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Appendix

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Executive Summary

The City of Bowling Green, Kentucky has prepared this Consolidated Plan under the guidelines published by the U.S. Department of Housing and Urban Development, Office of Community Planning and Development. It provides the City with guidance for housing and community development activities in a comprehensive strategy maximizing the resources available.

The City of Bowling Green was notified in August, 2003, that it is entitled to Community Development Block Grant funding (CDBG). This Consolidated Plan meets the application requirements for that formula program. This plan has addressed all three of the statutory goals: decent housing, a suitable living environment, and expanded economic opportunities. The consolidated planning process included citizen participation activities, data collection and analysis, and the formation of certain conclusions and recommendations for use of CDBG funding.

The first section of the Consolidated Plan reviews the citizen participation activities undertaken in the preparation of the Plan. The second section is a five-year strategic plan which identifies the housing and community development needs in Bowling Green and the priorities for action. The third section is the one-year Action Plan which identifies the sources and uses of funding for accomplishing the annual objectives.

The priority needs identified through the consolidated planning process include:

Homeownership Opportunity – The City’s rate of homeownership (49 percent) is well below the rate of the Commonwealth of Kentucky and the rest of the nation. The lack of affordable housing units to purchase and faulty credit were two of the reasons cited for the low homeownership rate. Through targeted redevelopment and public/private collaboration efforts, the City hopes to improve homeownership opportunities and reverse the declining homeownership rate. These efforts will include development of new housing for purchase and the rehabilitation of existing housing stock for conversion to homeowner occupancy.

Elderly Residential Support – The elderly in Bowling Green continue to experience housing affordability problems. In addition, the frail elderly that require additional personal services have very limited choices for in-home care. Project-based housing for the elderly has been well received. Additional affordable units, coupled with supportive services in an assisted living setting, would benefit the aging population in the community.

Transitional Housing – Only a minimal number of transitional housing units exist in Bowling Green. Short-term housing options for an individual or family that is trying to move away from an undesirable situation are very limited. The City will be further reviewing the need for transitional housing and exploring options for meeting that need.

Community Re-Development - The City had adopted urban renewal plans for two targeted areas prior to the designation as an entitlement community. The two plans, Historic Bowling Green and St. Joseph School Area, have incorporated extensive, specific redevelopment activities such as housing development and rehabilitation, street and sidewalk improvements, and economic development opportunity.

The City plans to use CDBG funding in the most efficient ways possible and in projects that will have the greatest impact on our community. Each year, the annual action plan will be prepared in a manner that will maximize CDBG funding, leveraging it with other public and private funding sources.

Citizen Participation

Summary

Effective citizen participation is the key to a strong strategic planning process. Plans in which a strong citizen input has been encouraged are more likely to succeed and address the needs of the community. The Citizen Participation element of this Consolidated Plan began with a public hearing on October 20, 2003, in which the Housing and Community Development (HCD) staff presented an overview of the Consolidated Planning process and the affected federal funding sources of Community Development Block Grant (CDBG) and HOME, both from the U. S. Department of Housing and Urban Development (HUD). The hearing was open to the public and well-publicized (the complete Citizen Participation Plan and schedule is included in this document as Attachment A).

A Fair Housing focus group meeting was held on October 21, 2003. The HCD staff again presented an overview of the Consolidated Plan process and then reviewed the components of a Fair Housing Plan: Analysis of Impediments to Fair Housing Choice, Actions to be Taken, and Maintenance of Records. The focus group of 42 people represented various aspects of the housing industry including advocacy groups, landlords and builders, social service providers, and citizens (a complete attendance listing is included in Attachment A). The goals of this focus group were to (1) obtain as much information as possible on fair housing problems, (2) develop a realistic, comprehensive set of actions and measurable results, and (3) implement these actions within an optimal timeframe and to devise methodology for evaluating results.

A final public hearing was held on December 16, 2003, in which the HCD staff reviewed the draft Consolidated Plan, including the one-year Action Plan. This hearing took place during the 30 day comment period for the Consolidated Plan so that any citizen comments could be adequately addressed in the Plan before submission to HUD.

Comments and Response

Both written and oral comments were received at the two Public Hearings. These comments are summarized here, but a complete transcript and copies of written comments are included in Appendix A. Response by the City staff follows each comment.

October 20, 2003, Public Hearing

Alan Anderson – professor at Western Kentucky University – 801 Park Street:

Mr. Anderson encouraged the City to not just focus on the downtown area of Bowling Green. He cited examples in metropolitan areas which indicate that concentrated areas of low income housing is not an acceptable policy. He also encouraged a joint effort with Warren County Fiscal Court in developing housing and other aspects of our community. Mr. Anderson suggested three objective measurements for the Consolidated Plan: (1) decrease the affordability mismatch by a certain percentage within the 5 years, (2) dedicate a certain percentage of CDBG funding to housing, and (3) ensure that a certain percentage of housing is constructed outside of census tracts 101, 102, 103, and 104.

Response: Good quality housing is a basic need for all residents of Bowling Green and the City is committed to improving existing affordable housing stock as well as encouraging development of new affordable housing. The City has committed to giving a preference in its rehabilitation program to houses that were built before 1978 and where children under age 6 reside in an effort to reduce lead-based paint hazards. The greatest concentration of aged housing is located in census tracts 101, 102, 103, as well as 106, 109, and 112. Both of the redevelopment areas targeted by the City are within the Enterprise Community (census tracts 101, 102, and 103).

Bernadette Cornett, WKU Sociology graduate student, 1623 Pleasant Way:

Miss Cornett discussed the occurrence of segregation and poverty in Bowling Green. She explained the “color line” and suggested that there are two issues to be addressed: (1) the concentration of minorities, and (2) the spatial isolation of minorities along the edge of the white population.

Response: Through the Analysis of Impediments to Fair Housing Choice, the City has identified a need for education about the federal Fair Housing Act among residents, realtors, landlords, and others. If the concentration of minorities in certain areas is because of discrimination in housing, the City hopes this educational thrust will help in decreasing the incidence of discrimination. Further, diversity training was another identified need that the City will be addressing in the long term.

Elaine Walker, business owner/resident of downtown, 1303 State Street:

Mrs. Walker discussed the need to create mixed development in the downtown area. She is particularly interested in seeing CDBG funding used to rehabilitate the existing older buildings in the downtown, thereby increasing the tax base while preserving Bowling Green’s history.

Response: HOME funding will be used for a homeowner rehabilitation program. In an effort to decrease the lead-based paint hazards in Bowling Green, preference

will be given to homes that were built before 1978 in which children age 6 and under reside.

Justin Cress, WKU student, 905 Rodes-Harlin:

Mr. Cress commented that CDBG funding can only build so many houses. It is important that the City look at market incentives to remodel and rebuild homes across the City. He was also concerned about increasing the mobility of families, particularly with respect to eliminating source of income discrimination.

Response: The City agrees that the limited CDBG funding will not be able to meet the demand for affordable housing in Bowling Green. The City plans to maximize the CDBG funding by leveraging it with other City funds, HOME funds, and private investment. As a longer term goal, the City will study options for structuring market incentives to encourage affordable housing development throughout the jurisdiction.

Dennis Chaney, Barren River District Health Department, 1109 State Street
Helen Siewers, Greenways Commission and Warren County Council on Physical
Activity, 1141 State Street:

Mr. Chaney encouraged the implementation of the greenbelt system master plan. He emphasized the occurrence of obesity and related health problems resulting from a sedentary lifestyle and discussed the need for lifestyle and behavior changes. Mrs. Siewers commented that many families do not have access to pedestrian travel ways. She asked the City to look at infrastructure needs, particularly the sidewalks gaps in the downtown and west side of Bowling Green. She also encouraged streetscape and lighting improvements.

Response: As redevelopment occurs in the downtown and west side of Bowling Green, the City will ensure that sidewalk infrastructure is upgraded/completed to help provide continuous pedestrian ways.

Chris Keyser, Bowling Green – Warren County Primary Care Center, 1109 State Street:

Ms. Keyser discussed the health care crisis in the Commonwealth of Kentucky and how it is affecting care-giving in Bowling Green. The BG-WC Primary Care Center sees 11,000 unduplicated patients each year. The Center is planning to move to a larger facility within the next few years and Ms. Keyser asked for the City's support in that move.

Response: The City recognizes the important health care services that the Primary Care Center provides. The five-year Consolidated Plan provides a small amount of supplemental funding to assist with the Center's plans for a larger facility.

Cheryl Blaine, Downtown Redevelopment Authority, Fountain Square:

Mrs. Blaine discussed the approved Master Plan for the downtown and indicated the strong interest from the private development community. She said the Plan calls for many of the ideas discussed at the public hearing, including preservation, economics, housing, and public spaces. She suggested that the CDBG funding be used as a catalyst for attracting private development into the area.

Response: Because of the limited CDBG funding available, the City plans to leverage the funding as much as possible with private investment to impact the redevelopment of the downtown area.

Abraham Williams, Housing Authority of Bowling Green, 247 Double Springs Road:

Mr. Williams requested funding assistance in three areas: (1) Cost sharing for stormwater infrastructure at the proposed housing development on Double Springs Road; (2) Public service funding for a multi-cultural community police officer serving Public Housing and Phenix Place; (3) HOME funding for construction of new homes and for rehabilitating existing homes.

Response: (1) At the time of the preparation of the Consolidated Plan and Action Plan, the Housing Authority has requested that Warren County Fiscal Court submit a CDBG application to the Kentucky Small Cities program for assistance with the infrastructure in the proposed housing development. The City's Action Plan does not include funding for this proposal at this time; however, the City is committed to expansion of affordable housing opportunities for residents of Bowling Green. (2) According to CFR 570.201(e), public services are an eligible activity when the activity is a new service or quantifiable increase in the level of an existing service. Because the requested funding is for a currently existing police officer position, the Action Plan does not include funding for this request. (3) If the City becomes a Participating Jurisdiction (PJ), the Consolidated Plan and Action Plan will be amended to include HOME funding; at that time, the City will consider subgranting a portion of the HOME funding to the Housing Authority for rehabilitation of existing homes. If the City does not become a PJ, then the Housing Authority can apply directly to the Kentucky Housing Corporation for HOME funding.

Donald Butler, Community Action of Southern Kentucky, 921 Beauty Avenue:

Mr. Butler supported any City plans to provide affordable housing for families and seniors, including in the downtown area. He also discussed the need for affordable child care services and his agency's commitment to providing quality child care services, particularly for Head Start eligible children.

Response: The City recognizes the need for quality, affordable child care services and has included this as a priority in the Action Plan.

Rick Kelley, 1332 Edgewood Avenue:

Mr. Kelley commented on the importance of using the CDBG funding as a catalyst for economic development. In particular, he proposed using CDBG funds in the downtown area for acquisition of property in the proposed Circus Square park, development of the property into a park, provision of incentives to spur economic development from the private sector, and to construct sidewalks and infrastructure.

Response: The City has utilized Kentucky Small Cities CDBG program funding in Phase I of the acquisition of properties in the proposed Circus Square and is awaiting additional funding from the same source for Phase II. The City will seek other funding sources for the development of the park. As stated previously, the City intends to strategically use CDBG funding, leveraged with private investment, to impact the redevelopment area.

December 16, 2003, Public Hearing

Debbie Fugate, Abel Court Apartments, 1020 Barren River Road:

Ms. Fugate asked for clarification on the type of elderly/disabled units proposed, how many units would actually be accessible, whether the units would be single family or duplexes, if there would be a preference for families without present housing, if they would be funded through Section 8 or Low Income Housing Tax Credits, if there would be minimum restrictions on length of stay in the home.

Response: Although the final details of the proposed elderly housing have not been completed, it is anticipated that the units will be constructed in a similar manner to Double Springs Manor and Grant Village (recently completed elderly complexes in Bowling Green). The units will be constructed according to the Uniform Accessibility Design Standards. It is anticipated that all units will be two or more attached units, with the possibility of condominium or townhouse sales to qualifying elderly. The units will be affordable, but final details of the financing package will be determined.

Judy Jewell and Dale Eichelberger, Housing Authority of Bowling Green, 247 Double Springs Road:

Ms. Jewell and Mr. Eichelberger recapped Executive Director Abraham Williams' request from the first public hearing for funding assistance in three areas: (1) Cost sharing for stormwater infrastructure at the proposed housing development on Double Springs Road; (2) Public service funding for a multi-cultural community police officer serving Public Housing and Phenix Place; (3) HOME funding for construction of new homes and for rehabilitating existing homes.

Response: Conditions have not changed since the first public hearing and the City's response is the same as above.

Geraldine Banks, New Era Planning Association:

Ms. Banks asked about the location of the proposed elderly housing in the Shake Rag district.

Response: The City is planning the first phase of this housing at 3rd Avenue and Chestnut Street on the site of the present City-owned day care center, Little Treasures.

**Consolidated Plan Comment Period
December 1, 2003, through January 3, 2004**

C. J. Woods, et.al., Bowling Green Human Rights Commission:

The Executive Committee of the BGHRC submitted a letter stating their advocacy for fair housing in the community. The letter also suggested that the BGHRC should be involved in monitoring the compliance with the City's Fair Housing Plan. The Committee also advised the City to continue consultation with local agencies in the implementation of the plan.

Response: The City's intent to implement the Fair Housing Plan has been declared in the Analysis of Impediments and in statements by City staff in the December 16 public hearing. This implementation will require the efforts of both City staff and local agencies such as the BGHRC. The City will assign a staff person to be responsible for oversight of the City's progress in implementation; this oversight will include working closely with agencies such as BGHRC and obtaining feedback from the community at large regarding the City's progress.

Technical Assistance

In addition to the public comment periods and hearings, HCD staff provides technical assistance to the public in developing proposals for funding and in understanding the planning and funding process. Although the HCD staff does not keep a daily log of technical assistance provided, some examples include:

- New Era Planning Association, Inc. – this is an African-American advocacy group which is interested in maintaining the African-American heritage in our community, particularly with respect to the downtown revitalization plans and the Shake Rag Historic District. The HCD staff has assisted NEPA by suggesting locations for office space, helping define their focus area, and providing guidance in developing a market study for their Third Avenue commercial project.
- A local business man is interested in creating economic opportunity in a ten block area of the downtown. City staff have met with him on several occasions to discuss his plans and to offer advice in the development of his concept plan.

- The HCD staff has worked with several businesses that would like to relocate or expand in the downtown redevelopment area. HCD assists the businesses in finding acceptable locations, identifying funding sources for certain aspects of their business plan, and providing referrals of other businesses that may be interested in co-locating with them in the downtown.
- Community Action of Southern Kentucky – with the City’s planned elderly housing use of the Little Treasures day care site, the City is assisting CASK in finding an alternative site within the Historic Bowling Green redevelopment area.

Strategic Plan

The Consolidated Plan for the City of Bowling Green is intended to be a working document covering a five year time period from FY2004 through FY 2009. In this section of the plan, needs and priority needs in the community are described, prioritized, and then specific objectives are outlined toward the goals of providing decent housing, a suitable living environment, and expanded economic opportunities for Bowling Green residents of extremely low-, very low-, and low income.

Homeless

Kentucky Housing Corporation commissioned the Institute for Regional Analysis and Public Policy at Morehead State University to conduct a statewide survey of homeless persons. This survey was conducted in early 2001 and was the second in a series of studies on homelessness; the first survey was conducted in 1993. This survey is the primary source for characteristics of homelessness in Kentucky, particularly given the fact that the U.S. Census Bureau made no attempt to gather any census information for the homeless population in the 2000 Decennial Census.

A homeless person, by HUD definition in the Steward B. McKinney Act, is:

- An individual that lacks a fixed, regular or adequate night time residence; and
- Who has a primary night-time residence that is:
 - A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
 - An institution that provides a temporary residence for individuals intended to be institutionalized; or,
 - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

The 2001 statewide survey found that nearly one-third of the homeless are children. The “average homeless respondent” was a 35 year old, white female, with less than a high school education. Family problems, including domestic violence, and economic difficulties were the most commonly cited explanations for homelessness. Most homeless persons that responded to the survey (95 percent) lived in some type of temporary housing, including shelters and homes of friends or relatives; most (89 percent) had received some social services. About half of the survey respondents had been homeless for less than 3 months.

There were 91 surveys completed in Warren County, which includes Bowling Green. Using the average multiplier of 1.97 family members living with the respondents, the homeless population can be estimated at 179 persons.

Several agencies respond to the needs of homeless individuals and families in Bowling Green. These services cover a wide range of needs including emergency and transitional shelter and assistance, permanent housing, and educational and mental health assistance. These existing services and facilities include:

Barren River Area Safe Space (BRASS)

BRASS is a non-profit corporation which serves victims of domestic violence. They provide crisis counseling and related domestic violence and advocacy services. BRASS provides 27 beds of emergency shelter. BRASS partnered with HANDS and Wabuck Development Company in developing a transitional living facility, Bohannon Place. Funded through Federal Home Loan Bank and Low Income Housing Tax Credits, the facility was completed and ready for occupancy in October, 2003, and provides 12 transitional family units, an on-site manager, and a police department substation.

Phoenix House

The Phoenix House provides a substance abuse treatment program and counseling services for women. The House provides 18 beds of transitional housing, a clothing bank, and other services for women and children under the age of 10.

Salvation Army

Men, women, and children are provided emergency shelter for a maximum of five nights per year in the 65 beds at the Salvation Army. The agency also provides a soup kitchen, clothing, utility assistance, food boxes, and some counseling services.

Bowling Green-Warren County Welfare Center

The Welfare Center provides one-time emergency financial rent and utility assistance, health services, and food and clothing.

H.O.T.E.L. Inc.

HOTEL, Inc., is a faith based organization that serves as a clearinghouse for food, clothing, and household items. The agency also provides rent and utility assistance, child day-care services, health and literacy services, and job and service referrals.

St. Vincent de Paul

St. Vincent's is a faith based organization that provides food, clothing, and household items.

LifeSkills, Inc.

LifeSkills offers mental health assistance, chemical dependency services, and service referrals through the Community Mental Health Center. Tenant based rental assistance for homeless persons with disabilities and emergency assistance to prevent homelessness are also available.

Community Action of Southern Kentucky, Inc. (CASK)

CASK is a comprehensive service agency which provides food and clothing, emergency financial shelter and utility assistance, educational assessment, employment counseling, lifeskills training, and relocation and referral services. CASK provides a federal Supportive Housing Program that helps the homeless establish a stable living situation through resettlement services and longer term case management. This program is part of the regional Homeless Continuum of Care, funded through the Community Services Block Grant Program, which has identified the homeless transitional units as a number one need in the region. CASK also assists with Section 8 rental assistance applications and has a cooperative agreement with the City's Section 8 program where homeless families have a preference for admission to the program.

Housing Authority of Bowling Green

HABG offers three units of transitional housing. They also maintain a clothing bank. HABG is the public housing provider in the community and an extensive discussion of HABG's programs and services is provided in the Public Housing section later in this document.

During the Analysis of Impediments to Fair Housing Choice focus group meeting held in October, 2003, participants identified the need for more transitional housing units in Bowling Green. The group felt that public, private, and community agencies must join together to develop safe, affordable transitional units for targeted populations, including the homeless and abused. The need for transitional units was given a priority "C" which indicated that it was a long-range planning issue.

The existing agency network provides many of the support services needed by the homeless. With 65 beds and a 5 night limit, the Salvation Army meets the homeless individual's most immediate need for shelter. Other housing assistance, such as Community Action, Lifeskills, Section 8, and the Housing Authority, provide additional, longer-term housing support.

Special Needs Population

Subpopulations of the Special Needs group includes the elderly, frail elderly, persons with disabilities, and persons with alcohol or other drug addiction. Data is available for certain subpopulations and is displayed for both the entire City of Bowling Green as well as the subset for the Enterprise Community (Census Tracts 101, 102, and 103) in the table that follows:

Subpopulation	Bowling Green	Enterprise Community
Elderly (age 65 and over)	5,895	994
Frail Elderly	700	203
Persons w/ disabilities	9,266	2,767
Mental disability	2,593	885
Physical disability	4,288	1,292
Developmental disability		
Persons w/ HIV/AIDS *	20	NA
Persons w/ alcohol/drug addiction		

Source: U.S. Bureau of the Census, Census 2000

* Data is available only for persons with AIDS in Warren County; data for persons with HIV is no longer available as a public record. Source: Barren River District Health Department.

Elderly

The 2000 Census enumerated the Bowling Green elderly population at 5,895 persons, which is 12 percent of the jurisdiction's population. Although the number of elderly persons has increased by 561 since the 1990 Census, the elderly as a percentage of the total population has decreased from 13.1 percent.

Household income for the elderly is detailed in the table below:

Household Income (% of Median)	Elderly Renter	Elderly Owner	Total Elderly Households	Percent of Elderly Households	Percent of Households in Bowling Green
Extremely Low Income (0 to 30%)	670	580	1,250	37.1%	33.1% of ELI households in BG
Very Low Income (31 to 50%)	316	581	897	26.6%	30.4% of VLI households in BG
Low Income (51 to 80%)	213	660	873	25.9%	29.2% of LI households in BG
TOTAL	1,199	1,821	3,020	59.5%	31.1% of all LMI households in BG
Total Elderly HH in Bowling Green	1,471	3,599	5,070	100%	25.7% of all HH in BG

Source: U.S. Department of Housing and Urban Development, CHAS Data Book, Table 1C

Elderly households make up about one quarter of all households in Bowling Green, but nearly one third of all low-to-moderate income households. Nearly 60 percent of elderly households are characterized as low-to-moderate income. While the median household income for Bowling Green was \$29,047 (1999 Income in 2000 Census), the median household income for elderly households

was \$24,764 (for householders 65 to 74 years old) and \$17,930 (for householders 75 years and over). In comparison, the mean retirement income was \$17,473 and the mean Social Security income was \$10,427. Although the elderly make up 25.7% of the households in Bowling Green, there were only 13.7% of Bowling Green households receiving retirement income. In contrast, nearly one quarter (24.7%) of households receive Social Security income. Of the 5,895 elderly individuals in Bowling Green, 807 (13.7%) live in poverty.

The income levels for the elderly living in the Enterprise Community (Census Tracts 101, 102, and 103) show a greater disparity, with the median household income at less than half of the median household income for Bowling Green (\$29,047):

Median Household Income in 1999	Census Tract 101	Census Tract 102	Census Tract 103
Householder 65 to 74 years	\$9,688	\$10,272	\$12,500
Householder 75 years and over	\$7,604	\$7,750	\$12,443

Source: U.S. Bureau of the Census, Census 2000

The State of Cities Data Set, provided by HUD, details some of the housing problems experienced by the elderly. About one quarter of all elderly, black non-hispanic households have housing problems; the most significant of these is the renters with 30 to 50 percent Median Family Income where 100 percent of the households are identified as having a housing problem. For elderly, white non-hispanic households, nearly 55 percent of all renters have a housing problem; in fact, over 60 percent of all renter low-to-moderate income households experience a housing problem. Additionally, nearly three-fourths of the homeowner elderly in this racial category with 0 to 30 percent of Median Family Income face some housing problems. Elderly housing problem data for the Hispanic population was unavailable.

Given the great number of elderly households that are experiencing housing problems, there appears to be a housing assistance need for this segment of the population. Affordable rental units for the elderly are needed, particularly for the elderly with income in the 30 to 50 percent of median range. Anecdotal evidence from the City's Section 8 program indicates that the elderly is the one segment of the population that is least likely to apply for tenant-based assistance; yet, when senior housing is constructed in Bowling Green, it is leased up very quickly. This suggests that the low income elderly population is more likely to apply for site-based assistance and that it is the better method for meeting the housing needs of low income elderly.

There is also a need for assistance to elderly homeowners in the 0 to 30 percent of median range; this assistance may be in the form of rehabilitation of existing units, financial assistance for utility bills, or a reverse mortgage program that

would allow the elderly homeowner to utilize the equity that has built up over the years in their home.

Frail Elderly

The frail elderly are those individuals who are 65 and over and have a self-care disability; they may or may not have an additional disability. Census figures for the frail elderly includes those individuals that reside in households and institutional and non-institutional group quarters. Typically, the frail elderly require some supportive services which may be provided by family members or agency services.

In Bowling Green, the 2000 Census indicates that there are 700 individuals that can be classified as “frail elderly” using the definition above. Of those, 203 live in the Enterprise Community. The Bowling Green data includes 534 individuals who live in a nursing home or similar group quarters. Using these Census figures, there are at least 166 frail elderly that are either receiving supportive services in their home or that are underserved. Many more individuals may be at or near the frail state, but have chosen to deny their self-care disability; the number of frail elderly is likely higher than the Census data shows.

Community Action of Southern Kentucky delivers lunch time meals to homebound senior citizens. CASK also operates a senior volunteer program in which volunteers check in on other home-bound seniors and provide light services for them.

Barren River Area Agency on Aging offers in-home personal care services such as meal delivery, homemaking, personal care, home repair, and respite, on a sliding scale fee. These services are offered to help avoid nursing home placement.

Kentucky Cabinet for Families and Children is responsible for child and adult protective services and investigates all complaints regarding neglect or abuse.

One of the methods for providing supportive services to the frail elderly is through assisted living facilities. Assisted Living facilities provide residential independent living, regulated by State government, with continuous protective oversight and assistance with daily living activities. Bowling Green has a limited number of assisted living units in its three facilities: Bowling Green Retirement Village, Village Manor/Christian Health Center, and Morningside of Bowling Green. All three of these facilities are “market rate” and none have sliding scale fees for low-to-moderate income individuals. Although there has been some marketing interest expressed by developers for the Bowling Green market, there has been no additional development of assisted living units. Assisted living facilities can provide the additional personal care that an individual needs, without the institutional long-term care of a nursing/convalescent home.

Section 8 tenant-based rental assistance can be used for the “housing” portion of the assisted living cost in verified cases; however, the supportive service portion of the assisted living cost is significantly higher. There appears to be a gap in services for the frail elderly that are low and moderate income who would benefit from residency in an assisted living facility. Such a facility could be coupled with a senior housing facility (as identified as a need in the previous Elderly section) so that residents could move from senior housing into assisted living without leaving their established base of friends and neighborhood.

Persons with Disabilities

In the 2000 Census, 9,266 (20.6%) of the residents of Bowling Green indicated they had a self-determined disability; 1,031 households (5.4%) were receiving Supplemental Security Income (SSI). Of the persons indicating a disability, 28 percent indicated a mental disability and 46 percent indicated a physical disability. There is a significant difference between self-determined disability and a disability that will qualify the individual for Social Security benefits; in fact, the national rate of approval for those who have applied for disability benefits is only 44.6 percent.

Data from the local Social Security Administration office indicates that there are 5,677 persons receiving benefits because of disability in Warren County (6.1 percent of the county’s population). Of those, 2,960 (52 percent) receive SSD, which means they have previously worked and paid into the Social Security system but are now unable to work due to disability. The remaining 48 percent receive SSI, the program for individuals who have never worked due to disability or have only worked a limited amount of time that was insufficient to qualify for SSD benefits.

Approximately 44 percent of the households in the City’s Section 8 program are disabled, with 32 percent of the households being non-elderly disabled. The program staff have found that additional support is often needed for the disabled tenants in finding units that meet their needs or in communicating with landlords about a particular need. At program admission, one of the resources that is provided to the tenant is a listing of known accessible housing units; this does not limit the tenant’s choice of housing, but is intended as one resource in their search for housing. The listing of known accessible units includes 26 privately owned units, 27 units of Public Housing, and 31 Section 8 project-based units.

Data for persons with HIV/AIDS is very limited for Bowling Green/Warren County. The HIV incidence is no longer available by county since regulatory changes in confidentiality were made in 1998. According to data from the Barren River District Health Department, as of the end of 2002, there was a cumulative total of 58 documented cases of AIDS in Warren County; only 20 of those individuals were living.

Lifeskills, Inc. is a public non-profit organization serving mentally disabled individuals and their families. Lifeskills administers the HUD Shelter Plus Care Program which provides tenant-based rental assistance to those with severe mental disabilities; this program couples intensive case management with supportive services so the individual may live independently in the private market.

Barren River Area Agency on Aging offers the Personal Care Attendant program which enables severely disabled individuals who are at risk of being institutionalized to remain in their own homes. The program provides state subsidies to provide personal attendant services such as personal care, housekeeping, shopping, travel, meal preparation, and other day-to-day activities.

Persons with Alcohol or other Drug Addiction

The U.S. Department of Health and Human Services through the National Institute on Alcohol Abuse and Alcoholism estimates that 7.4 percent of the American population meets the diagnostic criteria for alcohol abuse or alcoholism. In the 2002 National Survey on Drug Use and Health by the Substance Abuse and Mental Health Services Administration, an estimated 8.3 percent of the U.S. population aged 12 or older were illicit drug users. Data on the occurrence of alcoholism or drug addiction in Bowling Green is not available at this time, but there are supportive services in place to assist individuals struggling with recovery.

Lifeskills, Inc. administers a federal HOME tenant-based rental assistance program for women that are transitioning out of Park Place, a drug-abuse treatment center. This program couples intensive case management and support for the women and their families.

Phoenix House provides transitional housing for women who have successfully received treatment for alcohol or substance abuse; supportive programming includes education, job training, and relapse prevention.

Housing and Supportive Needs

As the elderly segment of our population grows, there will be increased need for supportive services, including home maintenance assistance, in-home personal care services, and assisted living facilities. Nearly 60 percent of the City's elderly are low income and many will require some financial assistance to receive the services they need. Affordable rental units, homeowner rehabilitation assistance, and financial utility assistance are all needed for the elderly.

Affordable supportive services are needed for the frail elderly -- ideally, a facility which would allow an individual to transition from independent living to assisted living without leaving established friendships.

Housing

There are multiple aspects of this Consolidated Plan which will be covered in this Housing section, including: Housing Needs, Market Analysis, Public Housing, Lead-Based Paint, Barriers to Affordable Housing, Fair Housing, Anti-Poverty Strategy, and Monitoring.

Housing Needs

Only 49 percent of all occupied units in Bowling Green are homeowner occupied, compared to the state rate of 70.8 percent and the national rate of 66.2 percent. This community's homeownership rate has been slowly declining over the past few decades. The homeownership rate in 1990 was almost 51 percent. One of the focal points of the City's HCD Department, since its inception in the late 1970's, has been to increase the homeownership rate in Bowling Green. HOME, CDBG, and Family Self-Sufficiency Program are some of the tools with which HCD has worked toward increasing homeownership, particularly in the Enterprise Community. The homeownership disparity has brought with it many related problems such as declining housing conditions and code enforcement issues. Increased homeownership, as will be discussed later, is one of Bowling Green's top priority community development needs.

Using 2000 Census data, HUD prepared the following income data for households in Bowling Green:

% of MFI	Renter Elderly 1 & 2 Member	Renter Small Related 2 to 4	Renter Large Related 5 or more	Renter All Other House holds	Total Renters	Owner Elderly	Owner All Other	Total Owners	Total House holds
0 to 30%	670	992	235	965	2,862	580	334	914	3,776
31 to 50%	316	633	142	870	1,961	581	411	992	2,953
51 to 80%	213	685	90	659	1,647	660	678	1,338	2,985
TOTAL House holds	1,471	3,759	546	3,923	9,699	3,599	6,408	10,007	19,706
Percent LMI (0 to 80%)	81.5%	61.5%	85.5%	63.7%	66.7%	50.6%	22.2%	32.4%	49.3%

Source: U. S. Department of Housing and Urban Development, CHAS Data Book, Table 1C

Note: LMI means low to moderate income.

Review of this data indicates that a full two-thirds of all renters in Bowling Green are low income, ie. 80 percent or less of the median family income. In fact, half of the households are very low income, and nearly one-third (29.5 percent) of the renter households are extremely low income. Two alarming statistics in the renter households is the elderly households and large family households; more than 80 percent of the households in these categories are low income. As one would reasonably assume would be the case, the statistics for homeowners are somewhat better, with only one-third of all homeowner households that are low income. The elderly, however, have a significantly higher segment that are low income (50.6 percent). The LMI rate for all households is 49.3 percent; the rate is slightly higher (50.2 percent) when considering the entire Bowling Green population.

This income data is further detailed in the Affordability Mismatch Output for All Households, wherein the rents and values are categorized according to their affordability to household income groupings:

	Total Renter Units		Total Owner Units
Rent <= 30% MFI		Value <= 30% MFI	
# of occupied units	1,754	# of occupied units	NA
% of occupants <= 30%	55.1%	% of occupants <= 30%	NA
% w/ housing problems	28.1%	% w/ housing problems	NA
Rent 31 to 50% MFI		Value 31 to 50% MFI	
# of occupied units	3,504	# of occupied units	2,340
% of occupants <= 50%	46.0%	% of occupants <= 50%	34.2%
% w/ housing problems	43.3%	% w/ housing problems	31.4%
Rent 51 to 80% MFI		Value 51 to 80% MFI	
# of occupied units	4,459	# of occupied units	2,321
% of occupants <= 80%	54.7%	% of occupants <= 80%	33.7%
% w/ housing problems	43.7%	% w/ housing problems	20.1%

Source: U. S. Department of Housing and Urban Development, CHAS Data Book, Affordability Mismatch

Note: MFI is Median Family Income

A review of the database of existing assisted rental units in Bowling Green indicates there are some 2,144 rental units that should be affordable to low income households. These units include:

Housing Credit (tax incentives)	363 units
Section 8 project-based	593
Section 8 tenant-based	509
HOME assisted	49
Public Housing	530
Below Market Interest Rate	100

The low percentage of <= 30% MFI households with housing problems can be attributed, at least in part, to the existence of these units. Admission to most rental assistance programs requires the household to be at or below 50 percent of

the median income for their household size. The target rent burden is no more than 30 percent of the tenant's household income. Although the 30 percent rent burden is the target, the experience in the City's Section 8 tenant-based assistance program has been that the tenants will oftentimes exceed the 30 percent mark. In fact, the average rent burden for tenants in the City's program is 36 percent, with only 7 percent of all tenant households at or below the 30 percent target. Two reasons have been identified for this over-burden even in assisted units:

- (1) Housing Choice – the tenant may choose a larger unit than they are eligible for; typically, a tenant may choose to have one more bedroom than the program guidelines have calculated. In fact, 27 percent of tenants in Fiscal Year 2003 chose units that were larger than their assigned bedroom size; this practice is allowed so long as the gross rent does not exceed 40 percent of the household's adjusted gross monthly income.
- (2) High Rents – there is somewhat of a discrepancy between the low payment standard for the Section 8 program and the higher rents that are charged for units in Bowling Green. In some cases, tenants must be granted extensions for the housing search because they have difficulty finding an acceptable, affordable unit.

The City's Section 8 waiting list has nearly 400 households; the preferences for admission to the program are (1) displaced families, (2) homelessness, or (3) participation in the FSS Quick Start program. Most project-based units, however, have vacancy rates in the range of 5 to 10 percent or more.

The National Low Income Housing Coalition prepares an annual report detailing housing affordability for low income families. "Out of Reach 2003: America's Housing Wage Climbs" concludes that in Warren County, an hourly wage of \$8.81 is needed to afford a two bedroom unit. With the minimum wage in Kentucky at \$5.15, one would need to work 64 hours per week to afford the fair market rent of a two bedroom unit. A unit is considered affordable if it costs no more than 30 percent of the renter's income. The report estimates that just over one-third (37 percent) of all renters are unable to afford a 2 bedroom fair market rent.

The income data presented previously is further detailed in the State of Cities Data Set in which HUD has provided information on housing problems for white non-hispanic, black non-hispanic, and Hispanic households. The data set is presented in an alternative format here to compare each category more easily (the complete data set is provided in the Appendix).

	Renter White Non-Hisp	Renter Black Non-Hisp	Renter Hispanic	Owner White Non-Hisp	Owner Black Non-Hisp	Owner Hispanic
<=30% MFI						
Elderly 1&2 member HH	350	99	0	337	22	0
% w/ housing problems	63.7%	20.2%	NA	73.6%	18.2%	NA
Family	532	261	85	204	25	0
% w/ housing problems	71.2%	68.2%	70.6%	87.7%	100%	NA
All other HH	1,009	158	24	124	14	0
% w/ housing problems	79.1%	84.2%	58.3%	77.4%	100%	NA
Total Households	1,891	518	109	665	61	0
% w/ housing problems	74%	63.9%	67.9%	78.6%	70.5%	NA
31 to 50% MFI						
Elderly 1&2 member HH	237	15	0	468	43	0
% w/ housing problems	61.2%	100%	NA	29.7%	44.2%	NA
Family	626	153	37	116	44	0
% w/ housing problems	41.1%	83.7%	89.2%	66.4%	56.8%	NA
All other HH	1,023	144	20	97	0	0
% w/ housing problems	28.3%	66%	50%	81.4%	NA	NA
Total Households	1,886	312	57	681	87	0
% w/ housing problems	36.6%	76.3%	75.4%	43.3%	50.6%	NA
51 to 80% MFI						
Elderly 1&2 member HH	237	22	0	514	24	0
% w/ housing problems	61.2%	18.2%	NA	10.1%	16.7%	NA
Family	626	187	58	430	83	10
% w/ housing problems	41.1%	31.6%	41.4%	50.5%	54.2%	100%
All other HH	1,023	106	34	185	8	0
% w/ housing problems	28.3%	3.8%	29.4%	53%	0%	NA
Total Households	1,886	315	92	1,129	115	10
% w/ housing problems	36.6%	21.3%	37%	32.5%	42.6%	100%
Total Households	7,683	1,505	424	8,089	603	77
% w/ housing problems	40.2%	43.2%	47.2%	19.2%	25.7%	71.4%

Source: State of Cities Data Set CHAS Data, U.S. Department of Housing & Urban Development.

There are several disparities among the three racial/ethnic categories in both renter and owner households. Each racial category will be discussed individually, then compared.

White Non-Hispanic Households: This is the largest population group with 15,772 households (80 percent of all households in Bowling Green). Nearly one-third of the households in this racial category have housing problems, with 40 percent of renters and almost 20 percent of owners experiencing some housing problems. The greatest housing problems are with

- families that are owner households with less than 30 percent MFI or renter households with 31 to 50 percent MFI, and
- non-elderly, non-family renter households with less than 30 percent MFI or owner households with less than 50 percent MFI.

Black Non-Hispanic Households: There are 2,108 households in this racial category, representing almost 11 percent of all households in Bowling Green. Only 29 percent of the black non-hispanic households are homeowners, compared with the city-wide rate of 51 percent. The greatest housing problems in this category are:

- the renting elderly who are 31 to 50 percent MFI, where every household is experiencing a problem,
- renting families who are 31 to 50 percent MFI,
- non-elderly, non-family renter households who are at or below 30 percent of the MFI, and
- owner families and non-elderly, non-family households who are at or below 30 percent MFI.

Hispanic Households: Hispanic households represent only 2.5 percent of the households in Bowling Green, according to Census Data. Only 15 percent of all Hispanic households are homeowners, again compared with 49 percent city-wide; over 70 percent of those homeowners have housing problems. Nearly half of all renter Hispanic households have housing problems. According to the data, there are no elderly, Hispanic, renter households and only 4 homeowners.

HUD has defined “disproportionate” need as any racial group which has a housing problem at least ten percentage points higher than the households in the category as a whole. Using the table above, there appears to be greater disparity among homeowner racial categories than the renters. For all renter households, the percentage with a housing problem varies no more than seven percentage points, from 40.2 percent to 47.2 percent. Within each income level and household type there are various levels of disparity, but the overall housing problem issue is similar.

In the owner households, however, there is a definite disproportionate housing problem. While less than 20 percent of white non-hispanic households had a problem, over one quarter of black non-hispanic households and nearly three quarters of all Hispanic households have housing problems. In fact, the rates of homeownership for the black non-hispanic and the Hispanic segments of the population are well below the distribution of the population. White non-hispanics

represent about 80 percent of the population and of the homeowners in Bowling Green. In contrast, black non-hispanics represent over 12 percent of the population but only 6 percent of the homeowners. Hispanics represent just over 4 percent of the population, but less than 1 percent of homeowners in Bowling Green.

Racial Group	Racial Group as a Percent of the Total Bowling Green Population	Racial Group as a Percent of Homeowners
White Non-Hispanic	79.1%	80.8%
Black Non-Hispanic	12.7%	6.0%
Hispanic	4.1%	0.8%

Source: U. S. Bureau of the Census, 2000.

Homeownership rates among racial/ethnic categories must be improved across the board. Development of affordable “for sale” housing and rehabilitation of existing affordable housing is imperative if Bowling Green is to swing the pendulum back to higher rates of homeownership.

Market Analysis

The Downtown Redevelopment Authority contracted with RKG Associates, Inc. (Economic, Planning, and Real Estate Consultants) of Alexandria, Virginia, to complete a housing analysis of the local housing market, both for Bowling Green and for the downtown area. RKG collected market information from both public and private sources to identify trends, needs, and market opportunities in Bowling Green and the downtown. Some of the current and recently completed projects in the downtown area that should help meet housing demand include: Park Row Senior Apartments, the renovation of Bowling Green Junior High into housing, Grant Village senior housing, Adams Station apartments, and a new residential subdivision proposed by the Housing Authority of Bowling Green.

A complete copy of the Housing Market Analysis is included as **Attachment C**. The major conclusions drawn from the study were:

- The residential real estate market has been strong in Warren County since 1990, adding roughly 650 new residential units annually since 2000. Areas south and west of Bowling Green have been the strongest for new development and almost all of the growth has been single-family detached units.
- The market for existing housing is slightly weak with listings averaging 120 days; demand for new housing is very strong.
- The downtown has not experienced the same level of growth with only 48 units being built since 1990; the area has also lost housing as older, dilapidated units have been removed and replaced by non-residential development.
- Lower-income households tend to be renters due to the financial constraints of the down-payment and credit requirements.

- There appears to be a significant shortage of ownership opportunities for lower-income households, particularly ones below the HUD-regulated median income threshold.
- There is significant demand for owner-occupied and renter-occupied subsidized housing in Bowling Green.
- There appears to be opportunity for some high-end development. However, interviews with local professionals indicate that homebuyers tend to prefer more modest housing that does not maximize their spending potential.
- Downtown housing, particularly townhouse or condominium development, in the price range of \$125,000 to \$175,000 would likely attract interest.

In addition to the Housing Market Analysis commissioned by the Downtown Redevelopment Authority, there have been at least two additional housing market studies completed in 2003. The Housing Authority of Bowling Green contracted with John Wall and Associates of Cary, North Carolina, to review the marketability of a proposed single family, mixed income subdivision to be located at the northwestern edge of Bowling Green. Preliminary findings show that the proposed development of 90 homes is sufficiently large to allow for its own sense of identity and community and that the development should target households in the \$25,000 to \$45,000 per year income range. Based on this range, the preliminary analysis suggested that there is a projected need for about 300 homes per year.

A second market study completed by Woods Research, Inc., of Columbia, South Carolina, was targeted at the senior housing market. The study indicated that a proposed complex for seniors was viable, achievable, and very competitive with the existing apartment complex rents. The project proposed rents at 50 and 60 percent of the adjusted median income plus some units with a heavy subsidy. The one-year demand for income eligible units was estimated to be in excess of 400 units.

Public Housing

The Housing Authority of Bowling Green provides 530 units of public housing within the City's jurisdiction. Only about 65 percent of the units were occupied as of September 30, 2003, primarily due to the modernization activities that are near completion. The Section 8 tenant-based rental assistance program is operated separately by the City of Bowling Green's HCD Department. The program is currently funded for 509 vouchers. Characteristics of tenants in each program are detailed below:

	Public Housing	Section 8	City of Bowling Green
Total Units/Vouchers/Housing Units	530	509	21,281
Average Annual Income	\$10,426	\$7,764	\$29,047*
HH Having Wages	40%	33%	79%
HH w/ Any Welfare	12%	63%	4%
HH w/ Social Security or pension	54%	54%	30%
Elderly	27%	17%	12%
Disabled	38%	44%	6%**
Female Headed Household	35%	46%	13%
Racial Distribution (Head of HH)			
White	48%	60%	83%
Black/African American	38%	39%	13%
American Indian	9%	0%	1%
Asian	5%	0%	2%
Hispanic Ethnicity	1%	1%	4%
Average Household Size (persons)	3.5	2.1	2.3

Sources: HUD Resident Characteristics Report (September 30, 2003, for Public Housing; August 31, 2003, for Section 8); U. S. Census Bureau, Census 2000.

Note: All figures are rounded to nearest whole number except average household size.

* City of Bowling Green is reported as median income, not average.

** Data from the Social Security Administration is available for Warren County only.

The Housing Authority is working to improve the physical condition of the housing units and facilities through the HUD Modernization Program. In 2002, central air conditioning units were installed in the final apartment complex, completing a multi-year project to install central heat/air in all of the 530 units. One of the complexes, Gordon Avenue Apartments, was substantially upgraded in 2003 with vinyl replacement windows, doors, flooring, fixtures, roofs, front porches, and decorative exterior elements. Another complex, Angora Court Apartments, is being renovated at present with new roofs, screen doors, vinyl replacement windows, and exterior paint.

In addition to the standard Public Housing units, the Housing Authority has purchased and completely renovated a 68 unit apartment complex. Phenix Place Apartments was jointly financed by HUD Multi-Family and BB&T Bank. The Housing Authority has also purchased 44 acres of farmland near their main office on which a 100 home subdivision is planned. The Housing Authority is also actively seeking out single family homes near the public housing locations that can be rehabilitated by its work force and resold to qualifying families.

The Housing Authority has a strong program of education, community service, and self-sufficiency activities that benefit the residents of its four complexes, and has received numerous national, state, and local awards for their services. Programming includes:

- Education and Employment Programs for Adults
 - REACH HIGHER – a 6 month Welfare-to-Work program providing paid work experience in lieu of TANF benefits through 30 plus nonprofit, business, and industry partners.
 - REACH – provides participants with on-the-job training with the Housing Authority while requiring English as a Second Language (ESL), General Equivalency Degree (GED), or post-secondary education.
 - Financial Literacy – educates participants in basic financial principles such as budgeting, money management, and establishing good credit.
 - Case Management – assists residents in basic human needs.
 - Family Literacy – offers ESL, GED, and parent education, serving 110 parents and children.
 - Live the Dream Homeownership Supportive Services – provides pre-purchase homeownership preparation training.
 - Enterprise Community First Time Homeowner Project – provides \$2,000 in downpayment assistance for EC residents.
 - Project SOAR – provides skills-specific occupational training, paid work experience, and employment for public housing residents.
 - Community Garden Demonstration Project
 - Cabinet Shop – serves as a training facility for REACH HIGHER and REACH programs; cabinets were constructed for all 530 public housing units and are now built for other public housing as well as the general public.
- Education and Employment Programs for Youth
 - After-School Learning Centers – provide after-school tutoring, homework assistance, and educational enrichment.
 - Western Kentucky University/General Motors Foundation Fast Lane Academic Enrichment Program – WKU faculty and students provide tutoring, homework assistance, and hands-on activities.
 - Youth Sports – including flag football, basketball, and soccer.
 - Project PEACE (Positive Enrichment, Academic and Cultural Education) – teaches leadership through community service, diversity training, and multi-cultural activities.
 - Youth of Distinction – provides intensive reading, writing, and occupational skills training for youth; training in journalism, broadcasting, sports and recreation, small business ownership, and performing arts.
 - Youth Employment Services – provides occupational skills training, paid work experience, and job placement for in-school and out-of-school youth.
 - Project MADE – leadership program focusing on conflict resolution, peer mediation, and community service.

- Western Kentucky University Civic Engagement Program – teaches civic responsibility through community service.
- Education and Supportive Services Program for Elderly/Disabled
 - Project CARES – increases independence and quality of life for elderly/disabled residents through physical exercise programs, health screenings, yoga, literacy, and nutrition education.
 - Service Coordinator – provides case management and program coordination.

The City of Bowling Green’s Section 8 program has an active Family Self-Sufficiency (FSS) program that reached its full enrollment of 70 participants in 2003. Upon voluntary enrollment into FSS, tenants work with the Family Counselor to establish goals and objectives for becoming self-sufficient. A personal commitment for self-improvement on the part of the tenant is crucial to the success of the program. The Family Counselor:

- Provides individual assistance with establishing and achieving the tenant goals.
- Provides case management that links the tenant with community agencies which can help the tenant become self-sufficient.
- Offers training and workshops on money management, employability, homeownership, budgeting, credit, and more.

As a tenant begins earning higher income, the Section 8 program places residual housing assistance payments into an escrow fund which the tenant will be able to access upon graduation from the program.

In September, 2000, HUD issued the final rule to permit the use of Section 8 voucher assistance for homeownership. This rule made Housing Choice Voucher (HCV) funds, historically available only for rental assistance, available for use as mortgage subsidy. Qualified voucher families in participating jurisdictions may use their HCV subsidy to help them purchase a single family home, manufactured home, condominium or interest in a cooperative. Although the general regulations which form the framework for the program are established by HUD, PHAs have wide discretion in designing the local program to fit local needs. It is hoped that by broadening the use of HCV funds to include mortgage subsidy, more very low income families can become homeowners and begin to build assets for their future as productive, self-sufficient citizens. HCD established its HCV homeownership program in late 1999 (under the Proposed Rule with HUD approval), admitting the first homeownership participant in early 2001. Program participants are required to meet minimum income criteria, complete homeownership counseling programs and be in good standing with the HCV program. Participating families are responsible to secure private market mortgage financing and the HCV program sends an income-based subsidy to the mortgage holder each month.

Lead-Based Paint

Census 2000 data for Bowling Green indicates that the median residential structure was built in 1974, four years prior to the federal prohibitions on residential use of lead-based paint. The median age is as much as 20 years older in the Enterprise Community area: Census Tract 101 has a median year of 1954, Census Tract 102 has a median year of 1966, and Census Tract 103 has a median year of 1958. Census data for residential structures was compiled by the Census Bureau in 10 year increments. Just under 61 percent of all residential structures in Bowling Green (12,846) were built in 1979 or earlier. This compares to the state of Kentucky’s 64 percent and the national rate of 67 percent. Bowling Green’s slightly lower rate of aged housing is due, in part, to an aggressive code enforcement and demolition program. Although 61 percent of the structures were constructed in 1979 and earlier, that is not a sure indicator of the presence of lead-based paint. Many homes have undergone renovations by their owners and there have been dozens of housing units rehabilitated that were funded by HUD through the HOME, Rental Rehab, and CDBG programs.



Twenty percent of all residential units in Bowling Green are located in the Enterprise Community, but one-third of all housing dated 1979 or earlier is located there. Therefore, there appears to be a larger share of aged housing in the Enterprise Community, an area of greater concentration of low income families. This assumption is also supported by the median structure age data above.

Results of a 2000 study published in Environmental Health Perspectives (October 2002) showed that an estimated 25 percent of housing in the United States had significant lead-based paint hazards. These hazards take the form of deteriorated paint, dust lead, or bare soil lead. The study indicated, however, that the rate of incidence was much lower than estimated in a 1990 HUD study. The 2000 study indicated that the incidence rate is slightly lower in Metropolitan Statistical Areas with a population of less than 2 million (such as Bowling Green), where the estimated rate was 22 percent. Using the study's incident rates for age of housing, the following estimates of residential structures containing lead-based paint hazards were made:

Year Housing Unit Built	Number of Units	Percent w/ Lead-Based Paint	Number w/ Lead-Based Paint (est.)
Pre-1940	1,974	68%	1,342
1940-1959	3,717	43%	1,598
1960-1979	7,155	8%	572
1980-2000	8,347	3%	250
TOTAL	12,846		3,762

Source: U. S. Census Bureau data from Census 2000; and Environmental Health Perspectives, vol. 110, no. 10, October 2002.

Note: The table above varies slightly from the research data in Environmental Health Perspectives in that the third construction period was 1960-1977 instead of 1960-1979 as collected from the U.S. Census Bureau. A slight overestimation in this category is likely.

The 2000 study also estimated that 35 percent of the housing units with lead-based paint hazards are occupied by lower income families (households with less than \$30,000 per year of income). Racial distribution showed that 25 percent of the hazard units are occupied by whites and 29 percent by African Americans; 32 percent of the units were occupied by Hispanic families.

Data from the Barren River District Health Department (BRDHD) indicates that the incident rate of lead poisoning is decreasing as housing improvements are made and parents are educated about lead based paint. Children in Warren County that receive preventive health care services at BRDHD are screened with a five question survey and those who are found to be at-risk are then finger blood tested. Other children may be tested at the request of a parent or physician.

The level of lead contamination is broken into 6 categories. Class 1 is the mildest form of contamination in which the child tests at less than 9 *ug*/dl (micrograms per deciliter); this level requires continued monitoring, including a repeated blood test in 12 to 20 weeks. All classes with blood lead levels of 10 *ug*/dl or greater is considered lead poisoning. When a case of Class 3 lead poisoning is indicated, the Health Department will re-test (an arm blood draw) the child and provide in-home counseling, environmental review, parent education, and medical and nutritional therapy. The child is also referred to a physician for a medical evaluation. Warren County, fortunately, has not had any cases of Class 4 or 5 lead poisoning in this data period. Data for Class 2A, 2B, and 3 are listed in the table below.

Children in Warren County testing positive for lead contamination	1998	1999	2000	2001	2002	2003*
Class 2A – 10 to 14 ug/dL	35	21	17	10	7	6
Class 2B – 15 to 19 ug/dL	13	8	7	6	6	2
Class 3 – 20 to 44 ug/dL	7	7	6	6	5	3
TOTAL	55	36	30	22	18	11

Source: Barren River District Health Department

* 2003 data is through October 3, 2003.

The hazards of lead contamination have been well documented in national studies. Continued lead hazard reduction measures are needed locally, particularly in homes with children under the age of six. Rehabilitation, maintenance and demolition activities, when proper work practices are used, can continue to help reduce the number of homes with lead-based paint hazards. Preference in a rehabilitation program could be given for homes with lead paint and a child under 6 years of age.

Barriers to Affordable Housing

Bowling Green is situated, topographically and geologically, in a karst plain. Karst is a type of terrain formed primarily by limestone where the groundwater has enlarged openings forming the subsurface drainage system. Surface streams are almost non-existent in the area; the Barren River, running through northern Bowling Green, is one exception. Typical features of the karst terrain include sinkholes, caves, and sinkhole collapse, and flash flooding. The karst landscape presents many barriers to development and construction of affordable housing. As the city of Bowling Green developed over the years, the most difficult terrain was left undeveloped, while the city spread out more and more to gain enough land to compensate. By comparison, Bowling Green is triple the size in land area of Owensboro, a Kentucky city with similar population. One of the karst features that increases development costs is the occurrence of limestone. Limestone is a very hard, dense rock that is located near the soil's surface in many areas of Bowling Green. Installation of streets, water and sewer lines, and footer locations are often stalled because of the time and expense that a developer must invest in excavating or blasting rock. While solid rock is a problem in some areas, its collapse can also be a problem. The majority of recent development in Bowling Green has utilized sinkholes, retention basins, and detention basins as the common stormwater management systems. While these practices may be less costly initially than installing storm sewers, they are now being reviewed by local officials for their effect on water quality. As the City of Bowling Green seeks to implement the federal regulations for the Clean Water Act, best management practices will be required which may add to the development cost.

For the Section 8 rental assistance program, one of the barriers to affordable housing is the payment standard for determining assistance. In September, 2003,

HUD rescinded the use of Success Rate Payment Standards which were based on the 50th percentile Fair Market Rent. As of October 1, 2003, all Section 8 housing is to be calculated using the 40th percentile Fair Market Rent. This change, though small, effectively limits the choice of housing for Section 8 participants, particularly one bedroom households which are usually the elderly and single parents of one child. These households generally have a very limited income and the difference between \$408 (50th percentile) and \$377 (40th percentile) in monthly assistance for rent and utilities can be difficult to overcome. HUD also rescinded the use of exception rents in high-end census tracts, further limiting housing choice in Bowling Green. *Note: Prior to the implementation of the rescission, the Section 8 program was notified that HUD had voided the rescinded use. It is an on-going administrative challenge for the local Section 8 program to implement the “short-notice” changes that HUD decrees periodically. More discussion by HUD with local Section 8 programs prior to program changes would be extremely helpful, both for HUD and the local program.*

Although the local zoning ordinance does not contain specific incentives for affordable housing development, there have been significant changes in the ordinance over the past few years which have encourage a variety of residential development. The Zoning Ordinance, which is administered by the City-County Planning Commission of Warren County, was adopted in 2001, after two years of re-organizing and re-writing the former ordinance. The revisions were undertaken with several goals in mind such as making the document more user-friendly, offering more residential zoning choices, and providing more flexible zoning options. One of the most flexible zoning districts that will be useful for affordable housing development is the Planned Unit Development (PUD). PUD zoning allows the developer to establish his own standards such as setbacks, lot coverage, lot size, and density, subject to Planning Commission approval.

As noted in the “Housing” section above, the greatest barrier to affordable housing in Bowling Green is simply the lack of affordable units for families of low and moderate income. The high percentage of households that have housing problems is indicative of the affordability problem in Bowling Green.

Fair Housing

An Analysis of Impediments to Fair Housing Choice was completed by the City of Bowling Green HCD staff in the Fall of 2003. The Analysis of Impediments process resulted in the following impediments, primarily “omissions”, being recognized:

- Lack of education about discrimination and Fair Housing laws.
- Lack of mobility of residents and access to resources.
- Lack of affordable units to rent or purchase.
- Lack of pro-active property maintenance code enforcement.
- Cumbersome legal system for evictions.

Details of these impediments and the proposed actions to overcome the impediments are detailed in the Analysis of Impediments document (see Attachment D).

Anti-Poverty Strategy

According to the Census Bureau, poverty is determined by the Bureau by using “a set of money income thresholds that vary by family size and composition to detect who is poor. If the total income for a family or unrelated individual falls below the relevant poverty threshold, then the family or unrelated individual is classified as being ‘below the poverty level’.” From 1990 to 2000, the number of families living in poverty in Bowling Green has decreased from 1,745 to 1,704. As a percentage of the families, the rate has improved from 18.1 percent in 1990 to 15.7 percent in 2000. Although the number of families in poverty has decreased, the number of individuals living in poverty has actually increased in the same period, from 8,759 persons in 1990 to 9,568 persons in 2000, in increase of 9.2 percent.

Although the rate of families living in poverty is improving slightly, Bowling Green still has higher poverty rates in all categories than the state and national rates.

Poverty Status in 1999	Bowling Green (percent)	Kentucky (percent)	United States (percent)
Families below poverty level	15.7	12.7	9.2
With related children under 18 years	24.3	18.1	13.6
With related children under 5 years	32.8	21.6	17.0
Families with female householder	41.8	33.1	26.5
Individuals	21.8	15.8	12.4
Age 65 and over	15.0	14.2	9.9
Related children under 18 years	25.1	20.4	16.1

Source: U. S. Bureau of the Census, Census 2000

The Enterprise Community, consisting of Census Tracts 101, 102, and 103, showed improvement from 1990 to 2000:

Bowling Green Enterprise Community Population and Poverty	Tract 101		Tract 102		Tract 103	
	1990	2000	1990	2000	1990	2000
Total Population	2,270	2,048	3,697	3,611	3,407	3,562
Individuals with income below poverty level	995	853	1,834	1,416	1,287	1,316
Percent of Population below poverty level	43.8	41.7	49.6	39.2	37.8	36.9

Source: U. S. Bureau of the Census, Census 2000.

All three census tracts show a decrease in the rate of poverty, with the most decrease occurring in Tract 102. The Enterprise Community Strategic Plan has been approved by HUD as a Neighborhood Revitalization Strategy.

Community Development

In 1999, three Census tracts in the City of Bowling Green – 101, 102, and 103 – were designated as an Enterprise Community (EC) by the U. S. Department of Agriculture. The strategic plan adopted for the Enterprise Community has helped coordinate the provision of services necessary for comprehensive economic change in this area of the City. Through the HUD Partnership approval process, the EC has also been designated as a Neighborhood Revitalization Strategy Area.

The EC planning document is not included with this Consolidated Plan document due to size limitations; it is available for review at the Housing and Community Development Department office. The EC strategic plan identified the following goals for the 10 year period:

Economic Empowerment

- Increase business development (industrial, retail, and service).
- Create jobs – need based on census data and unemployment rate.
- Cut unemployment rate (rate should mirror the overall rate of Bowling Green).
- Perform market demand study for neighborhoods to see what type of businesses can be supported.
- Provide job training specific to industry needs.
- Increase total number of jobs in area (professional, unskilled, skilled, and technical).
- Increase employment within walking distance or more transportation to jobs.
- Increase access to capital.

Supporting Families

- Maximize existing program coordination to provide seamless services.
- Expand affordable day care and provide top quality day care.
- Expand adult day care.
- Provide respite for caregivers.
- Expand health care so residents can access specialist care.
- Provide health care to those who fall through the gap.

Housing

- Increase homeownership and homeownership education.
- Improve aesthetics of neighborhood.
- Deal with absentee landlords.
- Increase housing opportunities for elderly.
- Improve housing conditions.
- Provide affordable assisted living for elderly.

- Increase housing supportive services.
- Provide a continuum of care for special populations combined with “bricks and mortar” projects.

Education

- Improve educational opportunities for zone residents.
- Increase adult literacy and education.
- Reduce school dropouts.
- Increase GED attainment for persons without a diploma.
- Support programs which provide for vocational, junior college, or university education.
- Increase responsiveness to LEP students and their families.
- Begin education at a very early age.

Neighborhood Development

- Expanded transportation.
- Develop the Riverfront/Nature Walk.
- Better coordination of public services.
- Improve streets, drainage, quality of air and noise.
- Improve access and supervision of recreation facilities.
- Improve library services and neighborhood centers.
- Expand sidewalk program to interconnect areas within neighborhoods.
- Upgrade waterlines to meet minimum fire protection.
- Eliminate brownfields.
- Preserve the downtown.
- Reuse underutilized and vacant buildings.

Youth Development

- Expand existing after school and summer programs.
- Reduce the number of young people taking/experimenting with drugs.
- Reduce gang activity.
- Provide opportunities for all youth to access higher education, be it college or technical/vocational training.
- Assist young people to develop the leadership skills necessary to take responsibility not only for their lives, but to be involved community members.
- Increase employment opportunities for young persons.
- Improve education and training opportunities.
- A computer for every home in the EC.

Drug and Alcohol Prevention

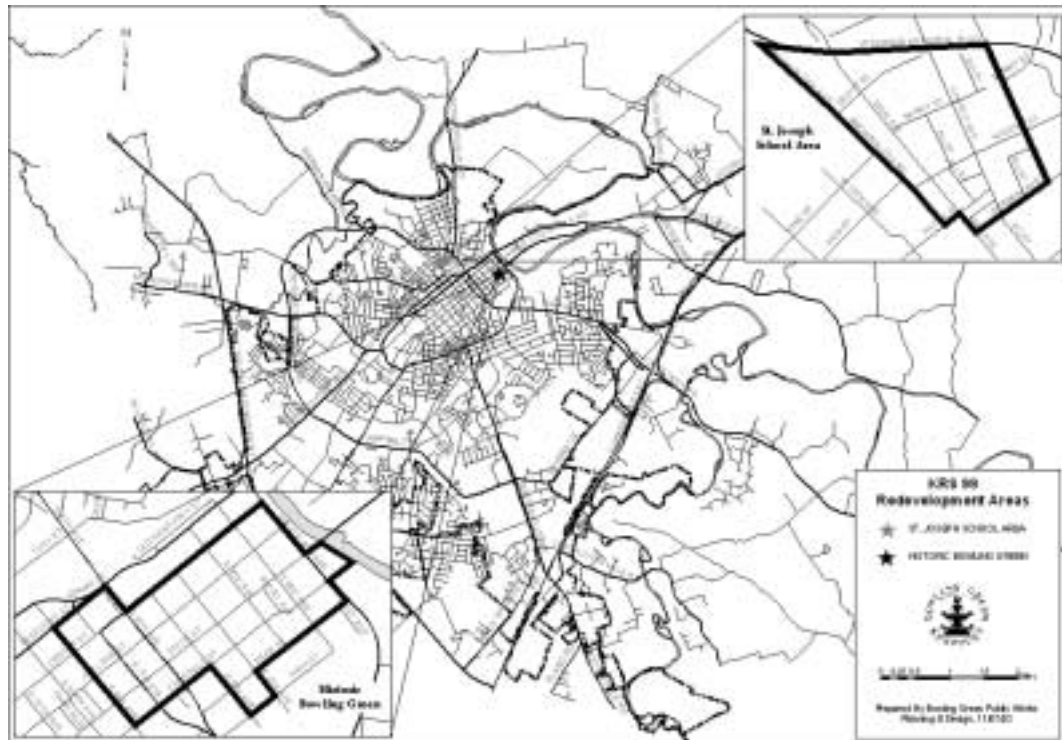
- Develop meaningful partnerships, which will strengthen the existing comprehensive drug strategy that incorporates treatment, enforcement, prevention, and education.

- Increase education and awareness must be increased within and outside the EC because these issues transcend the EC boundaries.

Crime Prevention

- Reduce crime.
- Reduce gang activity.
- Increase crime prevention.
- Increase community policing efforts in the EC.

In addition to the EC plan, the City of Bowling Green has adopted two community development plans under Kentucky Revised Statutes (KRS) Chapter 99 which provide for the redevelopment of targeted areas of the City. Both areas have been declared to meet the criteria for slum and blight and both are located within the EC. The location of these two planning areas are shown in the map below and then described in the following narrative.



Historic Bowling Green Revitalization Area: This 29 block area contains some of the oldest sections of Bowling Green, lying between the City’s governmental center and the banks of the Barren River. The Community Development Plan (also called an urban renewal plan) is included with this document in Attachment B. The general objectives of the Plan, adopted in January, 2003, were:

- (1) To create a framework for implementing the Bowling Green Renaissance Kentucky program.

- (2) To protect the health, safety, and welfare of residents, visitors, and workers in the target area by elimination of hazardous or unsafe conditions of structures in the redevelopment area.
- (3) To encourage mixed use development, redevelopment, and general improvement of the project area, primarily for residential, commercial, and tourism activities.
- (4) To improve the appeal of the target area as a desirable place to live and or work through acquisition of property, demolition of substandard structures, removal of non-conforming land uses, promotion of mixed land uses for new job oriented commercial and residential uses, and construction of new public improvements.
- (5) To develop focal points and anchors in the target area such as Circus Square, a defined expansion of the medical facilities, expanded development of the riverfront area and redevelopment and rehabilitation of the historic “Shake Rag” African-American neighborhood which will enhance a mixed land use community and improve the quality of life for both residents, employees and individuals interacting within the target area.

Over two dozen specific operating objectives were identified in the Community Development Plan, ranging from the incorporation of recreational and green space components, to the establishment of a housing rehabilitation program, to the upgrade and improvement of sidewalks and other pedestrian corridors. The Plan included a Future Land Use Map which will guide all redevelopment of the area.

St. Joseph School Area Redevelopment Plan: The eleven block St. Joseph School Area is a historically residential area located a few blocks from downtown Bowling Green and CSX Railroad. Many of the residences were originally constructed to house the Irish immigrant workers employed by the railroad and adjacent industry. The redevelopment plan was adopted in 1994 with the purpose of developing “successful strategies for the restoration of a once proud, viable “working class” residential neighborhood to a sound, healthy, and desirable residential neighborhood.” Additionally, the plans were to “preserve the unique turn-of-the-century character of the neighborhood by preserving and enhancing its historic architectural and physical characteristics” and “maintain its affordability during and after redevelopment”. Recommendations from the redevelopment plan include:

- Rehabilitation of existing properties.
- Maintenance and upgrading of public facilities.
- Preservation of its significant historic and traditional neighborhood character.
- Removal of abandoned and dilapidated structures.
- Use of infill development to provide additional housing opportunities.

While a number of the objectives in the plan have been completed, there remains a section of the redevelopment area that has not received adequate attention. Areas lying along West Main Avenue and Brownslock Road are of particular concern.

Both the Historic Bowling Green and the St. Joseph School Area redevelopment plans are important tools for the City. With the adoption of a Chapter 99 plan, KRS declares that “the clearance, replanning, rehabilitation and reconstruction of such areas on a large scale basis are necessary for the public welfare” and that such activities are “public uses and purposes”. This declaration gives the City the right of eminent domain when advancing the goals and objectives of the properly adopted Chapter 99 plan.

Citizen comments during the public hearing process (included in the Citizen Participation section of this document) indicate additional community development needs.

- Bowling Green-Warren County Primary Care Center – The health care crisis in the Commonwealth of Kentucky is affecting care-giving in Bowling Green. The Primary Care Center sees 11,000 unduplicated patients each year. It is currently housed in the facility with the Barren River District Health Department. Present plans for the Center are to move to a larger, separate facility within two years. CDBG funding has been requested to assist with purchasing equipment for the new facility.
- Sidewalks and Greenbelt Development – The City of Bowling Green and Warren County have adopted a Greenbelt System Master Plan that proposes to link public spaces with services and residential areas. The Barren River District Health Department and the Warren County Council on Physical Activity asked the City to look at infrastructure needs, particularly sidewalks and other pedestrian travel ways in all projects undertaken with CDBG funding.
- Child Care and Head Start – Community Action of Southern Kentucky serves a large number of families in the Enterprise Community and throughout Bowling Green with affordable child care services and Head Start. With a proposed elderly housing development, one of the child care centers in the Historic Bowling Green redevelopment area will be displaced. With the relocation of the facility, additional Head Start classes are planned to meet the growing demand.

Priority Needs

Although there seems to be an almost endless list of needs in housing and community development, some areas where the need is greatest must receive priority. Based on the background data and citizen input detailed in this document, the following needs have been identified as priorities:

- (1) Implementation of the two KRS 99 Redevelopment Plans – These plans were prepared with citizen input and reflect the City’s desire to

improve the two specific areas of our community. Slum and blight clearance, re-introduction and/or increase of homeownership, and upgrading of the overall appearance of these areas will have a lasting impact on the City.

- (2) Homeownership – This community has been fighting a losing battle for decades. The homeownership has been declining and is now less prevalent than rental occupancy. The tide must be turned for the City to stabilize its neighborhoods. Homeownership programs for both new construction and for rehabilitation are imperative.
- (3) Elderly Residential – The elderly population is one of the City’s most treasured assets, yet many suffer with housing affordability problems. Affordable rental units are one proven solution for assisting the elderly in Bowling Green. As our population ages, there also is greater need for personal services, including affordable assisted living facilities.
- (4) Transitional Housing – One housing need identified by the fair housing focus group during the Analysis of Impediments was the need for more transitional housing. Additional transitional housing units constructed by HANDS have just been completed and were ready for occupancy in October, 2003. This need is being addressed by agencies other than the City.

The City plans to address the priority needs over the next five years with Community Development Block Grant and other funding in the following manner:

Project	# of Housing Units	CDBG Funding	Other Funding	Total Project Cost
Elderly Housing – Historic BG Area	84	\$1,088,000	\$7,402,500	\$8,490,500
Elderly Housing – St. Joseph Area	18	\$319,000	\$1,269,000	\$1,588,000
Homeownership – Historic BG Area	44	\$1,236,000	\$2,677,000	\$3,913,000
Homeownership – St. Joseph Area	7	\$30,000	\$420,000	\$450,000
Small Business Development		\$50,000		\$50,000
Child Care Facility		\$150,000	\$568,000	\$718,000
Primary Care Facility		\$80,000	\$2,500,000	\$2,580,000

**Consolidated Plan Annual Action Plan
Summary of Annual Objectives and Projects
FY 2004**

Obj #	Specific Annual Objective	Budgeted Expenditure	Source	Performance Measure	Expected Units	Actual Units
RHE – 1	Increase the number of affordable rental housing units for elderly.					
RHE – 1.1	Develop 24 units of elderly housing at Chestnut Street and 3 rd Avenue.	\$2,105,500	\$137,000 - CDBG \$11,500 – City of BG \$1,957,000 – other/private	Decrease percent of elderly with housing problem. Lease up of all 24 units within 18 months of approval.	24	
RHE – 1.2	Develop 18 units of elderly housing at W. Main Avenue	\$1,588,000	\$319,000 – CDBG \$54,000 – City of BG \$1,215,000 – other/private	Decrease percent of elderly with housing problem. Lease up of all 18 units within 18 months of approval.	18	
OH – 1	Increase the number of affordable housing units for purchase.					
OH – 1.1	Preserve and improve existing homeowner occupied housing in Shake Rag Historic District	\$200,000	\$200,000 – HOME	Rehabilitate 8 units of homeowner occupied housing in an affordable manner.	8	
CD – 1	Enhance the operation of neighborhood facilities.					
CD – 1.1	Assist in the development of a child care facility in the Historic BG Revitalization Area	\$718,000	\$150,000 – CDBG \$168,000 – City of BG \$400,000 – other/private	Construct new day care/Head Start facility to relocate and expand 3 rd Avenue Little Treasures.		
ADM – 1	Administer CDBG funding in a manner that is in compliance with all applicable laws and regulations					
ADM – 1.1	Further Fair Housing by providing additional publicity and education opportunities; Administer CDBG funding	\$65,000	\$65,000 – CDBG	Conduct annual meeting of fair housing focus group to obtain feedback about fair housing efforts. Effectively administer CDBG funding to avoid monitoring findings.		

Analysis of Impediments to Fair Housing Choice

Executive Summary

The City of Bowling Green, Kentucky, initiated an Analysis of Impediments (AI) to Fair Housing Choice in October, 2003. This study was undertaken for several reasons, among them: (1) there had been recent discussion in the community about possible expanded local enforcement of fair housing laws, and (2) the City was awarded Community Development Block Grant entitlement status.

The lead agency for undertaking the AI was the Housing and Community Development Department (HCD) staff. The staff followed the suggested planning process contained in the U. S. Department of Housing and Urban Development (HUD) publication Fair Housing Planning Guide in preparing this document. Existing, available data was used in the background; sources for the data are cited within the document text. A five year Consolidated Plan is being prepared concurrently with this AI and an extensive documentation of the background housing data is contained in that Plan.

An “impediment” to fair housing choice is defined as “any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice” or “any actions, omissions, or decisions that have this effect”.

The AI process resulted in the following impediments, primarily *omissions*, being recognized:

- Lack of education about discrimination and Fair Housing laws.
- Lack of mobility/access to resources.
- Lack of affordable units to rent or purchase.
- Lack of pro-active property maintenance code enforcement.
- Cumbersome legal system for evictions.

These impediments and the actions that can be taken to overcome each impediment are further detailed later in this document.

Background Data

The City of Bowling Green is the county seat of Warren County and is the central city of the Metropolitan Statistical Area that includes Warren and Edmonson Counties. Bowling Green has become the regional service and employment center for a ten county area, particularly for retail, restaurants, and medical facilities. In the 2000 Census, Bowling Green’s population was 49,278. The population of the City grew over 18 percent in the decade from 1990 to 2000 (and

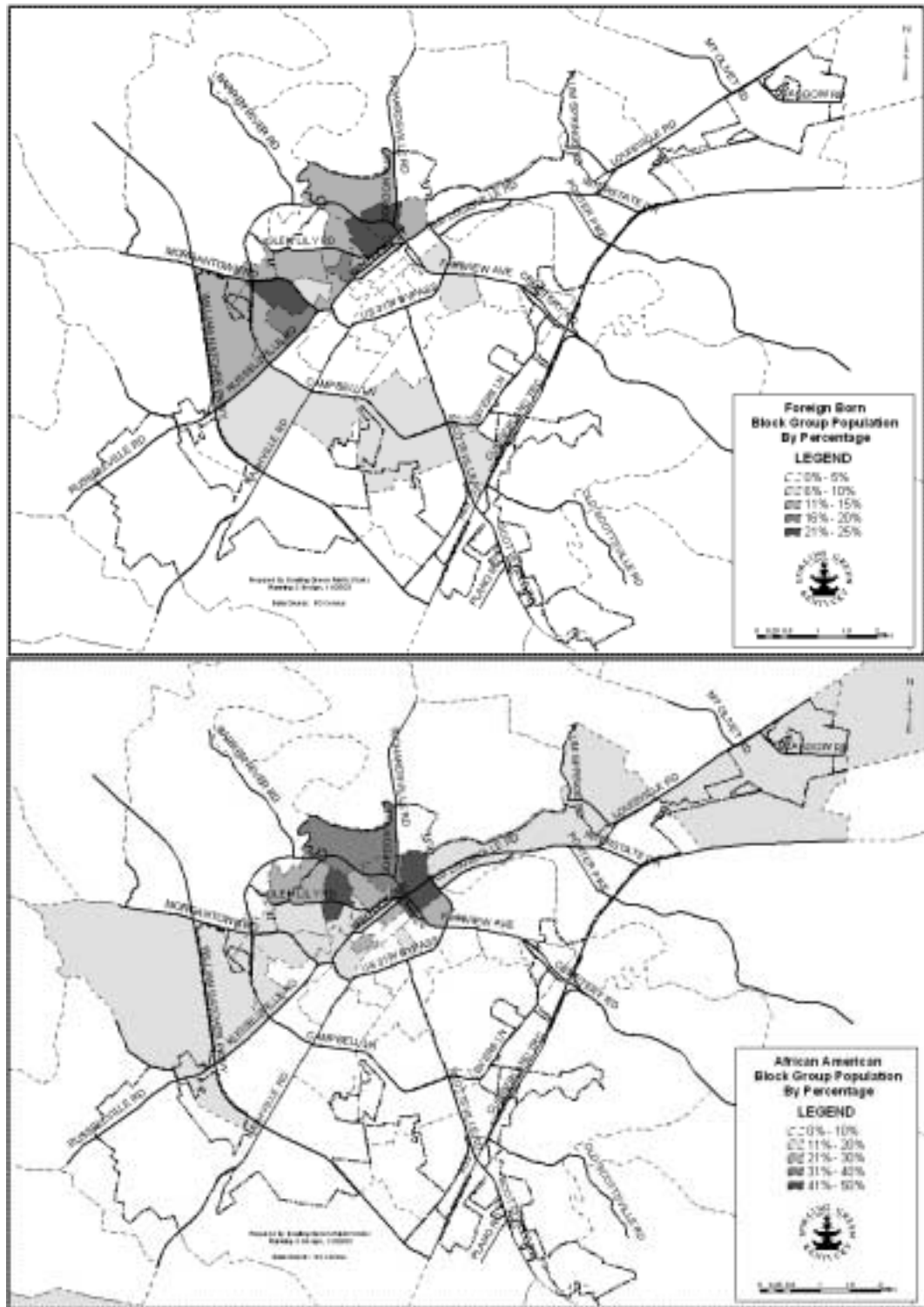
the County grew by over 19 percent), placing a strong demand on the housing industry in Bowling Green and Warren County.

Bowling Green’s population is becoming increasingly diversified as it welcomes families and individuals from all nationalities. The change in the past decade is detailed below:

Population Characteristic	1990	2000	Percent Change
Total Population (adjusted)	41,688	49,278	18.2
Race			
White only	35,110	39,842	13.5
Black/African American only	4,950	6,267	26.6
American Indian/Alaskan Native	69	111	60.9
Asian or Pacific Island	454	1,020	124.7
Other (other race, two or more races)	58	2,056	3444.8
Hispanic Ethnicity	275	2,011	631.3
Foreign Born	626	3,429	447.8

The geographic distribution of some of these populations (Hispanic ethnicity, Foreign Born, and Black/African American) is depicted in the following maps. Each population group is shown as a percentage of the total population in that particular block group.



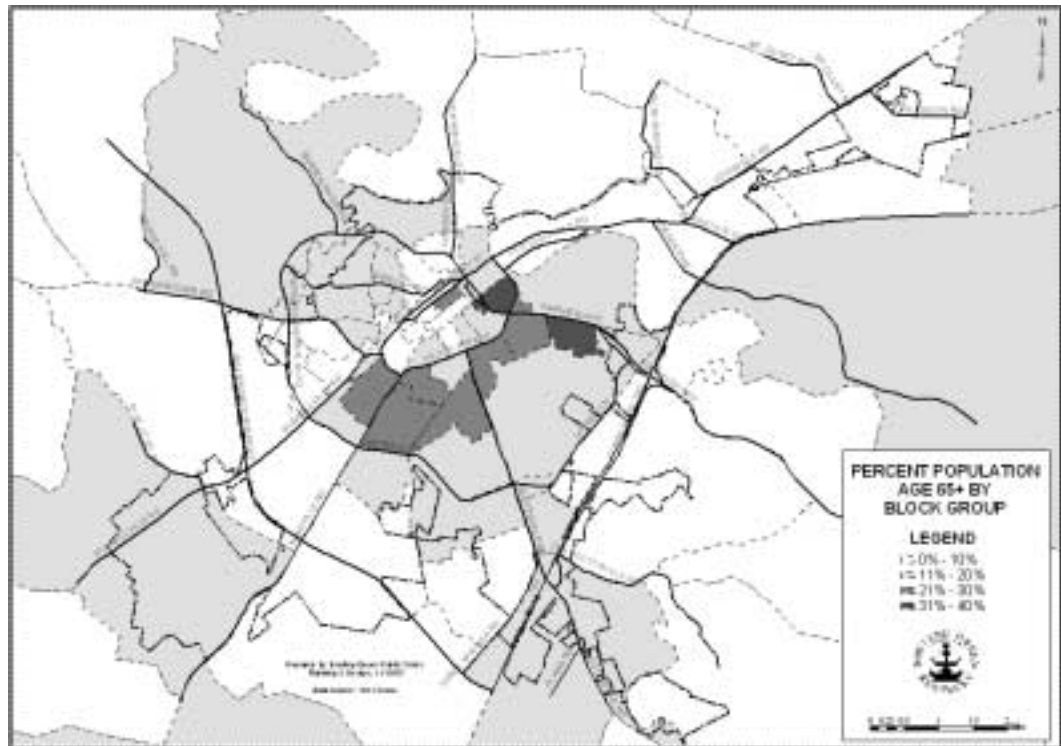


The median age in Bowling Green is fairly young at 28.6 years (Census 2000), compared to 35.9 years for Kentucky and 35.3 years for the United States. This young age has often been attributed to the fact that Bowling Green is a university town. Other age comparisons are listed in the table below:

Age Characteristic and Rate	Bowling Green	Kentucky	United States
Total Population	49,278	4,041,769	281,421,906
Median Age	28.6 years	35.9 years	35.3 years
Under 5 years	6 %	6.6%	6.8 %
School Age (5 to 19 years)	21.4 %	21 %	21.8 %
Elderly (65 years and over)	12 %	12.5 %	12.4 %

Source: U.S. Census Bureau, Census 2000

In the Census 2000 data, just over 20 percent of the population indicated some form of self-determined disability. In the working age population (21 to 64 years) over half of the individuals that indicated a disability were also employed. Data from the local Social Security Administration office indicates that there are 5,677 persons receiving benefits because of disability in Warren County (6.1 percent of the county's population). Applying this rate to the City's population would estimate about 3,006 persons in Bowling Green as disabled, although the rate may be slightly higher in the urban setting.



According to HUD income information, the median family income for Warren County in 2003 is \$50,500. In the Census 2000, the median household income for Warren County was \$36,151 and for Bowling Green was \$29,047.

Using 2000 Census data, HUD prepared the following income data for households in Bowling Green:

% of MFI	Renter	Renter	Renter	Renter	Total Renters	Owner	Owner	Total Owners	Total House holds
	Elderly 1 & 2 Member	Small Related 2 to 4	Large Related 5 or more	All Other House holds		Elderly	All Other		
0 to 30%	670	992	235	965	2,862	580	334	914	3,776
31 to 50%	316	633	142	870	1,961	581	411	992	2,953
51 to 80%	213	685	90	659	1,647	660	678	1,338	2,985
TOTAL House holds	1,471	3,759	546	3,923	9,699	3,599	6,408	10,007	19,706
Percent LMI (0 to 80%)	81.5%	61.5%	85.5%	63.7%	66.7%	50.6%	22.2%	32.4%	49.3%

Source: U. S. Department of Housing and Urban Development, CHAS Data Book, Table 1C

Review of this data indicates that a full two-thirds of all renters in Bowling Green are low income, ie. 80 percent or less of the median family income. In fact, half of all households are very low income, and about one-quarter (24.6%) of the renter households are extremely low income. Two alarming statistics in the renter households is the elderly households and large family households; more than 80 percent of the households in these categories are low income. As one would reasonably assume would be the case, the statistics for homeowners are somewhat better, with only one-third of all homeowner households that are low income. The elderly, however, have a significantly higher segment that are low income (50.6%).

About 65 percent of the Bowling Green population age 16 and over is in the labor force (Census 2000). Bowling Green has maintained a fairly low unemployment rate for the past several years with the most recent preliminary results (August 2003) for Warren County showing the rate at 4.6 percent. This rate is up slightly from the August data in previous years (2002 – 3.8 percent, 2001 – 4.3 percent, and 2000 – 2.5 percent).

Distribution of the employed population is shown by industry in the table that follows:

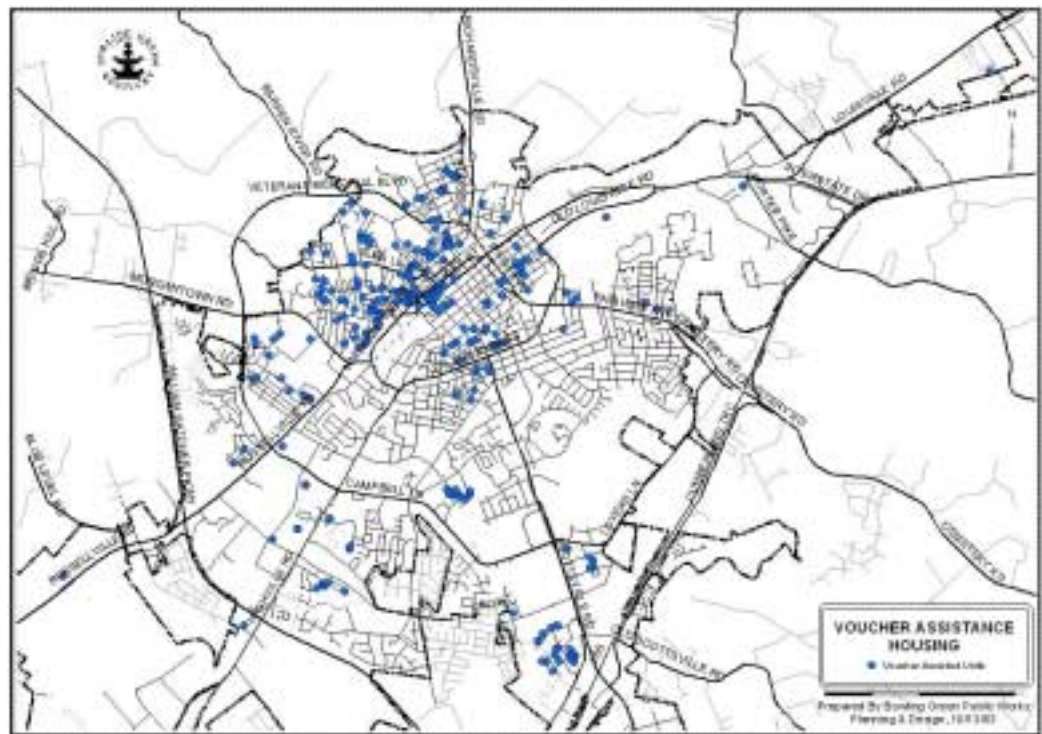
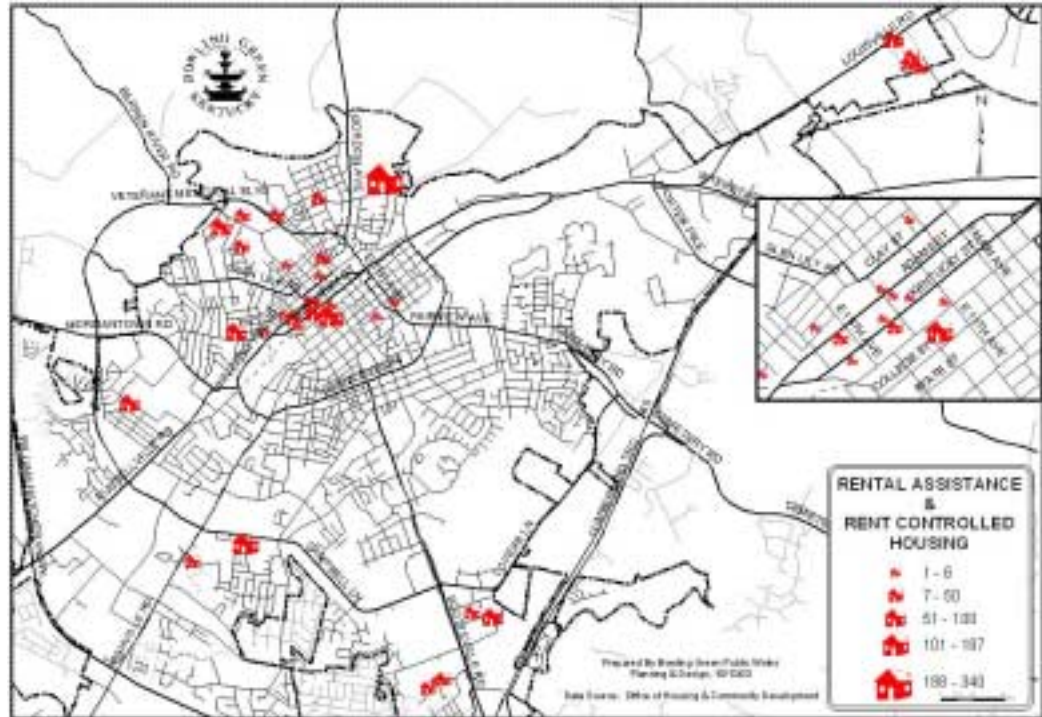
Industry	Percent of Bowling Green Labor Force Employed in Occupation
Agriculture, forestry, fishing and hunting, and mining	0.9
Construction	4.4
Manufacturing	17.4
Wholesale trade	3.1
Retail trade	15.6
Transportation and warehousing, and utilities	3.9
Information	2.1
Finance, insurance, real estate, and rental and leasing	4.7
Professional, scientific, management, administrative, and waste management services	5.4
Educational, health and social services	23.1
Arts, entertainment, recreation, accommodation and food services	11.7
Other services (except public administration)	4.4
Public administration	3.2

Source: U.S. Census Bureau, Census 2000

Major employers in Bowling Green include Commonwealth Health Corporation, Warren County Board of Education, Western Kentucky University, and General Motors.

Only 49 percent of all occupied housing units in Bowling Green are homeowner occupied, compared to the state rate of 70.8 percent and the national rate of 66.2 percent. This community's homeownership rate has been slowly declining over the past few decades. The homeownership rate in 1990 was almost 51 percent and two decades prior to that it was 56.7 percent. One of the focal points of the City's HCD Department has been to increase the homeownership rate in Bowling Green. HOME, CDBG, and Family Self-Sufficiency Program are some of the tools with which HCD has worked toward increasing homeownership, particularly in the Enterprise Community. The homeownership disparity has brought with it many related problems such as declining housing conditions and property maintenance code enforcement issues.

Bowling Green has 1,645 project based assisted rental units and 509 tenant-based assisted units. The following maps show the geographic distribution of the project based units and then the distribution of the tenant-based units. Although tenants with Section 8 vouchers can lease anywhere within the jurisdiction of the City of Bowling Green, the distribution map indicates that a large number of the tenants dwell within the Enterprise Community.



Current Fair Housing Legal Status

A review of housing discrimination complaints filed with the U.S. Department of Housing and Urban Development and the Kentucky Human Rights Commission showed that six complaints had been filed in the three and a half year period from January 2000 to the end of September 2003. All six were filed on the basis of disability. All six of the complaints have been closed.

The Bowling Green Human Rights Commission is the local agency responsible for intake, referrals, and education about fair housing laws. In the period between January, 2001, and October 10, 2003, the Commission had 13 intake referrals related to housing discrimination. Of those, 5 were based on race, 4 were based on disability, and 4 were based on familial status.

In March, 2001, the Lexington Fair Housing Council conducted testing and accessibility surveys in Bowling Green. Six tests were conducted in which three were based on race, two on familial status, and one on disability. The only test that resulted in evidence of discrimination was the test focusing on disability when an apartment complex owner would not make a pet exception for a blind tester's service animal. A complaint was filed with HUD and the landlord paid the Council \$250 and attended a fair housing class. The Council's accessibility surveys resulted in three properties determined not to be in compliance with the requirements of the Fair Housing Act.

Identification of Impediments to Fair Housing Choice

The Fair Housing Focus Group Meeting held October 21, 2003, was very well received and attended. The HCD staff invited a cross-section of the housing community to participate in an afternoon of discussion about fair housing issues in Bowling Green; over 280 invitations were mailed. The attending group of 42 included:

City/local government	11
Landlords/property managers	6
Realty/Banking/Mortgage Co	5
Service Providers	11
Advocacy	4
Builders/architect	2
WKU/HUD	3

The characteristics of the group were a similar representation of the City as a whole:

Characteristic	Attendees	City of Bowling Green
Female	52%	52%
Male	48%	48%
White	88%	81%
African American	12%	13%
Asian/Islander	0%	2%
Hispanic	2%	4%

The meeting began with an overview of the Fair Housing Plan components and an explanation of the Analysis of Impediments. The HUD definition of “impediments” was presented and examples were used to help explain further. The group was challenged with the meeting goals of:

- Obtaining as much information as possible about fair housing problems in Bowling Green.
- Developing a set of realistic and comprehensive actions and measurable results.
- Implementing these actions within an optimal time frame and evaluating the results.

With the “impediment” definition and these meeting goals in mind, the group was divided into six working tables, each with a cross-section of representation in the housing industry, and charged with the first small group task. The first task was to brainstorm fair housing issues, and then to filter these issues into actual impediments – actions, omissions, or decisions – keeping in mind the protected classes. At the completion of this task, the issues from all tables were consolidated in a large group discussion.

In the second task, each small group was assigned a short list of fair housing issues from the large group discussion. The small group was charged with identifying specific actions to eliminate each impediment. At the conclusion of this work, these actions were shared with the large group for discussion and clarification.

The final task was for each small group to prioritize the impediments for inclusion in the Fair Housing Plan. The groups were instructed to assign each impediment a priority of A (immediate action necessary), B (action needed within 5 years), or C (long-range planning need). Many impediments and actions were repeated among groups and have been consolidated for the purposes of streamlining this document.

Impediment #1: Lack of education about discrimination and Fair Housing Laws. The consensus among participants was that residents, landlords, realtors, and the community need more information about the Fair Housing Laws, how to avoid discriminatory practices, and what to do if housing discrimination occurs. Related issues included lack of trust in local government, fear of reprisal, NIMBY (Not In My Back Yard) attitudes, public perception, and cultural awareness.

Immediate Actions:

- Air anti-discrimination programming on cable government access and other channels.
- Require City-funded agencies to distribute fair housing literature.
- Air multi-lingual public services announcements on local media that includes information about where to go, what to do, and what housing discrimination is.
- Distribute fair housing information through the schools in various translations.
- Conduct educational programs in schools, clubs, service organizations, churches.
- Produce a “Spotlight on Bowling Green” (City-sponsored monthly cable program) addressing fair housing.
- Post fair housing information on websites and billboards.
- Provide training for landlords, realtors, agency staff about fair housing laws.
- Promote public meetings to gain citizen input on projects benefiting minorities and low income families.
- Identify local sources, service agencies that can assist in filing a fair housing complaint and publicize.

Five Year Actions:

- Study need for rental unit inspection program.
- Develop informal hearing process for fair housing complaints.
- Study need for “continuing education” classes for landlords.
- Study need for landlord registration program for all landlords.
- Develop ombudsman system to act as intermediary between landlords/tenants, consisting of a combination of:
 - Citizen ombudsmen representing each culture/language, and
 - City department or agency to help process complaints and settle problems informally.
- Facilitate neighborhood associations, especially in the rental communities, and include fair housing information in the outreach/education program.

Long-Range Actions:

- Encourage better participation in public hearings by all affected residents.
- Conduct diversity awareness training.
- Study need for Landlord-Tenant Act and take necessary action.
- Require all City and City-funded agencies to offer fair housing publications in English and Spanish, and publish telephone numbers for translation services.

- Undertake public information/education campaign to ensure that renters know both their rights and their responsibilities.

Impediment #2: Lack of mobility/access to resources. The available jobs are not located in areas where assisted housing is available. Landlords are allowed to discriminate against potential renters based on source of payment, such as Section 8 vouchers and non-employment. There is not adequate pedestrian facilities for people to walk to the services/jobs they need.

Immediate Actions:

- Expand public relations efforts for existing public transit to inform residents of availability of routes and services.
- Develop public relations campaign to help overcome stigma of public transit.

Long-Range Actions:

- Expand public transit routes for easier access to job locations.
- Mandate private development of sidewalks, trails, and lighting.
- Seek federal funding for expanded public transit.
- Provide additional funding for Greenways development.

Impediment #3: Lack of affordable units to rent/buy. Mixed income housing development and mixed housing types are needed. Existing credit, budget, and housing counseling needs to be expanded and publicized. The City and housing industry need to emphasize the benefits of homeownership. Additional transitional units and disabled accessible units are needed.

Immediate Actions:

- Educate the community about the benefits of mixed income housing.
- Review zoning ordinance for changes to encourage mixed housing types.
- Promote education of high school students about budgeting/credit issues.
- Provide adequate pre- and post- purchase credit counseling for homeowners.
- Develop publicity campaign encouraging homeownership and emphasizing the available resources for purchasing a home.

Five-Year Actions:

- Develop incentive plan for builders/developers to construct affordable unit to purchase, eg. cut the red tape.
- Seek HOME, Federal Home Loan Bank, and other funds and incentives for development of homeownership opportunities.

- Increase education/outreach about existing homeownership programs:
 - Literature/brochures
 - Model homes/advertising
 - Community/agency involvement
 - Expansion of current efforts

Long-Range Actions:

- Ensure all new construction complies with fair housing requirements.
- Apply sanctions when violations occur.

Impediment #4: Lack of pro-active property maintenance code enforcement.

Substandard housing and low property maintenance contributes to the lack of safe, decent, and sanitary affordable housing. A pro-active code enforcement program could help with the preservation of the rental housing stock and, hopefully, reduce the NIMBY attitude of homeowners who fear rental property will adversely affect property values, as they become more confident that rental property will be properly maintained.

Immediate Actions:

- Implement pro-active code enforcement program within the City’s HCD Department.

Five-Year Actions:

- Establish a rehabilitation/renovation assistance program.
- Implement targeted neighborhood clean-up programs.

Long-Range Actions:

- Force the sale of property not brought into compliance with property maintenance codes.

Impediment #5: Legal system, as it relates to evictions, is too cumbersome.

In some cases, the 30 day eviction notice requirement is not adhered to and families are given little or no notice before an eviction. In other cases, a 30 day minimum requirement is detrimental to the neighborhood and property when the eviction is for just cause, such as drug or violence related incidents.

Immediate Actions:

- Educate landlord on requirement of 30 day eviction notice.

Five-Year Actions:

- Study need for Landlord-Tenant Act and take necessary action.

Long-Range Actions:

- Request the Commonwealth to designate a specialized judge for fair housing/discrimination cases.
- Lobby for statutory changes to allow lesser notice requirements for evictions with just cause.

Assessment of Current Fair Housing Programs and Activities in Bowling Green

The City of Bowling Green first enacted local fair housing laws in 1969. As the federal and state fair housing laws evolved over the years with the addition of more protected classes, the local ordinance was also amended. Most recently, the protected classes of disability and familial status were incorporated, and some clarifications were made in the complaint procedure to be used by the Bowling Green Human Rights Commission (HRC).

The local fair housing ordinance assigns the function of administering fair housing and fair treatment ordinances to the HRC. The HRC has been working with HUD toward the goal of “substantial equivalency certification”. This certification would affirm that the local fair housing ordinance, including the enforcement of the ordinance by the HRC, provides for rights, procedures, remedies, and judicial review provisions that are equivalent to the federal Fair Housing Act. A 90 day legal analysis by HUD determines whether the local ordinance mirrors federal laws. As of October, 2003, this certification has not been made. The HRC has pursued this certification for several reasons including affirmation of the local fair housing ordinance and enforcement as well as funding for community education and awareness of fair housing rights, procedures, remedies, and judicial review. Housing discrimination complaints from Bowling Green are currently being forwarded to state and federal agencies in Louisville, Kentucky.

The City of Bowling Green contributes \$56,570 per year in financial support to HRC, which allows the HRC to investigate employment and public accommodation complaints. The local HRC advocates for fair housing treatment and provides fair housing training and materials to anyone who requests it, but does not currently investigate fair housing complaints. Fair housing activities provided by the HRC include:

- Public service television program dedicated to Fair Housing issues in the month of April.
- Fair housing classes and workshops provided to real estate agents, renters, landlords, property owners, prospective home buyers, mortgage and banking personnel, translators – Hispanic, Bosnian, Vietnamese.
- Housing testing for discrimination.

- Quarterly mailing to local minority businesses, churches, and organizations with updates on local housing issues and information.
- Display and distribution of brochures, fair housing literature, and informational posters in HRC offices.
- Public speaking engagements to civic groups and organizations regarding Fair Housing.
- Accept referrals from other agencies regarding housing discrimination and Fair Housing inquiries.
- Counsel clients about Fair Housing.
- Partnership with the Housing Authority of Bowling Green to provide Fair Housing education and awareness to residents participating in Homeownership program.
- Consult with property managers and tenants on Fair Housing questions and problems.
- Partnership with Kentucky Housing Corporation and Kentucky Fair Housing Council to promote Fair Housing activities.
- Partner with the local Board of Realtors, the City of Bowling Green, and Warren County in issuing a proclamation declaring April as Fair Housing Month, thereby increasing awareness about fair housing and discrimination.

The City's HCD Department, as well as all other local agencies that receive federal housing funding, provide fair housing information and encourage the equal treatment in the housing industry. Some of the actions taken by HCD include:

- Display and distribution of fair housing literature in the HCD offices.
- Inclusion of fair housing information in the quarterly landlord newsletter.
- Providing referrals for customers who think they may have been discriminated against.
- Counseling clients about fair housing choice.
- Providing a list of known accessible units to all Housing Choice Voucher recipients.
- Providing transportation assistance to Mainstream families if needed to broaden the housing search area.
- Approving Exception Payment Standards as a reasonable accommodation.
- Adopting an Affirmative Marketing and Fair Housing Policy and Procedures Plan to help ensure compliance with all laws regarding discrimination.
- Make available to builders and contractors the Accessibility Design Guidelines.

Conclusions and Recommendations

Shelter is one of the most basic needs for all human beings. Through HUD and the Fair Housing Act, the federal government has made a commitment to ensure that all individuals and families are treated fairly in choosing housing to meet their need for shelter. The City of Bowling Green has also confirmed this commitment with the adoption of a local fair housing ordinance.

Through this Analysis of Impediments, education has been identified as the most pressing need to ensure fair housing choice. It is imperative that individuals and families seeking housing know their rights and that those involved in the housing industry know their responsibilities. The City of Bowling Green, through the HCD Department and the HRC will undertake an intensive educational and promotional campaign during Year 1 and Year 2 of the CDBG programming. Fair housing and discrimination information will be disseminated by various means to reach as many residents and housing providers as possible.

During the five year period, the City will also research and discuss establishing an ombudsman program and review the need for establishing a local informal hearing board to hear voluntary cases of fair housing discrimination. The ombudsman program would further assist in getting fair housing information to the families who need it. Then, if the informal hearing process is established and successful, the City will also review the need for full local enforcement proceedings. Other legislative review will include the need for a Landlord-Tenant ordinance.

Certification

I, Mayor Sandy Jones, certify that the City of Bowling Green, Kentucky, will affirmatively further fair housing and that:

- This Analysis of Impediments to Fair Housing Choice was conducted by the City of Bowling Green, Kentucky, in 2003, and that this document is an accurate representation of the analysis process;
- The City of Bowling Green will take the appropriate actions as identified in this document to overcome the effects of the impediments identified in this Analysis; and
- The City of Bowling Green will maintain records of this Analysis and the actions taken to overcome the impediments to fair housing choice.

Sandy Jones, Mayor of Bowling Green, Kentucky

Date