
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 August, 2023. In conjunction with the Consolidated Plan, this study is conducted every five years in order to gain fresh perspective on the fair housing issues facing the community.

The lead agency for undertaking the AI was the Neighborhood and Community Services (NCS) staff. 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 concurrent 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 six impediments being recognized as those most prevalent in the community:

- Lack of landlord education about discrimination and Fair Housing laws.
- Language and cultural differences.
- Lack of accessible units to rent or purchase.
- Cumbersome and lengthy legal system for evictions.
- Lack of transition services for persons released from prison.
- Lack of local Fair Housing enforcement.

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 Allen, Butler, Edmonson, and Warren 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 2010 Census, Bowling Green’s population was 62,218. The population of the City grew over 16 percent in the decade from 2010 to 2020 (and the County grew by over 20 percent), placing a strong demand on the housing industry in Bowling Green and Warren County. Current population estimates (2022) show additional population growth of 3.9% in the City and 3.8% in the County, respectively.

Bowling Green’s population is becoming increasingly diversified as it welcomes families and individuals from all nationalities. Current demographic estimates are listed below:

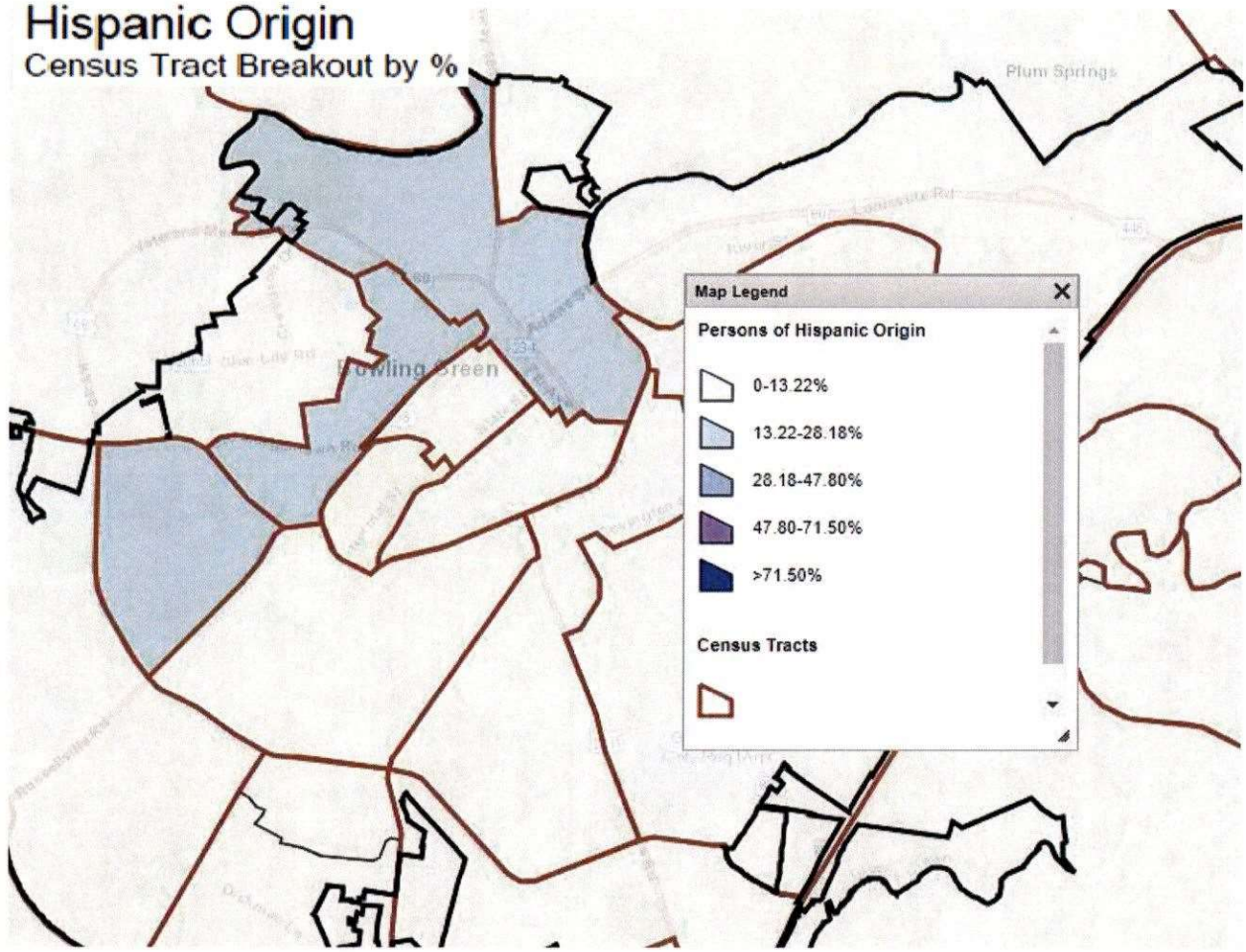
Population Characteristic	2020 Census
Total Population (adjusted)	72,333
Race	
White only	46,512
Black/African American only	9,987
American Indian/Alaskan Native	298
Asian	5,758
Pacific Islander	586
Other (other race, two or more races)	9,192
Hispanic	7,045

Nativity/Citizenship	Number	Percent
Native	62,260	87.2%
Naturalized U.S. Citizen	2,944	4.1%
Europe	823	1.2%
Asia	1,442	2.0%
Africa	282	0.4%
Oceania	0	0.0%
Latin America	397	0.6%
Northern America	0	0.0%
Not a U.S. Citizen	6,218	8.7%
Europe	447	0.6%
Asia	2,728	3.8%
Africa	650	0.9%
Oceania	431	0.6%
Latin America	1,871	2.6%
Northern America	91	0.1%
Total Population	71,422	100.0%

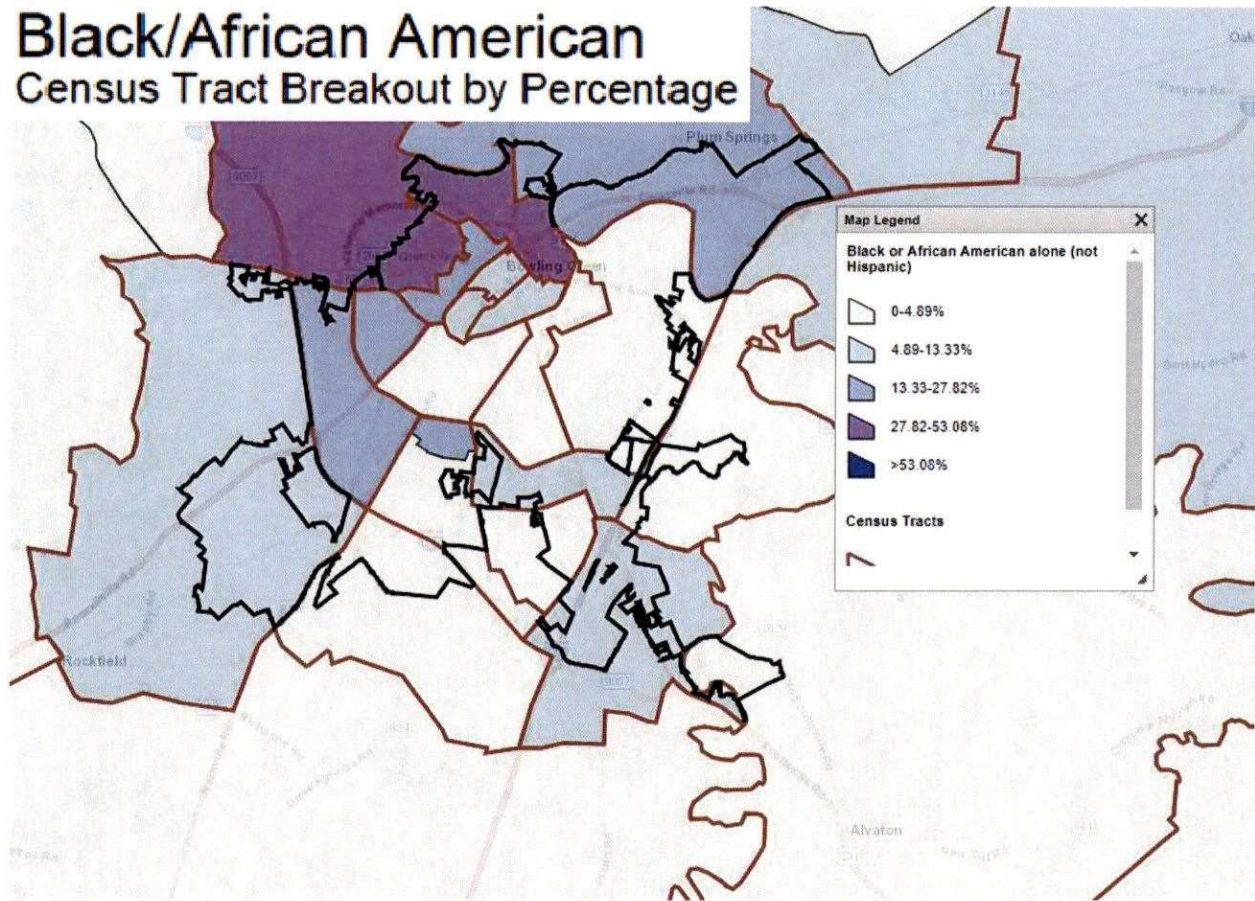
As the above table shows, there’s an estimated 6,218 people in the City that are currently not U.S. citizens, and many are likely refugees. These individuals represent 8.7% of the City’s population. It is likely that some of the naturalized citizens, which represent 4.1% of the City population, are former refugees. With 12.8% of the City population originating from outside the U.S., the City has a large foreign-born population.

The geographic distribution of some of these populations (Hispanic ethnicity, Black/African American and % of non-English Speaking) is depicted in the following maps. Each population group is shown as a percentage of the total population in that particular Census Tract.

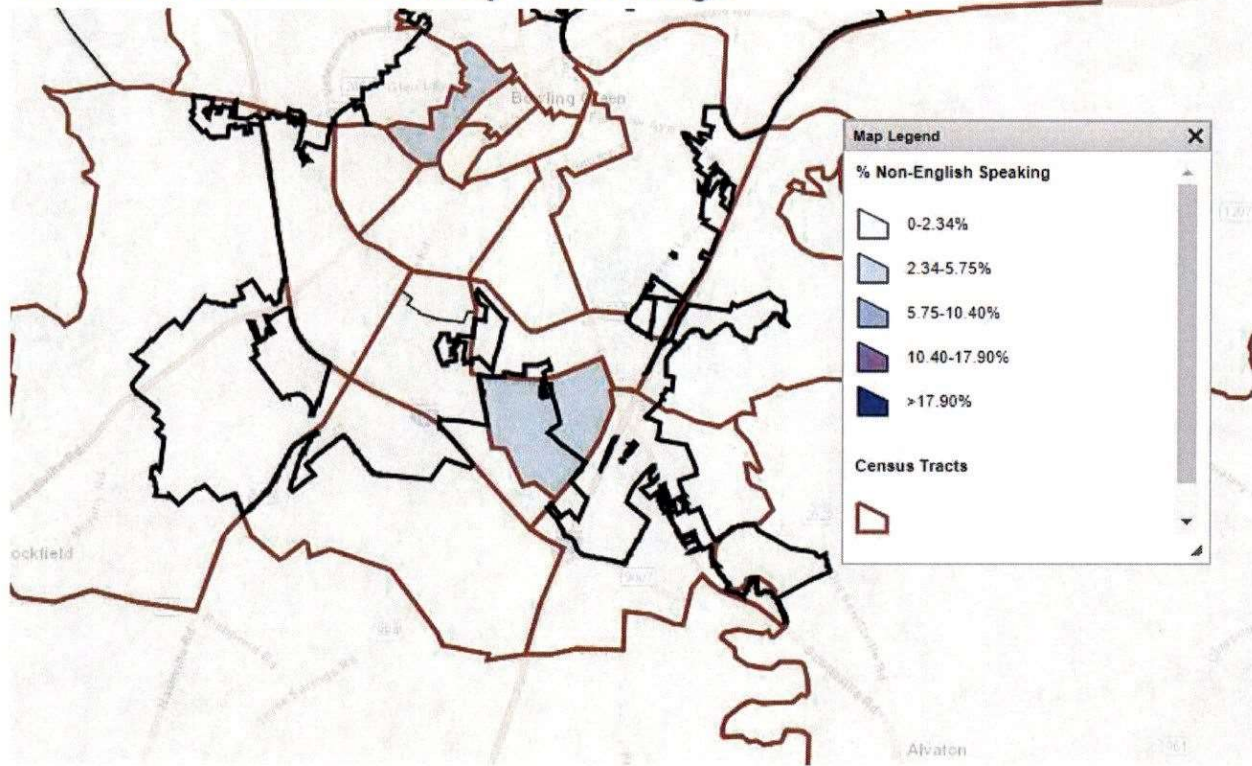
Hispanic Origin Census Tract Breakout by %



Black/African American Census Tract Breakout by Percentage



Non-English Speaking Households Census Tract Breakout by Percentage



In 2022, the The median age in Bowling Green is 32 years, which represents a younger median age when compared to Kentucky, 40.2 years. This young age has often been attributed to the fact that Bowling Green (PSA) is a university town. Other age comparisons are listed in the table below:

		Population by Age							Median Age
		<25	25 to 34	35 to 44	45 to 54	55 to 64	65 to 74	75+	
PSA	2010	27,372 (44.0%)	9,345 (15.0%)	6,653 (10.7%)	6,757 (10.9%)	5,448 (8.8%)	3,397 (5.5%)	3,246 (5.2%)	28.5
	2022	28,932 (38.5%)	12,409 (16.5%)	8,687 (11.6%)	7,283 (9.7%)	7,318 (9.7%)	5,875 (7.8%)	4,597 (6.1%)	32.0
	2027	29,960 (38.1%)	11,684 (14.9%)	10,194 (13.0%)	7,622 (9.7%)	7,221 (9.2%)	6,438 (8.2%)	5,490 (7.0%)	32.8
	Change 2022-2027	1,028 (3.6%)	-725 (-5.8%)	1,507 (17.3%)	339 (4.7%)	-97 (-1.3%)	563 (9.6%)	893 (19.4%)	N/A
Kentucky	2010	1,436,172 (33.1%)	566,216 (13.0%)	576,662 (13.3%)	643,097 (14.8%)	538,993 (12.4%)	325,314 (7.5%)	252,913 (5.8%)	37.9
	2022	1,362,514 (30.0%)	597,713 (13.2%)	584,088 (12.9%)	560,566 (12.4%)	611,535 (13.5%)	493,134 (10.9%)	327,610 (7.2%)	40.2
	2027	1,360,530 (29.8%)	547,453 (12.0%)	599,957 (13.1%)	559,717 (12.2%)	571,828 (12.5%)	530,673 (11.6%)	399,614 (8.7%)	41.2
	Change 2022-2027	-1,984 (-0.1%)	-50,260 (-8.4%)	15,869 (2.7%)	-849 (-0.2%)	-39,707 (-6.5%)	37,539 (7.6%)	72,004 (22.0%)	N/A

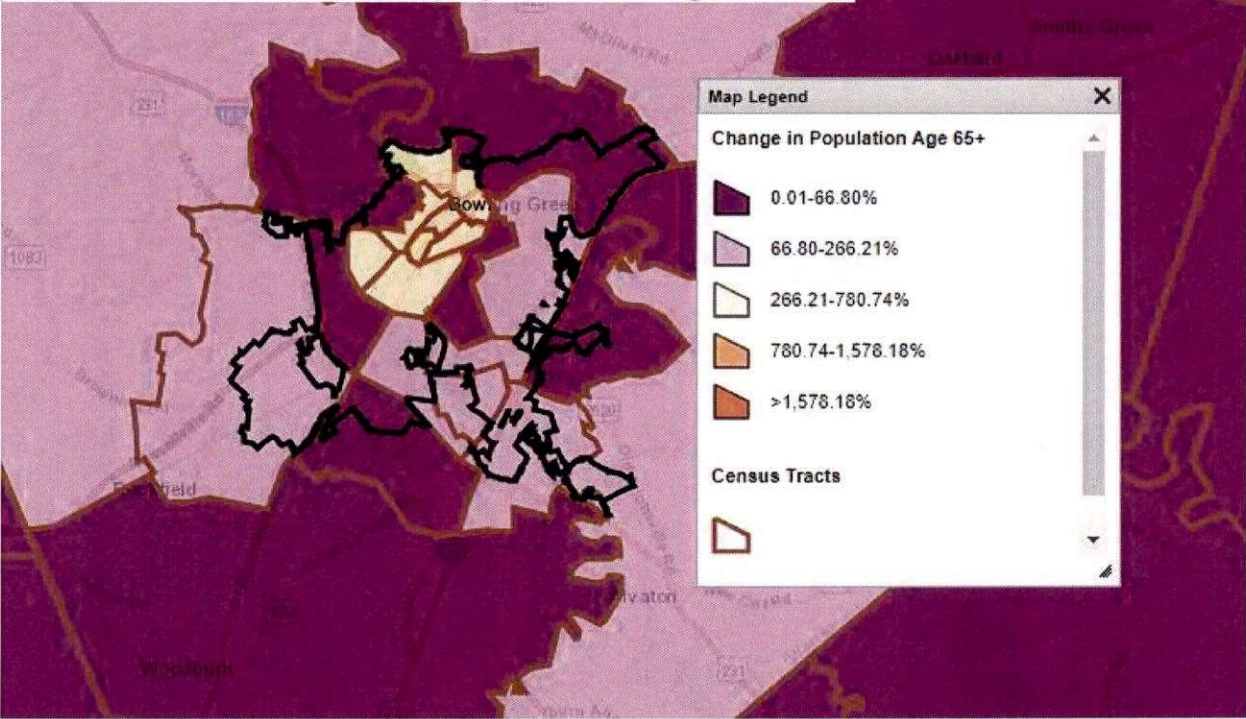
Source: 2010 Census; ESRI; Urban Decision Group; Bowen National Research

As shown below, the age group in the City with the greatest growth between, 2022 and 2027 is 75 years and older, projected to grow by 19.4%.

PSA (Bowling Green) Change in Population by Age (2022-2027)



**Change in Age 65+ Population
Census Tract Breakout by Percentage**



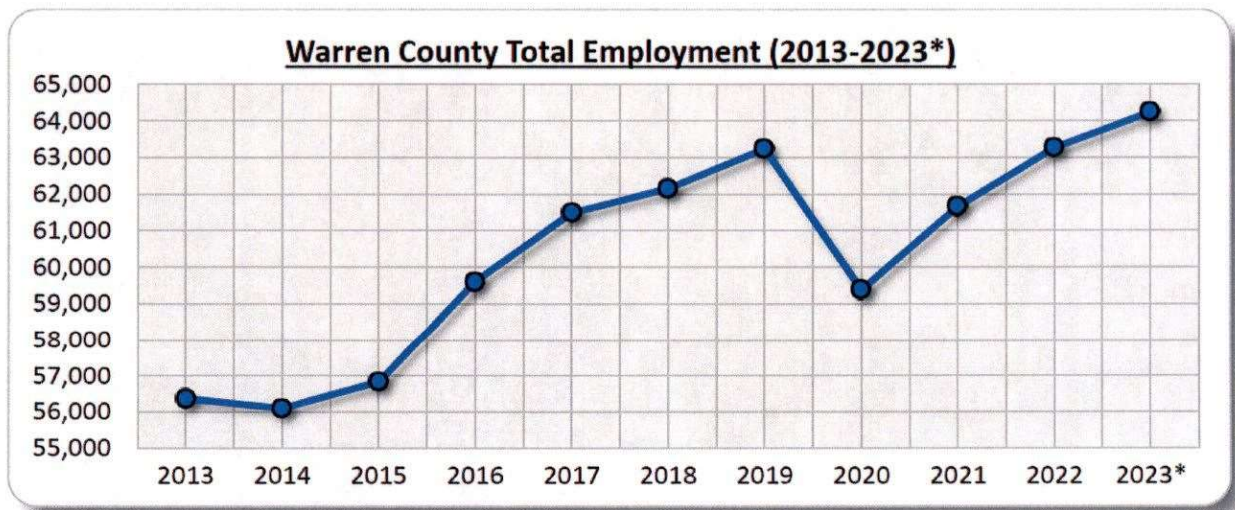
The median household income for Bowling Green in 2022 is estimated at \$49,172. This represents an increase of 35% over the median household income in 2010, \$36,431. However, the 2022 median household income for Bowling Green is nearly \$10,000 lower than the estimated statewide median income (\$58,437). Between 2022 and 2027, it is projected that the median household income in Bowling Green will increase by 18.9% to \$58,457.

	Median Household Income				
	2010 Census	2022 Estimated	% Change 2010-2022	2027 Projected	% Change 2022-2027
PSA	\$36,431	\$49,172	35.0%	\$58,457	18.9%
SSA	\$47,370	\$70,649	49.1%	\$82,661	17.0%
Combined (PSA & SSA)	\$41,071	\$58,611	42.7%	\$68,060	16.1%
Kentucky	\$40,424	\$58,437	44.6%	\$67,763	16.0%

Source: 2010 Census; ESRI; Urban Decision Group; Bowen National Research

shares for the surrounding county (9.0%) and for the state of Kentucky (16.3%). In particular, nearly one-third (32.2%) of the population under the age of 18 lives below the poverty level in Bowling Green. Thus, nearly 5,000 children under the age of 18 live in poverty within the PSA. The higher rate of poverty within the area indicates that affordable housing alternatives will remain an important component of the PSA housing stock for the foreseeable future.

From 2013 to 2019, total employment in Warren County increased by 12.2%, or 6,862 employees, which represents a larger increase than the state (4.8%) and nation (9.6%) during this time period. In 2020, total employment in Warren County decreased by 6.1%, which reflects a rate of reduction above that for the state (4.9%) and nation (5.9%) during that year. This reduction in total employment during 2020 is largely attributed to the economic impacts related to the COVID-19 pandemic. Following the end of many of the restrictions associated with the pandemic, total employment in Warren County increased by 3.8% in 2021 and 2.6% in 2022, which are above the statewide increases (2.7% and 1.6%) for these two years. Through May 2023, total employment in Warren County is at 101.6% of the 2019 level, which represents a recovery rate above that of the state (99.2%), and equal to that of the nation (101.6%). As such, it appears that the economy in Warren County has made a strong recovery following the initial impact of COVID-19.



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

NAICS Group	Employees	Percent
Agriculture, Forestry, Fishing & Hunting	45	0.1%
Mining	47	0.1%
Utilities	211	0.4%
Construction	1,422	2.6%
Manufacturing	6,328	11.8%
Wholesale Trade	2,235	4.2%
Retail Trade	8,388	15.6%
Transportation & Warehousing	771	1.4%
Information	1,027	1.9%
Finance & Insurance	1,760	3.3%
Real Estate & Rental & Leasing	1,231	2.3%
Professional, Scientific & Technical Services	2,943	5.5%
Management of Companies & Enterprises	48	0.1%
Administrative, Support, Waste Management & Remediation Services	2,078	3.9%
Educational Services	2,762	5.1%
Health Care & Social Assistance	9,459	17.6%
Arts, Entertainment & Recreation	1,127	2.1%
Accommodation & Food Services	7,102	13.2%
Other Services (Except Public Administration)	2,559	4.8%
Public Administration	2,050	3.8%
Non-classifiable	195	0.4%
Total	53,788	100.0%

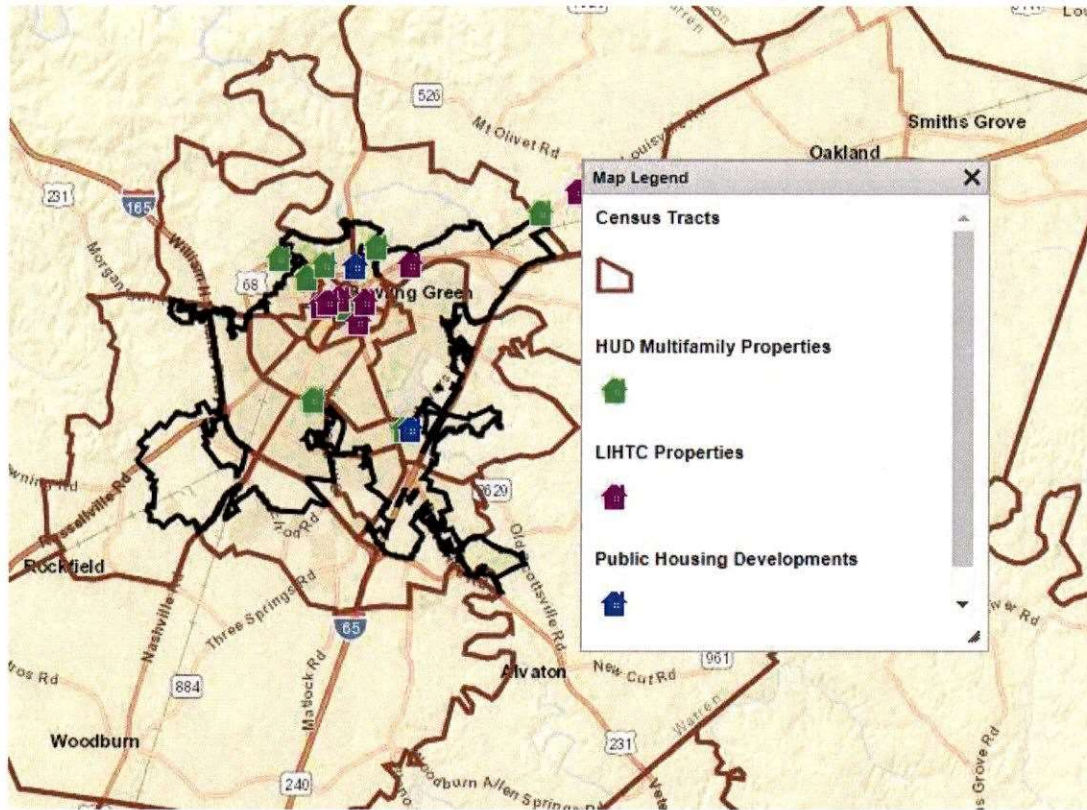
Source: 2010 Census; ESRI; Urban Decision Group; Bowen National Research

The labor force within Bowling Green is based primarily in five sectors: Health Care & Social Assistance (17.6%), Retail Trade (15.6%), Accommodation & Food Services (13.2%), Manufacturing (11.8%), and Professional, Scientific & Technical Services (5.5%). Combined, these five job sectors represent nearly two-thirds (63.7%) of the local employment base. This represents a slightly greater concentration of employment within the top five sectors compared to the top five sectors in the state (58.1%). Areas with a heavy concentration of employment within a limited number of industries can be more vulnerable to economic downturns with greater fluctuations in unemployment rates and total employment. With a slightly greater concentration of employment and three of the top sectors in Bowling Green (retail trade, accommodation and food services, and manufacturing) being typically more vulnerable to downturns, the economy within Bowling Green is likely less insulated from economic fluctuations as compared to the state, overall. It is also important to note that many occupations within the top industries of the City typically have lower average wages which can contribute to demand for affordable housing options.

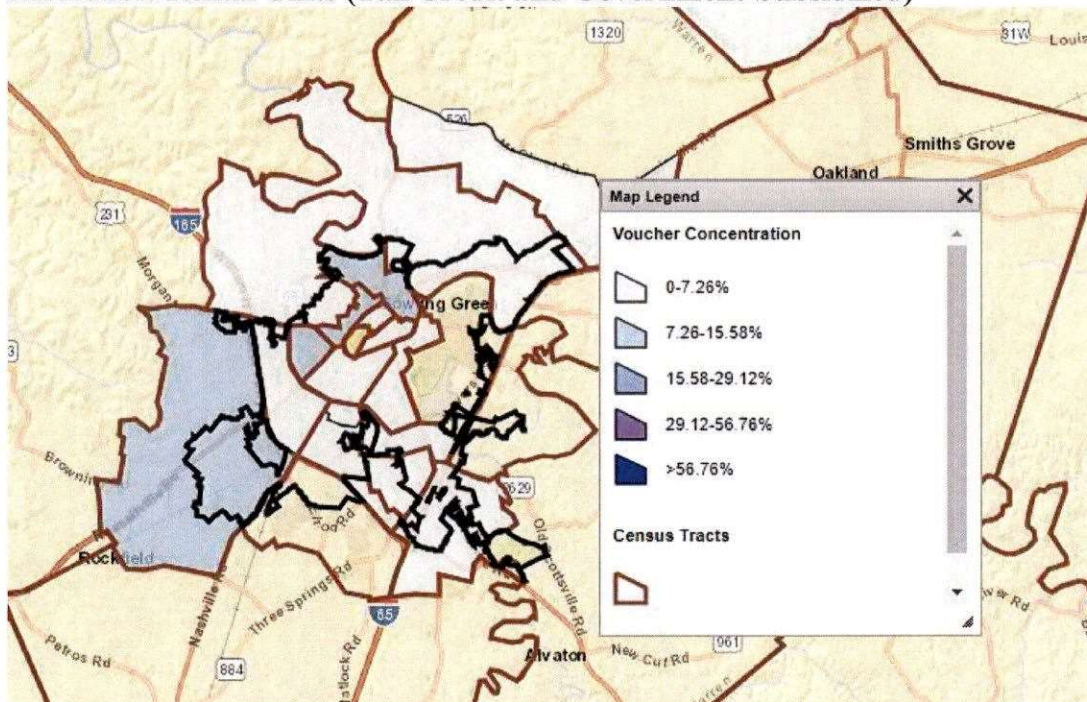
Housing affordability issues among the listed occupations are more prevalent when home ownership is considered. In order to afford the purchase of a typical home in the City at the median list price of \$347,200, an individual would have to earn at least \$104,160 per year. Therefore, none of the occupations with wages up to the median wage in the top 30 occupations have sufficient incomes to afford the purchase of a typical home in the City. With the challenges for homeownership in mind, one of the focal points of the City's NCS Department has been to increase the homeownership rate in Bowling Green through utilization of HOME funds, CDBG funds, and Voucher Homeownership Programs. It is hoped that these efforts will pay off in better homeownership opportunities over time.

The homeownership disparity has brought with it many related problems, such as declining housing conditions and property maintenance code enforcement issues. A Homeowner Rehabilitation program undertaken by the City helped to address the issue of the deterioration and potential loss of viable living space by those low-income homeowners who are unable to afford general maintenance or the major repairs that inevitably result from deferred maintenance. However, that program ended over 10 years ago with the rehab of 23 homes. To have a greater widespread impact on low income neighborhoods, over the last several years the City implemented an exterior property improvements program that removes blighting influences and improves curb appeal. Hundreds of properties have been served to date by the program.

Currently there are approximately 1,400 affordable rental units (Tax Credit and government-subsidized) and 750 Housing Choice Voucher tenant-based units. These units are fully occupied with long waiting lists indicating strong demand. The following maps show the geographic distribution of the affordable rental units and 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 tenant's dwell in or near the Bowling Green Reinvestment Area.



Affordable Rental Units (Tax Credit and Government-Subsidized)



Housing Choice Voucher Tenant-Based Units

Current Fair Housing Legal Status

Bowling Green residents who feel that they have experienced housing discrimination can contact one of four agencies for help: The Bowling Green Human Rights Commission; the Kentucky Commission on Human Rights; the U. S. Department of Housing and Urban Development; or the Lexington Fair Housing Council.

The Bowling Green Human Rights Commission (HRC) is the local agency responsible for intake, referrals, and education about fair housing laws. Between July 2019 and June 2023, the HRC received over 400 housing related complaints. Around 90 of the complaints received were referred to the Lexington Fair Housing Council or the Kentucky Commission on Human Rights for further investigation. Over 80 of the complaints were referred to Bowling Green’s Code Enforcement Division. Almost 80 of the complaints were related to evictions. Thirty of the complaints were outside the jurisdiction of the HRC and were referred accordingly.

Examples of other discrimination complaints that HRC staff received include:

- Disparate treatment—blatant discrimination against certain groups of people.
 - offering “move-in” specials to Caucasians only
 - “I don’t want to rent to Blacks, Hispanics, Bosnians”, etc.
 - Charging higher rents to certain groups.
 - Land Sales Contract sales to non-English speaking families under terms that take advantage of their limited English comprehension.
- Disability—denying rental access to the disabled.
 - “Your wheelchair will scratch the hardwood floors.”
 - Denying service animals.

Identification of Impediments to Fair Housing Choice

When identifying impediments to fair housing choice, the City of Bowling Green took a multi-pronged approach that included using the latest data available from housing market professionals, and public input from various sectors of the community in a number of different settings.

Housing Needs Assessment and Market Analysis

Housing Problems

As part of the Consolidated Plan, a Housing Needs Assessment and Market Analysis was completed by Bowen National Research. The housing needs study evaluated the number of households experiencing one or more of the following housing problems: living in substandard housing (lacking complete indoor plumbing or kitchen facilities), overcrowded households, cost burdened households, and severe cost burdened households).

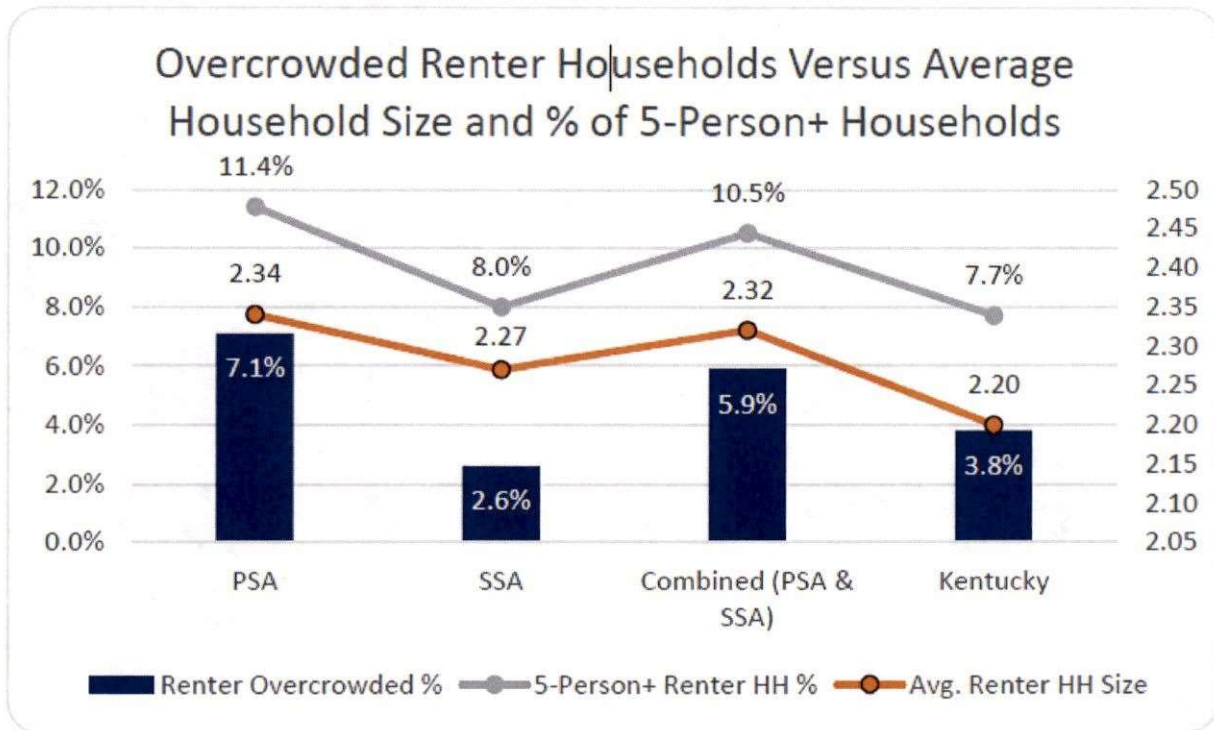
The following table compares key household income, housing cost, and housing affordability metrics of Bowling Green and the state. Cost burdened households are defined as those paying over 30% of their income toward housing costs, while severe cost burdened households pay over 50% of their income toward housing.

	Housing Age and Conditions											
	Pre-1970 Product				Overcrowded				Incomplete Plumbing or Kitchen			
	Renter		Owner		Renter		Owner		Renter		Owner	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
PSA	3,831	24.1%	3,915	32.2%	1,132	7.1%	239	2.0%	380	2.4%	150	1.2%
SSA	1,032	17.8%	2,156	12.6%	151	2.6%	165	1.0%	66	1.1%	65	0.4%
Combined (PSA & SSA)	4,863	22.4%	6,071	20.7%	1,283	5.9%	404	1.4%	446	2.1%	215	0.7%
Kentucky	190,792	33.9%	376,751	31.8%	21,365	3.8%	13,449	1.1%	12,037	2.1%	9,189	0.8%

Source: American Community Survey (2017-2021); ESRI; Urban Decision Group; Bowen National Research

Within the PSA (Bowling Green), nearly one-fourth (24.1%) of renter-occupied housing was built prior to 1970. This represents a smaller share of such units compared to the share (33.9%) for the state of Kentucky. While a larger share (32.2%) of the owner-occupied housing in the PSA was built prior to 1970, this is comparable to the state share (31.8%) of such units. The share of renter occupied housing within the PSA experiencing overcrowding (7.1%) is significantly larger than that of the state (3.8%). While the share (2.0%) of owner-occupied housing experiencing overcrowding is much less than the share for renters in the area, this represents a slightly larger share of such housing in the PSA as compared to the share within the state (1.1%). Incomplete plumbing or kitchens appear to be somewhat more prevalent issues within the PSA as compared to the state, with 2.4% of renter households and 1.2% of owner households experiencing these issues. Overall, the age of housing in the PSA does not appear to be a major issue; however, overcrowding and incomplete plumbing or kitchens appears to be more widespread within the PSA, particularly among renters, compared to the state. Substandard housing in the PSA is likely influenced by student housing in the market, particularly

overcrowded housing issues. Overall, there are approximately 1,512 renter households and 389 owner households within the PSA that live in substandard housing conditions (overcrowded or lacking complete kitchens or indoor plumbing). As overcrowding among renter households is the most notable issue within the PSA, the following graph attempts to illustrate the correlation of household size and overcrowding among renter households in Bowling Green.



The following table compares key household income, housing cost, and housing affordability metrics of the PSA (Bowling Green) and the state. Cost burdened households are defined as those paying over 30% of their income toward housing costs, while severe cost burdened households pay over 50% of their income toward housing.

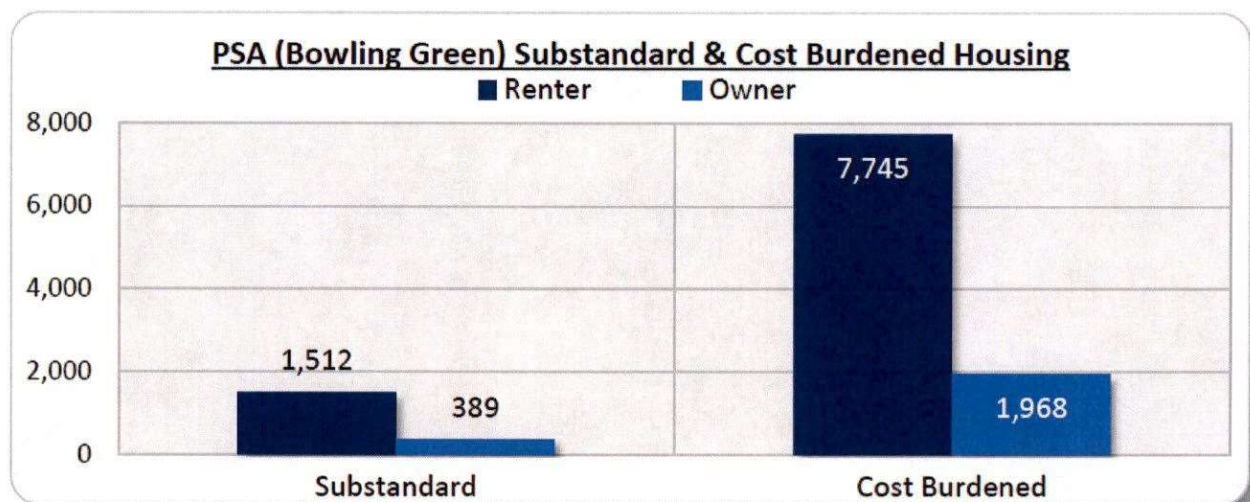
	Household Income, Housing Costs and Affordability							
	2022 Households	Median Household Income	Estimated Median Home Value	Average Gross Rent	Share of Cost Burdened Households*		Share of Severe Cost Burdened Households**	
					Renter	Owner	Renter	Owner
PSA	29,324	\$49,172	\$217,112	\$885	45.3%	16.1%	27.7%	5.7%
SSA	24,093	\$70,649	\$234,084	\$946	41.0%	13.8%	16.2%	4.9%
Combined (PSA & SSA)	53,417	\$58,611	\$227,197	\$901	44.2%	14.7%	24.7%	5.3%
Kentucky	1,812,070	\$58,437	\$180,430	\$877	38.7%	17.0%	19.2%	6.8%

Source: American Community Survey (2017-2021); ESRI; Urban Decision Group; Bowen National Research

*Paying more than 30% of income toward housing costs

**Paying more than 50% of income toward housing costs

The PSA's (Bowling Green) median home value of \$217,112 is 20.3% higher than the state's estimated median home value of \$180,430. The average gross rent of \$885 in the PSA is approximately 0.9% higher than the state's average gross rent of \$877. The median household income for the PSA (\$49,172) is 15.9% lower than that for the state. Overall, these factors result in a higher share of cost burdened renter households (45.3%) and slightly lower share of owner (16.1%) households in the PSA compared to the shares within the state (38.7% and 17.0%, respectively). While the estimated median home value (\$234,084) and average gross rent (\$946) in the SSA (Balance of County) are notably higher than those in the PSA, the much higher median household income in the SSA (\$70,649) results in lower shares of cost-burdened renter (41.0%) and owner (13.8%) households. Regardless, there are approximately 7,745 renter households and 1,968 owner households in the PSA that are housing cost burdened. Of these, approximately 4,736 renter households and 697 owner households are severe housing cost burdened (paying 50% or more of their income toward housing costs). Overall, this data illustrates the importance of affordable rental and for-sale housing for the residents of Bowling Green. The following graph illustrates substandard housing and cost burdened households in the PSA (Bowling Green).



Stakeholder Survey

In August 2023, associates of Bowen National Research obtained input from 16 stakeholders within Bowling Green and Warren County regarding the local housing market. Input from stakeholders was provided in the form of an online survey. The 16 total respondents represent a wide range of industries that deal with housing issues, including local government officials, the banking industry, the real estate and apartment industries, local education institutions, the building industry, and various social service organizations. The purpose of these stakeholder surveys was to gather input regarding the need for specific types and styles of housing, the income segments housing should target, identifying housing issues in the market, and establishing potential solutions to address housing within Bowling Green and Warren County. Some of the questions and responses addressed fair housing in Bowling Green.

Stakeholders were asked what they believed were barriers to fair housing in Bowling Green. A total of 16 respondents provided feedback to this question with the following distribution:

Barriers to Fair Housing in Bowling Green		
Barriers	Number of Respondents	Share of Respondents
Not enough decent, safe and sanitary housing	10	62.5%
Shortage of services & housing for homeless persons (transitional)	9	56.3%
Language and cultural differences	8	50.0%
Landlords unfamiliar with discrimination laws	5	31.3%
Lack of enforcement of fair housing laws	5	31.3%
Not enough handicap accessible units	2	12.5%
I don't know	2	12.5%
Other (please specify)	2	12.5%
Lengthy eviction court process	0	0.0%

Stakeholder respondents were also asked to what extent specific housing issues are experienced in Bowling Green. A total of 16 respondents provided insight to this question with the following distribution:

Housing Issues Experienced	
Housing Issue	Weighted Score*
Home Purchase Affordability	96.7
Rent Affordability	93.8
Limited Availability	93.3
Lack of Down Payment for Purchase	86.7
High Cost of Renovation	83.3
Substandard Housing (Quality/Condition)	78.1
High Cost of Maintenance/Upkeep	71.9
Overcrowded Housing	70.0
Lack of Community Services (Grocery, Doctor, etc.)	46.9
Foreclosure	41.7

*Often = 100.0, Somewhat = 50.0, Not At All = 0.0

Stakeholder respondents were asked if there are any specific housing development programs that should be given priority as it relates to housing development in Bowling Green. Nine respondents provided open-ended statements. Topics cited by respondents included additional income-based housing developments with reduced barriers, affordable housing with rent-to-own options for individuals with poor credit, incentives for builders/developers to construct housing, increased density (zoning), additional housing vouchers, homeowner repair assistance, additional senior-oriented housing options, and programs to reduce geographic segregation of affordable/workforce housing.

Stakeholder respondents were asked if there are any specific housing developments programs at the local or state level that are not currently offered and should be explored. Seven respondents

provided open-ended statements. Programs and topics cited by respondents included *the need for* transitional housing for refugees, HOME Funds, Affordable Housing Trust Fund, Land Bank Trusts, and local incentives for construction of affordable units.

Stakeholder respondents were asked to identify obstacles to the development of housing for the homeless population in Bowling Green. Nine stakeholders provided open-ended responses to this question. Notable obstacles cited by respondents included: background checks and up-front costs of initial move-in, initial costs and continued funding of housing solutions, and consensus among stakeholders regarding purpose (charity versus creating pathways out of homelessness).

Stakeholder respondents were asked to provide recommendations on ways to address the needs of the homeless population in Bowling Green. Eight stakeholders provided recommendations. Some topics cited by stakeholders included: additional shelter beds, more programs to promote transition from homelessness to permanent housing, increasing capacity for a community development organization to manage different aspects of housing, additional temporary/emergency shelters, increased family units at emergency shelters, representation at eviction court, landlord registry, additional funding for staffing and housing for Permanent Supportive Housing, and recognizing that homelessness is a complicated and broad issue that involves mental health, substance abuse, domestic violence, and affordability.

Resident Survey

To gain information, perspective and insight about Bowling Green housing issues and the factors influencing housing decisions by its residents, Bowen National Research (BNR) conducted a survey of area residents as part of this study. This survey was conducted during August 2023 and resulted in 966 participants. The majority of this survey was conducted online. The City of Bowling Green contributed to the survey efforts by utilizing the city's website and social media accounts to inform area residents of the survey. Several of the responses addressed fair housing.

Respondents were asked to identify issues that negatively impact the local housing market. Respondents could select all applicable options from a list and/or provide an open-ended response. A total of 941 respondents provided feedback to this question. The following table illustrates issues cited by respondents:

Current Housing Market

Issues Negatively Impacting the Local Housing Market		
Issue	Number of Respondents	Share of Respondents
High Prices or Rents	868	92.2%
Limited Housing/Rental Supply	482	51.2%
Limited Access to Public Transportation	422	44.9%
Blighted Properties (Poor Condition)	402	42.7%
Lack of Features/Amenities (playground, well-maintained sidewalks, etc.)	298	31.7%
High Crime	238	25.9%
Limited Social Services/Assistance Programs	211	22.4%
Property Taxes	208	22.1%
Inconvenient/Lack of Community Services (healthcare, pharmacies, shopping, etc.)	178	18.9%
Limited Employment Opportunities	154	16.4%
Short-Term Rentals (such as Airbnb)	103	11.0%
Other	98	10.4%

Respondents were given an opportunity to provide open-ended feedback to the previous question. A total of 98 respondents provided feedback related to issues negatively impacting the local housing market. Topics cited by respondents included eviction, fair housing, length of waiting lists, overcrowded conditions, lack of property maintenance, difficulty finding housing with a criminal record, impact of student housing market, limited public transportation, and lack of housing choices for first-time homebuyers.

Respondents were asked to rate the degree of need (high need, moderate need, or low need) for certain *housing types* in Bowling Green. A total of 946 respondents provided insight to this question. The following table provides a *weighted* summary of respondent feedback.

Degree of Need for Housing Types in Bowling Green			
Housing Type	Weighted Score*	Housing Type	Weighted Score*
Affordable Workforce	83.0	Senior Apartments (Independent Living)	72.2
Homeless	82.2	For-Sale	69.7
Veterans Housing	75.7	Single-Person/Young Professionals	69.6
Special Needs/Disabled Housing	72.6	Senior Care Facilities (Assisted Living/Nursing Care)	63.4
Rental	72.3	Student Housing	49.3

Respondents were also permitted to provide open-ended responses to the previous question. A total of 39 respondents provided open-ended responses. Popular responses to this question included larger single-family homes, affordable housing for low-wage workers, affordable housing for seniors, and housing for the homeless population.

Respondents were asked to share additional comments and concerns about housing in Bowling Green. A total of 317 respondents (representing nearly one-third of all survey respondents) provided feedback. A large number of respondents (79) noted the high costs, rents, and/or prices for apartments and homes within Bowling Green. A total of 68 respondents cited affordable housing/affordability concerns regarding the local housing market. Notable comments were also

made about the local homeless population, landlords, area infrastructure, and the number of apartments being built in the city.

Current Housing Situation

Respondents were asked if they rent or own their place of residence. A total of 961 respondents answered this question with the following distribution:

Resident Respondents by Tenure		
Tenure	Number of Respondents	Share of Respondents
Rent	412	42.9%
Own	491	51.1%
I'm a caretaker and do not pay rent	5	0.5%
I'm a dependent living with relatives	22	2.3%
Other	31	3.2%
Total	961	100.0%

Note that 31 respondents (3.2% of total) stated “Other” when asked if they rent or own their place of residence. Of the 31 respondents, 11 respondents stated that they were homeless and/or living in a shelter or their car, while eight respondents noted that they lived with family or friends. The remaining “Other” respondents noted a variety of living situations, including renting a lot at a mobile home park, hotel, halfway house, and living at a place where the resident does not pay rent.

A list of common housing issues was provided and respondents were asked to specify whether they have experienced, or are currently experiencing, any of the issues as they relate to their place of residence. A total of 652 respondents provided feedback to this question with the following distribution:

Housing Issues Experienced		
Housing Issue	Number of Respondents	Share of Respondents
Paying More Than 30% of Income Toward Housing Cost	418	64.1%
Housing Doesn't Meet Needs (i.e., Size, Features, Location)	242	37.1%
Substandard Housing (Poorly Maintained)	186	28.6%
Overcrowded Housing	134	20.6%
Other	124	19.0%
Losing Your Lease/Eviction	47	7.2%
Home Mortgage Rejection	43	6.6%
Foreclosure	11	1.7%

Note that nearly 20% of respondents cited “Other” when asked about housing issues they experienced or are currently experiencing at their current residence. The most common issues stated by the respondents that selected “Other” included homelessness, quality issues/lack of updating, increased rents, and problems with property management.

Focus Group/Stakeholder Meetings

As part of a housing needs assessment and market analysis, stakeholder/ focus group meetings were held on August 23, 2023 with local agencies and organizations that have direct knowledge of the local market and housing needs. There were around 22 total in attendance from various agencies across two (2) different meetings lasting approximately 90 minutes each. The two focus group meetings provided local perspective on the challenges impacting residents, future residential development considerations, and factors limiting residential development.

Challenges/Issues for Residents:

This focus group indicated that the biggest challenges that residents experience are rising home prices/rents, lack of available housing, mismatch between housing types and needs, and mismatch between housing costs and wages. Attendees stated that housing prices and rents are escalating too rapidly for many households.

Future Residential Development Considerations

The overwhelming majority of participants indicated that the rents and prices of housing are the most important things to consider for future residential development in the city. Some participants commented that they believe there is an important role for nonprofit organizations to play in addressing local housing issues, whether it involves grant writing or helping to secure infrastructure for some residential development.

Possible Housing Solutions

Participants believed by a large margin that residential zoning should be reevaluated to determine if changes are warranted to the current zoning codes. Some discussion regarding zoning changes included suggestions of changing some single-family zoned areas to allow duplex or triplex development.

Public Hearing and Public Comment Period Comments

As part of the development of the Consolidated Plan, the City had a 30-day public comment period and public hearing in January 2024 inviting the general public to provide comments regarding the housing, community development, and fair housing needs in Bowling Green.

Six persons were in attendance at the public hearing. There were a couple of comments which impact fair housing. First, there was a call to change the Accessory Dwelling Unit (ADU) to allow for the expansion of more housing types including affordable housing. Second, it was discussed that residents currently can't initiate the change of land use from industrial zoning to residential, but rather the zoning change must be initiated by the property owner. It was recommended that the zoning ordinance be changed to allow industrial zoning land use changes be initiated by residential property owners.

Homelessness Discussions

Through a homeless discussion since the completion of the last Consolidated Plan, between the City and local homeless service providers, the City understood the consensus amongst the

organizations for the need of a one-stop drop in center for homeless service provides to assess to homeless persons and provide coordinated services from a centralized location. Required services from such facility include case management and referrals for health and mental care, job training and placement, housing, education, governmental benefit programs, drug rehabilitation, legal aid, transportation, and other design to assist those in need to find stability and become self-sufficient. The City is working with the Salvation Army and cooperating non-profits to develop a Life Nav Center to help local residents navigate social services and avoid becoming homeless.

Ongoing discussions with the Barren River Area Crisis Services Transformation Committee (BRACSTC) revealed the need to change how services are provided to those struggling with mental health. Currently county jails across Kentucky act as “de facto” mental health treatment centers. In 2023, the 562-bed Warren County Regional Jail saw a daily average of 638 inmates, and an average of 15 to 25 people daily who were on some form of mental health watch. Law enforcement in Bowling Green and Warren County currently spend around four hours per call responding to mental health crises. A new facility is needed to most often bypass criminal and judicial systems along with hospital emergency rooms, instead allowing law enforcement to take those experiencing a mental health crisis to be served at a mental health center. This will allow for those in crisis to receive immediate treatment from mental health and substance abuse professionals, specifically trained in these arenas, minimizing the need for law enforcement and jails to address this need. The BRACSTC, a leadership committee composed of 32 members of local government, law enforcement, healthcare professionals, mental health professionals and legislators, are together coordinating the development of an unprecedented regional mental health drop-in facility to assist those with mental health crises and substance abuse.

Consultation

Consultation took place with Bowling Green Human Rights Commission, City of Bowling Green International Communities Liaison, and City of Bowling Green Housing Division Coordinator to evaluate the existing impediments to fair housing to determine the need to add, remove, or update the identified impediments to fair housing in Bowling Green.

Bowling Green Human Rights Commission Consultation

The City of Bowling Green Grants Coordinator met with the Executive Director of the Bowling Green Human Rights Commission. The discussion included the continued vulnerability of the City’s international population, speaking approximately 100 languages, and the need to improve translation and interpretation services in assisting these individuals. The HRC is seeing more discrimination in the realm of substandard units being leased to members of the international community, immigrants and refugees. There’s been times where landlords are providing international residents with units not containing HVAC and other instances of overcrowding. Also further outreach is still needed to reach a greater audience for landlord education about discrimination and fair housing laws. Television broadcasts with fair housing commercials is believed to be successful and there is a goal for local outreach efforts to start including fair housing commercials on TV and radio. Evictions are still an issue locally and, it is recommended to include eviction laws or other eviction info on leases to improve this process with tenants and landlords.

There is still a need for transition services for people seeking permanent housing. HRC continues to see increases in the homeless population where residents don't have the required funds for down payment assistance. Recommendations made on this topic included offering grants prioritized to this segment of the population, developing more transitional housing and fair housing education opportunities for those exiting incarceration and medical facilities. Persons exiting incarceration and medical facilities are a vulnerable population where discrimination has been seen. Also the HRC is still limited in regards to fair housing enforcement and must rely on the Lexington Fair Housing Council and Kentucky Commission on Human Rights. It was discussed to update the City website with fair housing information including how to report discrimination and resolve complaints. Overall consensus from the discussion was the existing identified impediments to fair housing are still relevant to Bowling Green, with no additional impediments identified. However, several recommendations were made for updating the actions associated with the identified impediments to address the current fair housing issues facing our community today, which are included in the identified impediments section.

City of Bowling Green International Communities Liaison Consultation

The City's International Communities Liaison (ICL) supports initiatives that remove barriers to fair housing by partnering with community partners to host "know your right workshops" aimed at education landlords and tenants about their rights and responsibilities. These workshops have been held in collaboration with the Kentucky Equal Justice Initiative, Kentucky Legal Aid, and our own Code Compliance Division. The ICL has also supporting neighborhood meetings where neighbors have been displaced or are facing eviction in order to provide interpretation in Spanish and provide community resources and referrals to programs like our Housing Voucher Program and others, which can provide affordable housing options. These initiatives have been pro-actively done, but also reactively, as situations arise where neighbors are disproportionately affected and may face impediments to Fair housing.

The City of Bowling Green's International Communities Liaison (ICL) serves to coordinate the City's role in communicating and working effectively with the diverse international communities represented in Bowling Green, and to serve as an advocate for LEP (Limited English Proficient) persons who may seek City services. This position is an expanded role from a position at the Bowling Green Police Department that begun in 2008 with the overall goal to build positive relationships between the police department and members of the international communities of Bowling Green. The ICL shared some of the issues faced by the City's vulnerable foreign-born population with regards to fair housing and reviewed the existing identified impediments to fair housing. As part of a cultural orientation curriculum for new arrivals in Bowling Green, the ICL has a Welcome to the Neighborhood segment which details places to live, rental agreements, general house maintenance, driving laws, safety phone numbers, and how to be a good neighbor.

Prior Identification of Impediments to Fair Housing

A prior Consolidated Plan included a meeting with a cross-section of the community to discuss fair housing issues in Bowling Green. The attending group of nearly 40 included representatives from local government, neighborhood associations, housing non-profits, rental property owners/managers, lenders, service providers, advocacy, and media. The group identified impediments to fair housing and specific actions to eliminating each impediment in different time frames. The prior identification of impediments to fair housing serves as a baseline for the City to consider and reevaluate accordingly.

Identified Impediments and Associated Actions

Impediment #1: Language and cultural differences. Families speaking at least 100 languages or dialects now call Bowling Green home. The ability to read and understand the terms of a rental agreement or sales contract is limited if documents are not written in a language understood by both parties. The ability to negotiate a fair price is inhibited if both parties do not communicate in the same language. Complicating things even further, cultural differences may make it more likely that a foreign born individual will fall prey to unscrupulous landlords and be unwilling to take action against a person they perceive to be an authority figure. This was heightened in the Housing Needs Assessment where language and cultural differences received the third highest response from stakeholders for barriers to fair housing. A heightened fear of reprisal may also keep these individuals from coming forward as victims of discrimination, simply because they believe that they have fewer options. Previously the City took steps to increase communication between the international population and the City of Bowling Green, by the creation of an International Communities Liaison (ICL). The ICL provides outreach and coordination of City services to the international community.

The perception by some landlords that certain groups may overcrowd a unit (“Hispanics always have lots of people living in the same unit” or “Congolese always have a bunch of kids”) make them less likely to rent to these groups. There have been cases of landlords renting to Hispanic persons per person and over-crowding a home. Additionally, foreign born persons who have not yet obtained documentation find it difficult to find suitable housing.

Immediate Action:

- Hire a Community Navigator to assist international residents property sales and rental agreement, and accessing fair housing services including, but not limited to, the Bowling Green Human Rights Commission and Kentucky Legal Aid.
- Notify the International Communities Advisory Council of new affordable housing opportunities available to the foreign-born population.

Short Term Action:

- Continue neighborhood meetings with neighborhoods displaced and/or facing evictions in order to provide interpretation in Spanish and provide community resources and referrals to affordable housing programs.

- Develop fair housing informational brochures in multiple languages spoken locally in Bowling Green.
- As part of cultural orientation for new arrivals in Bowling Green, continue to include up to date details on places to live, rental agreements, general house maintenance, driving laws, safety phone numbers, and how to be a good neighbor.

Long Term Action:

- Incorporate Fair Housing Education and Outreach curriculum into International Center processes for new arrivals.
- Develop a standardized lease in locally prevalent languages available to landlords and local residents.

Impediment #2: Lack of accessible units. Substandard housing and the need for accessible units came up several times in the Stakeholder and Resident Surveys from Housing Needs Assessment and Market Analysis and Consolidated Plan Public Hearing. Additionally the study found that there are over 1,500 rental units in Bowling Green which are considered substandard, lacking kitchen or plumbing facilities or overcrowded. While modern building code requirements improve accessibility in newly constructed multi-family housing units, the accessibility of older units continues to lag.

Immediate Action:

- Utilize the building permit process as a means to educate developers/builders about accessibility.

Short Term Action:

- Identify grants and other funding which might be available to underwrite the cost of new or retrofitted accessible units and make the information available to developers and builders.
- Through outlets such as the Bowling Green Human Rights Commission and Bowling Green Apartment Association, continue to engage landlords and tenants with professionals from the housing and legal sector on reasonable accommodation requirements.
- Work with the Lexington Fair Housing Council and Kentucky Commission on Human Rights to strengthen and enhance the enforcement of fair housing accessibility laws locally.

Long Term Action:

- Provide financial incentives to encourage development or retrofitting of accessible units
- Analyze code enforcement statistics to gain a better understanding of the accessibility problems in Bowling Green to offer solutions data driven solutions.

Impediment #3: Lack of landlord education about discrimination and Fair Housing laws. From the 2023 Bowling Green Housing Needs Assessment there was consensus among stakeholders regarding landlords being unfamiliar with discrimination laws. Further, the study

recommended establishing a Landlord Registry. Recommendations from the City HRC meeting included developing TV or radio commercials on fair housing to reach a wider audience and the need to continue engaging landlords and tenants with the professionals from the housing and legal sector on fair housing issues.

Immediate Action:

- Continued concentrate education efforts on developers of multi-family housing.
- Use existing points of contact (i.e. Builders Association, etc.) to distribute Fair Housing information.
 - Speakers bureau
 - Written literature
 - Brochures
- Provide up to date fair housing information and in locally spoken languages.

Short Term Action:

- Encourage landlords to conduct move-in interviews with prospective tenants
- Continue “Know Your Rights Workshops” aimed at educating landlords and tenants about responsibilities and rights.
- Develop Fair Housing Radio and TV Commercials and distribute through local media outlets.

Long Term Action:

- Encourage landlords to develop and adhere to a written selection plan.
- Develop a Landlord Registry.
- Establish local enforcement of Fair Housing laws.

Impediment #4: The court eviction process is lengthy and cumbersome. The process requiring a 30 day notice sometimes has unintended consequences. In some cases, the 30-day eviction notice requirement encourages the landlord to use improper techniques to evict, circumventing the legal system (i.e., cutting off landlord furnished utilities to force the tenant to move out). 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 related or violent incidents, preventing the expeditious removal of a potentially dangerous or destructive tenant. Local sentiment shows the need to include eviction laws or related info on leases.

Immediate Action:

- Educate tenants regarding eviction timelines

Short Term Action:

- Establish local enforcement of Fair Housing laws.
- Research the eviction process to determine if changes need to be made.

Long Term Action:

- Revise State laws regarding 30 day notice requirement.

- Improve follow-up after a court eviction.
- Explore putting eviction laws or other eviction information on leases.
- Explore the development of eviction support programs.

Impediment #5: Lack of transition services for persons seeking permanent housing.

Consensus amongst homelessness service providers demonstrated the need of a one-stop drop in center for area agencies to assess homeless persons and provide coordinated services from a centralized location. Required services from such facility include case management and referrals for health and mental care, job training and placement, housing, education, governmental benefit programs, drug rehabilitation, legal aid, transportation, and other design to assist those in need to find stability and become self-sufficient.

A leadership committee composed of members from local government, law enforcement, healthcare professionals, mental health professionals and legislators revealed the need to change how services are provided to those struggling with mental health. Currently county jails across Kentucky act as “de facto” mental health treatment centers. There is a need of a new facility to bypass criminal and judicial systems along with hospital emergency rooms, instead allowing law enforcement to take those experiencing a mental health crisis to be served at a mental health center.

Both of the facilities described above would provide a pathway for a large variety of residents facing personal crisis to transition to permanent housing and end or avoid becoming homelessness.

Immediate Action:

- As part of an allocation of CDBG funding for new housing opportunities under the Neighborhood Improvements Program, the provision of affordable homeownership, rental and transitional housing opportunities.

Short Term Action:

- Establish inter-local agreements with homeless and mental health service providers to better serve homeless and residents at-risk of becoming homeless through coordinated strategies.
- Create more transitional housing and support opportunities through local providers

Long Term Action:

- Create a one-stop drop in center for homeless service providers to assess homeless persons and provide coordinated services from a centralized location.
- Create a mental health center for those experiencing a mental health crisis to receive treatment from mental health and substance abuse professionals.

Impediment #6: Lack of local enforcement of Fair Housing laws. It was the general consensus of many in the group that several of the issues discussed could be addressed through local enforcement of Fair Housing laws. The local fair housing ordinance assigns the function of

administering fair housing and fair treatment ordinances to the Bowling Green Human Rights Commission (HRC). Previously the HRC attempted to work 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. The local ordinance was submitted to HUD for review in 2005. After addressing several items identified by HUD as deficiencies, the ordinance was revised and resubmitted. However, as local legislative support for Substantial Equivalency has been lacking, the final request for HUD review was not initiated by the local HRC and the quest for Substantial Equivalency was shelved.

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 forwarded to state and federal agencies in Louisville and Lexington, Kentucky. As part of a prior Consolidated Plan, the City partnered with the HRC in an attempt to gain local enforcement approval from HUD, but unfortunately was unsuccessful.

Immediate Action:

- Utilize available websites, including the City’s, to provide more detailed information regarding how and when to file a discrimination complaint.

Short Term Action:

- Identify funding sources for funding of local enforcement.

Long Term Action:

- Establish a local enforcement agency.

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. Not long ago, 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 City of Bowling Green contributes approximately \$87,000 per year in general fund support and \$40,000 in CDBG funds to the HRC to fund fair housing outreach and awareness activities. 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. Complaints received locally are forwarded to agencies in Louisville and Lexington, Kentucky. Fair housing activities provided by the HRC between July 2018 and June 2023 include:

- Provided an estimated 15 Fair Housing workshops.
- Published and distributed around 12 newsletters to local minority businesses, churches, and organizations with updates on local housing issues and Fair Housing information.
- Organized and held four annual Fair Housing events.
- Participated in nearly 138 community activities to promote Fair Housing.
- Produced Fair Housing brochures and additional education and outreach materials.
- Accept referrals from other agencies regarding housing discrimination and Fair Housing inquiries.
- Counsel clients about Fair Housing.
- Partnered with the Housing Authority of Bowling Green to provide Fair Housing education and awareness.
- Consult with property managers and tenants on Fair Housing questions and problems.
- Partner with Fair Housing Council to promote Fair Housing activities.
- Served approximately 10,000 people in the local area.

The City's NCS 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 NCS include:

- Providing annual CDBG funding to the HRC to provide fair housing education and outreach into the community.
- Display and distribution of fair housing literature in the NCS offices.
- Inclusion of fair housing information in the landlord newsletter.
- Providing referrals for customers who think they may have been discriminated against.
- Counseling clients about fair housing choice.
- Providing educational materials and information to Housing Choice Voucher participants.
 - Providing Fair Housing information in the client Briefing Packets.

- Providing a list of known accessible units to all Housing Choice Voucher recipients.
 - Providing deconcentration information, including dispersion map, to voucher holders to encourage leasing outside of areas of poverty concentration.
- Adoption of policies and procedures to facilitate use of the Housing Choice Voucher by persons with special needs
 - Approving Exception Payment Standards as a reasonable accommodation.
 - Approving a larger subsidy to house a Live in Aide for a disabled person.
 - Waiver of the Non-Relative Rule to allow rental of property owned by a relative to a disabled person as a reasonable accommodation.
- Adoption of an Affirmative Marketing and Fair Housing Policy and Procedures Plan to help ensure compliance with all laws regarding discrimination.
- Making available to builders and contractors the Accessibility Design Guidelines.
- Development of the City of Bowling Green Language Access Plan.
- Updating of the Section 504 Plan.

Conclusions and Recommendations

Shelter is one of the most basic of human needs. 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 underscored its commitment to these laws with the adoption of a local fair housing ordinance.

Through this Analysis of Impediments, several issues have been identified which impede housing seeking residents in Bowling Green from realizing their right to fair and equitable treatment under the law. It is imperative that consumers of housing know their rights and that those providing housing know their responsibilities. The City of Bowling Green, through the NCS Department and the HRC, will continue the public education campaign to educate rental property owners and managers. Education of both landlords and tenants may target existing points of contact, such as Neighborhood Associations, the Realtors' Association, and the Builders Association.

Understanding the City's diversity, several years ago the City created the position of, International Communities Liaison (ICL), which serves to coordinate the City's role in communicating and working effectively with the diverse international communities represented in Bowling Green, and to serve as an advocate for LEP (Limited English Proficient) persons who may seek City services. A Community Navigator will be hired to further this mission.

The City will look at various means to educate landlords regarding reasonable accommodation and encourage compliance: the building permit process; organization of a landlord association; and financial incentives to encourage the development or retrofitting of accessible units. On the other hand, efforts will be undertaken to educate the consumer as to what is "reasonable".

Although homeless persons, persons released from medical facilities, and parolees returning to the community are not a protected class, the City will continue to seek funding to provide additional opportunities to house, serve, and support these population segments.

Over the long term, the City will continue to consider the need for and viability of Substantial Equivalency certification or other applicable Fair Housing legislation and the establishment of a local enforcement agency. In past discussion, consensus has been that local enforcement is the key to eliminating many of the issues identified herein.

Certification

I, Mayor Todd Alcott, 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 2024, 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.



Todd Alcott, Mayor of Bowling Green, Kentucky

May 7, 2024
Date