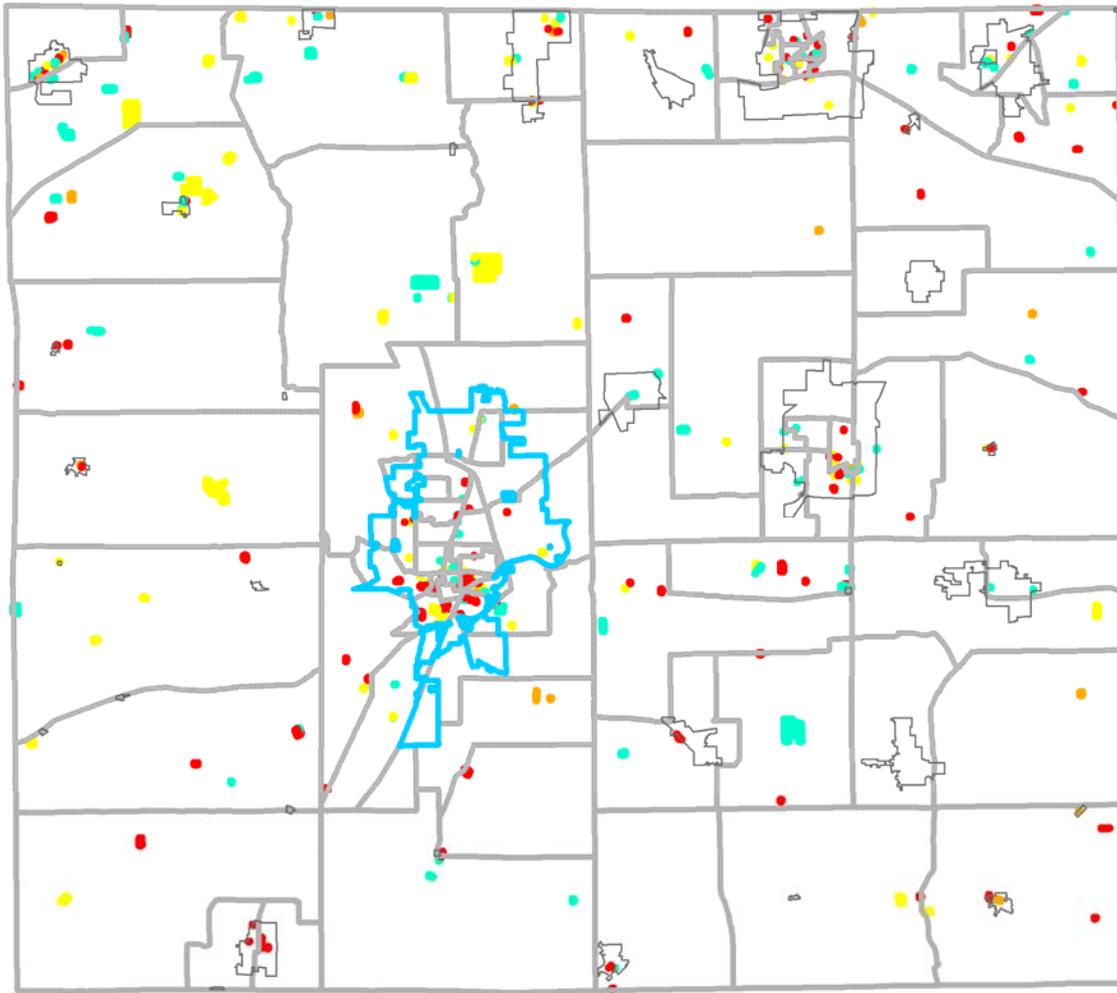
US Census Bureau, 2017 ACS Data Table B25071

**Map 33: City of Wooster Years Equivalent Delinquent Tax**



US Census Bureau, 2017 ACS Data Table B25071

**Map 34: Wayne County Years Equivalent Delinquent Tax and Unit Density**



**2019 Wooster  
Analysis of  
Impediments  
to Fair Housing Choice**  
**Auditor - Number of Years  
Delinquent**



*All block group data shown classified by natural break method based on the distribution data from Wooster block groups only. Produced by Development, City of Wooster, Ohio, 6/2019 with US Census Bureau data.*

US Census Bureau, 2017 ACS Data Table B25071

**Degree of Segregation:** While only 9.35% of the population, minority populations are generally dispersed throughout the City, but there are exceptions. Examining patterns by block group, the extreme west end of the community offers the least racial diversity, with minority populations comprising less than 3.2%, compared with a 9.35% average population citywide. Conversely, the Downtown historic neighborhoods had a minority composition ranging from 21.7% to 22.7%, as did a neighborhood north of the Hospital District. However, as discussed ahead, trends indicate a slight amelioration of any particular racial concentration, as opposed to segregation.

The following maps outline concentrations of specific races by block group utilizing 2017 American Community Survey Census Data. It should be noted that the creation or provision of such maps for the consideration of real estate development or purchase is illegal. The purpose of these maps is to aid in identifying geographic locations that may be unusually segregated, and therefore, potentially indicate a fair housing concern.

Special Note: Very small sample sizes for some racial, income, and disability classes result in mapping that is likely erroneous if interpreted strictly. Additionally, categories are defined by natural break method for the particular population sampled, and vary from map to map.

**Map 35:** City of Wooster Percentage of Caucasian Population

**Map 36:** City of Wooster Percentage of African American Population

**Map 37:** City of Wooster Percentage of American Indian Population (Invalid sample size)

**Map 38:** City of Wooster Percentage of Asian Population

**Map 39:** City of Wooster Percentage of One Other Race Alone (Invalid Sample Size)

**Map 40:** City of Wooster Percentage of Two or More Races

As mentioned previously, minority populations overall are estimated to have grown by about 10.7%, or roughly one hundred households, since 2010<sup>12</sup>. To better understand how racial patterns have changed recently **Map 41** highlights the change in the total minority population (non-White) by block group between the 2013 and 2017 American community survey. In the extreme, minority population losses from block groups ranged up to 12.9%, while gains of up to -10% were observed in neighboring block groups. **Map 42** details actual raw changes in minority population between 2013 and 2017, and provides context to the proportional changes, showing that only a few households relocating into or away from a neighborhood can drive substantial changes in proportionality.

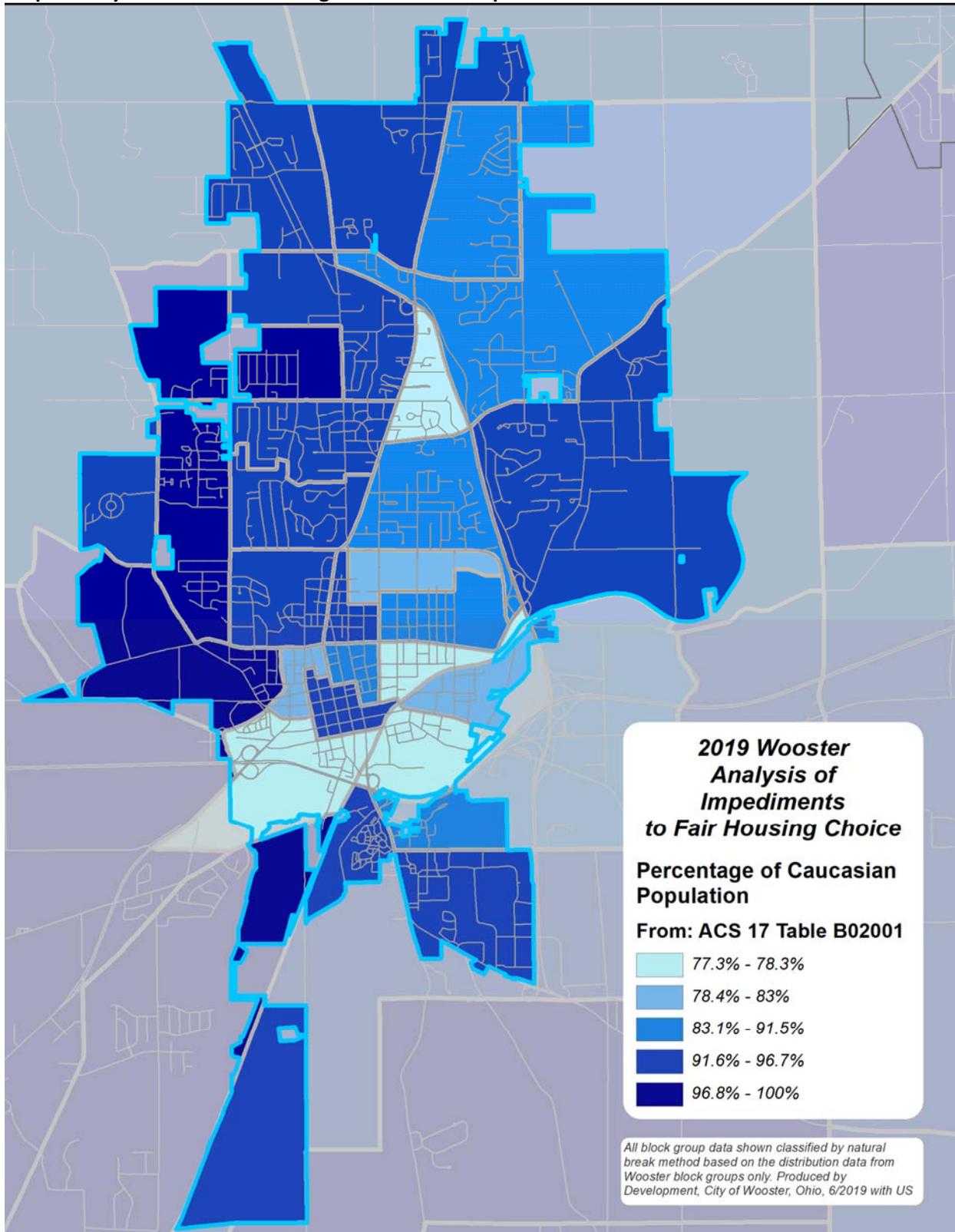
Areas with low minority populations, such as along with western extents of the city, saw very small increases over previous periods. There was a small decrease in minority populations in Wooster's historic neighborhoods, which saw populations grow anemically over the same period. As an indication, this shows that any tendency toward segregation is very weak. However, keeping in mind the limitations of the Census data and its wide margins of error, all geographic data is prone to significant error.

**Map 43** highlights the dispersion of persons with disabilities. Wooster Southwest neighborhood shows up with an unusually high rate of 67% of its households reporting a disabled resident. The average ranges from about 10% to 35% with a similar distribution throughout low-income and wealthy areas alike. While there is not a concern of segregation, the map does illustrate another level of vulnerability, one that may have fewer resources to address in low-income areas.

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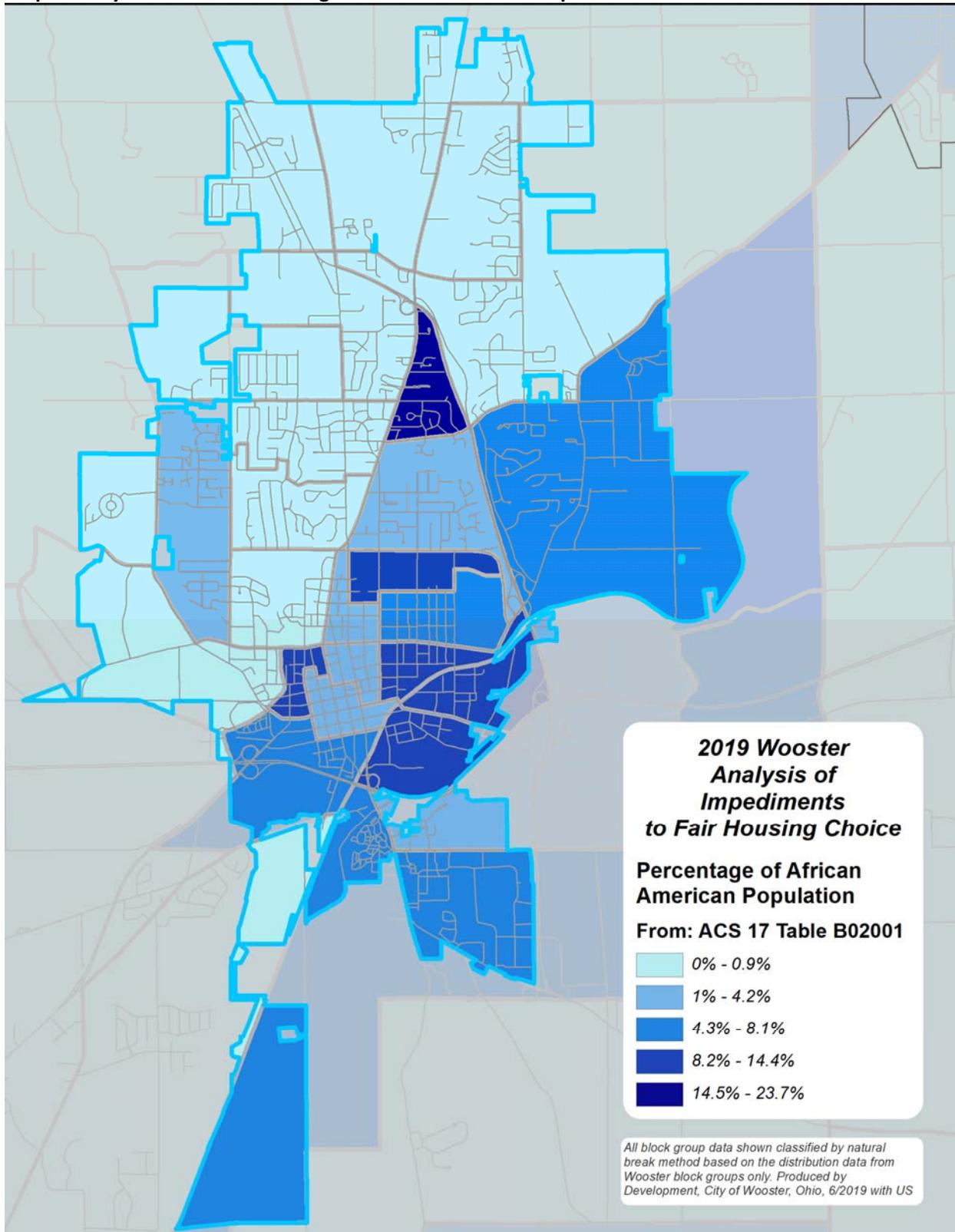
<sup>12</sup> Table B02001, Race, Universe – Total Population, 2009-2014 and 2017 American Community Survey.

**Map 35: City of Wooster Percentage of Caucasian Population**



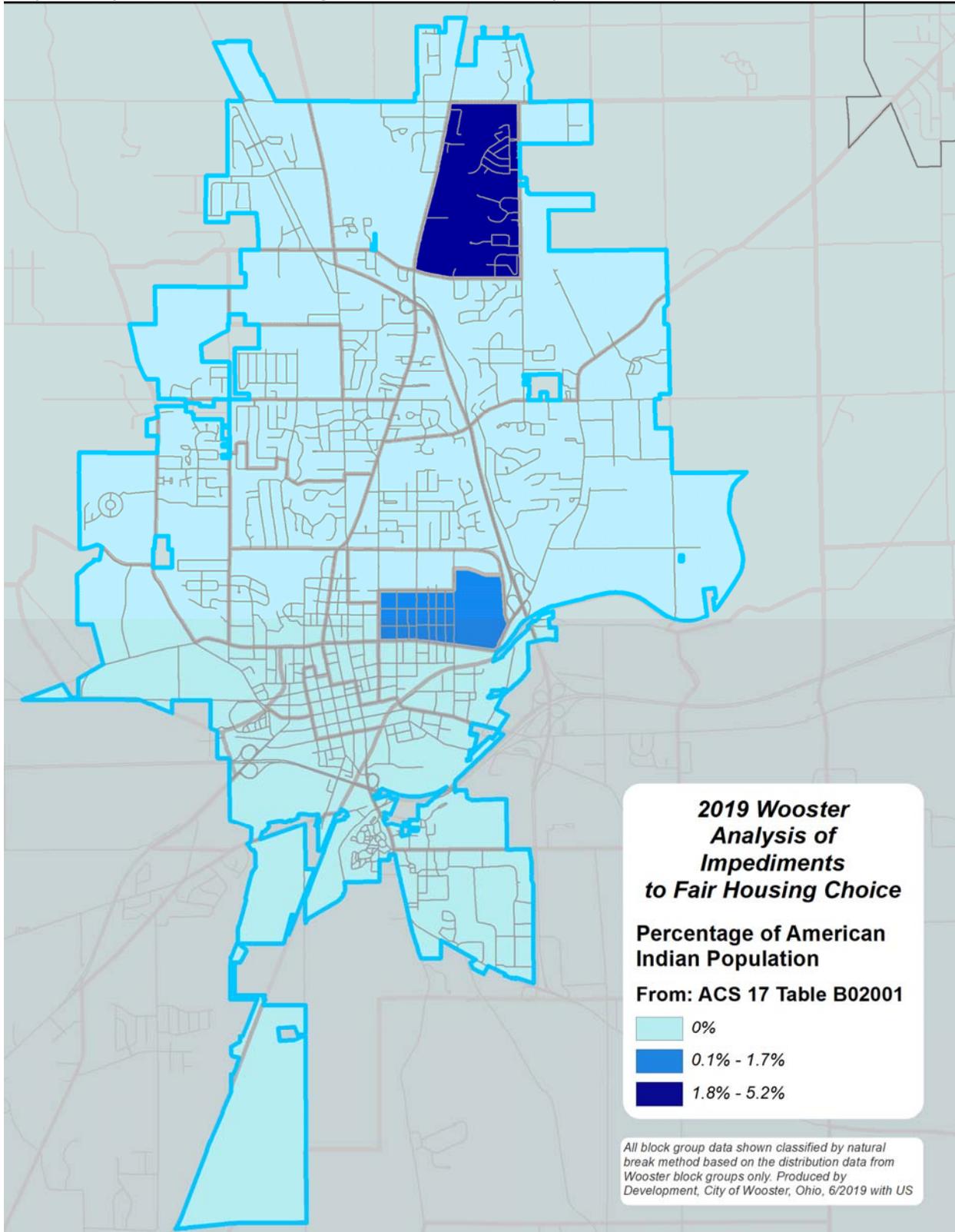
US Census Bureau, 2017 ACS Data Table B02001

**Map 36: City of Wooster Percentage of African American Population**



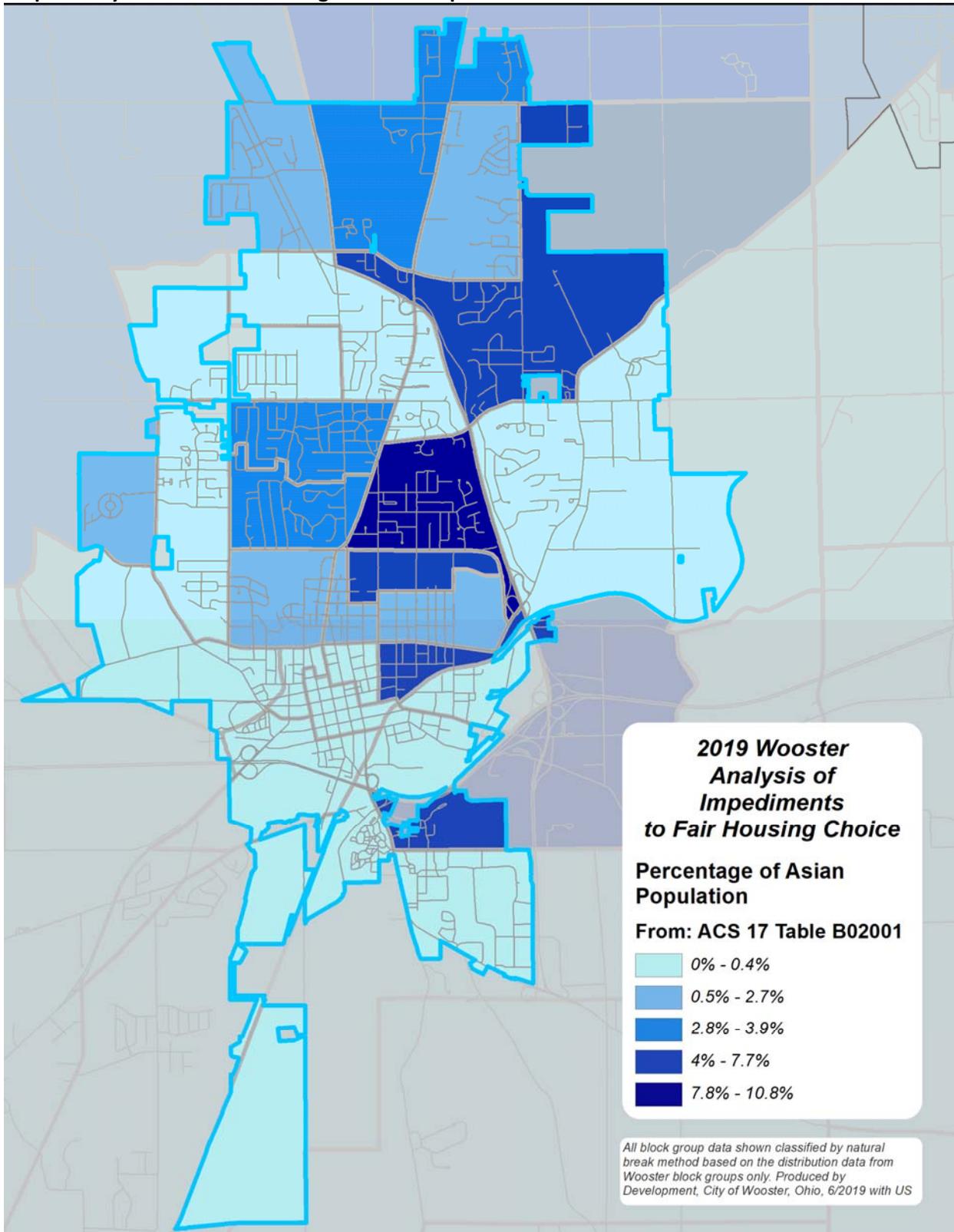
US Census Bureau, 2017 ACS Data Table B02001

**Map 37: City of Wooster Percentage of American Indian Population**



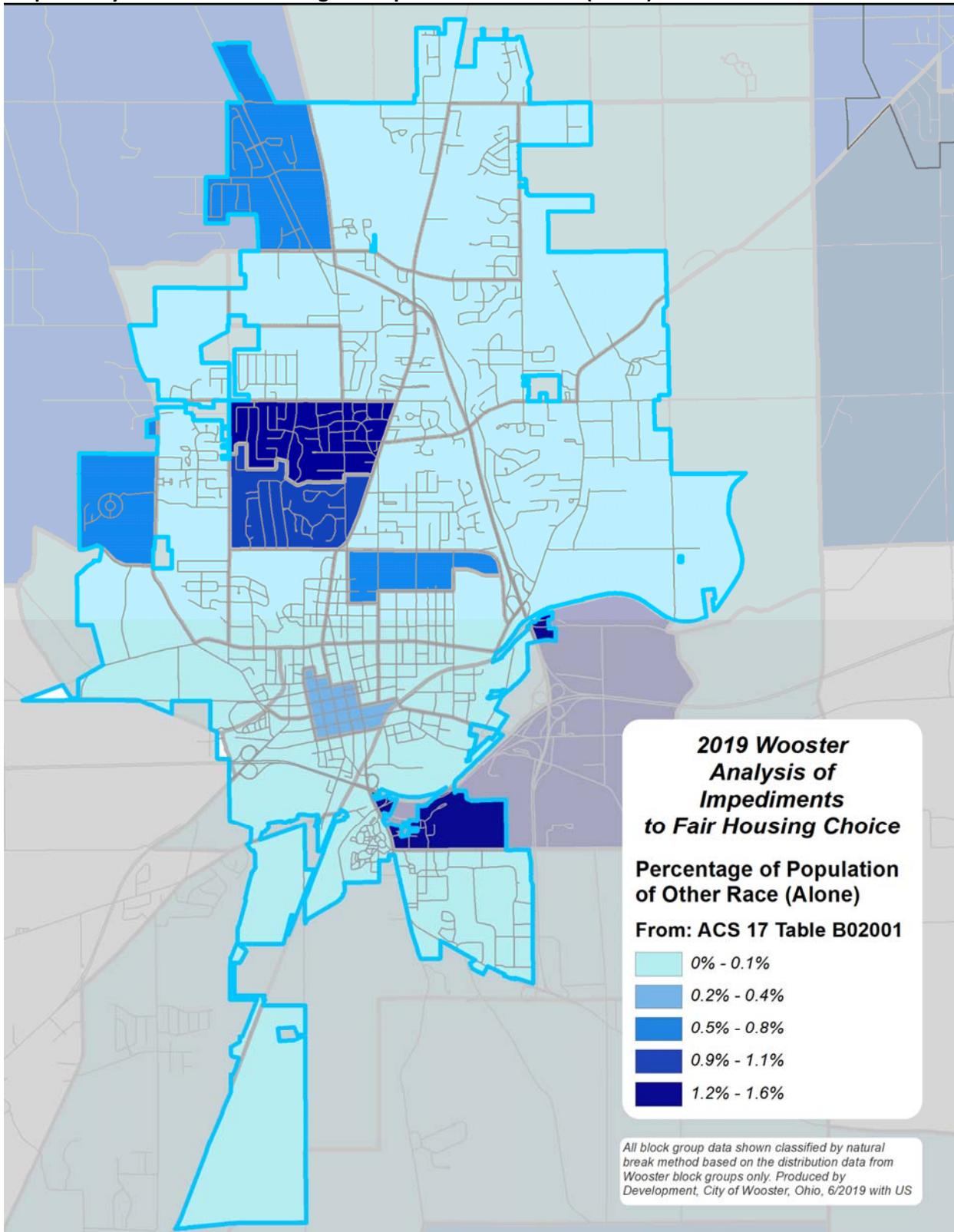
US Census Bureau, 2017 ACS Data Table B02001

**Map 38: City of Wooster Percentage of Asian Population**



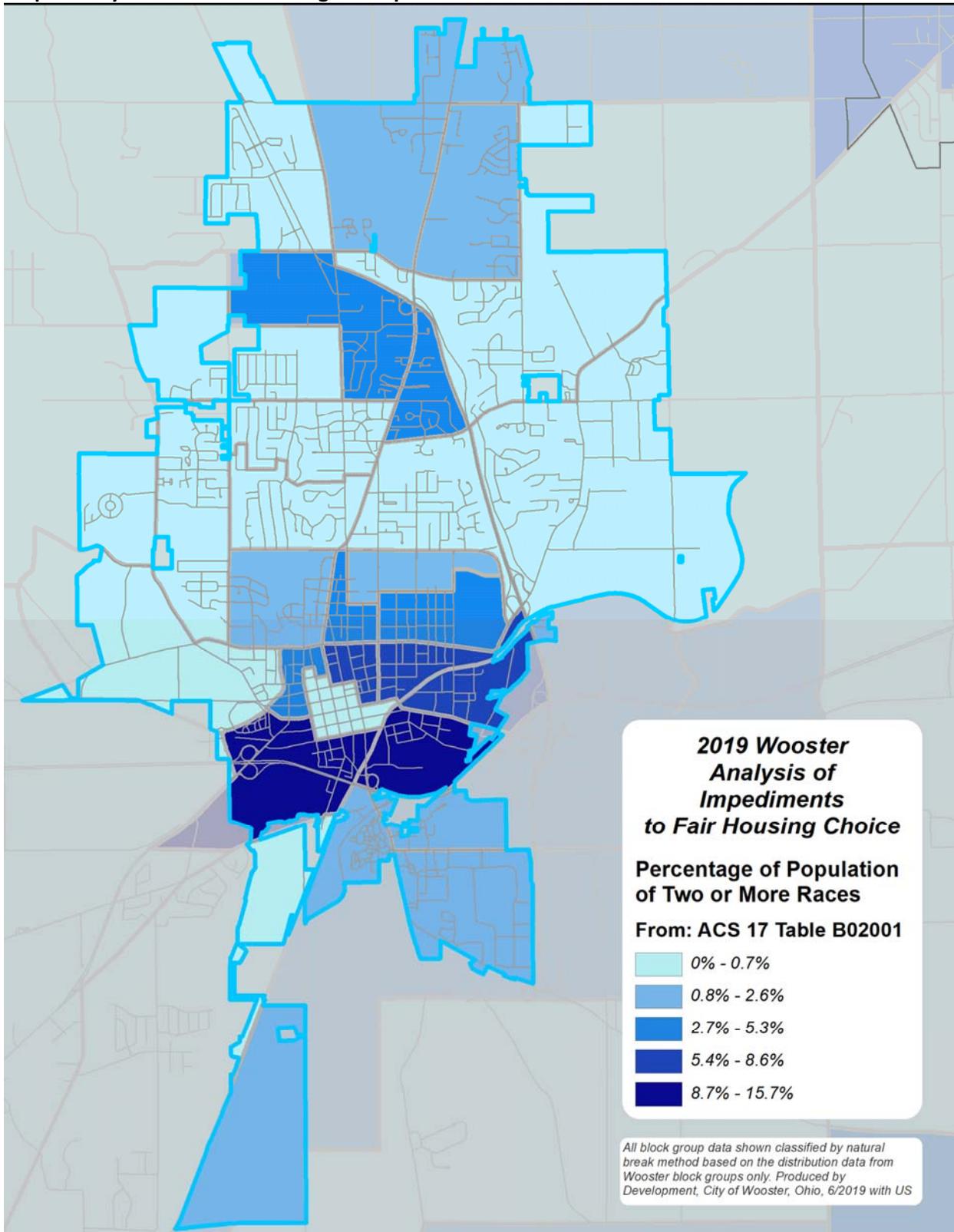
US Census Bureau, 2017 ACS Data Table B02001

**Map 39: City of Wooster Percentage of Population Other Race (Alone)**



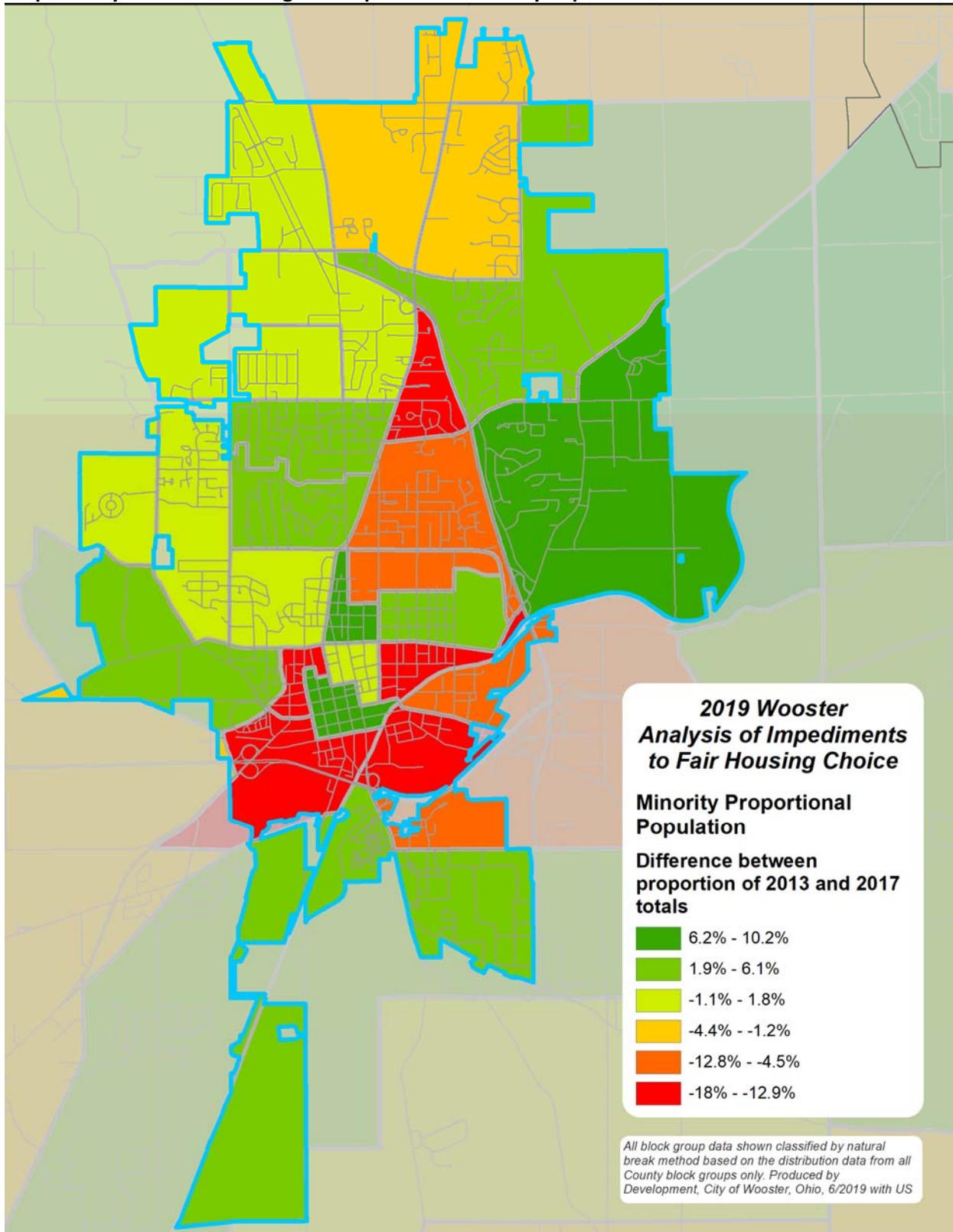
US Census Bureau, 2017 ACS Data Table B02001

**Map 40: City of Wooster Percentage of Population of Two or More Races**



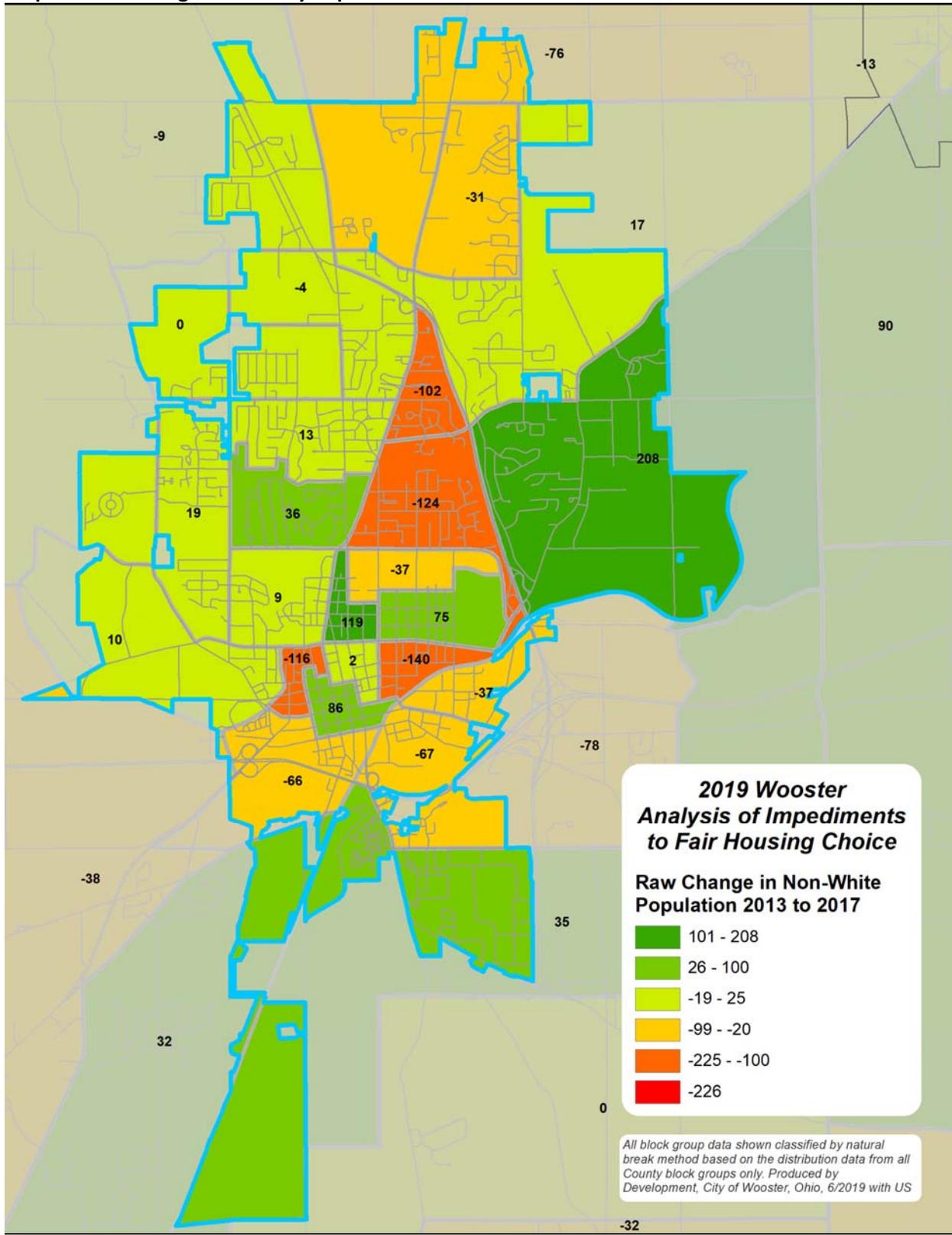
US Census Bureau, 2017 ACS Data Table B02001

Map 41: City of Wooster Change in Proportion of Minority Population 2013 to 2017



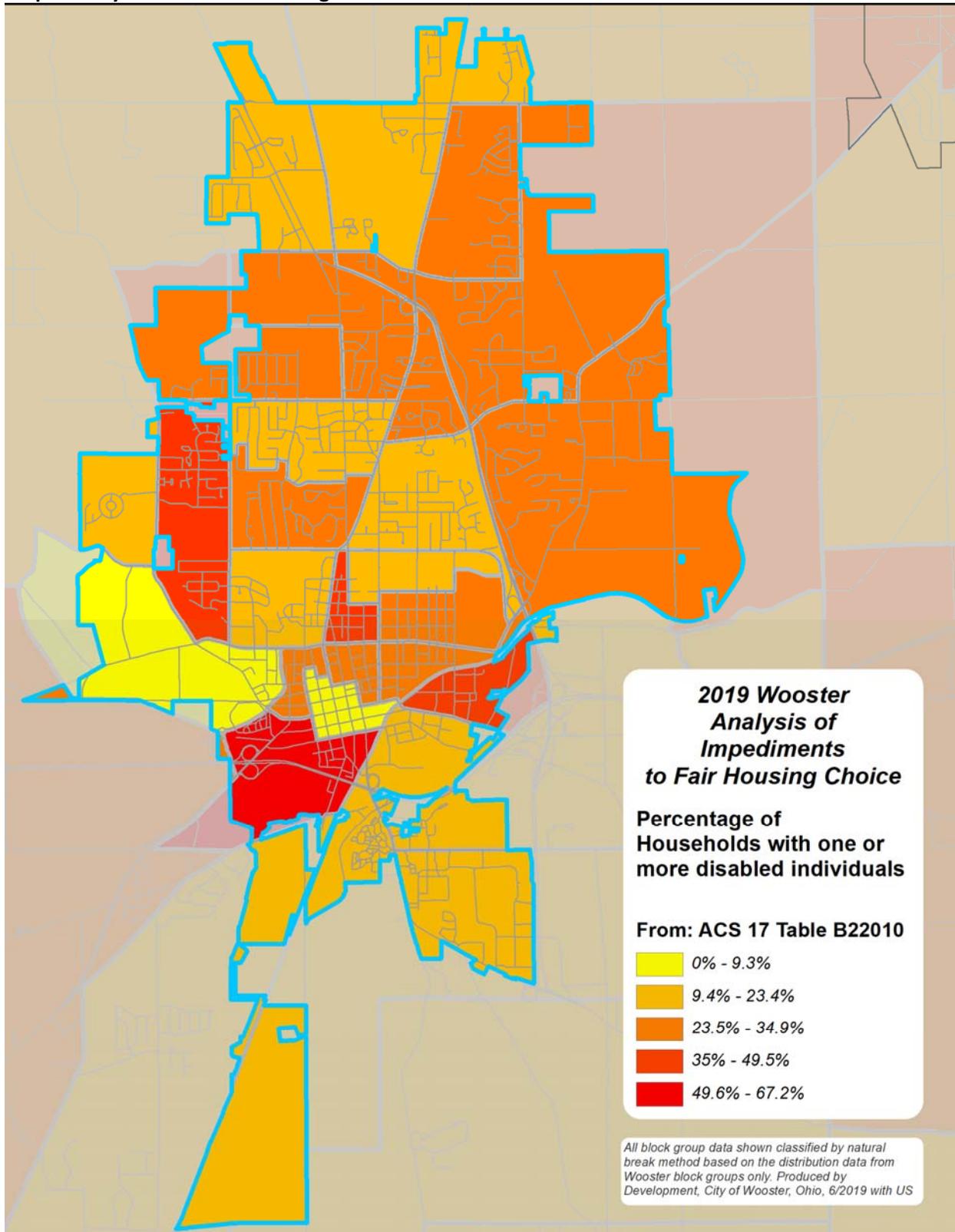
US Census Bureau, 2017 ACS Data Table B02001 and 2013 ACS Data Table B02001

**Map 42: Raw Change in Minority Population**



US Census Bureau, 2017 ACS Data Table B02001 and 2013 ACS Data Table B02001

Map 43: City of Wooster Percentage of Households with One or More Disabled Individuals



US Census Bureau, 2017 ACS Data Table B22010  
*the2018*

## Evaluation of Jurisdiction's Current Fair Housing Profile

### Local Complaint Analysis

Since the beginning of 2016, when the last analysis of impediments to fair housing study was completed, the City of Wooster Fair Housing Program (“Program” herein) has fielded 175 fair housing complaints or questions through its hotline and walk-in visits. Most inquiries were handled with a phone conversation, though a few involve walk-in visits and in-person appointments. Landlord-tenant concerns, such as a dispute over lease terms or eviction notices, constituted roughly half of all complaints fielded. While property maintenance concerns made up a little less than half of all complaints. (Many more complaints on property complaints were made directly to the City’s Building Standards Division.) About 26% of all calls dealt with either a fair housing question or a concern about one’s fair housing rights. A little less than 20% of all inquiries received originated from outside of the jurisdiction.

**Complaint Process:** The Program is managed by a designated Fair Housing Officer who is generally available over business hours to assist the public with fair housing questions, concerns, or complaints. Every call, letter, or visit to the Program seeking fair housing assistance, whether or not an actual fair housing issue, is logged for the purposes of future review and analysis. In all instances, the Fair Housing Officer listened to concerns, shared appropriate fair housing information, and worked to connect all seeking assistance to the appropriate local and state resources. Legal advice is expressly not provided by the Program, but routine references to fair housing and landlord-tenant law will be provided when it is available.

When a complaint has the potential to relate to fair housing, the Fair Housing Officer provided the inquirer with information regarding housing rights and housing remedies, provided access to educational materials and literature, and ensured routing to the Ohio Civil Rights Commission’s local office (Regional Ohio Civil Rights Commission: 330.643.3100, Mailing: Akron Gov. Center, 161 S. High Street, Suite 205, Akron Ohio 44308). Those wishing to make complaints were also invited to complete any forms at Wooster City Hall (or a partner agency’s office) when they were unable to travel or otherwise file their signature with the Akron office. The Wooster Fair Housing Program also responded to fair housing concerns by formal letters to document its receipt of a concern and list possible resources, including applicable references to laws or policies if available and appropriate. Any follow-up reporting action is taken as needed.

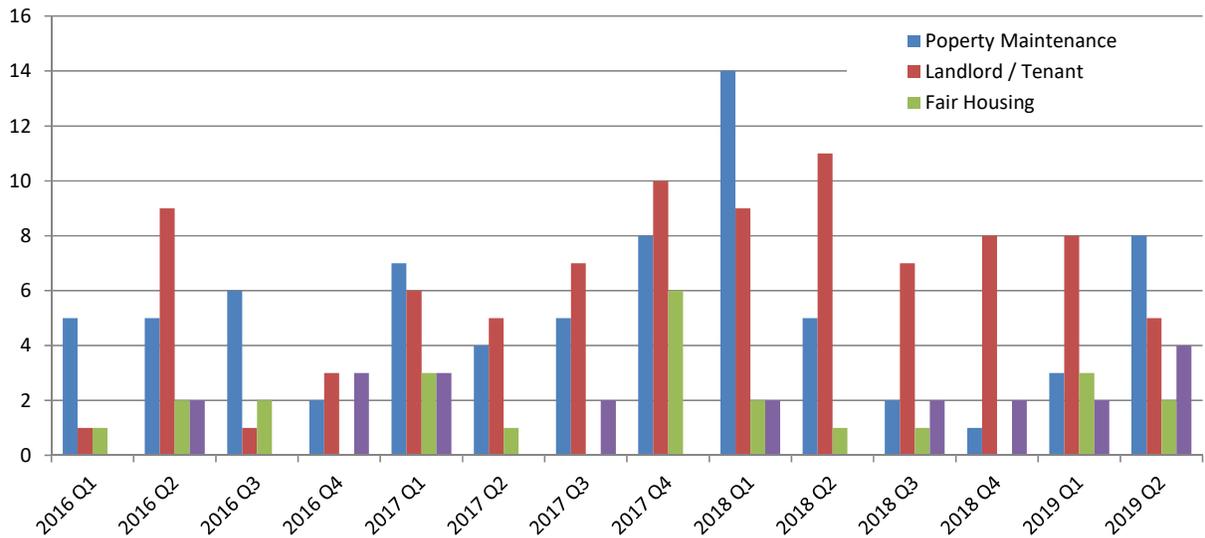
**Period Trends:** Starting in 2016, the City conducted its fair housing program in-house in lieu of using a consultant. The City created customized fair housing materials and engaged in direct outreach services and education, which likely contributed to an increased awareness of the program and correspondingly, an increase in call volumes. Starting in 2018, the decline shown in property maintenance concerns is due to changes in the fair housing intake process, where callers with property maintenance complaints only were automatically directed to the City’s Building Standards Division by the Program’s phone system. Similarly, out-of-jurisdiction calls declined for the same reason, as callers were directly transferred to the Wayne County program. The automated call forwarding was added increase response times.

The Fair Housing Program averages one inquiry per week. There was a notable uptick in calls starting toward the end of 2017 and going into 2018. During the same time, the program received an increase in landlord-tenant calls. The majority of landlord-tenant calls dealt with evictions or the lack of repairs being made when promised, and occasionally rent increases. In instances where a tenant faces imminent displacement due to an eviction, the program will provide resources on emergency housing opportunities. Every once in a while, tenants will directly express that they wish to get their landlord “in

trouble” after receiving eviction notices for failure to pay, or occasionally, a tenant will make a complaint about the property's condition, in the hopes that the city will be able to force the landlord to stop the eviction process and keep the tenant. (To the contrary, the City's property maintenance program is completely separate from any proceedings between the landlord and the tenant. Additionally, tenants are also cited for any violations for which they are responsible, including hoarding and conditions leading to insect infestation.)

**Table 27: Wooster Fair Housing Program Complaint Intake (Both Wooster and Out-of-Jurisdiction)**

	Total by Program					Wooster Fair Housing Calls				
	Total	Property Maint.	Landlord/ Tenant	Fair Housing	FH Info.	Total	Property Maint.	Landlord/ Tenant	Fair Housing	FH Info.
2016 Q1	6	5	1	1	0	5	4	1	1	0
2016 Q2	13	5	9	2	2	8	4	4	2	2
2016 Q3	10	6	1	2	0	7	4	0	1	0
2016 Q4	8	2	3	0	3	8	2	3	0	3
2017 Q1	13	7	6	3	3	9	6	5	1	2
2017 Q2	9	4	5	1	0	8	4	4	1	0
2017 Q3	13	5	7	0	2	9	4	4	0	2
2017 Q4	18	8	10	6	0	16	7	8	5	0
2018 Q1	22	14	9	2	2	15	13	6	1	1
2018 Q2	14	5	11	1	0	11	5	8	1	0
2018 Q3	11	2	7	1	2	11	2	7	1	2
2018 Q4	10	1	8	0	2	10	1	8	0	2
2019 Q1	11	3	8	3	2	11	3	8	3	2
2019 Q2	17	8	5	2	4	15	8	5	1	4
PERIOD	175	75	90	24	22	143	67	71	18	20
Percent	100%	43%	51%	14%	13%	100%	47%	50%	13%	14%



1. Property Maintenance concerns are referred to the City's Property Maintenance Inspection Program and are investigated in-person by the Zoning Inspector when permitted by the occupant.
2. Landlord/Tenant concerns include questions on non-performance with lease terms, disputes over rents, and evictions.
3. Fair Housing concerns are complaints where discrimination is specifically reported.
4. FH Info concerns are requests from information on fair housing rights and responsibilities.

Complaints are classified into four categories:

1. Property Maintenance – This type of complaint deals with a lack of repairs or neglect occurring at a property. Callers are encouraged to request an inspection from the City of Wooster Property Maintenance Inspector, which can sometimes be arranged the same day. Complainants are advised of landlord-tenant law resources, including COHHIO, and referred to the Ohio Revised Code, and provided information on placing rents into escrow. The Property Maintenance Inspector then follows up with the Program on the outcome of their contact with the complainant. Complaints have ranged from purely cosmetic issues such as paint color (not addressed by the Property Maintenance Program) to safety issues such as electrical outlets being illegally installed on a kitchen floor to furnaces being left broken during cold weather.
2. Landlord Tenant Calls – This complaint concerns issues between landlords and tenants over terms, finances, and the use of the property. Complainants are referred to COHHIO, Community Legal Aid, the Fair Housing website’s rent-escrow resources, and also the Ohio Revised Code.
3. Fair Housing – These complaints indicate that there is a possible allegation or perception of unlawful discrimination. A complaint does not confirm that a fair housing violation has taken place. While these numbers include substantiated cases of willful fair housing misconduct, they also include cases concerning landlord conduct that was not unlawful. When possible, the Program follows up with complainants in writing with supporting documentation.
4. Fair Housing Information – These inquiries seek information about fair housing in general. For instance, the Program regularly fields calls and visits from new landlords who ask for advice on how to be compliant in selecting new tenants or managing new properties. Other times, an individual may request advice on how to find an apartment willing to accept their ESA. As appropriate, follow-up information is provided in writing.

### 2016-2019 Fair Housing Most Common Concerns

Disability and familial status accounted for the most common complaints. Complaints were also made concerning sex and race. In most cases, landlords seemed readily willing to abide by fair housing requirements once they received clarification. However, the program also processed a few complaints concerning abject discrimination, including a property manager refusing to rent an apartment to a family on account of a family having Social Security disability income and an independent landlord refusing to communicate in writing with a hearing-impaired tenant.

**Disability:** Disability made up the top fair housing inquiry. Most complaints were related to lack of property maintenance or lack of access on the property. As with other property maintenance related concerns, issues regarding quality or safety of built structures was forwarded and investigated by the City of Wooster Zoning Department. Other concerns involved the ability to access common areas or parking with close proximity to building entrances. Certain complaints concerned HUD assisted properties that are typically held to a higher standard for maintenance and quality given their federal investment. Where appropriate, the program also referred complainants to the HUD Reporting Line<sup>13</sup>.

Issues surrounding Emotional support animals (ESAs) accounted for approximately a third fair housing complaints. Tenants and prospective tenants described difficulty in gaining permission to retain or bring their ESAs into their homes. Some landlords expressed concerns over the validity of ESA accommodation requests. The Wooster Fair Housing Program advises that landlords may request documentation from the requestor’s medical professional that specifies the ESA is necessary for that individual’s treatment. And it's also common practice in this region for landlords to request veterinary records showing that an

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<sup>13</sup> HUD Reporting Line - 1-800-685-8470

ESA is being properly cared for and current on applicable vaccinations. It is also customary for landlords to ask that ESA dogs or cats be either spayed or neutered. In general, most disability-related fair housing problems stem from technical issues that landlords seemingly were not aware of or did not consider to be a problem until they learned otherwise through the Program. The Wooster Fair Housing Program followed up with all complainants in writing and provided specific documentation to their concern where appropriate. In some cases, the Program later received inquiries from landlords requesting clarification on Fair Housing policies as a tenant had shared their letter. Many landlords lack experience working with tenants who have disabilities and as a result, do not always give thoughtful consideration to requests for reasonable accommodations.

**Familial Status:** The second most pressing concern cited was familial status. At least two complaints involved landlords disallowing or discouraging the renting of apartments to families with children, one of which was substantiated resulting in a warning letter being issued. Other complaints included a landlord suggesting an apartment was not available to a couple because they were unmarried, also constituting sex discrimination.

**Race:** Racial discrimination was also a concern fielded over the period, with two complainants reporting the use of racial slurs by landlords or property management staff. Though *indicative* of unlawful discrimination, in neither instance was there any discriminatory action alleged beyond speech. Based on complaints received and in examining circumstances in surrounding communities (discussed further), race remains a concern requiring further monitoring.

**Sex:** In addition to a previously mentioned complaint, discrimination against women was reported to partner and neighboring agencies. As indicated in the regional legal findings section, this also remains a concern for future monitoring.

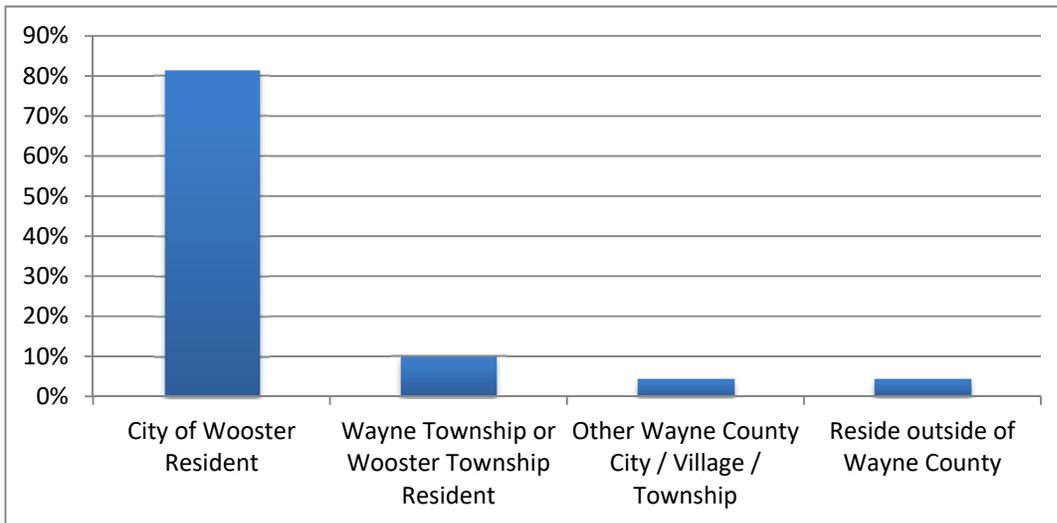
**Fair Housing Information:** The Program regularly fielded questions from individuals seeking to learn more about fair housing in general. Those inquiring included new landlords, apartment-seekers, and current landlords seeking clarifications on general matters. These inquiries are educational and preventative in nature. The volume of these inquiries generally matches that of all fair housing calls.

**On Referrals to the Wayne County Fair Housing Program:** A little over 18% of all calls and inquiries received concerned locations outside of the city's jurisdiction. The Wooster Fair Housing Program provides the same level of assistance to out-of-jurisdiction callers and walk-in visitors as in-jurisdiction complainants, with exception that the calls or meetings end with a transfer to the Wayne County Fair Housing Program, which is best equipped to advise on specific resources available in Wooster's neighboring communities. There were six concerns with regard to fair housing and two inquiries for fair housing information in general. The majority of the out-of-jurisdiction calls concerned landlord-tenant issues, while 25% concerned Property Maintenance. This includes providing advice on regional resources and common area practices. Among fair housing issues, complainants described discrimination related to sex, disability and ESAs, and age.

**2019 Fair Housing Survey:** As part of its five year analysis of impediments study, the City of Wooster conducted an online fair housing survey over social media. The survey was shared on the City’s front webpage at [www.woosteroh.com](http://www.woosteroh.com), posted across its social media accounts, and advertised on its public bulletin board and with local press outlets. After running live from June 25th, 2019 through June 28th, 2019, 70 people provided comment. The survey, not by any means scientific, was geared to solicit public comment on specific concerns. The data indicate that respondents were unique (with each survey generated from a unique internet protocol address) and many were generous in sharing details.

Approximately 80% of respondents were City of Wooster residents, with another 10% residing in either adjacent Wooster Township or Wayne Township. About 30% of the population expressed that they were not at all familiar with fair housing rights, with the other 70% reporting that they were either someone familiar (51%) or in extremely familiar (19%). About sentiment, 13% agreed that fair housing-related issues have improved for Wooster residents, 56% did not know, and 33% agreed conditions had worsened. Summary data from the survey is presented ahead:

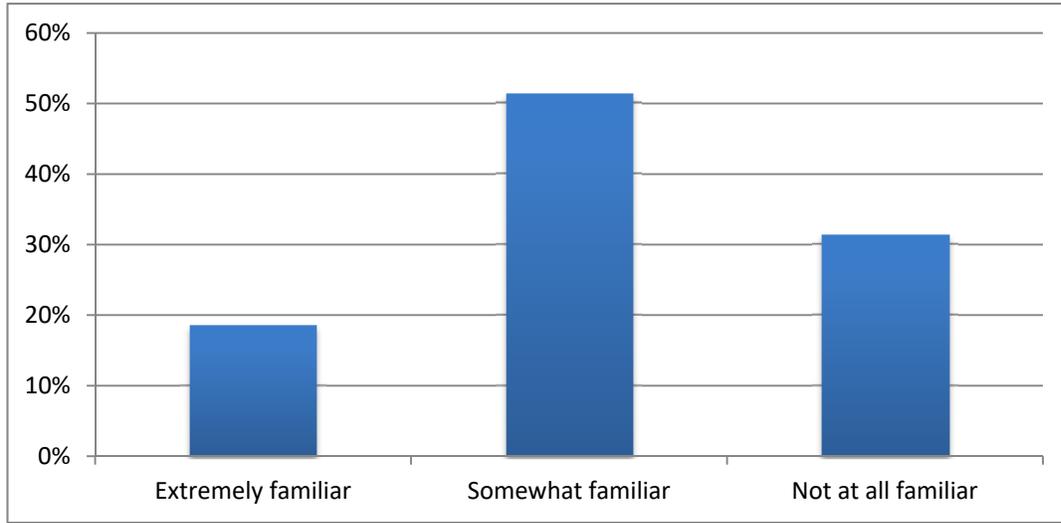
**Q. 1. Please select one:**



City of Wooster Resident	81%	57
Wayne Township or Wooster Township Resident	10%	7
Other Wayne County City / Village / Township	4%	3
Reside outside of Wayne County	4%	3

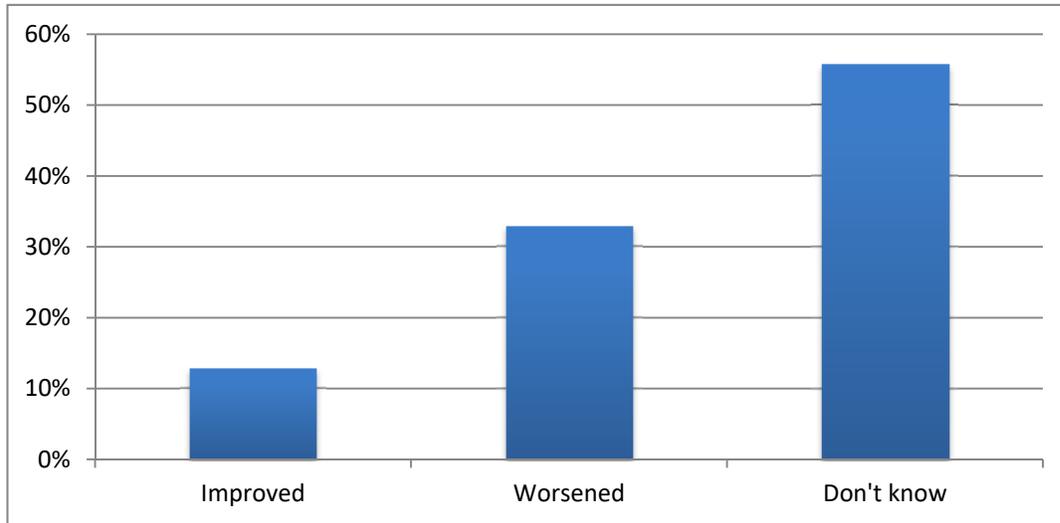
*Total Respondents: 70*

**Q. 2. Do you feel that you have an understanding of your fair housing rights?**



Extremely familiar	19%	13
Somewhat familiar	51%	36
Not at all familiar	31%	22
<i>Total Respondents: 70</i>		

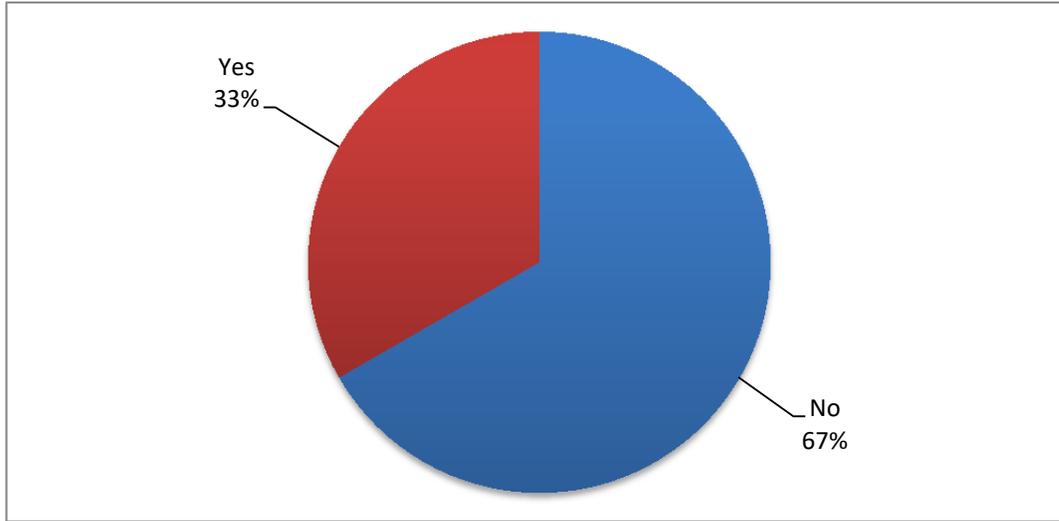
**Q. 3. Have fair housing-related issues facing Wooster residents improved or worsened in the last 5 years?**



Improved	13%	9
Worsened	33%	23
Don't know	56%	39
<i>Total Respondents: 70</i>		

When asked if there were any governmental actions or policies that would create barriers for people finding housing, 66% of the respondents responded with “no”, while 33% responded “Yes”. In commenting, respondents commonly cited the lack of affordable housing opportunities (sometimes faulting zoning) and landlords denying rental opportunities due to past personal histories.

**Q. 4. Are there any government actions or policies that would create barriers when trying to obtain housing? If “Yes” please comment.**

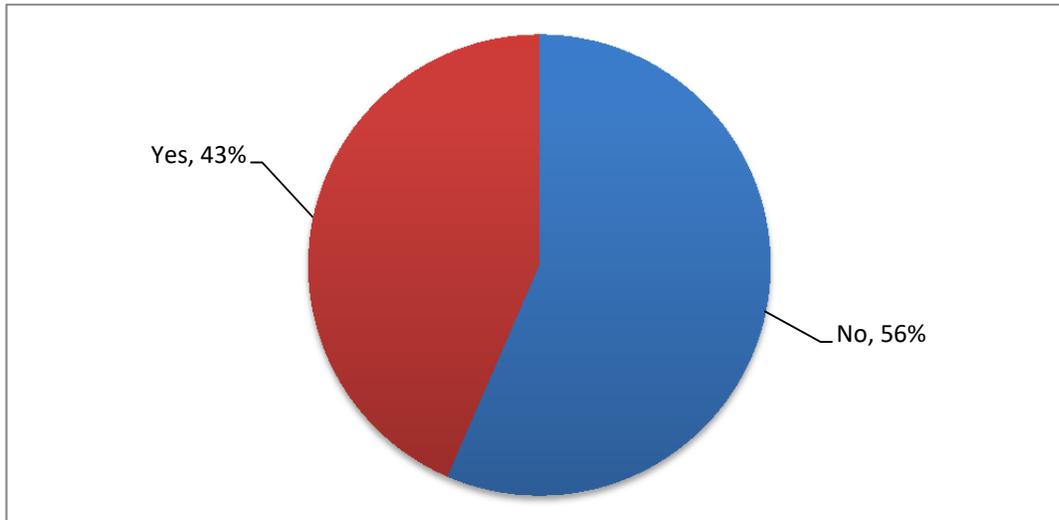


No	66%	46
Yes	33%	23

*Total Respondents: 70*

When asked if there were areas in the City of Wooster that have fair housing problems 57% of respondents indicated there were none. The 43% who indicated there were areas with fair housing problems cited the poor quality of structures, lack of landlord accountability, and lack of affordable housing opportunities. The North End, as well as areas beyond the City of Wooster’s downtown historic neighborhoods, were also described as being out of reach financially. A few respondents expressed that the problems expended throughout the city, while others cited specific apartment communities.

**Q. 5. Are there areas in the City of Wooster that have fair housing problems? If “Yes” please comment.**

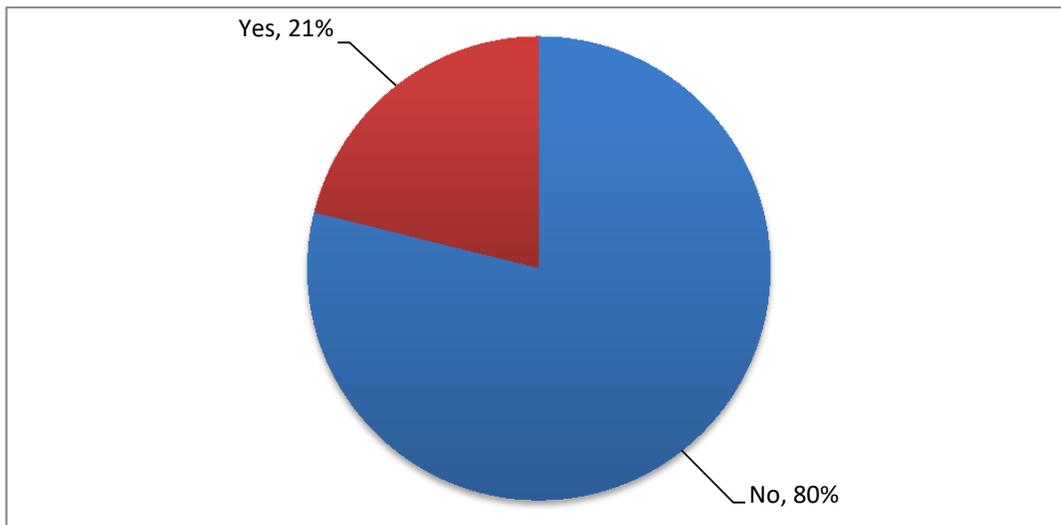


No	56%	39
Yes	43%	30

*Total Respondents: 70 Yes - Please Comment.*

Respondents were also asked if they were aware of any barriers in Wooster’s housing market that would make it harder for someone to obtain housing based on their protected class considering local lending, advertising, or landlord and real estate sales practices. 80% responded “no”, while 21% agreed that there were, most commonly citing the difficulty in housing opportunities for disabled persons. One respondent highlighted that landlords excluded emotional support animals.

**Q. 6. Are you aware of any barriers in Wooster’s housing market that would make it harder for someone to obtain housing based on that person’s disability, familial status, national origin, ancestry, race, color, military status, sex, or religion? (Considering local lending, advertising, landlord, and real estate sales practices?) If “Yes” please comment.**

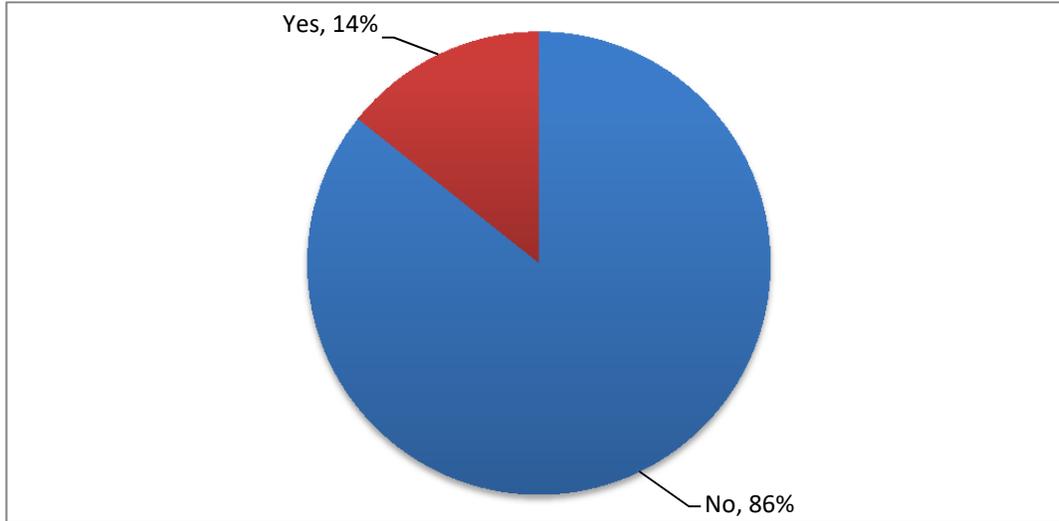


No	80%	56
Yes	21%	15

Total Respondents: 71  
 Yes - Please Comment.

The survey also asked if respondents were aware of any specific incidents of discrimination, regarding the renting or sale of housing in the City of Wooster on the basis disability, familial status, national origin, ancestry, race, color, military status, sex or religion. Ten of the 70 the respondents said that they were, with a few advising of discrimination against persons of color and individuals with disabilities.

**Q. 7. Are you aware of any specific incidents of discrimination, regarding the renting or sale of housing in the City of Wooster on the basis disability, familial status, national origin, ancestry, race, color, military status, sex or religion? If “Yes” please comment.**



No	86%	60
Yes	14%	10

*Total Respondents: 70*

*Yes - Please Comment. If you would like us to reply to your concern, please leave your email or phone number. Or, you may also contact us directly at 330.263.5200 Ext. 300:*

At the end of the survey, respondents were asked to share any further questions, comments, or concerns about fair housing, the most popular subject was the rising cost of housing and the need to create more affordable housing opportunities. Landlord accountability about property maintenance and terms were also an issue. Other concerns included undisclosed fees, care for the elderly, the unwillingness of landlords to allow companion animals and helping the homeless.

### Regional Legal Findings

In examining regional issues, case summaries from the United States Department of Justice were consulted, along with data from the Ohio Civil Rights Commission and Thomson Reuters Westlaw database. Accommodating individuals with disabilities prove to be an ongoing issue throughout the region.



THE UNITED STATES  
DEPARTMENT OF JUSTICE

#### US Department of Justice Housing Case Summaries<sup>14</sup>:

There were six cases managed by the United States Department of Justice in Ohio from 2016 through 2019.

(The City of Wooster is located in the Northern District

Court, however, Ohio Southern District cases are listed as well given their close proximity.) Somewhat mirroring local complaints, the Federal cases highlight the need for accommodations for persons with disabilities. The construction of housing with accessibility features proved to be an issue, as was a

<sup>14</sup> US Department of Justice, as published 6/2019: <https://www.justice.gov/crt/housing-cases-summary-page>

combination of individuals needing accommodations for emotional support animals. Other concerns included redlining by banks, sexual harassment, and interference with fair housing rights by property managers. These cases highlight a need for continued education and outreach along with the availability of resources for individuals needing assistance for advice on their fair housing rights in our region.

*United States v. Noble Homes (N.D. Ohio)*: On June 23, 2016, the court entered a consent decree in *United States v. Noble Homes (N.D. Ohio)*, a Fair Housing Act pattern or practice/election case. The complaint, which was filed on December 2, 2013, and amended on May 14, 2014, alleged that the defendants failed to design and construct two neighboring condominium complexes with the required accessibility features. The defendants, a developer and an architect in Ohio and their related businesses, were responsible for designing and constructing 13 condominium buildings across two related condominium complexes that contained significant accessibility violations. Pursuant to the decree, defendants, who are no longer in the business of building multifamily housing, will pay \$100,000 into a fund available for retrofits and a \$40,000 civil penalty. They will further pay \$10,000, respectively, to two fair housing organizations that expended time and resources in connection with this matter, and be subject to standard injunctive relief. Previously, on November 13, 2014, the court entered a partial consent decree resolving claims against two of the defendants, John Hershberger and Hersh Construction, Inc., who were responsible for the construction of one of the buildings in the condominium complexes that had less severe accessibility violations. The case was referred to the Division after the Department of Housing and Urban Development (HUD) received a complaint, conducted an investigation and issued a charge of discrimination.

*United States v. Kent State University (N.D. Ohio)*: On September 20, 2016, the court entered a consent decree resolving *United States v. Kent State University (N.D. Ohio)*, a Fair Housing Act pattern or practice/election case. The complaint, which was filed on September 16, 2014, and amended on December 12, 2014, alleged that Kent State University, the Board of Trustees of Kent State University, and four individual university officials violated the Fair Housing Act by refusing to grant a reasonable accommodation in university housing for a student and her husband who requested to live with an assistance animal that ameliorated the effects of her disability. The consent decree provides for \$130,000 for the students and a local fair housing organization involved in the case, a \$15,000 payment to the United States, and injunctive relief requiring the University to implement a policy on reasonable accommodations for assistance animals, as well as training and regular reporting. The case was referred to the Department after HUD received a complaint, conducted an investigation, and issued a charge of discrimination.

*United States v. Miller-Valentine Operations (S.D. Ohio)*: On May 9, 2019, the United States filed a complaint in *United States v. Miller-Valentine Operations, Inc., et al. (S.D. Ohio)*, alleging that the defendants failed to design and construct 82 apartment communities located in 13 states in a manner that complies with the accessibility requirements of the Fair Housing Act and the Americans with Disabilities Act.

*United States v. Trumbull Housing Authority (N.D. Ohio)*: On March 2, 2017, the court entered a consent order in *United States v. Trumbull Housing Authority (N.D. Ohio)*. The complaint, which was filed on January 13, 2017, by the United States Attorney's Office alleged that that defendant violated the Fair Housing Act on the basis of disability when it refused to make a reasonable accommodation to its practice of not approving the transfer of the Section 8 subsidy to a different unit for at least a year after the unit has passed inspection. The consent order provides for injunctive relief only. The complainants

rejected the monetary settlement that had been negotiated by the United States Attorney and the complainants' former attorney. The complainants have intervened and will pursue their claims for monetary relief separately. The case was referred to the Division after the Department of Housing and Urban Development (HUD) received a complaint, conducted an investigation, and issued a charge of discrimination.

*United States v. Union Savings Bank and Guardian Savings Bank (S.D. Ohio):* On January 3, 2017, the court entered a consent order in *United States v. Union Savings Bank and Guardian Savings Bank (S.D. Ohio)*. The complaint, which was filed on December 28, 2016, alleged that two related banks engaged in redlining majority-black neighborhoods in the Cincinnati, Dayton, and Columbus, Ohio, as well as the Indianapolis, Indiana metropolitan statistical areas between at least 2010 and 2014 in their residential real estate lending businesses. The consent order includes a loan subsidy fund, as well as requirements including a credit needs assessment, community outreach, targeted outreach and advertising, and consumer repair and education provisions.

*United States v. Klosterman (S.D. Ohio):* On March 21, 2018, the United States together with the United States Attorney's Office filed a complaint in *United States v. Klosterman (S.D. Ohio)*. The complaint alleges that the defendants, who own and manage rental properties in Cincinnati, Ohio, violated the Fair Housing Act by engaging in a pattern or practice of sexual harassment against female tenants and coercing, intimidating, threatening, or interfering with tenants in the exercise of their fair housing rights.



**Ohio Civil Rights Commission**  
*Our Ohio - Diverse. Strong. Protected.*

**Ohio Civil Rights Commission:** The Ohio Civil Rights Commission is the state agency charged with educating the public on and enforcing Ohio's laws against discrimination. The agency processed and closed 3,674 cases in 2018 concerning

illegal discrimination in employment, housing, higher education, and places of public accommodation. Overall, the Ohio Civil Rights Commission reported an uptick in complaints<sup>15</sup>, with 22.5% of cases resulting in relief for the complainant, including settlements (5.1%), conciliation (0.7%), a notice of a right to sue (1.85%), or withdrawal with benefits (13.2%). The majority (78%) of cases were found to be without probable cause (59.0%) or closed for other technical reasons such as a lack of the charging party not notarizing documentation (11%)<sup>16</sup>, or the complaint was outside of the Commission's jurisdiction (3%), or the charge was withdrawn without benefits (2%).

Notably, the OCRC's Administrative Law Judge Decisions affirmed a determination of steering due to race and unlawful service animals concerning a case in Stow<sup>17</sup>, Ohio, and also a determination of familial status discrimination that had occurred in Akron<sup>18</sup>. Upheld decisions also affirmed training requirements and fines.

Of all charges filed, the majority of which focused on equal employment concerns, race or color (1,570 charges) was the most common basis for a complaint, followed by retaliatory action<sup>19</sup> (1,428), disability

<sup>15</sup> Ohio Civil Rights Commission FY 2018 Annual Report

<sup>16</sup> The City of Wooster Fair Housing Program offers complainants with assistance in filling out formal charging documents with the Ohio Civil Rights Commission and provides notary services free of charge.

<sup>17</sup> Ohio Civil Rights Commission Administrative Law Judge Decision Comp Number 1-HOU-AKR-37746

<sup>18</sup> Ohio Civil Rights Commission Administrative Law Judge Decision Comp Number 11-HOU-AKR-35273

<sup>19</sup> These cases generally pertain to equal employment opportunities. In the case of housing, a landlord taking adverse action against a tenant, such as increasing rents, terminating a lease, or depriving the tenant of property

(1,127), sex and/or pregnancy (953), age (508), national origin (118), religion (171), familial status (89), and military status (23).



Division of Real Estate  
& Professional Licensing

#### **Ohio Department of Commerce, Division of Real Estate and Professional Licensing:**

A very small number of real estate licensees were disciplined for failure to properly include fair housing language in agreements between 2016 and 2018. Ohio Revised Code 4735.55(A)(2) and Ohio Revised Code 4735.55(A)(3) require specific fair housing language and blockbusting language, respectively, in estate listing agreements as well as property management agreements. Three such violations were identified in 2017 and four in 2018 statewide, none within the Wayne County<sup>20</sup>. In all but one case, the offenses were accompanied by other ethical or legal violations. Penalties for violations ranged from a minimum \$100 monetary fine and a public admonition (in the case of missing the language alone), to a maximum penalty, exacerbated by other misconduct, of a \$1,500 fine, a 15-day license suspension, and a 20-hour education requirement. Those found in violation are named in materials published and circulated by the Department and are typically further personally announced by state and local Board of Realtors offices.

THOMSON REUTERS

WESTLAW™

**Thomson Reuters Westlaw Database:** the City of Wooster subscribes to the Thomson Reuters Westlaw database. In collecting information on court actions filed over the last three years concerning and allocation of fair housing misconduct, a little over 50 cases originating in Northeast Ohio were identified. In most cases, the legal actions were brought by a tenant's against their landlord and were often in part of a larger claim. In all local instances, however, the cases were either withdrawn, rejected, or dismissed.

## **Additional Fair Housing Concerns**

**Racial Disparities in Survivability Outcomes:** Extreme racial disparities are evident in Ohio's Department of Health Data for the past decade in survivability, especially with infant mortality and induced abortion, which present irreversible negative impacts to the State's cultural and economic landscape. These intensifying trends, impacting largely the African American demographic, have also manifested in other states based on census data.

With 136,894 live births and 982 infant deaths in 2017, Ohio's most recent infant mortality rate stands at 7.17 deaths per 1,000 births, down from 2013's rate of 7.37 deaths per 1,000 births. At 12.3% of the population, the African American demographics make up 17.9% of all live births, and at the same time, comprises 39.1% of all infant deaths. By comparison, Caucasian infant mortality rates decreased from 6.11 per 1,000 live births in 2013, to 5.30 in 2017. At the same time, the African American population averaged an increase from 13.99 deaths per 1,000 live births in 2013 to 15.65 each year. As of 2017, Ohio-born African American infants are over three times more likely to die than the remainder of the population, with a total of 384 deaths.

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or services, constitutes retaliation when done to penalize the tenant for making a lawful complaint to a governmental agency, including property maintenance and fair housing complaints.

<sup>20</sup> State of Ohio Department of Commerce, Division of Real Estate, Disciplinary Action reports for years 2016, 2017, and 2018.

Similarly, accounting again for 12.3% of the State population (US Census American Community Survey), the African American Demographic was responsible for 17.9% of all live births, and 41.5% of Ohio's resident induced abortions (Ohio Department of Health). In comparison, Caucasians accounted for 81.9% of the State population, 75.8% of all births, and 46% of induced abortions. The Statewide average in 2017 for induced abortions to the sum of live births and induced abortions was 12.5%. By contrast, the ratio among African Americans was 24.2%, versus 8.0% for the Caucasian demographic. (All other races combined average similarly high ratios at 21.9%). African American pregnancies were 330% more likely to end in an induced abortion versus Caucasian pregnancies over the same period. Overall, induced abortion rates are declining at a faster rate than the State's declining birth rates. However, the rate of decline for induced abortions since 2013 among the African American Demographic was only 7.6%, versus 14.4% for the Caucasian Demographic.

**Table 28: Disparity in Ohio birth outcomes**

Race	2017 Total Population		2017 Total Births		2017 Infant Mortality			2017 Share of Induced Abortion		
	Number <sup>1</sup>	% of Total	Number <sup>2</sup>	% of Total	Number <sup>2</sup>	% of Total	Deaths per 1,000 Births	Induced Abortions <sup>3</sup>	% of Total	Rate Per 1,000 <sup>4</sup> Pregnancies
Total	11,609,756	100.0%	136,894	100.0%	982	100.0%	7.2	19,615	100.0%	125.3
White	9,503,779	81.9%	103,709	75.8%	550	56.0%	5.3	9,052	46.1%	80.3
Black	1,428,230	12.3%	24,542	17.9%	384	39.1%	15.6	8,141	41.5%	249.1
Other	677,747	5.8%	8,643	6.3%	48	4.9%	5.6	2,422	12.3%	218.9

1. Table B02001, RACE: Ohio. U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates.
2. Table 4: Ohio Neonatal, Post neonatal, and Infant Mortality, by Race and Ethnicity (2013-2017), 2017 Ohio Infant Mortality Data: General Findings, Ohio Department of Health.
3. Table 5a: Resident Induced Abortions Reported in Ohio, by Selected Counties, Race and Broad Age Groups 2017, 2017 Annual Abortion Report, Ohio Department of Health.
4. Pregnancies defined as the sum of all induced terminations and total births.

## Identification of Impediments to Fair Housing Choice

### The Sale or Rental of Housing

**Unintentional Discrimination Against Disability:** Disability proved the protected class that most commonly encountered discrimination. Most complaints were resolved with clarification of federal and state fair housing law. (Some misunderstanding, particularly concerning accommodating ESAs, arose over the differences between federal fair housing law, which grants exemptions from fair housing law to smaller landlords in certain situations, and State of Ohio fair housing law, which provides no exemptions whatsoever.) Ongoing education and outreach, along with making resources readily available for individuals seeking clarifications, is the best course of action.

**Willful Discrimination Against Disability, Familial Status, Race, and Sex:** Complaint data suggests that discrimination against familial status, gender, and race is a concern, in addition to a disregard for individuals with disabilities. Willful illegal discrimination, based on complaint data, tends to be associated with other unprofessional behaviors including fraud, disregard for safety, and disregard for privacy. These behaviors can and have placed tenants and homebuyers at risk for financial loss and physical injury. In addition to ongoing education and outreach, willful discrimination requires a mechanism for monitoring, access to enforcement, and expedient response to complaints that arise.

### Provision of Housing Brokerage Services

Fair housing ideals appear to be well-engrained into the region's housing brokerage service industry. Fair Housing education is a continuing education requirement for all real estate licensees. Additionally, the Wayne Holmes Board of Realtors works to provide education to its members and to publically promote fair housing ideals in the community, including utilizing the City of Wooster's Fair Housing Program to assist with ongoing information and outreach.

The relative lack of fair housing issues arising from the real estate brokerage industry for a State with over 11.6 million people is evidence that ongoing education and outreach efforts have been effective at promoting an inclusive market in both home sales and property management. Monitoring and highly public action<sup>21</sup> from the Ohio Department of Commerce in the rare events when fair housing violations do occur likely serves as a deterrent as well as an educational tool.

### Provision of Financing Assistance for Dwellings

Specific information regarding the provision of financial assistance is limited for the community. No local complaints have been found, nor any findings from legal institutions reported. As noted earlier, the southern district Court of Ohio has identified cases of redlining by banks located in that region, specifically *United States v. Union Savings Bank and Guardian Savings Bank (S.D. Ohio)*.

**Table 29** on the following page shared summary Home Mortgage Disclosure Act data from the Federal Financial Institutions Examination Council's designated Metropolitan Statistical Area or Metropolitan Divisions that surround Wooster, including Cleveland-Elyria, Akron Ohio, Canton-Massillon, and Mansfield Ohio Micropolitan statistical areas. Generally surrounding Wooster, these data provide a view

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<sup>21</sup> The Department of Commerce publishes and openly circulates the names of practitioners receiving disciplinary action, which is typically further shared in trade industry newsletters and publications

of financing for the general region. White applicants, the largest population group, averaged a loan application denial rate of 6.8%, while Black or African American applicants experienced an average denial rate of 16.0%.

**Table 29: Home Mortgage Disclosure Act (HMDA) Denials by Race – Neighboring MSAs**  
*Calculated for Wooster Neighbors Using Federal Financial Institutions Examination Council HMDA Data*

Race	Population	Percentage of Total Pop.	FHA VA			Conventional			Denial
			Number of Applications	Avg Amount	Percent Denied	Number of Applications	Amount Applied	Percent Denied	Average Rate
American Indian / Alaska Native	1,362	0.2%	55	\$129,800	10.9%	104	\$166,183	11.5%	11.3%
Asian	19,182	2.7%	274	\$148,117	16.1%	2,098	\$217,750	7.3%	8.3%
Black or African American	85,030	12.1%	4,166	\$117,386	15.7%	2,451	\$115,004	16.6%	16.0%
Native Hawaiian or Pacific Islander	128	0.0%	51	\$129,373	7.8%	64	\$168,172	7.8%	7.8%
White	575,891	81.9%	19,689	\$143,132	8.5%	45,837	\$176,143	6.1%	6.8%
2 or More Minority Races	18,695	2.7%	32	\$121,750	18.8%	33	\$107,091	30.3%	24.6%
Joint (White / Minority)			284	\$182,014	8.5%	575	\$233,090	7.0%	7.5%
Race Not Available			2,139	\$136,591	20.2%	4,577	\$192,631	11.8%	14.5%

1. Wooster is located outside of any of the Federal Financial Institutions Examination Council’s designated Metropolitan Statistical Area or Metropolitan Divisions. Data presented is the sum of Cleveland-Elyria, Akron Ohio, Canton-Massillon, and Mansfield Ohio findings.

2. Population based on 2017 census data.

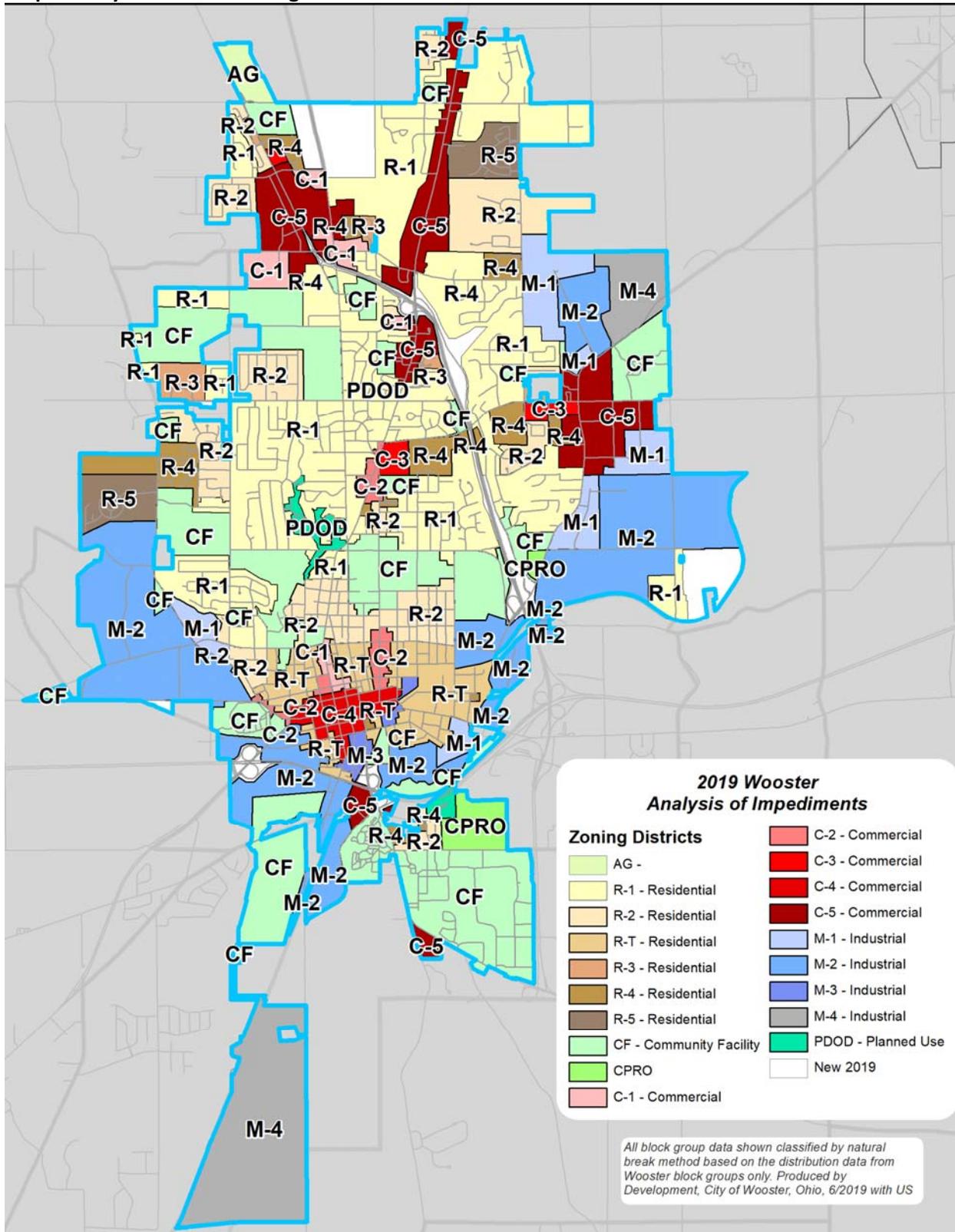
## Public Policies and Actions

The City of Wooster has publically supported the creation of new housing developments within the community and has placed care on supporting affordable housing markets as well as market-rate developments. In addition to the City’s legislative authority unanimously granting partnerships to participate in the CHIP program with the Wayne Metropolitan Housing Authority and partner governments, the same authority has supported several CRA tax abatements to housing development projects, including passing three approvals for low-income housing development projects specifically. Most recently, the Wooster Lofts workforce housing Project, received a real estate tax abatement through the legislature.

The City recently updated its zoning code designed to guide growth while maintaining flexibility to support a wide arrange of quality projects. **Map 44** outlines 2019’s zoning make-up. Zones are labelled with a letter identifying their use, such as “R” for residential, and then marked with a number to list intensity. For instance, R-1 refers to single-family housing, while R-2 is permissive of duplex uses in certain circumstances. R-4 and C-5 (“C” for commercial), offer the most intense development for housing, including multi-story apartment buildings.

Surrounding Downtown, zoning carefully tailored a guidelines to end a pattern of disinvestment where investors had carved older homes into multiple substandard units, destroying historical elements and engaging in a pattern of equity bleeding that sometimes left tenants in difficult and dangerous situations. Wooster residents have nearly died as a result of make-shift apartment construction.

Map 44: City of Wooster Zoning



US Census Bureau, 2017 ACS Data Table B01002

The R-T was established by changing the historically single-family neighborhoods back to single-family zoning, with a provision to grandfather existing multi-family structures until their owners ceased to use them for multi-family purposes, ensuring there would be no displacement of existing families. Coupled with an increase in property maintenance enforcement, the efforts resulted in reinvestment in the community and rehabilitation of several empty and distressed homes. Multi-family developments are still permitted in the R-T zoned area, and any other area within the City with the provision of a Planned Unit District. Similar to an overlay district, Planned Unit Districts allow developers to create specialized developments that would not normally fit into specific zones requirements for standards. There are four such districts in place today, all supporting residential uses. In each instance, the legislative authority may allow special exceptions to zoning rules provided a proposed development will meet a community need, but in return may demand a certain level of investment and oversight.

## Administrative Policies

The city of Wooster Administration has a long history of prioritizing community development activities throughout the city. Enhancing quality of life for residents and visitors and perspective future residents has been at the heart of the organization's governing philosophy. The City of Wooster has served as the applicant for the Wayne County, City of Wooster, and City of Orrville's Community Housing Impact and Preservation Partnership (CHIP) program. The administration has routinely identified development needs and worked to educate the public on its findings. And the Administration has continually worked to incorporate new tools and grant programs to aid community development.

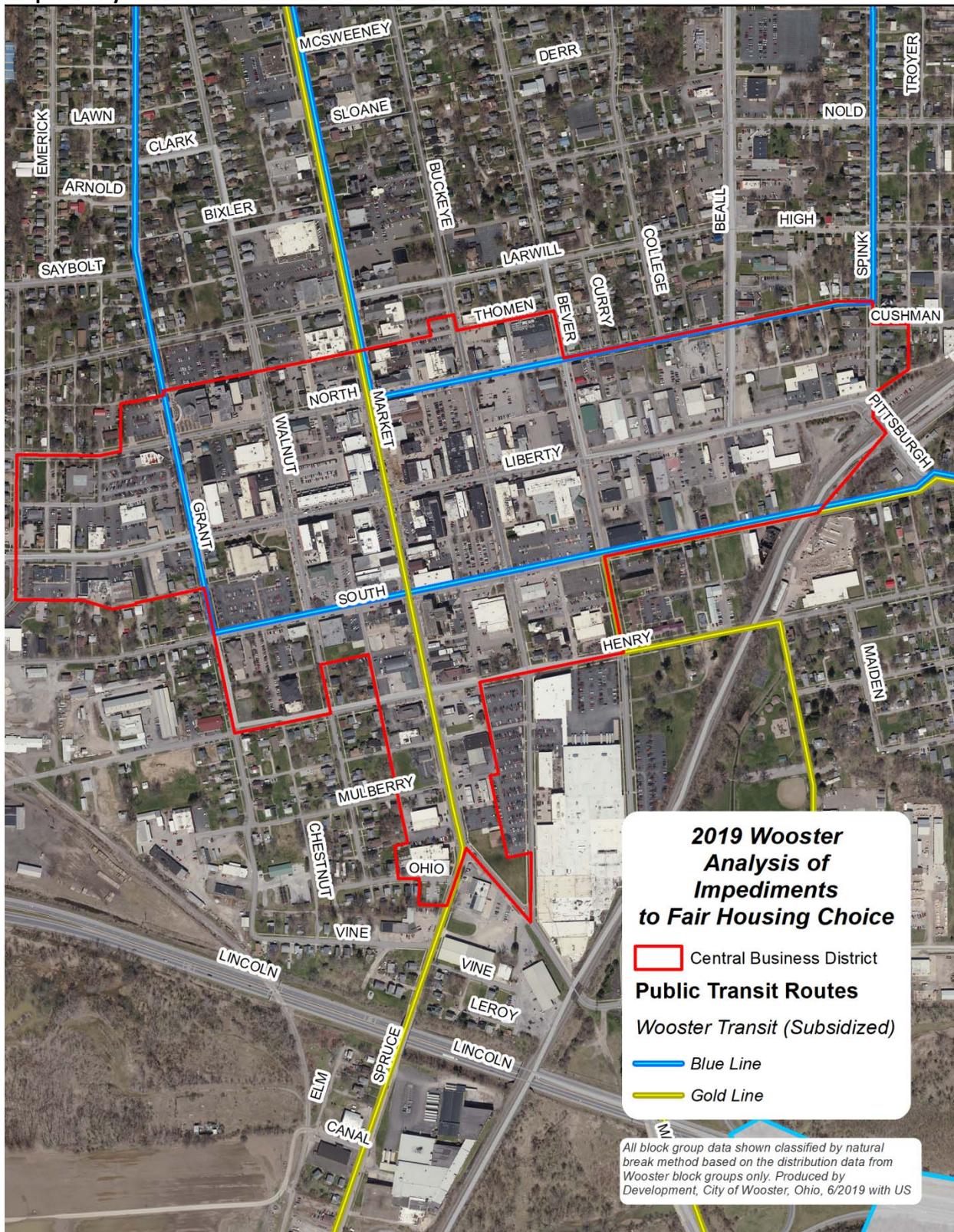
The city has also heavily invested in downtown redevelopment. Tools used to help revive what was once a 70% vacant downtown into a growing commercial and residential destination included the creation of the Community Reinvestment Area (CRA) real estate tax abatement program for homes and commercial buildings, the development of a building facade renovation program, the establishment of grant programs for private building redevelopment, the creation of a public parking district to remove a major development obstacle, and the development of public infrastructure.

In supporting the neighborhoods immediately surrounding the downtown (see **Map 45**), the city has placed focus on incentivizing rehabilitation through its CRA program (granting homeowners 100% abatements on property rehabilitation starting with a minimal investment of \$2,500.), CHIP program, a mandatory exterior home inspection program, and past use Neighborhood Stabilization funds to remove blighted properties. New public infrastructure projects ranging from water line replacements to road reconstruction efforts have also taken place in recent years in order to ensure ongoing reinvestment in the community's oldest and most challenged areas.

Displacement has occurred in situations where older housing had fallen into such disrepair that condemnation was necessary. The largest example included the closure of a mobile home park once located along Larwill Street, which followed years of neglect and mismanagement by its then-owners. Prior to condemnation, the City and its social service agency partners were able to coordinate in advance and assist residents in securing safer and more reliable housing.

The city's property maintenance program readily responds to complaints with on-site inspections. The program has issued hundreds of citations in recent years resulting in substantial repairs and safety upgrades to Wooster's housing inventory. Still, lack of quality housing, particularly for lower income individuals, was highlighted as a concern when reviewing complaint and public comment data. The Wooster Fair Housing Program can highlight this program further in its future educational outreach.

Map 45: City of Wooster Central Business District



City of Wooster GIS System, 6/2019

## Assessment of Local Fair Housing Activities

Wayne County, inclusive of the City of Wooster, is fully covered with access to fair housing resources. City of Wooster residents are able to file a complaint at any time with the City's Fair Housing Hotline or by making an inquiry on the City of Wooster's website. The City of Wooster's Fair Housing Program also accepts walk-in visitors at its City Hall location. Area social service providers and governmental agencies are kept updated on fair housing trends observed by the Program with quarterly mailings. Program materials are readily available online and in-print across the City. At any time, information may be accessed on area resources to assist with a fair housing concern and a complaint may be filed.

### City of Wooster Fair Housing Program

The City of Wooster Fair Housing Program is managed by a designated Fair Housing Officer who is charged with three primary missions:

1. Educate the public on fair housing rights and resources
2. Serve as a clearing house for fair housing complaints
3. Analyze impediments to fair housing choice in the City

Education is accomplished through a series of course offerings provided throughout the year, and through phone calls or meetings with individuals upon request. The City also conducts outreach, including issuing Program brochures to 11 different partners to place in their offices and entrances. Program partners include the Ohio Department of Jobs and Family Services in Wayne County, One-Eighty, Wayne Metropolitan Housing Authority, Social Security – Wooster Office, the Viola Startzman Free Clinic, Catholic Charities, Wooster Community Hospital Case Management, the Wayne County Public Library, NAMI Wayne & Holmes Counties, and the Wayne County Health Department.

All calls, letters, and in-person visits to the Program is assisted by the Fair Housing Officer. Complaints and inquiries are noted for future analysis. The Fair Housing Officer takes time to hear all concerns and gives information for applicable fair housing, property maintenance, or landlord-tenant conflict resources. While legal advice is not provided by the Program, resources for legal assistance are provided along with information on common area practices. The Program generally provides written correspondence to complainants on fair housing concerns so individuals have a record of their concern being taken along with guidance specific to their situation. The Program has also assists individuals in filing formal complaints with the Ohio Civil Rights Commission.

Complaint data is analyzed annually to best understand trends and better focus programming for upcoming years. A Comprehensive Analysis of Impediments to Fair Housing Choice, such as this 2019 report, are typically prepared approximately every five years.

### Additional Fair Housing Activities Serving Wooster

**Wayne County Fair Housing Program:** The Wayne County Fair Housing Program covers all Wayne County neighborhoods outside of the City of Wooster. Wayne County, an Ohio Small Cities CDBG grantee, provides its program in a similar manner. The program is managed through the Wayne County Planning Department, which is able to advise on concerns related to county services (and provides referrals to its Building Department and Health Department with respect to property maintenance), as well as providing contacts for local township or village offices. The program also provides access to a specialized fair housing consultant who is available to provide advice and guidance to individuals seeking

assistance. Assistance in filing complaints and also educational activities and outreach is also handled by the consultant. From time to time, the Wooster Fair Housing Program and Wayne County Program collaborate in sharing data and assessing certain complaints.

Other providers of fair housing educational opportunities:

- One-Eighty (in Partnership with the Coalition on Homelessness and Housing in Ohio)
- The Wayne County Housing Coalition
- Wayne Metropolitan Housing Authority
- Community Legal Aid
- Wayne / Holmes County Board of Realtors

**Community Legal Aid** in particular provides free legal help to qualified low-income residents in need. The nonprofit legal agency is staffed largely by volunteer attorneys who are able to help Wooster tenants and prospective tenants in taking legal action to assert their fair housing and landlord-tenant law rights. The organization provides additional educational materials on its website at: <https://www.communitylegalaid.org/>.

With the variety and consistency of programming to keep service providers and the general public educated on fair housing and the ease of access to information, Wooster's fair housing programming is strong and ample.

## Conclusions and Recommendations

### Impediments, Fair Housing Concerns

**Unintentional discrimination against individuals on the basis of disability:** A review of the fair housing complaint data reveals a handful of incidents where landlords likely discriminated unintentionally against individuals with disabilities. A review regional data suggests that intentional discrimination may also extend to familial status. Unintentional discrimination occurs when landlords misunderstand or fail to give thoughtful consideration to reasonable requests for accommodation. For instance, some landlords apparently denied tenants the right to have emotional support animals without supporting fees, despite supporting physician's note, not understanding why or how the request related to fair housing. Once provided clarification, the same landlords were readily willing to provide the requested accommodation. This concern suggests that ongoing education is needed, particularly in terms of accommodating individuals with disabilities and avoiding discrimination concerning familial status.

**Willful Discrimination Against Individuals on the basis of disability, familial status, race, and sex:** Some Wooster fair housing complaints highlighted willful discrimination against individuals on the basis of disability, familial status, race, and sex. Willful discrimination is action taken by a housing provider aware that such action is illegal. While rare, such complaints were not nonexistent, and were even observed in one case by Wooster City staff. Such complaints are often coupled with other serious allegations, such as severe neglect of property and fraud. Ongoing education and public outreach is required to address this concern. It is imperative that the City continue to inform its residents of their fair housing rights and options for recourse in the unfortunate event someone should find themselves faced with a discriminatory landlord or other housing provider. The City's current Fair Housing Program encourages individuals to think of the greater community when deciding whether to take the time to report illegal discrimination. To aid enforcement, the city should also continue its efforts to monitor fair housing complaints, provide documentation of complaints in writing where appropriate, and assist individuals in making complaints with the Ohio civil Rights Commission.

**Lack of Housing Affordability and Housing Availability:** Lack of housing affordability and availability of housing in general proved to be a top concern and review of the complaint data and in feedback from Wayne County Housing Coalition partners, as well as from the 2019 City of Wooster Fair Housing Survey. The lack of new housing starts in the community, coupled with a growing job base and shrinking household sizes, has increased demand for housing. Correspondingly, rents and sale prices have escalated significantly within the community. However, Wooster's housing market still remains quite affordable in comparison to the region, suggesting that housing costs are likely to continue to grow for some time as the community's market prices catch up with its neighbors. The lack of affordable housing has priced out many new families from locating within the city, allowing the Census to conclude a shrinking population base in a time of geographic in employment expansion. The loss of current and perspective residents has a direct negative impact on Wooster's employment base and its market base, in addition to the civic and social contributions and investments would-be residents could have provided to the greater community.

**Lack of Rental Housing Quality:** Housing quality, or property-maintenance, was a frequently cited concern in reviewing complaint data and public comments. Wooster's older housing stock presents unique challenges, as well as sometimes hefty demand for investment, which some landlords

unreasonably defer. In extreme cases, which occurs with some frequency in the city, landlords practice “equity bleeding”, where rents are collected without providing required long-term maintenance with the exit strategy of ultimately abandoning the property altogether through bankruptcy. In other cases, landlords are simply unaware of an issue, and first learn of a roof leak or electrical issue from the City instead of hearing first from their tenant. While housing quality has dramatically improved over the last several years in large part to enhancing the City’s Property Maintenance Program, not all tenants are aware of their rights to certain building quality standards in housing or are aware of the program. Increasing public awareness about building safety and the property maintenance program may equip tenants facing difficulties to address problems sooner, preserving housing opportunities and also saving property owners the cost of larger repairs that could result from further deterioration.

**Lack of Mobility:** Difficulty in affording or accessing and transportation is a frequently cited concern for low income individuals exploring work opportunities or those in need of preventative medical care. The City of Wooster has invested in a taxi pass program, which provides significantly subsidized transportation for individuals at 200% or below poverty. The popularity this program has dramatically increased in the past two years, following the city’s partnership with Community Action Wayne/Medina. The community has an arguably strong transportation system given its size. Unfortunately, the lack of mass transit elsewhere in Wayne County leads to hardship for some residents seeking to access employment or medical destinations in neighboring towns.

## Fair Housing Strategy Recommendations

In evaluating changes or remedies needed to overcome identified impediments, the following recommended actions are provided for consideration:

### Continuation of the City of Wooster’s Fair Housing Program

- **Focus outreach materials:** The program should update outreach and education materials to reflect the most recent fair housing concerns, which involve discrimination risks against disability, familial status, race, and sex. Examples should be provided to explain how individuals can better evaluate their rights, or the rights of others, particularly in cases where a tenant or homebuyer needs a reasonable accommodations given their protected class.
- **Publish metrics:** Provide general fair housing metrics to enhance community awareness of fair housing and resources on the Program’s website.
- **Continued Partnership with Wayne County Housing Coalition** (See ahead).
- **Inform on Property Maintenance:** The Program should provide educational resources for tenants struggling with property maintenance concerns. The City’s Property Maintenance Program readily responds to complaints with on-site inspections. The program has issued hundreds of citations in recent years resulting in substantial repairs and safety upgrades to Wooster’s housing inventory. Still, lack of quality housing, particularly for lower income individuals, was a repeated concern based on complaint and public comment data. With its multiple training opportunities and also communications with area partners, the Program should highlight the availability the City’s Property Maintenance Program in its outreach.
- **Update Fair Housing Legislation:** The City’s current fair housing ordinance specifies a process for leading investigations into fair housing complaints, which the City has neither the resources nor expertise to handle. It does, however, have the ability to provide consultative support for individuals who wish to file a complaint with a state agency capable of investigating complaints, such as the Ohio Civil Rights Commission or the Ohio Department of Commerce. The legislation should be revisited and updated to reflect current capabilities of the Fair Housing Program.

### Property Maintenance Program

- **Ongoing Services:** The city's reinvigorated property maintenance program has arguably ushered in Wooster's most expansive wave of housing rehabilitation yet. The city should continue its property maintenance program and evaluate opportunities to improve efficiencies. The program should continue to connect property owners who struggle financially with home repair resource programs, including Community Action Wayne/Medina, Wayne Metropolitan Housing Authority, and the City's CHIP program and CRA program.
- **Enforcement and Prosecution:** The City of Wooster has stepped up enforcement of its property-maintenance code by prosecuting landlords who willfully ignore citations and orders for repair. Such efforts should continue, as follow-through provides the program with greater credibility and offers a strong incentive for compliance. To date, prosecutions have proven effective in changing the behavior of most property owners, resulting in better care of Wooster's building infrastructure.

### Continued Partnership with Wayne County Housing Coalition

- **Ongoing Housing Needs Assessment.** As a consortium of Wayne County's housing and social service experts from every major governmental and housing-assistance nonprofit agency, the Wayne County Housing Coalition provides a rich resource for monitoring and evaluating community housing needs. The City of Wooster should continue its active involvement with the Wayne County Housing Coalition to remain abreast of changes in housing needs and social service resources and be available to coordinate City resources where needed.
- **Continue to engage and provide referrals for homeless residents.** As with many communities, Wooster has experienced an increase in homelessness with point-in-time count figures growing from approximately 56 individuals in 2016 to 108 in 2019 countywide. The community has a strong network of social service providers, and its small size allows it the ability to connect most persons facing homelessness directly with resources. For many different reasons, many individuals in need of help have refused repeated offers for assistance. Some will eventually take assistance, but require months or longer before feeling personally ready to make the lifestyle changes needed in taking such assistance. The City of Wooster's Police Department has placed a priority on community policing and relationship-building, which has allowed the City itself to be an active partner in connecting homeless persons with supportive services. Similarly, the Wayne County Sheriff's Department has also fostered relationships with Wooster's homeless community. This relationship-building has also been effective in ensuring safety for homeless individuals and the general public. The City of Wooster should continue its focus on community policing and network-building.

### Continued Partnership with Transportation Coalition:

- **Evaluate transportation needs with area transportation partners** and potential infrastructure improvements to aid transportation. Wooster's Taxi Pass Program provides a critical service to low income individuals and for those who are disabled. In addition to public funding, the program has been helped with infrastructure, such as bus stops in the Downtown.
- **Explore opportunities for connecting Wooster's transportation network** to new services beyond city limits as those options become available. The City of Wooster provides a model for how local governments are able to invest in strengthening opportunities for lower-income residents. Formal dedicated services presently do not exist beyond City limits. Wooster's data should be shared with area partners and neighbors as options to establish a larger inter-community network, such as a port-authority or other system, are explored in the future.

### **Continued Investment In Alternative Transportation:**

- **Provide continued support for low-to-moderate income transportation.** The City of Wooster's taxi pass program is undergoing significant change as its popularity grows. Over 1,300 residents now use the program to access employment, education, and other destinations around the City. Continued consideration of such services is needed in the future to ensure ongoing access.
- **Build links within the existing Wooster Loop System** to improve ease of access between residential neighborhoods and employment centers. Approximately 9% of all Wooster residents walk or bicycle to work. A dedicated system enhances safety and efficiency while also promoting neighborhood reinvestment and healthy lifestyles. Explore additional funding streams to leverage local funds, including state programs such as Clean Ohio, NatureWorks, and the Transportation Alternatives Program.
- **Evaluate sidewalk infrastructure** and pursue opportunities to fund needed repairs or new construction, such as through the CDBG Program, Safe Routes to School Program, or OPWC fund when performed in concert with street upgrades. Existing sidewalk infrastructure is most prone to failure in Wooster's oldest neighborhoods, where population densities are moderately high and commuting by walking is more popular. Several older neighborhoods throughout the City lack sidewalks altogether, with some busy residential streets having originally been constructed and intended as country roads.

### **Evaluation of Existing Community Reinvestment Area Program (CRA) and Real Estate Incentives:**

- **The City should evaluate all neighborhoods for their appropriateness for CRA designation.** The City's CRA program encourages housing rehabilitation and the creation of new housing with tax abatement incentives. Homeowners and landlords rehabilitating single-family and duplex homes are eligible to receive a 100% 10-year abatement on any improved value resulting from their project. The abatement period is extended to 12 years for new construction. The current CRA covers all points south and east of Bowman Road/Akron Road as far north as Portage Road. (An area north of Bowman Street bounded by University Street, Palmer Street, and an unnamed alley east of Spink Street, is also included.) As the housing market and conditions in general have changed significantly over the last decade since the boundaries were last amended, a reevaluation of the current boundaries should be considered.
- **The City of Wooster should continue supporting its local CHIP Partnership** with Wayne County, the City of Orrville, the City of Rittman, and the Wayne Metropolitan Housing Authority in providing funding resources for preserving existing housing low-to-moderate income families through the CHIP Program. In addition to improving the quality of life for low-to-moderate income families, the program provides an excellent opportunity for neighborhood stabilization and dramatically lowers strain on public resources. For instance, a \$10,000 CHIP-funded emergency repair not only allows a low income family to remain in their home, but also preserves the value and tax base for the property as well as preserves and read in tax base of its neighboring real estate. Additionally, keeping a low-income family in an existing home saves up to \$7,000 per year in public housing costs, providing a return on investment within two years.
- **The City should continue fostering Downtown redevelopment to support job and housing creation.** The City should continue to engage and support Main Street Wooster in planning infrastructure upgrades and enhancing policies, such as those concerning parking access and building maintenance, to help improve economic and quality of life opportunities. The Downtown also supports its surrounding lower-income historic neighborhood with a labor market, access to transportation, a variety of civic resources, and social services. Reinvestment in the core has already led to meaningful reinvestment within surrounding neighborhoods.

- **The city should continue to explore the viability of other state development programs** to aid in future development and housing creation. Provision of certain incentives, including tax incremental financing, or new community authorities, or partnerships to establish land banks, may be helpful in fostering new development that either provides affordable housing, or creates market conditions enabling affordable and quality housing.

**Housing Development Attraction:**

- **The city should continue to coordinating with its economic development partners to identify sites and engage potential developers to increase Wooster's housing inventory.** Establishing a development opportunity portfolio may be helpful in rapidly responding to inquiries. The city's responsiveness to site selection information requests and development proposals most recently led to the City successfully helping a regional developer to obtain funding through the Ohio Housing Finance Agency for a new 52-unit affordable housing complex. The City of Wooster's economic development partners include the Wooster Area Chamber of Commerce, the Wayne Economic Development Council, the Wooster Growth Corporation, and the Wayne County Community Improvement Corporation.

## Signature Page

The City of Wooster 2019 Fair Housing Analysis of Impediments to Fair Housing Choice and its recommendations have been reviewed and adopted. The recommendations included herein are hereby incorporated as the City's Administrative Policy.

### Chief Elected Official

Robert F. Breneman Date: 7-3-19  
Robert F. Breneman, Mayor

### CDBG Program Administrator & Housing Program Administrator

Jonathan G. Millea Date: 7-3-19  
Jonathan Millea, AICP, Development Coordinator & CDBG Administrator

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