



# City of Wheeling, West Virginia

## FY 2020-2024 Analysis of Impediments to Fair Housing Choice

### Department of Economic & Community Development

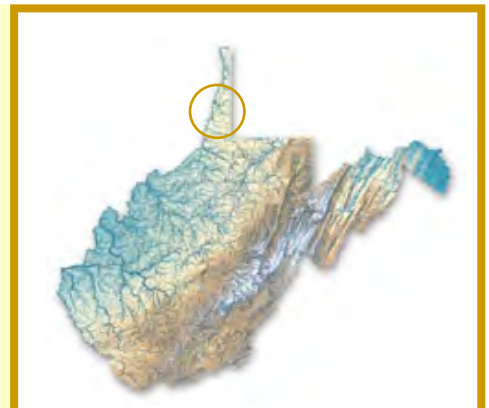
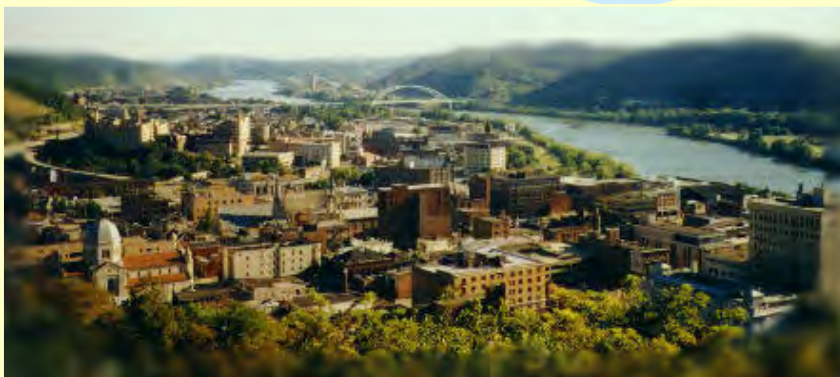
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### For Submission to H.U.D.

Community Development Block Grant  
and  
HOME Investment Partnership Program

Prepared By:



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## Executive Summary

The City of Wheeling, West Virginia is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG) and is the participating jurisdiction for the Northern Panhandle HOME Consortium. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," it must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. HUD advises communities that the Analysis of Impediments to Fair Housing should address the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of Title I of the Housing and Community Development Act of 1974, Title II of the Americans with Disabilities Act of 1990, Architectural Barriers Act of 1968, Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, Executive Order 11063, Executive Order 11246, Executive Order 12892, Executive Order 12898, Executive Order 13166, and Executive Order 13217.



The HUD Fair Housing and Equal Opportunity (FHEO) Office has advised Federal entitlement communities to update their Analysis of Impediments (AI) to Fair Housing Choice to coincide with their Five Year Consolidated Plan, and then every five (5) years thereafter. As part of its Annual Action Plan, each entitlement City must annually sign a certification stating that the City will affirmatively further fair housing. This means that the City will follow its Analysis of Impediments to Fair Housing Choice (AI), take appropriate actions to overcome the effects of any impediments identified through the AI, and maintain records reflecting what analysis and corrective actions were taken.

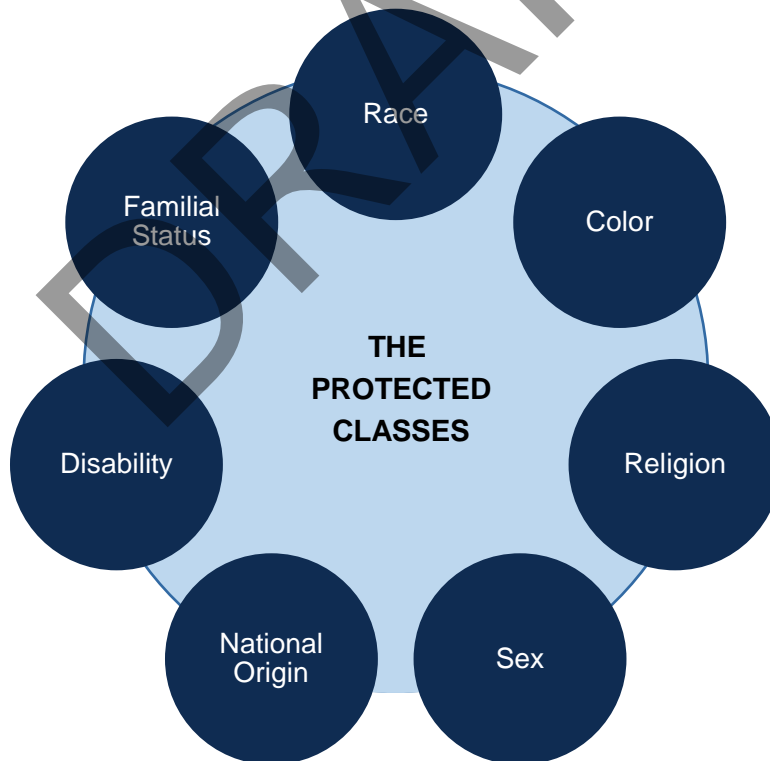
The City of Wheeling previously prepared an Analysis of Impediments to Fair Housing Choice in 2015, and has prepared a new Analysis of Impediments to Fair Housing Choice for 2020-2024. The findings produced through this analysis will be further addressed in the City's FY 2020-2024 Five Year Consolidated Plan.

This analysis focuses on the status and interaction of six (6) fundamental conditions within the City of Wheeling:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;

- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities for minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse to sell or rent property to persons included under the category of a protected class. The Fair Housing Act prohibits discrimination against persons based on their *race, color, religion, sex, national origin, disability, or familial status* in the sale, rental, and financing of housing.



As population shifts and economic trends grow, Fair Housing issues vary drastically between jurisdictions and regions. The City of Wheeling is taking a more efficient and

proactive approach toward affirmatively furthering fair housing choice for residents on both a local level and a regional level for the Northern Panhandle HOME Consortium.

The City of Wheeling has gained insight into the issues affecting the housing market of the City. While certain fair housing issues are regional in scale, this AI strives to identify strategies and goals it can take to address the barriers that are impacting Fair Housing Choice for the City's residents.

The methodology employed to undertake this Analysis of Impediments included:

- **Research**

- A review was performed of the City of Wheeling's zoning ordinance.
- A review of the Wheeling Housing Authority's Affirmative Marketing Plan.
- The most recent demographic data for the City and County was analyzed from the U.S. Census, which included general, demographic, housing, economic, social, and disability characteristics.
- A review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data was undertaken.
- A review of financial lending practices through the Home Mortgage Disclosure Act (HMDA) database was completed.
- A review of the real estate practices was undertaken.
- Home mortgage foreclosure data was also reviewed.

- **In-Person Meetings/Interviews**

- Meetings were conducted with the following:
  - City of Wheeling Department of the City Manager
  - City of Wheeling Department of Public Works
  - City of Wheeling Police Department
  - City of Wheeling Economic and Community Development
  - City of Wheeling Housing Authority
  - Greater Wheeling Coalition for the Homeless
  - Belomar Regional Council
  - Wheeling Heritage
  - South Wheeling Preservation Alliance
  - Regional Economic Development (RED)
  - CHANGE, Inc.
  - WesBanco
  - Russell Nesbitt Services
  - Woda Cooper Companies, Inc.
  - Kennen & Kennen Realtors

- WYCA
  - Project Hope
  - Seeing Hand
  - Ohio County Family Resource Network
  - Family Service-Upper Ohio Valley
  - Youth Service System
  - House of the Carpenter
  - Ohio County Board of Education
  - West Virginia Northern Community College
  - Bethlehem Temple
  - Temple Shalom
- **Analysis of Data**
    - Low- and moderate-income areas were identified and mapped.
    - Concentrations of minority populations were identified and mapped.
    - Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
    - Fair housing awareness in the community was evaluated.
    - The locations of Housing Cost Burdens throughout the Consortium Area were analyzed.
    - The locations of CDBG and HOME expenditures throughout the area were analyzed.
    - The City's and Consortium's Five Year Goals and Objectives were reviewed.
  - **Potential Impediments**
    - Public sector policies that may be viewed as impediments were analyzed.
    - Private sector policies that may be viewed as impediments were analyzed.
    - The status of previously identified impediments was evaluated.
  - **Citizen Participation**
    - Electronic copies of a fair housing survey were made available on the City of Wheeling's Community Development & Housing website. The online survey produced 164 responses. See copy of survey form in the Appendix Section.
    - The City of Wheeling held one (1) Public Hearing to engage the public and local organizations/agencies and help identify issues impacting Fair Housing Choice. The Public Hearing was held on Wednesday, December 4, 2019 in City Council Chambers .
    - Notices for the public meetings were published in the "The Intelligencer," the local newspaper of general circulation in the area.



- The City of Wheeling met with representatives from local housing, community development, and social service organizations through a series of small group discussions. These were held with the following types of organizations:
  - Wheeling Housing Authority
  - Community Organizations
  - Economic Development Organizations
  - Education Providers
  - Fair Housing Organizations
  - Housing Providers
  - Health Care Organizations
  - Homeless Service Providers
  - Public Safety Officials
  - Social Service Providers
- The 2020-2024 Analysis of Impediments to Fair Housing Choice was made available on the City of Wheeling’s website at <https://www.wheelingwv.gov/> beginning on July 17, 2020. Due to the COVID-19 pandemic, no hard copies were made available.

The City of Wheeling held one Public Hearing on the “draft” 2020-2024 Analysis of Impediments on August 4, 2020.

Based on the data analysis and citizen participation process, the City staff in Wheeling identified the following issues impacting fair housing choice in the area:

- **Housing Opportunities:**
  - There is a shortage of affordable housing in the City of Wheeling that is decent, safe, and sanitary.
  - There is a shortage of affordable housing units in areas of opportunity where low-income persons and households may want to move.
  - The population and the housing supply of the City of Wheeling have been decreasing. However, the population is decreasing at a faster rate.
  - The number of renter-occupied and owner-occupied units have been decreasing in the City of Wheeling.
- **Cost Burden:**
  - Lower household incomes create cost burdened housing conditions; approximately 14.0% of homeowners and 44% of renters in the City are cost burdened by 30% or more.
  - Individuals and families in the lowest-income areas struggle to find higher wage jobs.

- The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs.
- **Disability/Accessibility:**
  - There is a lack of housing in the City that is accessible and affordable for the elderly, the disabled, and persons with special needs.
  - The denial by some landlords to make reasonable modifications and accommodations limits the amount of accessible units in the City that are for rent for persons with special needs.
- **Fair Housing:**
  - Tenants and homebuyers do not always file housing discrimination complaints when they have been discriminated against, either because they do not know about the Fair Housing Act or they do not know where to report complaints.
  - There is a lack of awareness of tenants' rights and landlords' responsibilities, including what reasonable modifications and accommodations are.
- **Access/Mobility:**
  - The limited public transportation network in the City is not convenient for lower income households to go to: work, health care, shopping, etc., which limits the choices where a low-income household can live.
  - The City of Wheeling is not designed for walkability, and there is a need for sidewalks in many portions of the City.
  - Landlords will frequently refuse to make reasonable modifications and accommodations, and discriminate against elderly tenants.

The City of Wheeling held a Public Hearing on the “draft” 2020-2024 Analysis of Impediments on Tuesday, August 4, 2020.

Using these findings, the City of Wheeling developed the following impediments for the 2020-2024 Analysis of Impediments to Fair Housing Choice and defined specific goals and strategies to address each impediment.

- **Impediment 1: Housing Affordability**

Decent, safe, sanitary, and affordable housing remains a problem in finding fair housing choice as well as the, quality of life and attractive neighborhoods.

**Goal:** Increase the supply of decent, safe, sound, and affordable housing targeted to lower income households, both renters and owners.



**Strategies:** To meet this goal, the following activities and strategies may be undertaken by the City of Wheeling.

- **1-A:** Maintain the supply of available decent, safe, sanitary, and affordable housing through code enforcement, rehabilitation, and support of the creation of and capacity building of Community Housing Development Organizations (CHDOs), both locally and throughout the HOME Consortium Area.
- **1-B:** Increase homeownership opportunities for LMI households through the purchase of available housing, requiring housing counseling, as well as providing downpayment and closing cost assistance through the Northern Panhandle HOME Consortium.
- **1-C:** Support and strengthen an effective property maintenance inspection program and code enforcement in the City.
- **1-D:** Promote programs for accessibility, weatherization, insulation, storm windows, energy audits, etc. to help reduce energy costs for LMI households that are cost burdened.

## • **Impediment 2: Housing Accessibility**

There is a lack of housing that is accessible to the older population, and persons with disabilities which limits their choice of housing.

**Goal:** Increase the supply of housing that meets the accessibility, visitability, and quality of life needs of the older population and persons with disabilities.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **2-A:** Increase the supply of accessible owner-occupied housing by providing financial assistance to support the removal of architectural barriers.
- **2-B:** Enforce building codes to ensure that new multifamily construction meets the accessibility provisions of the Fair Housing Act.
- **2-C:** Continue to promote education and awareness of the requirements for reasonable accommodations for persons with disabilities and the elderly in rental housing.
- **2-D:** Encourage the development of new construction of housing that is accessible and affordable to the elderly and disabled.

- **Impediment 3: Fair Housing Education, Advocacy, Monitoring, and Enforcement**

There is a lack of awareness of tenant rights and landlord responsibilities under the Fair Housing Act, and a need to continually monitor and enforce the Fair Housing Act.

**Goal:** Increase the knowledge and awareness of the rights of individuals and the responsibilities of building owners in regard to the Fair Housing Act through education advocacy, monitoring, and enforcement to eliminate discrimination in housing and providing fair housing choices for all individuals and families.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **3-A:** Continue to support educational and training programs concerning the tenant rights and landlord responsibilities covered by the Fair Housing Act.
- **3-B:** Continue to support local and Consortium efforts to strengthen efficient and effective fair housing monitoring, investigation, testing, and enforcement strategies.
- **3-C:** Continue to support the delivery of fair housing advocacy services to at-risk groups and victims of housing discrimination.
- **3-D:** Continue to promote the delivery of financial literacy counseling for LMI and minority households to combat predatory and subprime lending practices.

- **Impediment 4: Cost Burden**

Both homeowners and renters are cost burdened by the monthly cost of housing which affects fair housing choice.

**Goal:** Reduce the amount of households which are cost burdened in the City and the HOME Consortium area.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **4-A:** Provide financial assistance to homebuyers to lower the cost of buying a home and thus reducing their monthly housing costs to within 30% of income.

- **4-B:** Promote the development of new affordable rental units under the LIHTC program, bond issues, Federal subsidized housing program, etc. to reduce a renter households' monthly housing cost to within 30% of their income.
- **4-C:** Promote the development of mixed income housing by private developers by offering financial incentives and density bonuses.

- **Impediment 5: Income vs. Housing Choice**

There is a lack of economic and job opportunities in the City of Wheeling and the HOME Consortium area which prevents low-income households from increasing their income and ability to choose to live outside areas of concentrated poverty.

**Goal:** The local economy will improve which will create new job opportunities and in turn increase household income.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **5-A:** Strengthen partnerships with area businesses and firms to expand the local tax base and create a more sustainable economy.
- **5-B:** Support workforce development and skills training that results in increased job opportunities and higher wages.
- **5-C:** Support programs that promote entrepreneurship and small business development for the retention and creation of job opportunities for low-income businesses and minority and women-owned businesses.

- **Impediment 6: Impacted Areas**

There are specific areas in the City of Wheeling where there is a concentration of low-income households and minorities.

**Goal:** Promote the deconcentration of low-income people and minorities from impacted areas and provide housing choice outside these areas.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **6-A:** Support, promote, and encourage affordable housing developments that are constructed outside impacted areas.
- **6-B:** Continue to market and promote the homebuyer program to minority families and low-income households so they can afford to buy a home outside areas of impactation.

## I. Introduction

The City of Wheeling, WV is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program and HOME Investment Partnership (HOME) Program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the community is "affirmatively further fair housing," it must conduct an Analysis of Impediments (AI) to Fair Housing Choice. The AI identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. The HUD Fair Housing and Equal Opportunity (FHEO) Office has advised the Federal entitlement communities to prepare a new Analysis of Impediments to Fair Housing Choice to coincide with the Five Year Consolidated Plan, and then every five (5) years thereafter.

HUD defines "fair housing choice" as:

*"The ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices"*

This Analysis of Impediments to Fair Housing Choice consists of the following six (6) conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

HUD-FHEO suggests that communities conducting an Analysis of Impediments should also consider the policies concerning “visitability,” Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act. Housing that is “visitable” means that it has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor.

- “Visitable” housing has at least one accessible means of ingress/egress, and all interior and bathroom doorways have as a minimum a 32-inch clear opening.
- Section 504 of the Rehabilitation Act (24 CFR Part 8), known simply as “Section 504,” prohibits discrimination against persons with disabilities in any program receiving Federal financial assistance.
- The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments.
- The Fair Housing Act requires property owners to make reasonable modifications to units and/or public areas in order to allow a disabled tenant to have full use of the housing unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant the full use of the housing unit.

In regard to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

The City of Wheeling previously prepared an Analysis of Impediments to Fair Housing Choice in 2015. The City of Wheeling has prepared this 2020-2024 Analysis of Impediments to Fair Housing Choice (AI) as an update to that plan. The findings produced through this analysis will be further addressed in the City’s FY 2020-2024 Five Year Consolidated Plan.

The document is designed to act as a planning tool, providing the City of Wheeling with the necessary framework to strategically address any identified impediments to fair housing choice over the next five (5) years and continue to make modifications based on events and activities in the community during that time period.

## II. Background Data

### Description

The land where present-day Wheeling sits was first occupied by Native Americans for a thousand years. In the 17<sup>th</sup> Century, The Iroquois conquered the area and maintained it as a hunting ground. Celeron de Blainville was a French Explorer, and one of the first Europeans in the area. In 1749, de Blainville marked his claim to Wheeling Creek by placing a lead tablet at its mouth. In fact, you can still see a remnant of this tablet today. The area was later surveyed by the British explorer Christopher Gist in 1751, and even by George Washington in 1770.

In 1769, Colonel Ebenezer Zane explored and claimed the area. Zane took claim to the land using something called “tomahawk” or “Cabin” Rights. This process involves the claimant typically girdling several trees near the head of a spring, then blazing the bark of one or more of them with their initials or name. The area quickly grew around Forth Henry which was built in 1774. In 1795, Wheeling was established as a town and incorporated in 1836. Wheeling quickly grew as a trade and commerce hub due to its strategic location along the Ohio River and its placement along the National Road.

Wheeling is the birthplace of the State of West Virginia. Historically, many of the residents of Wheeling were opposed to slavery. So when the Commonwealth of Virginia passed an Ordinance of Secession (to secede from the Union), an assembly of delegates from northwestern Virginia held the Wheeling Convention. The Wheeling Convention led to the creation of a Restored government of Virginia which would ultimately become the State of West Virginia. Wheeling would serve as the new state’s first capital from 1863 until 1870 when it was moved to Charleston. In 1875, the City of Wheeling once again served as the state capital until 1885 when it was moved back to Charleston permanently.

Wheeling is currently the county seat of Ohio County and the principal city of the Wheeling Metropolitan Statistical Area. It is located 55 miles from Downtown Pittsburgh, 120 miles from Columbus, Ohio, and 130 miles from Cleveland, Ohio. Thanks to its location along major transportation routes, including the Ohio River, National Road, and the B&O Railroad, Wheeling became a manufacturing center in the late nineteenth century. After experiencing the closing of factories and substantial population loss following World War II, Wheeling's major industries now include healthcare, education, law and legal services, entertainment and tourism, and energy.

Based on the size of the City of Wheeling, the data from the 2010 U.S. Census is the most recent complete set of data available. However, 2013 - 2017 American



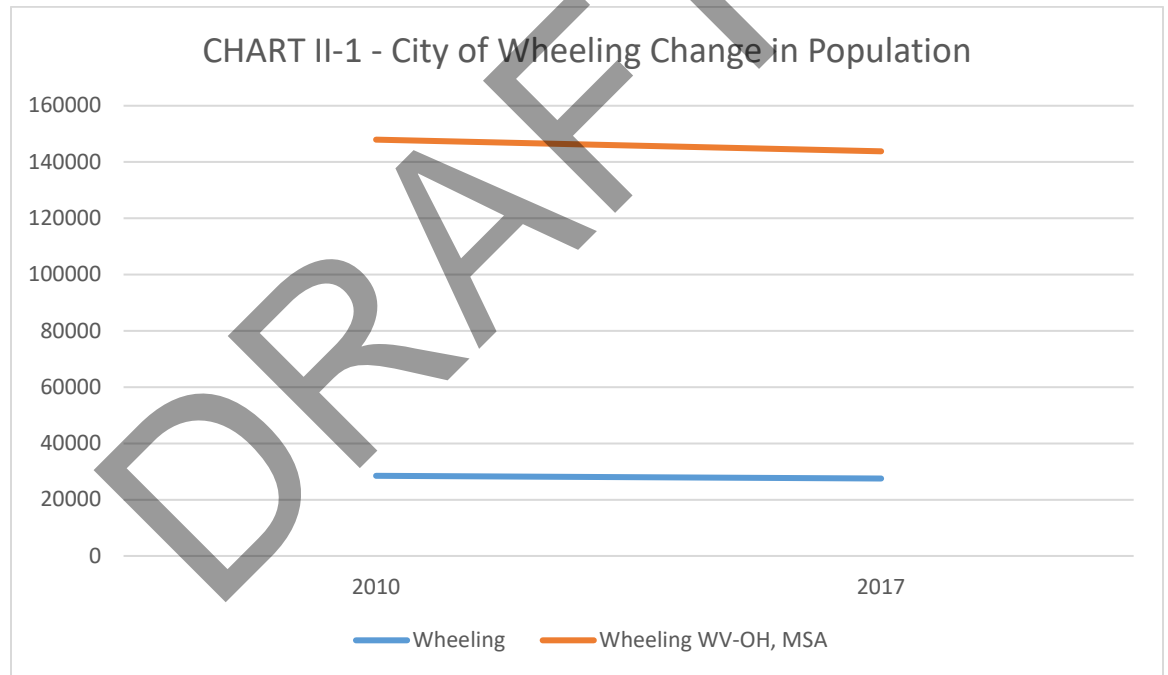
Community Survey offers recent estimates of general demographics for Wheeling. This Census data, along with other databases such as the CHAS Data and HMDA Data, have been used to evaluate the City of Wheeling’s demographic and socio-economic characteristics, and other conditions affecting fair housing choice.

## A. Population, Race, Ethnicity, and Religion

### Population

Wheeling’s population decreased from 28,662 people in 2010 to 27,521 people in 2017 (an decrease of 4.1 percent).

Population across the entire Wheeling Metropolitan Area, decreased from 2010 to 2017.



Source: 2010 U.S. Census and 2013-2017 ACS

### Race

The following table highlights the racial composition of Wheeling at the time of the 2013 and 2017 American Community Surveys.

**TABLE II-1 - Race and Hispanic or Latino Population in Wheeling**

Race and Hispanic or Latino	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
<b>Total</b>	<b>28,662</b>	<b>100%</b>	<b>27,521</b>	<b>100.00%</b>
White alone	26,276	91.7%	25,026	90.93%
Black or African American alone	1,408	4.9%	1,618	5.89%
American Indian and Alaska Native alone	67	0.2%	48	0.17%
Asian alone	326	1.1%	237	0.86%
Native Hawaiian and Other Pacific Islander alone	1	0%	0	0.00%
Some other race alone	59	0.2%	94	0.34%
Hispanic or Latino	248	0.9%	290	1.1%

Source: 2008-2012 and 2013-2017 ACS

The most common race identified in Wheeling in 2012 was White alone with 26,276 residents comprising of 91.7% percent of the population. The second most common race identified in Wheeling in 2012 was Black or African American alone with 1,408 residents comprising of 4.9% percent of the population.

The most common race identified in Wheeling in 2017 was White alone with 25,026 residents comprising 90.93% percent of the population. The second most common race identified in Wheeling in 2017 was Black or African American alone with 1,618 residents comprising of 5.89% percent of the population.

There was not any change in proportional representation in Wheeling from 2012 to 2017 that was larger than 5.0 percentage points

### **Ethnicity**

The following table highlights the ethnicities of Wheeling residents at the time of the 2012 and 2017 American Community Surveys.

**TABLE II-2 - Ethnicity and Ancestry in Wheeling**

ANCESTRY	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
<b>Total population</b>	28,662	100%	27,521	100%
American	1,587	5.5%	2,518	9.1%
Arab	603	2.1%	525	1.9%
Czech	193	0.7%	183	0.7%
Danish	57	0.2%	42	0.2%
Dutch	442	1.5%	433	1.6%
English	3,341	11.7%	2,932	10.7%
French (except Basque)	589	2.1%	529	1.9%
French Canadian	35	0.1%	20	0.1%
German	9,050	31.6%	7,319	26.6%
Greek	206	0.7%	255	0.9%
Hungarian	330	1.2%	180	0.7%
Irish	6,029	21%	5,045	18.3%
Italian	2,378	8.3%	2,520	9.2%
Lithuanian	104	0.4%	62	0.2%
Norwegian	45	0.2%	61	0.2%
Polish	2,105	7.3%	1,837	6.7%
Portuguese	20	0.1%	8	0%
Russian	208	0.7%	231	0.8%
Scotch-Irish	538	1.9%	678	2.5%
Scottish	577	2%	424	1.5%
Slovak	172	0.6%	198	0.7%
Sub-Saharan African	71	0.2%	31	0.1%
Swedish	136	0.5%	44	0.2%
Swiss	118	0.4%	160	0.6%

Ukrainian	107	0.4%	134	0.5%
Welsh	352	1.2%	305	1.1%
West Indian (excluding Hispanic origin groups)	8	0%	22	0.1%
Other Groups	4,185	14.6%	3,795	13.8%

Source: 2008-2012 and 2013-2017 ACS

The most common ancestral group identified in Wheeling in 2012 was German with 9,050 residents comprising of 31.6 percent of the population. The second most common ancestral group identified in Wheeling in 2012 was Irish with 6,029 residents comprising of 21 percent of the population.

The most common ancestral group identified in Wheeling in 2017 was still German with 7,319 residents comprising of 26.6 percent of the population. The second most common ancestral group identified in Wheeling in 2017 was still Irish with 5,045 residents comprising of 18.3 percent of the population.

It is important to note that “Other Groups” make up the third largest ancestral group throughout the City. These “Other Groups” include people with multiple ancestries, including African American and Hispanic populations. There was not any change in proportional representation in Wheeling from 2012 to 2017 that was larger than 5.0 percentage points.

Another way to consider racial distribution in a community is to look at the dissimilarity indices for an area. The **Dissimilarity Index (DI)** is based on the data from the 2010 U.S. Census and ACS data which measures whether one particular group is evenly distributed across census tracts in the metropolitan area in the same way as another group. More specifically, the index represents the extent to which the distribution of any two (2) groups (racial, ethnic, etc.) differs across census tracts. While there are limitations due to outside factors and scale size, the Dissimilarity Index can provide an effective method of analyzing segregation and identifying trends in a community.

A high value indicates that the two groups tend to live in different tracts. Dissimilarity Index values between 0 and 39 generally indicate low segregation; values between 40 and 54 generally indicate moderate segregation; and values between 55 and 100 generally indicate a high level of segregation. However, context is important in interpreting the dissimilarity index. The index measures the degree two groups are segregated in a

particular geographic area; however, the index alone does not provide the location of the segregation within the geographic area. Brown University has provided metro-area dissimilarity indices for 1990 to 2010.

**TABLE II-3 - Dissimilarity Index in the Wheeling, WV-OH MSA**

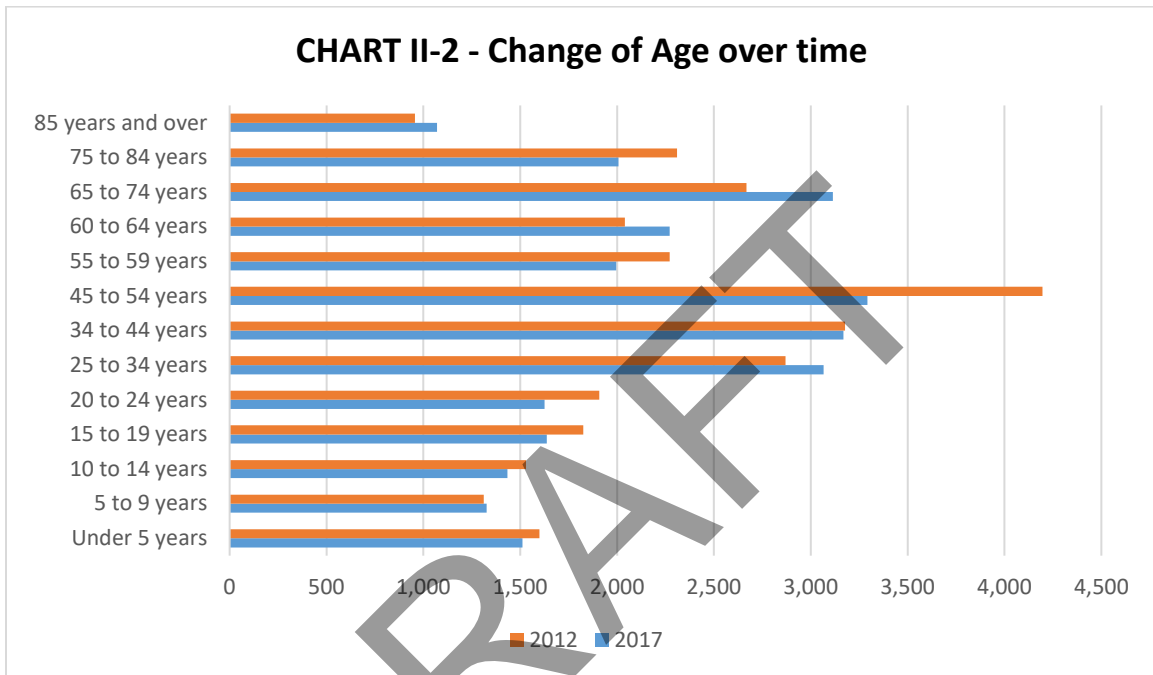
Racial/Ethnic Dissimilarity Index	Wheeling, WV-OH MSA		
	1990	2000	2010
Black / White	52.7	53.6	49.2
Hispanic / White	28.8	23.2	21.6
Asian or Pacific Islander/White	44.9	38.7	33.1

Source: 2000 U.S. Census

The Dissimilarity Index (DI) trends among social/ethnicities in the Wheeling, WV-OH MSA have diverged based on the race or ethnicity. According to the dissimilarity indices, the Wheeling region is moderately segregated. The area has been growing less segregated from 1990 to 2010 in terms of White residents and Hispanic or White and Asian residents. However, the region has only slightly become less segregated between White and African American/Black residents since from 1990 to 2010.

**Age**

The following chart illustrates age distribution in Wheeling at the time of the 2008-2012 ACS and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 21.5 percent of the population; 28.5 percent of the population is between 20 and 45 years of age; 27.6 percent of the population is 45 to 65; and 22.5 percent of the population is 65 years of age and older. The median age is 45 years of age.



Source: 2008-2012 ACS and 2013-2017 ACS



**Religion – Ohio County**

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of Ohio County, the County used the data made available by The Association of Religion Data Archives (ARDA). ARDA surveys the congregation members, their children, and other people who regularly attend church services within counties across the country. Although this data appears to be the most comprehensive data that is available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations in the year 2000. The total number of regular attendees was adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. However, the total value cannot be disaggregated to determine the distribution across denominational groups.

The table below shows the distribution of residents of Ohio County across various denominational groups, as a percentage of the population which reported affiliation with a church.

**TABLE II-4 - Religious Affiliation in Ohio County, WV**

	1990		2000		2010	
	#	%	#	%	#	%
<b>Total Population:</b>	<b>50,871</b>	-	<b>47,427</b>	-	<b>44,443</b>	-
Evangelical Protestant	2,650	7.86%	2,745	8.05%	3,963	14.13%
Black Protestant	-	0.00%	-	0.00%	234	0.83%
Mainline Protestant	13,371	39.65%	11,976	35.11%	8,919	31.80%
Catholic	17,561	52.07%	18,524	54.31%	13,134	46.83%
Orthodox	-	0.00%	525	1.54%	180	0.64%
Other	141	0.42%	338	0.99%	1615	5.76%

Total Adherents:	33,723	66.29%	34,108	71.92%	28,045	63.10%
Unclaimed:	17,148	33.71%	13,319	28.08%	16,398	36.90%

Source: The Association of Religion Data

Between 1980 and 2010, Ohio County experienced a significant decrease in people identifying themselves as “Mainline Protestants”, while there was a noticeable increase in the portion of the religious population identifying itself as “Evangelical Protestants.” The proportionally large population identifying as “Catholic” fluctuated in the decades between 1980 and 2010, but ultimately remained only slightly higher overall. The percentage of adherents to any religious tradition increased steadily throughout the 1990 and 2000 decades, but finally decreased by 2010 to nearly the original 1980 level. There was also an increase of people identifying with religious traditions that ARDA classifies as “Other,” which includes Latter-Day Saints traditions, as well as adherents of Jewish, Muslim, Hindu, and Baha’i congregations.

## B. Households

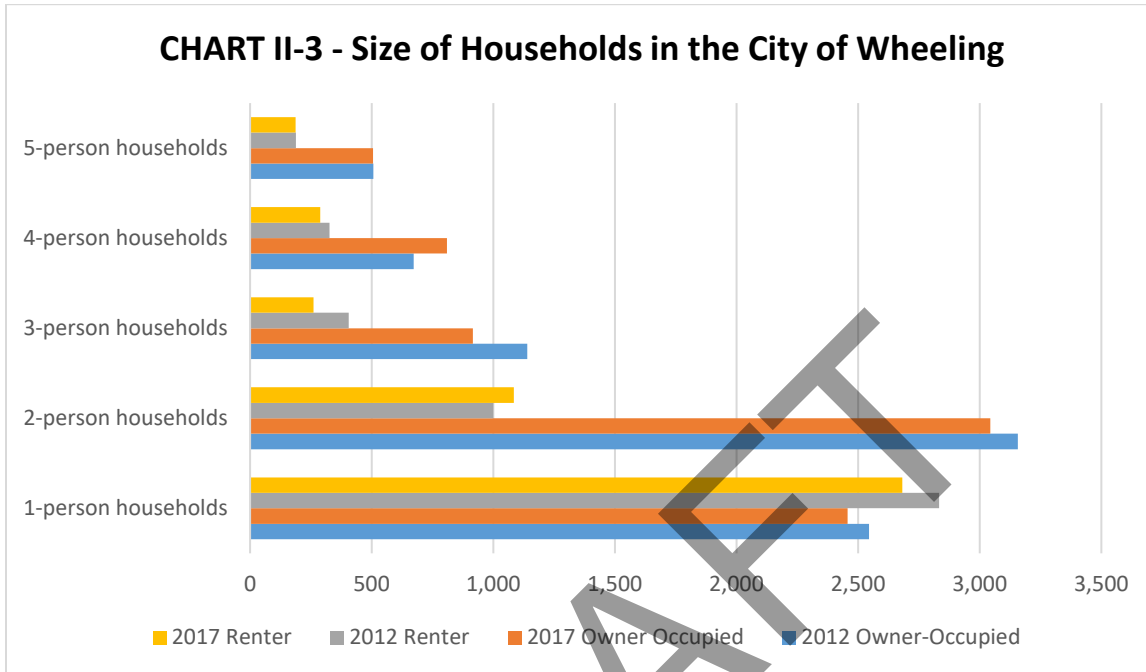
### Household Tenure

According to the 2008-2012 American Community Survey, there were 14,944 housing units in Wheeling. Of these housing units, 12,772 (85.5%) were occupied and 2,172 (14.5%) were vacant. Of the occupied housing units, 8,019 (62.8%) were owner-occupied and 4,753 (37.2%) were renter-occupied.

According to the 2017 American Community Survey, there were 14,652 housing units in Wheeling. Of these housing units, 12,233 (83.5 percent) were occupied and 2,419 (16.5 percent) were vacant. Of the occupied housing units, 7,730 (63.2%) were owner-occupied and 4,503 (36.8%) were renter-occupied.

From 2012 to 2017 there was a 292 unit decrease in the total number of housing units, a 539 unit decrease (4.2 percentage point decrease) in the number of occupied units, and a 247 unit increase (5.3 percentage point increase) in the number of vacant units. The number of owner-occupied units decreased by 289 units (3.7 percentage point decrease) and the number of renter-occupied units decreased by 250 units (5.6 percentage point decrease).

There were not any significant changes in Household Tenure in Wheeling from 2012 to 2017.



Source: 2008-2012 ACS and 2013-2017 ACS

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**Household Tenure by Race and Ethnicity**

The tables below compare homeowners and renters by race and ethnicity in Wheeling.

**TABLE II-5 - Household Type by Race and Ethnicity in the City of Wheeling**

Cohort	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Householder who is White alone	12,043	94.30%	11,509	94.10%
Householder who is Black or African American alone	518	4.10%	570	4.70%
Householder who is American Indian and Alaska Native alone	23	0.20%	0	0%
Householder who is Asian alone	95	0.70%	56	0.50%
Householder who is Native Hawaiian and Other Pacific Islander alone	0	0%	0	0%
Householder who is some other race alone	7	0.10%	16	0.10%
Householder who is two or more races	86	0.70%	73	0.60%
Householder who is Hispanic or Latino	100	0.80%	50	0.40%
Householder who is not Hispanic or Latino	11,955	93.60%	11,459	93.70%

**TABLE II-6 - Household Tenure by Race and Ethnicity in the City of Wheeling**

Cohort	2008-2012 ACS				2013-2017 ACS			
	Owner	%	Renter	%	Owner	%	Renter	%
Householder who is White alone	7,719	60.40%	4,324	33.90%	7,445	60.90%	4,064	33.20%
Householder who is Black or African American alone	198	1.60%	320	2.50%	180	1.50%	390	3.20%
Householder who is American Indian and Alaska Native alone	23	0.20%	0	0%	0	0%	9	0.10%
Householder who is Asian alone	66	0.50%	29	0.20%	53	0.40%	3	0%
Householder who is Native Hawaiian and Other Pacific Islander alone	0	0%	0	0%	0	0%	0	0%

Householder who is some other race alone	0	0%	7	0%	16	.10%	0	0%
Householder who is two or more races	13	0.1%	73	0.6%	36	0.3%	37	0.3%
Householder who is Hispanic or Latino	9	0.1%	91	0.1%	29	0.2%	21	0.2%
Householder who is not Hispanic or Latino	7,710	60.4%	4,245	33.2%	7,416	60.6%	4,043	33%

Source: 2008-2012 ACS and 2013-2017 ACS

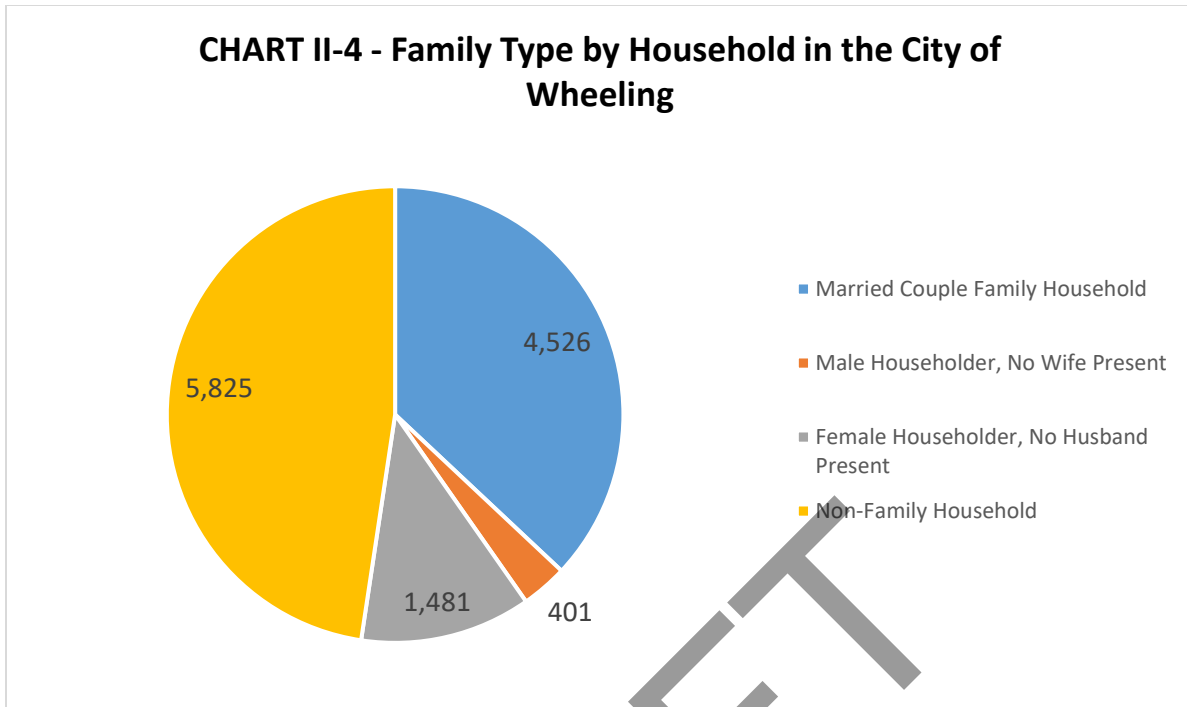
Homeownership rates remained relatively constant in the City. Homeowners represented 62.8% (8,019 households) of all households in 2012 and 63.2% (7,730 households) of all households in 2017. In comparison, rental rates decreased in the City. Renters represented 37.2% (4,753 households) of all households in 2012 and 36.8% (4,503 households) of all households in 2017.

There were no significant shifts in Household Tenure from 2008 to 2017 in Wheeling.

### **Families**

In 2012, there were a total of 12,772 households in Wheeling. Non-family households comprised 46.6% (5,957 households) of all households. In 2017, there were a total of 12,233 households, of which 5,825 (46.6% households) comprised of non-family households. The total number of households in Wheeling decreased by 539 units from 2012 to 2017, whereas the total number of non-family households decreased by 132 units (2.2 percentage point decrease). A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 47.6 percent of all households, married-couple family households comprised 37 percent of all households, female householders with no husband present comprised 12.1 percent of all households, and male householders with no wife present comprised 3.3 percent of all households in the City. The chart below illustrates the breakdown of households by type in Wheeling as of 2017 using data from the 2013-2017 ACS.



Source: 2013-2017 ACS

### C. Income and Poverty

#### Household Income

The median household income in the City of Wheeling increased by 16.8 percent (\$5,926 increase) from \$35,245 in 2012 to \$41,171 in 2017.

The table below compares the distribution of household income according to the 2008-2012 American Community Survey and the 2013-2017 American Community Survey.

**TABLE II-7 - Household Income in Wheeling**

Items	2008-2012 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
<b>Total Households</b>	<b>12,772</b>	<b>100%</b>	<b>12,233</b>	<b>100%</b>
Less than \$10,000	1,616	12.7%	1,379	11.3%
\$10,000 to \$14,999	1,078	8.4%	956	7.8%
\$15,000 to \$24,999	1,848	14.5%	1,514	12.4%
\$25,000 to \$34,999	1,812	14.2%	1,460	11.9%
\$35,000 to \$49,999	1,649	12.9%	1,828	14.9%



\$50,000 to \$74,999	2,240	17.5%	1,890	15.5%
\$75,000 to \$99,999	1,132	8.9%	1,202	9.8%
\$100,000 to \$149,999	980	7.7%	1,217	9.9%
\$150,000 to \$199,999	284	2.2%	418	3.4%
\$200,000 or more	133	1%	369	3%
<b>Median Household Income</b>	35,245	(X)%	41,171	(X)%
<b>Mean Household Income</b>	48,652	(X)%	62,249	(X)%

Source: 2008-2012 and 2013-2017 ACS

The U.S. Department of Housing and Urban Development (HUD) establishes income limits that determine eligibility for assisted housing programs including Public Housing, Section 8 Project-Based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD develops income limits based on Median Family Income estimates and Fair Market Rent definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county.

The Median Income for a family of four in the Wheeling Metro Area is \$65,200 for FY 2019.

The table below identifies the FY 2019 HUD Income Limits applicable to the Wheeling Metro Area.

**TABLE II-8 - Wheeling, WV-OH Metro Area  
Section 8 Income Limits for FY 2019**

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
<b>Extremely Low (30%) Income Limits</b>	\$13,700	\$16,910	\$21,330	<b>\$25,750</b>	\$30,170	\$34,590	\$39,010	43,050*
<b>Very Low (50%) Income Limits</b>	\$22,850	\$26,100	\$29,350	<b>\$32,600</b>	\$35,250	\$37,850	\$40,450	\$43,050

<b>Low (80%) Income Limits</b>	\$36,550	\$41,750	\$46,950	<b>\$52,150</b>	\$56,350	\$60,500	\$64,700	\$68,850
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Source: HUD Section 8 Income Limits

The following table highlights the current low- and moderate-income population in the City of Wheeling. The block groups that have a population of more than 51% low- and moderate-income are highlighted in the following table. The City of Wheeling has an overall low- and moderate-income population of 39.54%.

**TABLE II-9 - Low- and Moderate-Income Population for the City of Wheeling Jurisdiction, WV**

CITY	COUNTY	TRACT	BLOCK GROUP	LOWMOD	LOWMODUNIV	LOWMODPCT
City of Wheeling	Marshall County	020800	1	535	1,115	47.98%
City of Wheeling	Marshall County	021300	2	230	1,305	17.62%
City of Wheeling	Ohio County	000200	1	110	400	27.50%
City of Wheeling	Ohio County	000200	2	425	1,365	31.14%
City of Wheeling	Ohio County	000200	3	280	630	44.44%
City of Wheeling	Ohio County	000200	4	245	655	37.40%
City of Wheeling	Ohio County	000300	1	450	1,260	35.71%
City of Wheeling	Ohio County	000300	2	200	540	37.04%
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>000400</b>	<b>1</b>	<b>745</b>	<b>1,100</b>	<b>67.73%</b>
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>000500</b>	<b>1</b>	<b>315</b>	<b>585</b>	<b>53.85%</b>
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>000500</b>	<b>2</b>	<b>500</b>	<b>925</b>	<b>54.05%</b>
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>000600</b>	<b>1</b>	<b>630</b>	<b>1,055</b>	<b>59.72%</b>
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>000600</b>	<b>2</b>	<b>190</b>	<b>290</b>	<b>65.52%</b>
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>000700</b>	<b>1</b>	<b>40</b>	<b>65</b>	<b>61.54%</b>
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>000700</b>	<b>2</b>	<b>565</b>	<b>890</b>	<b>63.48%</b>
City of Wheeling	Ohio County	001300	1	235	620	37.90%

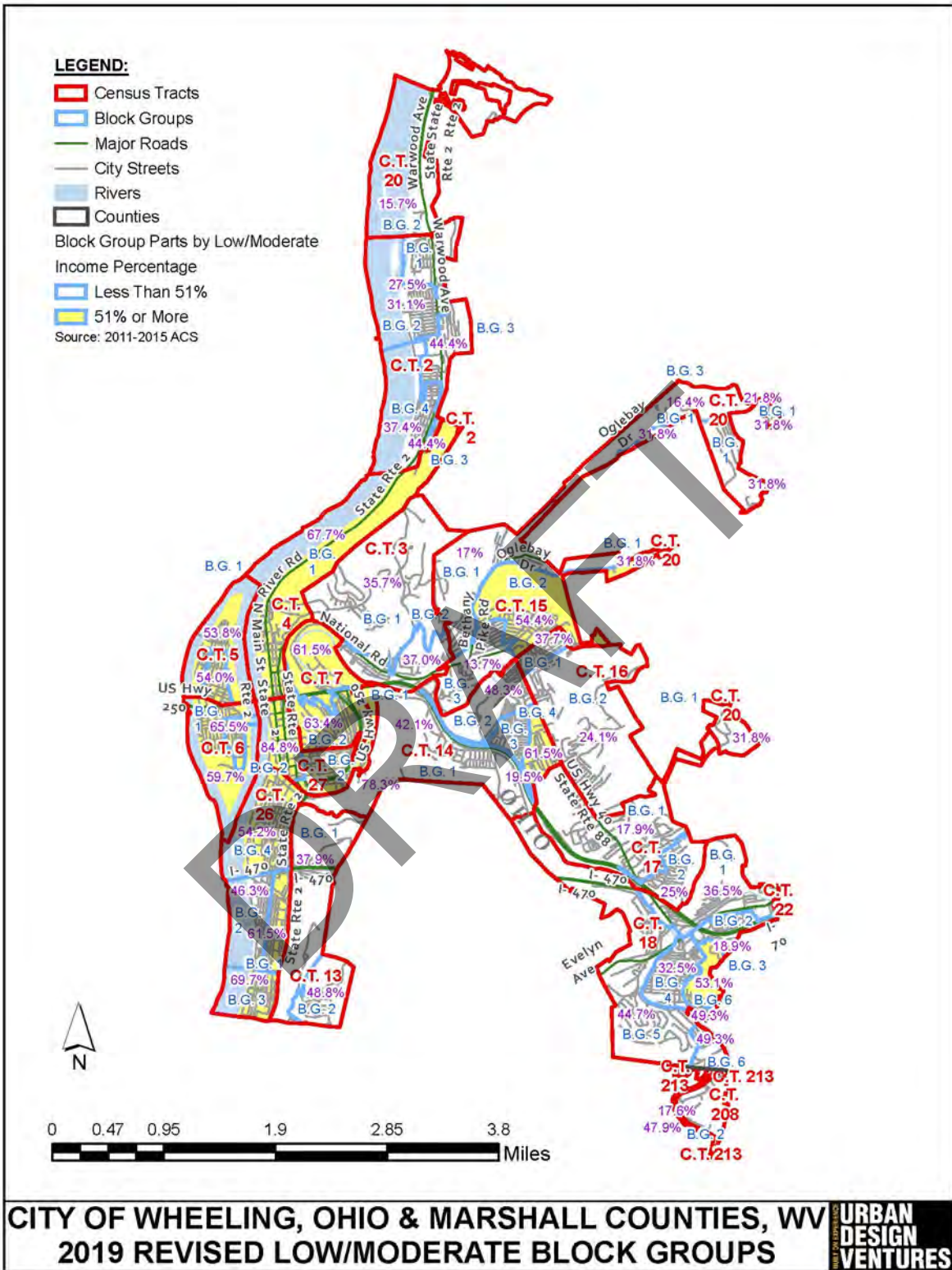
City of Wheeling	Ohio County	001300	2	415	850	48.82%
City of Wheeling	Ohio County	001400	1	270	640	42.19%
City of Wheeling	Ohio County	001400	2	295	610	48.36%
City of Wheeling	Ohio County	001400	3	135	690	19.57%
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>001400</b>	<b>4</b>	<b>440</b>	<b>715</b>	<b>61.54%</b>
City of Wheeling	Ohio County	001500	1	85	500	17.00%
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>001500</b>	<b>2</b>	<b>580</b>	<b>1,065</b>	<b>54.46%</b>
City of Wheeling	Ohio County	001500	3	110	800	13.75%
City of Wheeling	Ohio County	001600	1	255	675	37.78%
City of Wheeling	Ohio County	001600	2	340	1,410	24.11%
City of Wheeling	Ohio County	001700	1	165	920	17.93%
City of Wheeling	Ohio County	001700	2	180	720	25.00%
City of Wheeling	Ohio County	001800	1	515	1,410	36.52%
City of Wheeling	Ohio County	001800	2	75	395	18.99%
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>001800</b>	<b>3</b>	<b>470</b>	<b>885</b>	<b>53.11%</b>
City of Wheeling	Ohio County	001800	4	280	860	32.56%
City of Wheeling	Ohio County	001800	5	760	1,700	44.71%
City of Wheeling	Ohio County	001800	6	175	355	49.30%
City of Wheeling	Ohio County	002000	1	315	990	31.82%
City of Wheeling	Ohio County	002000	2	190	1,210	15.70%
City of Wheeling	Ohio County	002000	3	155	945	16.40%
City of Wheeling	Ohio County	002000	4	365	1,670	21.86%
City of Wheeling	Ohio County	002600	1	280	455	61.54%
City of Wheeling	Ohio County	002600	2	125	270	46.30%
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>002600</b>	<b>3</b>	<b>415</b>	<b>595</b>	<b>69.75%</b>

<b>City of Wheeling</b>	<b>Ohio County</b>	<b>002600</b>	<b>4</b>	<b>385</b>	<b>710</b>	<b>54.23%</b>
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>002700</b>	<b>1</b>	<b>280</b>	<b>330</b>	<b>84.85%</b>
<b>City of Wheeling</b>	<b>Ohio County</b>	<b>002700</b>	<b>2</b>	<b>325</b>	<b>415</b>	<b>78.31%</b>

Source: HUD Exchange

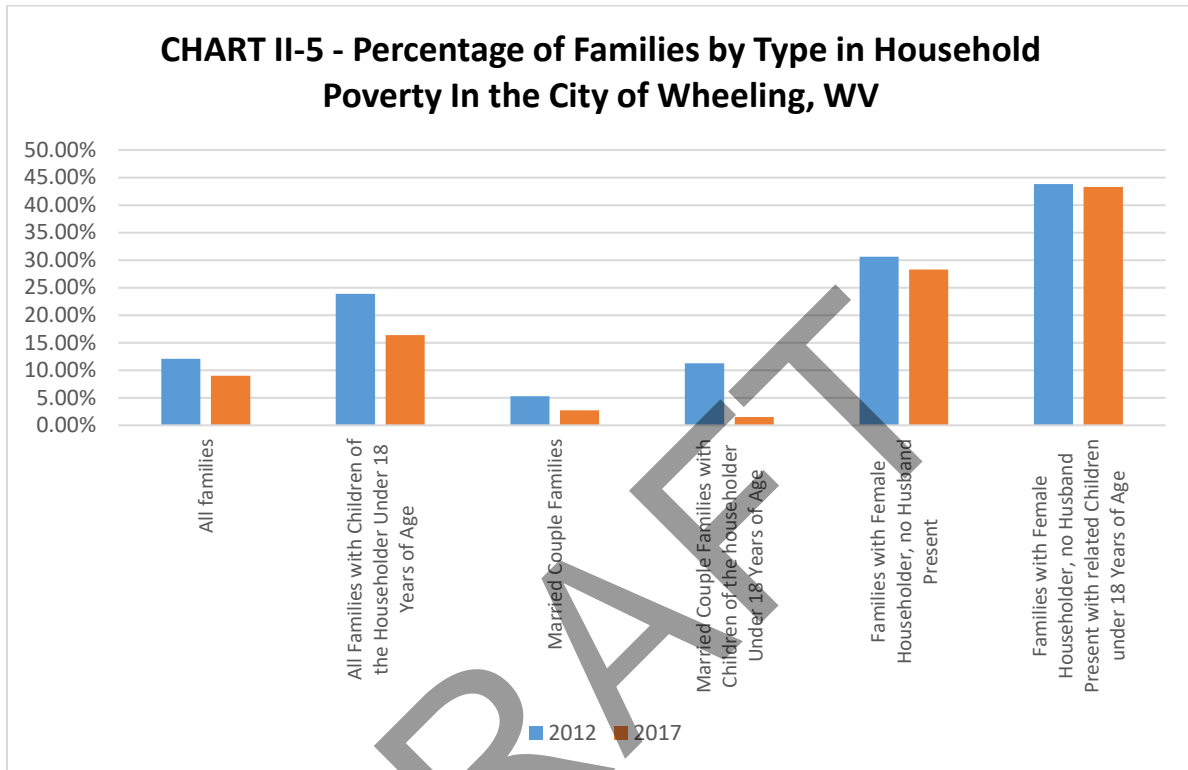
The following map illustrates areas of the City of Wheeling with concentrations of low- and moderate-income residents. These Census Block Groups are above for 51% low- and moderate-income. They are mostly concentrated on Wheeling Island and along the Ohio River.

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## Family and Household Poverty

The City of Wheeling's poverty statistics for families with children are highlighted in the chart below.



Source: 2008-2012 and 2013-2017 ACS

In Wheeling, the percentage of all families living in poverty experienced a decrease from 12.1% in 2012 to 9% in 2017. The percentage of female-headed householders with no husband present and with children under 18 years in poverty was 43.8% in 2012 and decreased to 43.3% in 2017. The number of single female-headed households in poverty in the City continues to remain fairly steady.

## D. Employment

### Occupation

In 2012, according to 2008-2012 ACS Estimates, the total number of eligible workers (population 16 years and over) in the City of Wheeling was 23,810 persons. In 2012, 58.6 percent (13,951 persons) of eligible workers were in the labor force and 3.8 percent (908 persons) of eligible workers in the work force were unemployed.

In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in the City of Wheeling was 22,959 persons. In 2017, 57 percent (13,081 persons) of eligible workers were in the labor force and 3 percent (696 persons) of eligible workers in the work force were unemployed.

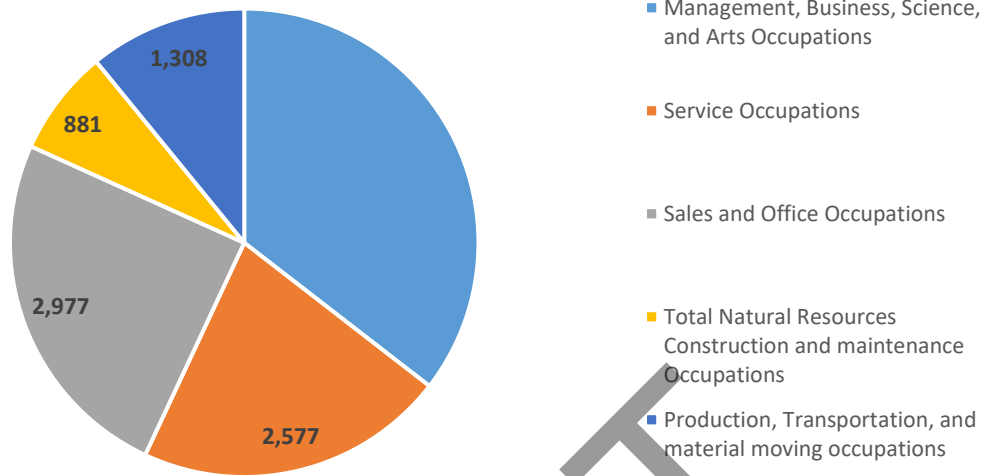
Workers in 2017 had a mean travel time to work of 18.9 minutes.

Per the 2013-2017 American Community Survey, an estimated 43.8 percent (5,359 households) of households in the City of Wheeling receive income from Social Security. The mean Social Security Income for 2017 was \$16,852.

The following charts outline the distribution of Wheeling workers by occupation.

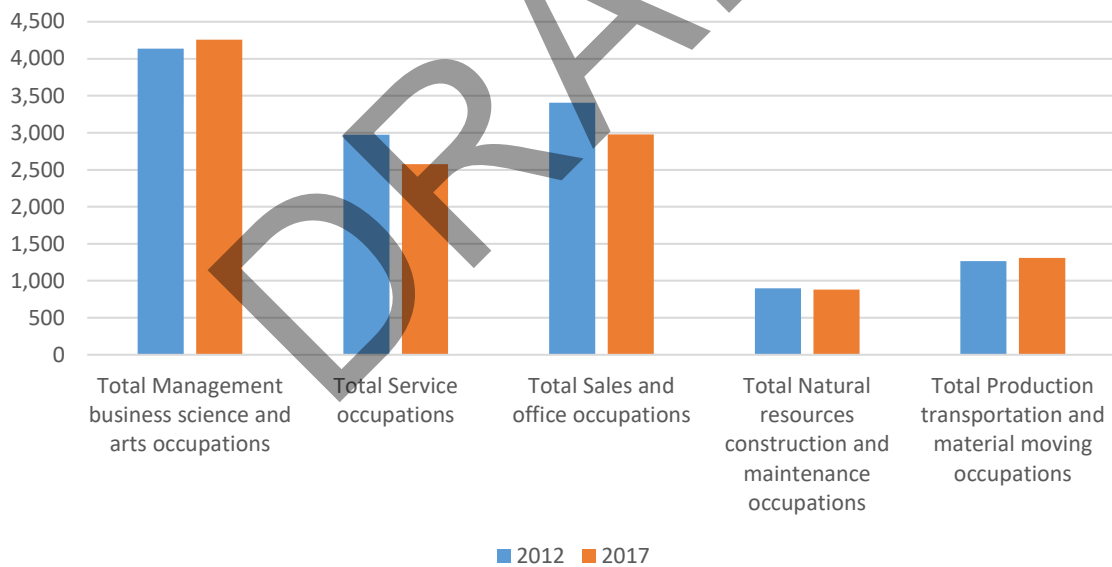
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**CHART II-5 - Occupations in Wheeling**



Source: 2013-2017 ACS

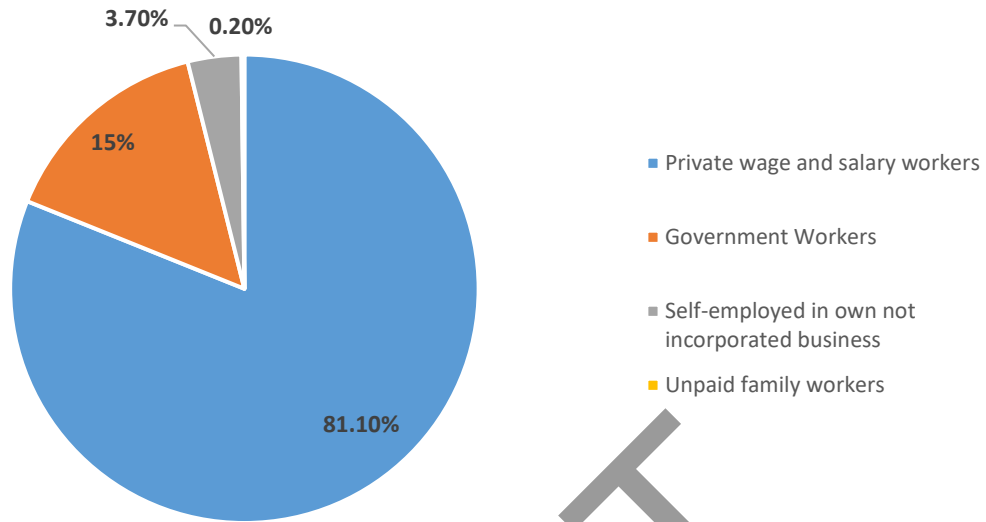
**CHART II-6 - Occupation Change in the City of Wheeling**



Source: 2008-2012 ACS and 2013-2017 ACS



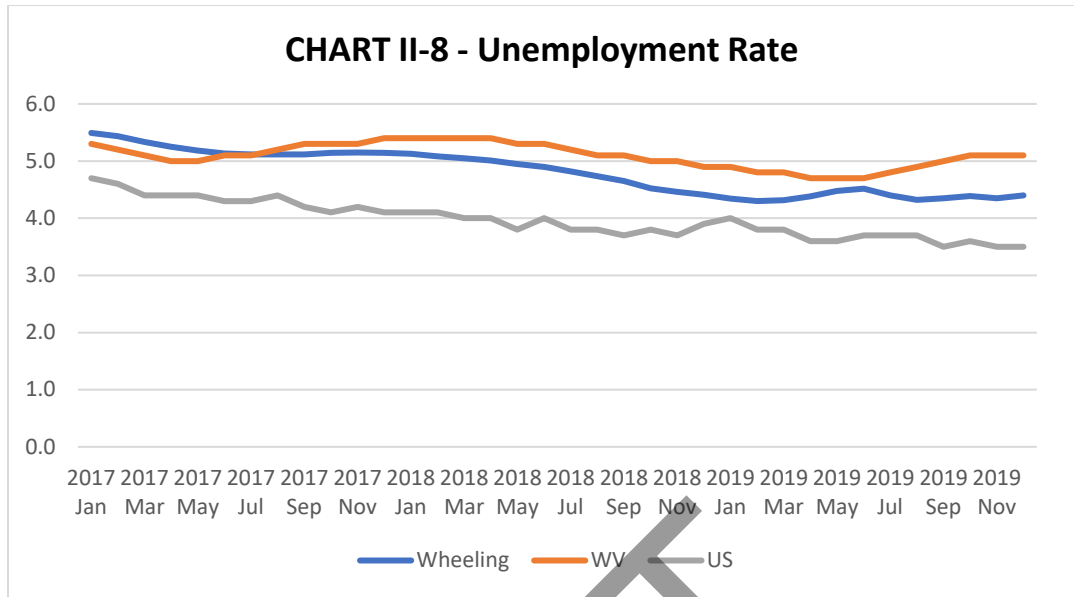
**CHART II-7 - Worker Class in the City of Wheeling in 2017**



Source: 2008-2012 ACS and 2013-2017 ACS

**Unemployment Rate**

The unemployment rate for the City of Wheeling is shown below compared with the unemployment rate in the State of West Virginia and nationally. The unemployment rate in the City of Wheeling was 3.5% in December 2019 (the latest data available). At the same time the State of West Virginia unemployment rate was 5.1%, which was above the Nation's at 3.5%.



Source: Bureau of Labor Statistics

The unemployment rates for the City of Wheeling is not seasonally adjusted, so a manual adjustment was performed. From January 2017 to September 2019, the City unemployment rate was an average of 0.3 percentage points lower than the State unemployment rate, and an average of 0.8 percentage points higher than the national unemployment rate..

The trends suggest that from January 2017 to September 2019 the unemployment rate in the City of Wheeling has (and the state of West Virginia), has been lagging behind the country as a whole. Therefore, the City may not be benefitting significantly from federal pro-growth policies.

## E. Housing Profile

Just over two-thirds of the City’s housing stock (77.7%) was built prior to 1970, which means they are potential lead hazards. There is a need for newer housing as only 3.6% of its housing stock was built after 2009. Approximately 43.8% of the City’s housing stock was built prior to 1939.

### Housing Profile

The following table details the year that housing structures were built in the City of Wheeling as of 2017.

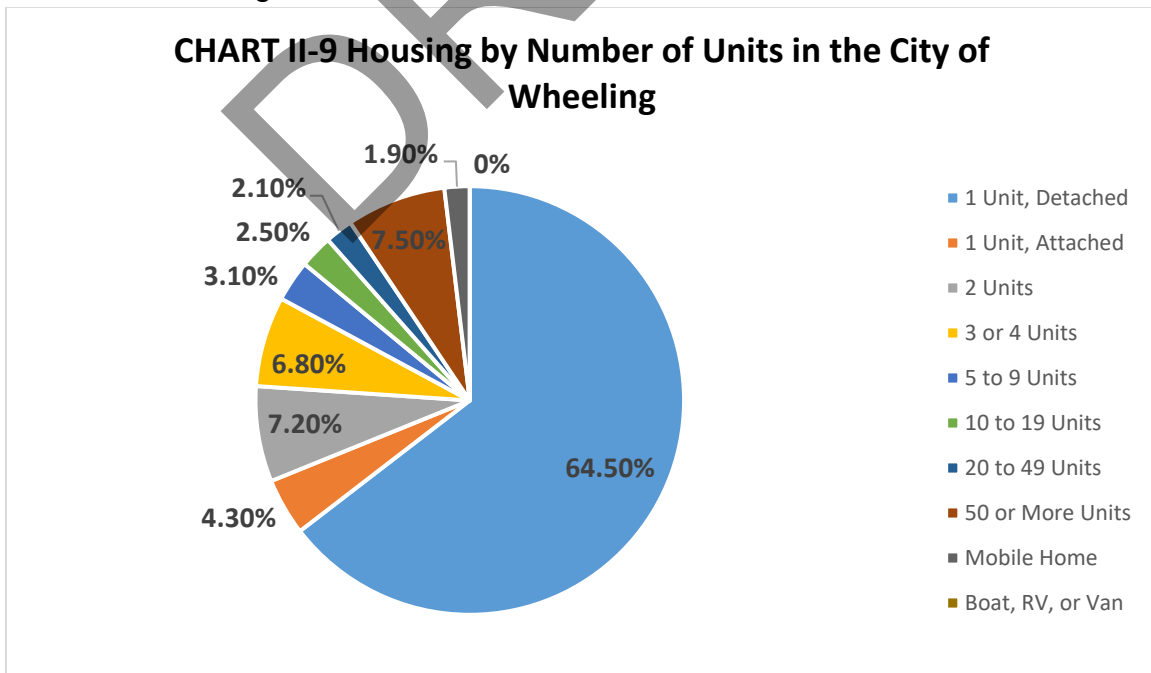
**TABLE II-10 - Year Structure Built in Wheeling**

Housing Profile	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total	14,944	100%	14,652	100%
Built 2014 or later	-	-	0	0%
Built 2010 to 2013	0	0%	73	0.5%
Built 2000 to 2009	382	2.6%	460	3.1%
Built 1990 to 1999	395	2.6%	467	3.2%
Built 1980 to 1989	797	5.3%	418	2.9%
Built 1970 to 1979	1,558	10.4%	1,833	12.5%
Built 1960 to 1969	1,465	9.8%	1,674	11.4%
Built 1950 to 1959	1,587	10.6%	1,601	10.9%
Built 1940 to 1949	1,654	11.1%	1,706	11.6%
Built 1939 or earlier	7,106	47.6%	6,420	43.8%

Source: 2008-2012 ACS and 2013-2017 ACS

The majority of housing units in the City of Wheeling are 1-unit detached houses comprising 64.5% percent (14,652 units) of all housing units.

The following chart illustrates the composition of the housing stock in Wheeling as of 2017.



Source: 2013-2017 ACS

The 2013-2017 American Community Survey estimates that the median value of owner-occupied homes in Wheeling has increased since 2012 from \$92,800 to \$104,300. The latest available data from real estate listings presented a similar value of home values in the City; according to Zillow, the median list price of a home in Wheeling was 103,010 as of January 2020.

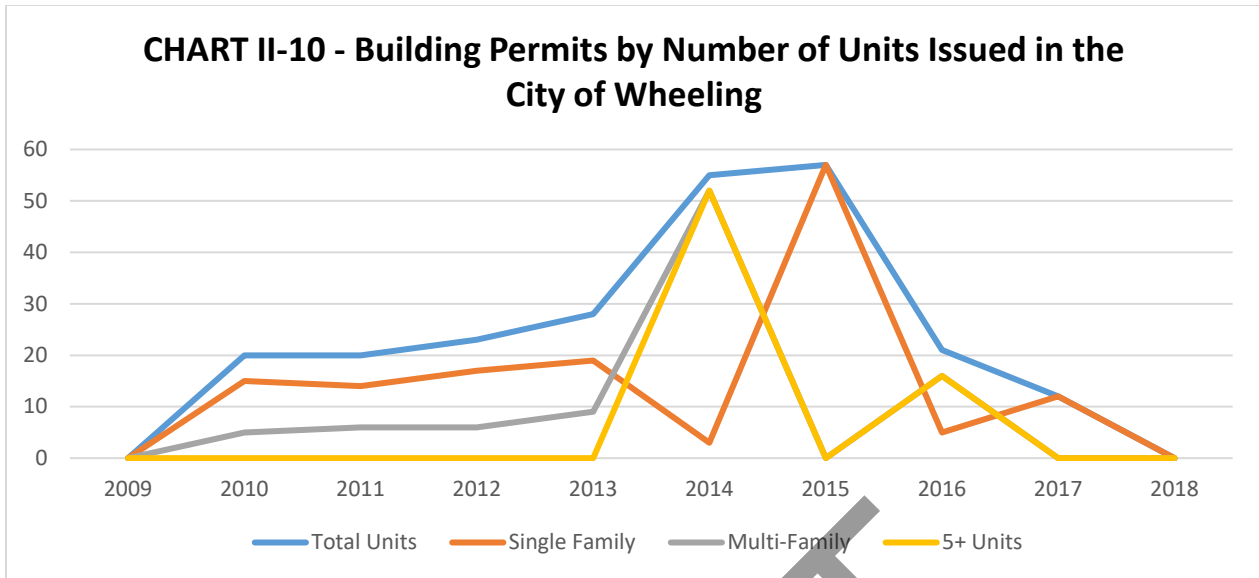
The following table outlines the number of new housing units for which building permits were filed annually in the City of Wheeling. The City has seen a decrease in the total number of new units constructed since 2015, where the number of new permits peaked, with a large decrease between 2015 and 2016, and a continuing decrease from 2016 to 2018.

The table below contains data on the number of permits for residential construction issued by the City of Wheeling.

**TABLE II-11 - Units Authorized by Building Permits – Wheeling**

YEAR	Total	Single Family	Multi-Family	5+ Units
2018	0	0	0	0
2017	12	12	0	0
2016	21	5	16	16
2015	57	57	0	0
2014	55	3	52	52
2013	28	19	9	0
2012	23	17	6	0
2011	20	14	6	0
2010	20	15	5	0
2009	0	0	0	0

Source: SOCDs Building Permits Database, HUD



Source: SOCDs Building Permits Database, HUD

The year with the highest number of total units was 2015 when 57 single family units were authorized. Averaged across the 10-year period, 60.1 percent of new units each year were single family units. The average number of housing units authorized per year was 34 from 2009 to 2018. However, the peak years of construction were 2014 and 2015.

## F. Financing

### Owner Costs

The median monthly housing cost for owner-occupied households was \$8,019 in 2012 and \$7,730 in 2017. The median monthly housing cost for owner-occupied households decreased by 33.6 percent, or \$289, from 2012 to 2017. Dollar amounts have been adjusted for inflation. This is likely due to the decrease in demand for owner occupied units.

The following table illustrates mortgage status and selected monthly owner-occupied costs in 2012 and 2017.

**TABLE II-12 - Monthly Owner Costs in Wheeling**

Monthly Owner Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	8,019	100%	7,730	100%
Less than \$300	2094	26.1%	1804	23.3%
\$300 to \$499	2,072	25.8%	1,716	22.2%
\$500 to \$799	1366	17.0%	1757	22.7%
\$800 to \$999	1021	12.7%	867	11.2%
\$1,000 to \$1,499	934	11.6%	1,062	13.7%
\$1,500 to \$1,999	316	3.9%	306	4.0%
\$2,000 or more	216	2.7%	218	2.8%
Median (dollars)	485	(X)%	548	(X)%
Median monthly costs with a mortgage	914	(X)%	946	(X)%
Median monthly costs without a mortgage	305	(X)%	333	(X)%

Source: 2008-2012 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2010-2014 ACS and the 2013-2017 ACS.

**TABLE II-13 - Monthly Owner Costs as a Percentage of Household Income in Wheeling**

Owner Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	8,019	100%	7,730	100%
Less than \$20,000	1,203	15%	1,113	14.4%
Less than 20 percent	321	4%	271	3.5%
20 to 29 percent	281	3.5%	232	3%
30 percent or more	601	7.5%	610	7.9%
\$20,000 to \$34,999	1,596	19.9%	1,133	14.7%
Less than 20 percent	954	11.9%	701	9.1%

20 to 29 percent	281	3.5%	129	1.7%
30 percent or more	361	4.5%	303	3.9%
<b>\$35,000 to \$49,999</b>	<b>1,139</b>	<b>14.2%</b>	<b>1,163</b>	<b>15%</b>
Less than 20 percent	778	9.7%	746	9.7%
20 to 29 percent	273	3.4%	309	4%
30 percent or more	88	1.1%	108	1.4%
<b>\$50,000 to \$74,999</b>	<b>1,772</b>	<b>22.1%</b>	<b>1,478</b>	<b>19.1%</b>
Less than 20 percent	1,371	17.1%	1,299	16.8%
20 to 29 percent	321	4%	141	1.8%
30 percent or more	80	1%	38	0.5%
<b>\$75,000 or more</b>	<b>2,261</b>	<b>28.2%</b>	<b>2,821</b>	<b>36.5%</b>
Less than 20 percent	2,021	25.2%	2,672	34.6%
20 to 29 percent	200	2.5%	129	1.7%
30 percent or more	40	0.5%	20	0.3%
<b>Zero or negative income</b>	<b>48</b>	<b>0.6%</b>	<b>22</b>	<b>0.3%</b>
No cash rent	NA	NA	NA	NA

Source: 2008-2012 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2012, 14.6 percent (1,170 units) of owner-occupied units were cost burdened and 14 percent (1,079 units) of owner-occupied households in 2017 were cost burdened. This is likely due to an increase in demand for rental housing in Wheeling.

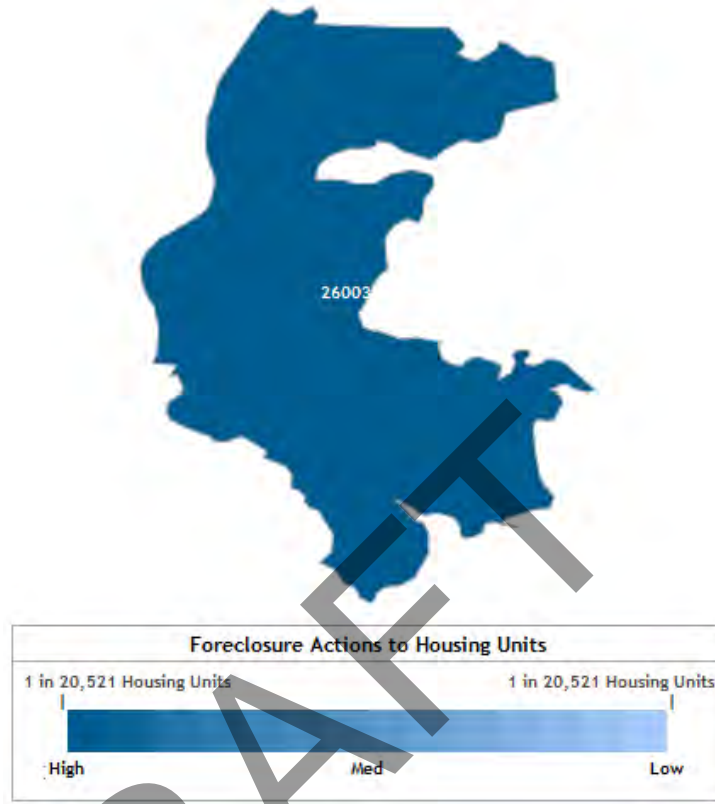
According to [www.zillow.com](http://www.zillow.com), the median list price for a house in the City of Wheeling was \$135,000 in January 2020, and the median sale price was unavailable. The average price per square foot in the City of Wheeling is \$89 in the same time period.

### **Foreclosures**

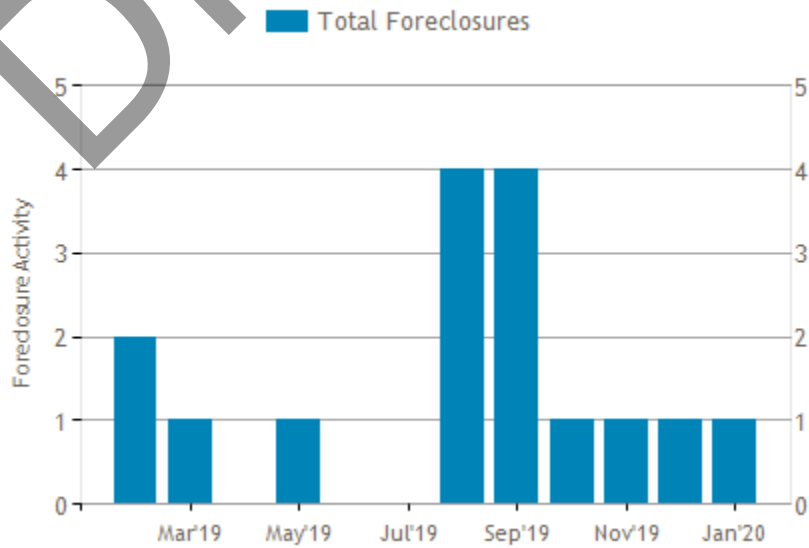
According to [www.realtytrac.com](http://www.realtytrac.com), the City of Wheeling had 181 foreclosures at a rate of 1 in every 20,521 in January, 2020, while Ohio County had a foreclosure rate of 1 in 10,889. Wheeling's foreclosure rate is second highest in the County, after Triadelphia.

The foreclosure rate in the City is lower than that of the State of West Virginia, which has a foreclosure rate of 1 in every 6,050.

**CHART II-11 - Foreclosure Rates in the City of Wheeling, WV**



**CHART II-12 Number of Foreclosures in the City of Wheeling, WV**



The number of foreclosures for the City of Wheeling was at its highest in August and September of 2019 with 4 foreclosures. While foreclosures can



negatively impact a community, it offers a chance for the City and non-profit housing agencies to purchase homes and resell them to low-income households at reasonable prices.

### **Renter Costs**

The median monthly housing cost for renter-occupied households was \$537 in 2012; and \$616 in 2017. The median monthly housing cost for renter-occupied households increased by 14.7 percent, or \$79, from 2012 to 2017. Dollar amounts are adjusted for inflation.

The following table illustrates mortgage status and selected monthly renter costs in 2012 and 2017.

**TABLE II-14 - Selected Monthly Renter Costs in Wheeling**

Monthly Renter Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	4,753	100%	4,503	100%
Less than \$300	773	16.3%	753	16.7%
\$300 to \$499	1,085	22.8%	756	16.8%
\$500 to \$799	1,885	39.7%	1,634	36.3%
\$800 to \$999	267	5.6%	347	7.7%
\$1,000 to \$1,499	26	0.5%	72	1.6%
\$1,500 to \$1,999	0	0.0%	29	0.6%
\$2,000 or more	773	16.3%	753	16.7%
No Cash Rent	314	6.60%	252	5.60%
Median (dollars)	537	(X)%	616	(X)%

Source: 2008-2012 and 2013-2017 American Community Survey

The following table illustrates housing costs for renter-occupied households in 2012 and 2017 according to the 2008-2012 ACS and the 2013-2017 ACS.

**TABLE II-15 - Selected Monthly Renter Costs as a Percentage of Household Income in Wheeling**

Renter Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
<b>Renter-Occupied Housing Units</b>	4,753	100.0%	4,503	100%
<b>Less than \$20,000</b>	2,162	45.5%	1,705	37.9%
Less than 20 percent	96	2.0%	90	2.0%
20 to 29 percent	403	8.5%	269	6.0%
30 percent or more	1,663	35.0%	1,346	29.9%
<b>\$20,000 to \$34,999</b>	1,067	22.4%	1,001	22.2%
Less than 20 percent	142	3.0%	152	3.4%
20 to 29 percent	368	7.7%	301	6.7%
30 percent or more	557	11.7%	548	12.2%
<b>\$35,000 to \$49,999</b>	480	10.1%	635	14.1%
Less than 20 percent	214	4.5%	199	4.4%
20 to 29 percent	216	4.5%	365	8.1%
30 percent or more	50	1.1%	71	1.6%
<b>\$50,000 to \$74,999</b>	421	8.9%	396	8.8%
Less than 20 percent	398	8.4%	294	6.5%
20 to 29 percent	23	0.5%	93	2.1%
30 percent or more	0	0.0%	9	0.2%
<b>\$75,000 or more</b>	239	5.0%	352	7.8%
Less than 20 percent	239	5.0%	337	7.5%
20 to 29 percent	0	0.0%	7	0.2%
30 percent or more	0	0.0%	8	0.2%
<b>Zero or negative income</b>	70	1.5%	162	3.6%
No cash rent	314	6.6%	252	5.6%

Source: 2008-2012 and 2013-2017 American Community Survey

**TABLE II-16 - Gross Rent as a Percentage of Household Income in Wheeling**

Rental Cost as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
<b>Rental Units paying rent</b>	4,369	100%	4,089	100%
Less than 15 percent	636	14.6%	628	15.4%
15 to 19 percent	453	10.4%	444	10.9%
20 to 24 percent	562	12.9%	452	11.1%
25 to 29 percent	448	10.3%	583	14.3%
30 to 34 percent	600	13.7%	576	14.1%
35 percent or more	1,670	38.2%	1,406	34.4%
Not computed	384	8.8%	414	10.1%
No Cash Rent	314	7.7%	252	6.2%

Source: 2008-2012 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2012, 47.8 percent (2,054 units) of renter-occupied units were cost burdened and 44.0 percent (1,820 units) of renter-occupied households in 2017 were cost burdened

In 2012, 14.6 percent (1,170 units) of owner-occupied households were cost burdened whereas 47.8 percent (2,054 units) of renter-occupied households were cost burdened. In 2017, 14 percent (1,079 units) of owner-occupied households were cost burdened whereas 44 percent (1,982 units) of renter-occupied households were cost burdened.

The 2019 and 2020 HUD Fair Market Rents and HOME Rent Limits for the Metro Area are shown in the table below.

**TABLE II-17 - Fair Market Rents (FMR) and HOME Rent Limits for the Metro Area**

Rent	FY 2019	FY 2020	Change in FMR 2018 to 2019
Efficiency	\$548	\$566	-\$18
One-Bedroom	\$552	\$570	-\$18
Two-Bedroom	\$702	\$737	-\$35
Three-Bedroom	\$900	\$941	-\$41
Four-Bedroom	\$1,092	\$1,154	-\$62

Source: U.S. Department of Housing and Urban Development

Fair Market Rents (FMRs) are primarily used to determine standard payment amounts for HUD assisted housing. The High HOME Rent Limit for an area is the lesser of the Section 8 Fair Market Rent (FMR) for the area or a rent equal to 30% of the annual income of a family whose income equals 65% of the area median income, as determined by HUD. The Low HOME Rent Limit for an area is 30% of the annual income of a family whose income equals 50% of the area median income, as determined by HUD, capped by the High HOME Rent Limit. HUD's Economic and Market Analysis Division calculates the HOME rents each year using the FMRs and the Section 8 Income Limits.

The City's median rent is estimated to be \$616 according to the 2013-2017 ACS data, while the median rent in the City of Wheeling for a two-bedroom apartment is \$1,005 according to Zillow in January, 2020. The average rents posted commercially exceed the City's median rent and fair market rents. The rental market in the City of Wheeling is competitive and assisted rental housing units do not disproportionately impact the market forces dictating rents in the area. Rents in this area are comparable to those Ohio County as a whole (\$601).

## G. Household Types

Based on a comparison between the 2009 to 2015 population, the City of Wheeling had an 2.1% decrease in its population. The population decrease was 586 persons, and the housing demand decreased by 1,069 households. The median income of the area increased by 12.2% from \$32,458 to \$36,989

from 2009 to 2015. This increase in median income represents a change in nominal dollars and not a change in real dollars. In order to calculate the change in real dollars, the Consumer Price Index is used to calculate the inflation rate for a given period. Between 2009 and 2015, the cumulative inflation rate was approximately 10.5%, meaning that the \$32,458 median income in 2009 would be \$35,859 if it were expressed in terms of 2015 dollars. By taking into consideration the rate of inflation, the median income in Wheeling has been increasing faster than the rate of inflation.

**TABLE II-18 - Changes Between 2009 & 2015**

Demographics	2009	2015	% Change
Population	28,486	27,900	-2.1%
Households	13,684	12,615	-8.5%
Household Median Income	\$32,458	\$36,989	+12.2%

Data Source: 2008-2012 and 2013-2017 American Community Surveys

**Note:**

According to the U.S. Census Bureau the following notes were issued in regard to the HUD - CHAS (Comprehensive Housing Affordability Strategy) and the discrepancies in adding up the totals in the following tables. As with the CHAS 2000 and all other special tabulations of Census data, the Census Bureau requires that the CHAS data be rounded. The rounding scheme is as follows: 0 remains 0; 1-7 rounds to 4; 8 or greater rounds to nearest multiple of 5. This causes discrepancies when adding up smaller geographies and when adding up data within CHAS tables. Consider a city where the CHAS data indicate that there were 4 renter households with extremely low income and 4 owner households with extremely low income. One might be tempted to conclude that there are 8 total households with extremely low income. For instance, the CHAS table indicates that there are actually a total of 15 extremely low income households, that would appear to be contradictory. This situation is the result of rounding. The City could have 6 renter households with extremely low income and 7 owner households with extremely low income, which is a total of 13 extremely low income households; but all of these numbers would be rounded, to 4, 4, and 15.

**TABLE II-19 - Number of Households Table – City of Wheeling**

	0-30% AMI	>30-50% AMI	>50-80% AMI	>80- 100% AMI	>100% AMI
<b>Total Households *</b>	2,055	1,500	2,405	1,190	5,460
Small Family Households *	395	205	550	320	2,600
Large Family Households *	84	8	170	70	280
Household contains at least one person 62-74 years of age	474	295	605	190	1,505
Household contains at least one person age 75 or older	304	530	610	309	444
Households with one or more children 6 years old or younger *	211	96	328	89	356

Data Source: 2011-2015 CHAS

Of all households, less than half (43.3%) have a higher income than the HUD Area Median Income (AMI) for the Wheeling, WV-OH, MSA. This includes both small and large family households, though there are few large family households under 100% AMI. The remaining 56.7% of total households make less than the AMI, with the largest remaining group (19.1% of total households) being those making between 50-80% of AMI. Households that make 30% of AMI have an annual income of \$11,091; as HUD defines affordable housing as paying no more than 30% of income on rent, this leaves low-income households with less than \$277 per month (without taking out taxes) to spend on housing. The largest housing problem in the City of Wheeling is housing affordability. According to the 2013-2017 ACS data, an estimated 44% of all renter households are cost burdened by 30% or more, and an estimated 14.0% of all owner households are cost burdened by 30% or more.

**TABLE II-20 - Housing Problems (Households with one of the listed needs) – City of Wheeling**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	40	0	25	10	75	0	20	0	0	20
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	0	10	0	10	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	35	0	35	0	70	0	0	4	0	4
Housing cost burden greater than 50% of income (and none of the above problems)	685	260	0	0	945	325	35	34	19	413
Housing cost burden greater than 30% of income (and none of the above problems)	250	280	375	49	954	150	175	240	90	655
Zero/negative Income (and none of the above problems)	135	0	0	0	135	38	0	0	0	38

Data Source: 2011-2015 CHAS

The following table illustrates the discrepancies between homeowners and renters regarding housing problems. There are slightly more renter-occupied housing units than owner-occupied units (3,750 to 3,406, respectively), renters face a much higher rate of housing problems.

**TABLE II-21 - Housing Problems (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden) – City of Wheeling**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	760	260	70	10	1,100	325	55	39	19	438
Having none of four housing problems	545	635	915	420	2,515	255	550	1,380	745	2,930
Household has negative income, but none of the other housing problems	135	0	0	0	135	38	0	0	0	38

Data Source: 2011-2015 CHAS

**TABLE II-22 - Cost Burdened Greater Than 30% – City of Wheeling**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	220	105	145	470	105	45	99	249
Large Related	65	0	0	65	4	0	25	29
Elderly	275	163	134	572	274	143	114	531
Other	439	270	120	829	88	50	35	173
Total need by income	999	538	399	1,936	471	238	273	982

Data Source: 2011-2015 CHAS

For those who are cost burdened by more than 30%, renters make up a higher percentage of affected households than owners based on the total number of households (51.6% of households vs. 28.8% of households).



**TABLE II-23 - Cost Overburdened Greater Than 50% – City of Wheeling**

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	190	50	0	240	70	0	14	84
Large Related	65	0	0	65	0	0	0	0
Elderly	145	80	10	235	185	18	14	217
Other	344	130	15	489	69	35	0	104
<b>Total need by income</b>	<b>744</b>	<b>260</b>	<b>25</b>	<b>1,029</b>	<b>324</b>	<b>53</b>	<b>28</b>	<b>405</b>

Data Source: 2011-2015 CHAS

For those who are cost burdened by more than 50%, renters make up a higher percentage of affected households than owners based on the total number of households (27.44% of households vs. 11.9% of households).

**TABLE II-24 - Overcrowding Conditions – City of Wheeling**

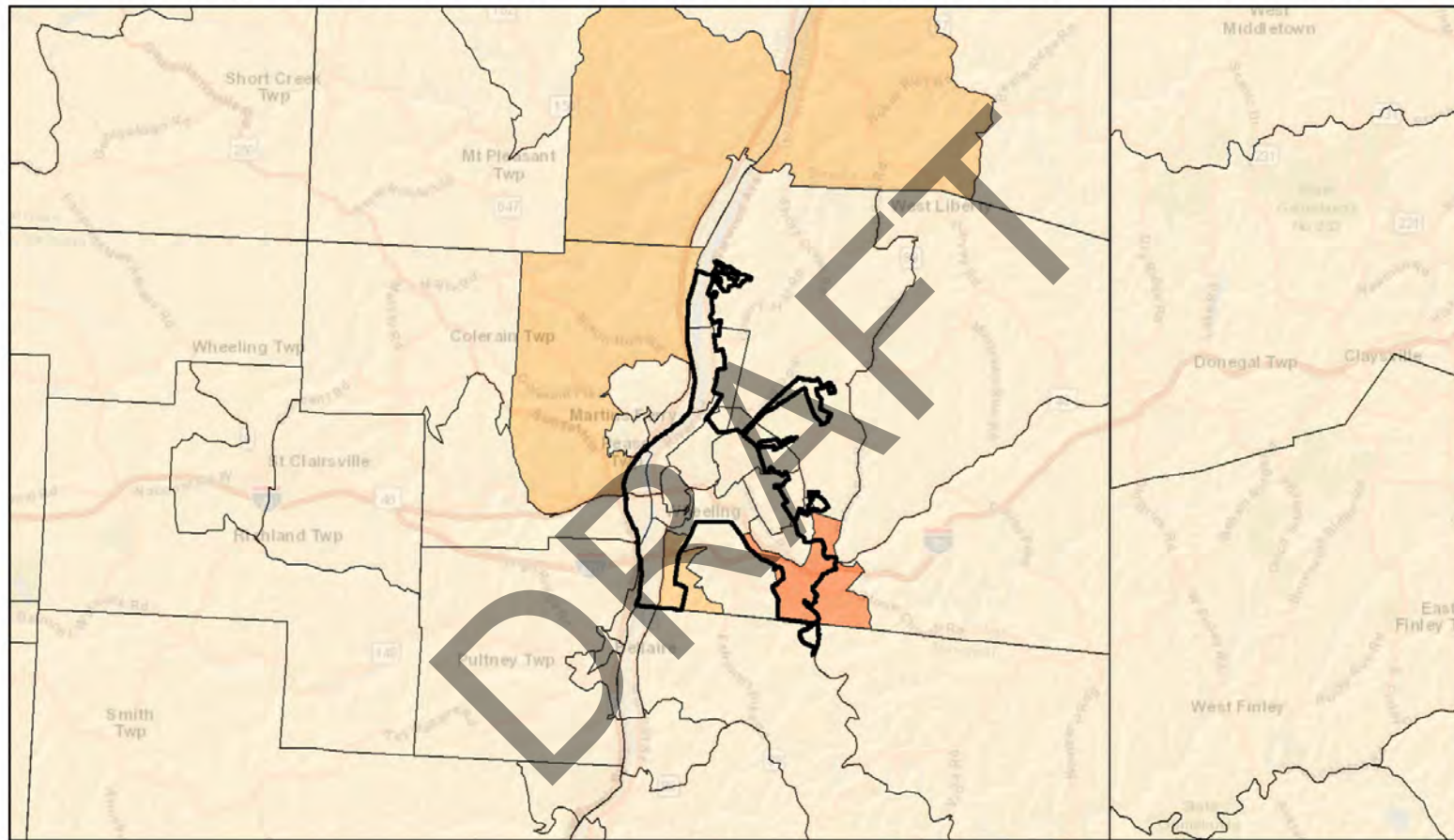
	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	35	0	45	0	80	0	0	4	0	4
Multiple, unrelated family households	0	0	0	0	0	0	0	0	0	0
Other, non-family households	0	0	0	0	0	0	0	0	0	0
<b>Total need by income</b>	<b>35</b>	<b>0</b>	<b>45</b>	<b>0</b>	<b>80</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>4</b>

Data Source: 2011-2015 CHAS

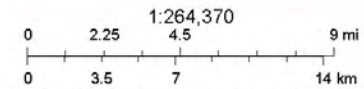
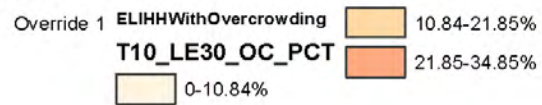
The following three (3) maps illustrate census tracts where there is overcrowding for Extremely Low, Very Low, and Low Income Households.

- Percentage Extremely Low Income Households with Overcrowding
- Percentage Very Low Income Households with Overcrowding
- Percentage Low Income Households with Overcrowding

### % Extremely Low Income Households with Overcrowding - City of Wheeling, West Virginia

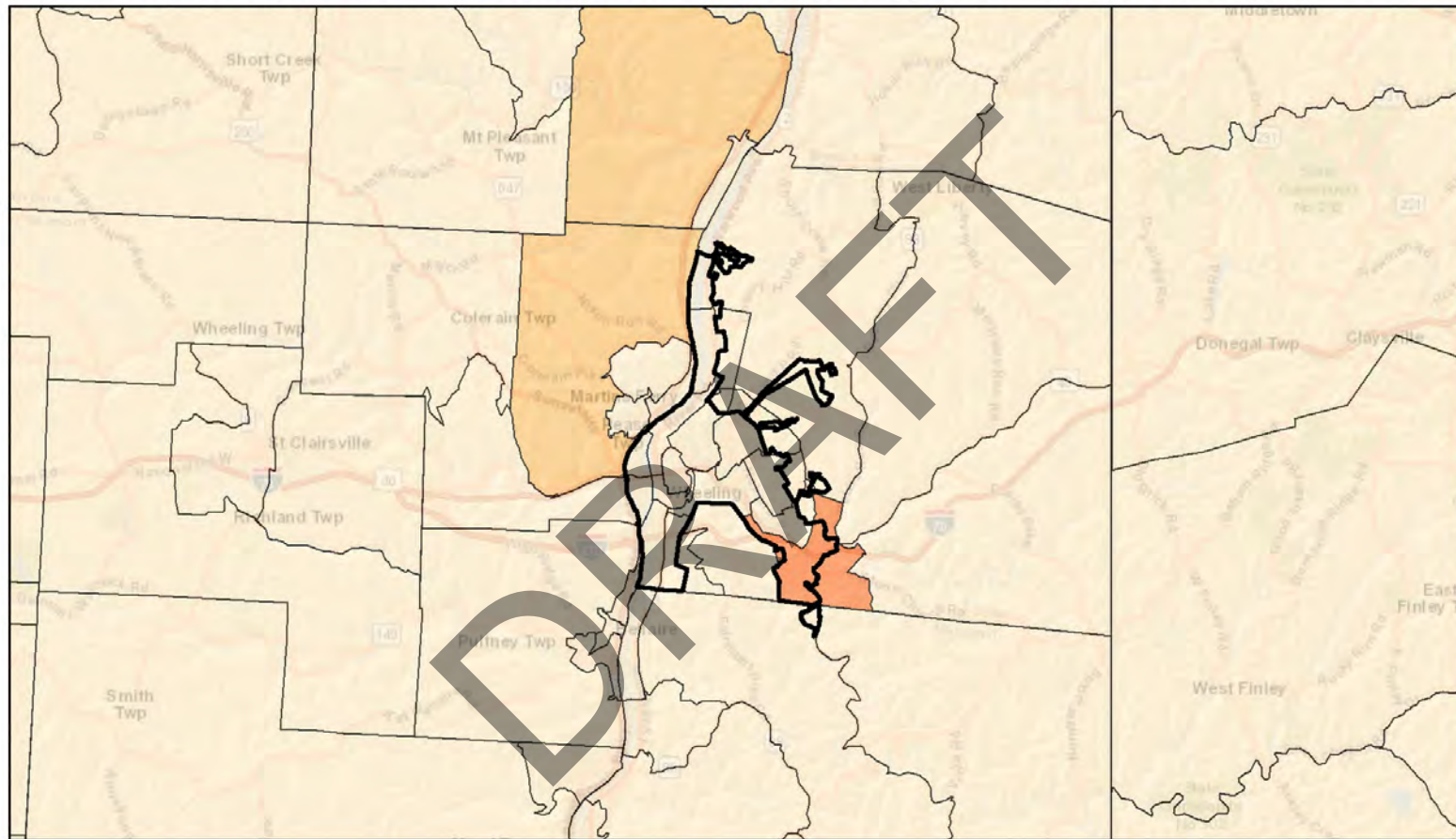


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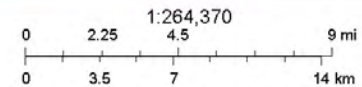
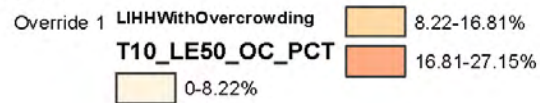


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

### % Low Income Households with Overcrowding - City of Wheeling, West Virginia



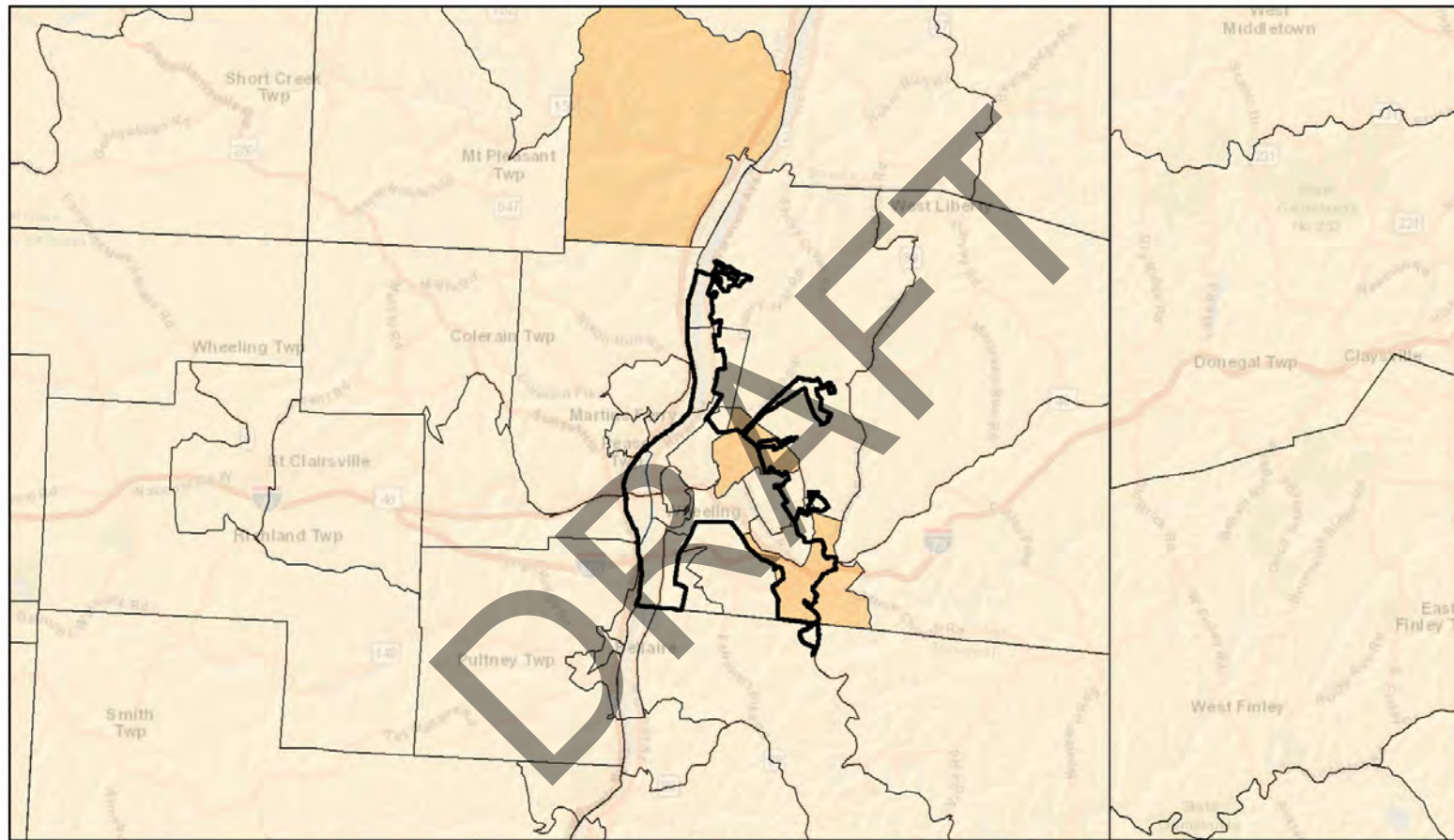
March 4, 2020



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

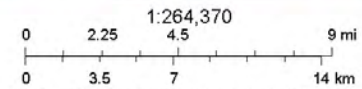


### % Moderate Income Households with Overcrowding - City of Wheeling, West Virginia



March 4, 2020

Override 1 MIHHWithOvercrowding 6.81-14.56%  
T10\_LE80\_OC\_PCT  
0-6.81%



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

## H. Cost Overburden

Overall, there is a shortage of decent, safe, sound, and affordable housing in the City of Wheeling. Many of the City's lower income households are paying more than 30% of their total household income on housing related costs. The following information was noted: 1,510 White households were cost burdened by 30% to 50%, and 1,250 White households were severely cost overburdened by greater than 50%; and 110 Black/African American households were cost overburdened by 30% to 50%, and 200 Black/African American households were severely cost overburdened by greater than 50%.

**TABLE II-25 - Housing Cost Burden – City of Wheeling**

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	9,255	1,685	1,479	185
White	8,815	1,510	1,250	168
Black / African American	239	110	200	15
Asian	84	4	10	4
American Indian, Alaska Native	4	10	0	0
Pacific Islander	0	0	0	0
Hispanic	47	20	25	0

Data Source: 2011-2015 CHAS

According to the HUD-CHAS data, there are a total of 11,760 White households and 1,510 of those White households are cost burdened by 30% to 50%, is 89.6%% of the total cases of households that were considered cost burdened by between 30% and 50%. Additionally, a total of 110 Black/African American households were considered cost burdened by between 30% and 50%, which is 6.5% of the total cases of households that were considered cost burdened by between 30% and 50%, which is 19.5% of the total 12,890 Black or African American households recorded in the dataset.

A total of 1,250 White households were considered severely cost burdened by greater than 50%, which is 10.4% of the total number of White households recorded in the dataset. A total of 200 Black/African American households

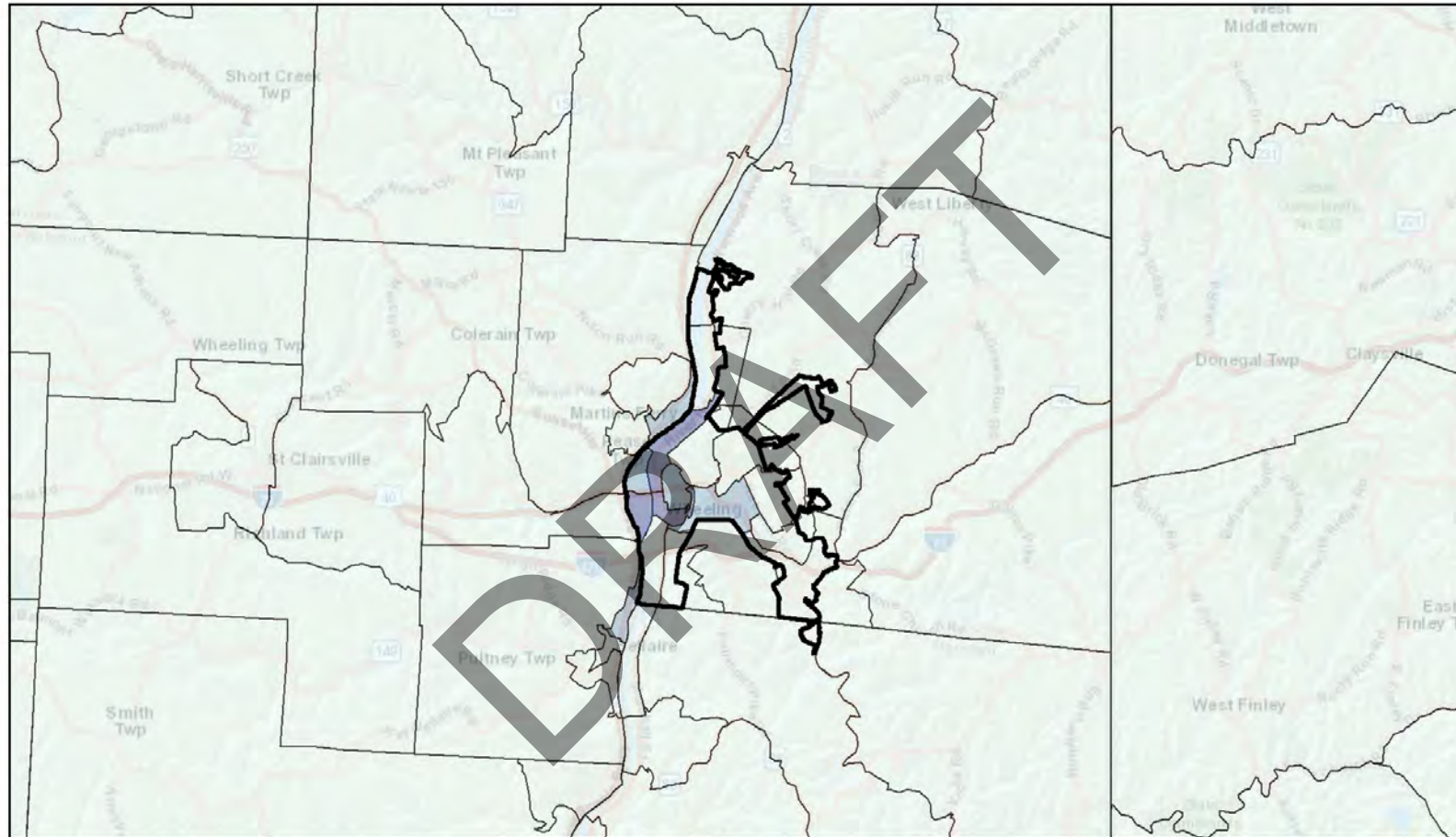
were considered severely cost overburdened by greater than 50%, which is 35.6% of the total number of Black/African American households recorded in the dataset.

The following four (4) maps illustrate census tracts where there are housing cost overburdens for all households, Extremely Low, Very Low, and Low Income Households.

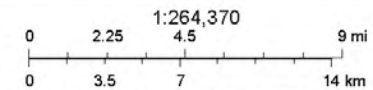
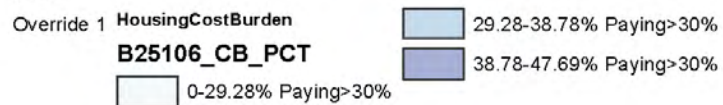
- Housing Cost Burden
- Percentage Extremely Low Income Households with Severe Cost Burden
- Percentage Very Low Income Households with Severe Cost Burden
- Percentage Low Income Households with Severe Cost Burden

DRAFT

### Housing Cost Burden - City of Wheeling, West Virginia



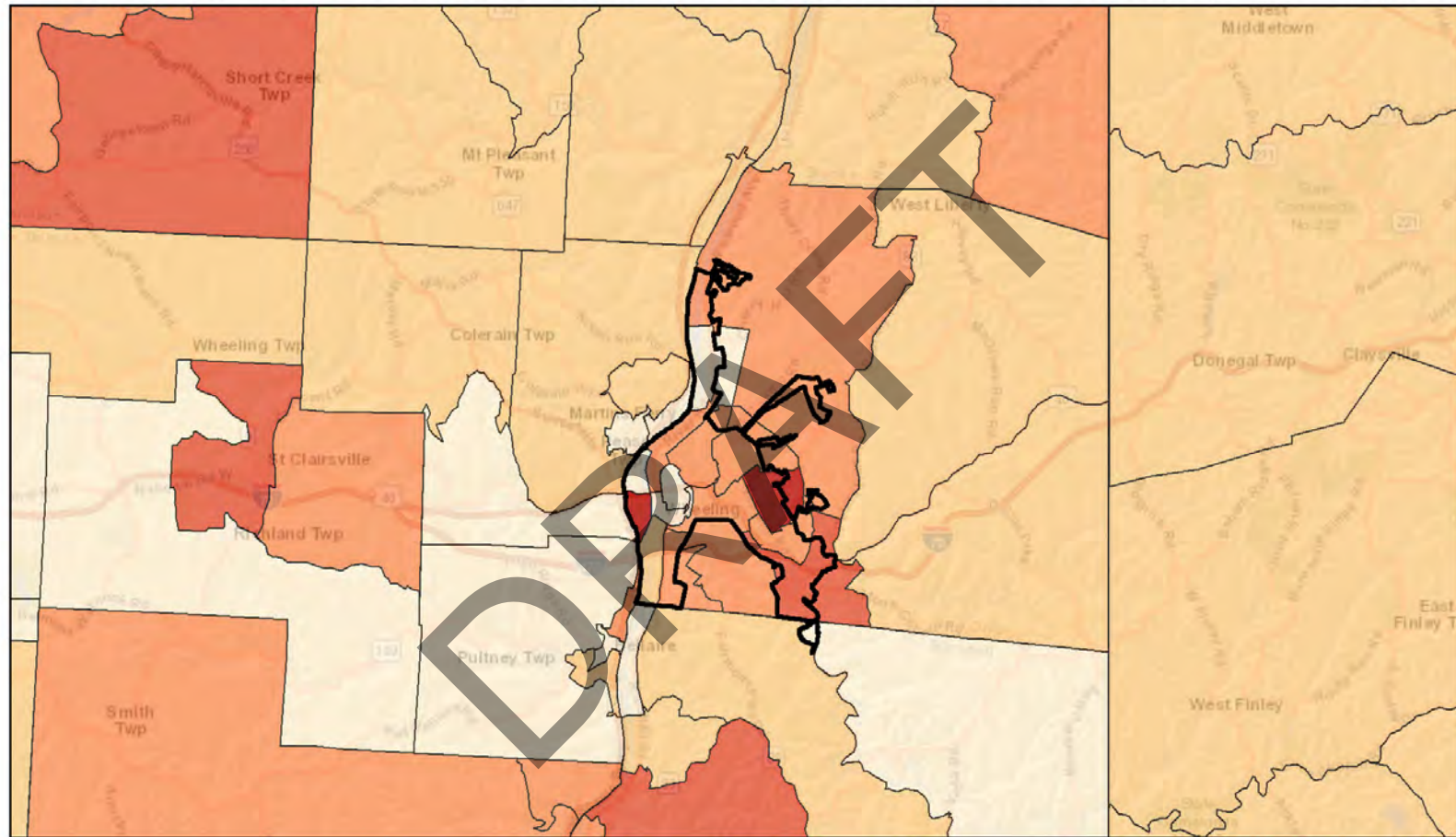
March 4, 2020



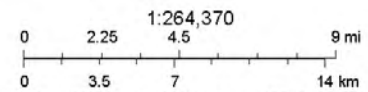
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



### % Extremely Low Income Households with Severe Cost Burden - City of Wheeling, West Virginia



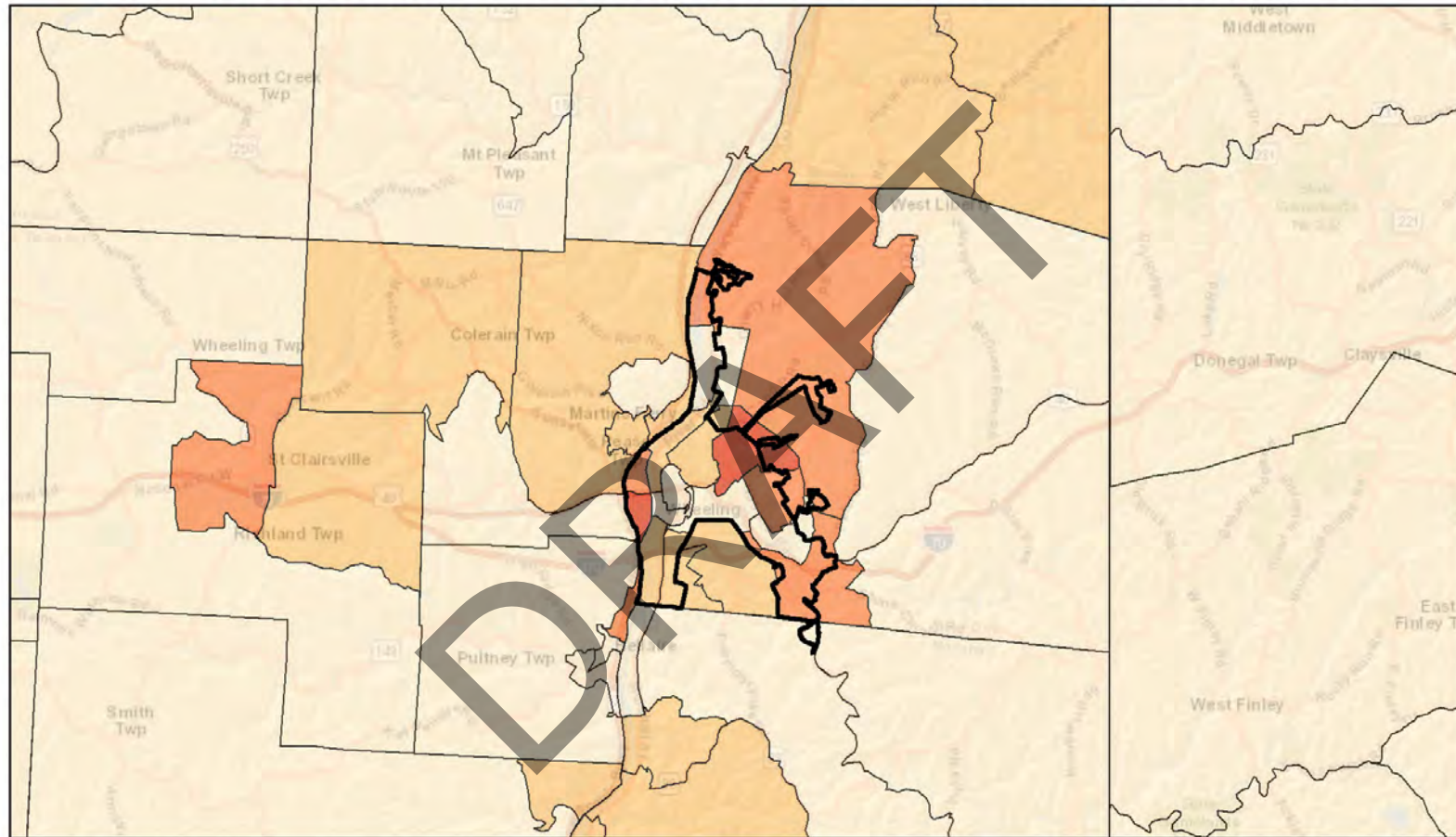
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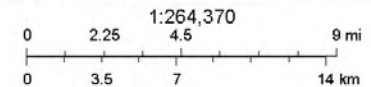
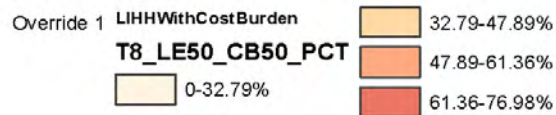
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



### % Low Income Households with Severe Cost Burden - City of Wheeling, West Virginia

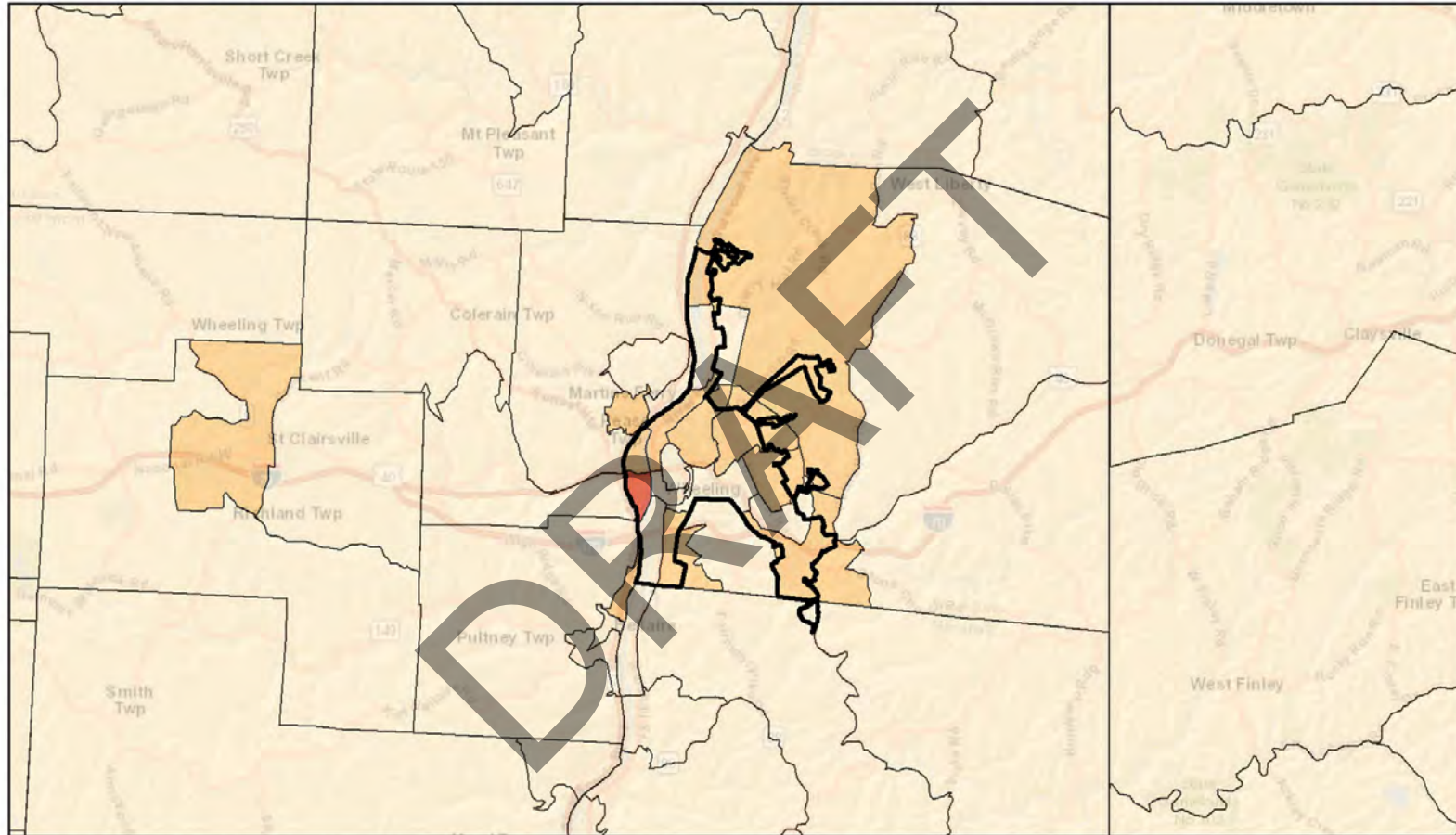


March 4, 2020

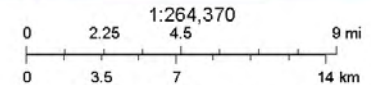
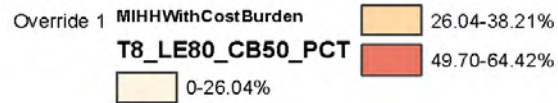


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

### % Moderate Income Households with Severe Cost Burden - City of Wheeling, West Virginia



March 4, 2020



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

## I. Housing Problems

Housing needs disaggregated by racial and ethnic cohorts were analyzed to determine if a racial or ethnic group disproportionately experienced a housing need as compared to the City's overall housing needs. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing problems. A housing problem is defined as one of the four following housing problems: 1. housing lacks complete kitchen facilities; 2. housing lacks complete plumbing facilities; 3. housing has more than 1 person per room; and 4. housing cost burden is over 30%. The following tables comprised of 2011-2015 CHAS and ACS data identify the disproportionate housing needs in the City Wheeling:

**TABLE II-26 - 0%-30% of Area Median Income (Extremely Low Income) – City of Wheeling**

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
<b>Jurisdiction as a whole</b>	1,480	395	173
White	1,230	370	158
Black / African American	215	15	15
Asian	10	0	4
American Indian, Alaska Native	10	0	0
Pacific Islander	0	0	0
Hispanic	10	4	0

Data Source: 2011-2015 CHAS

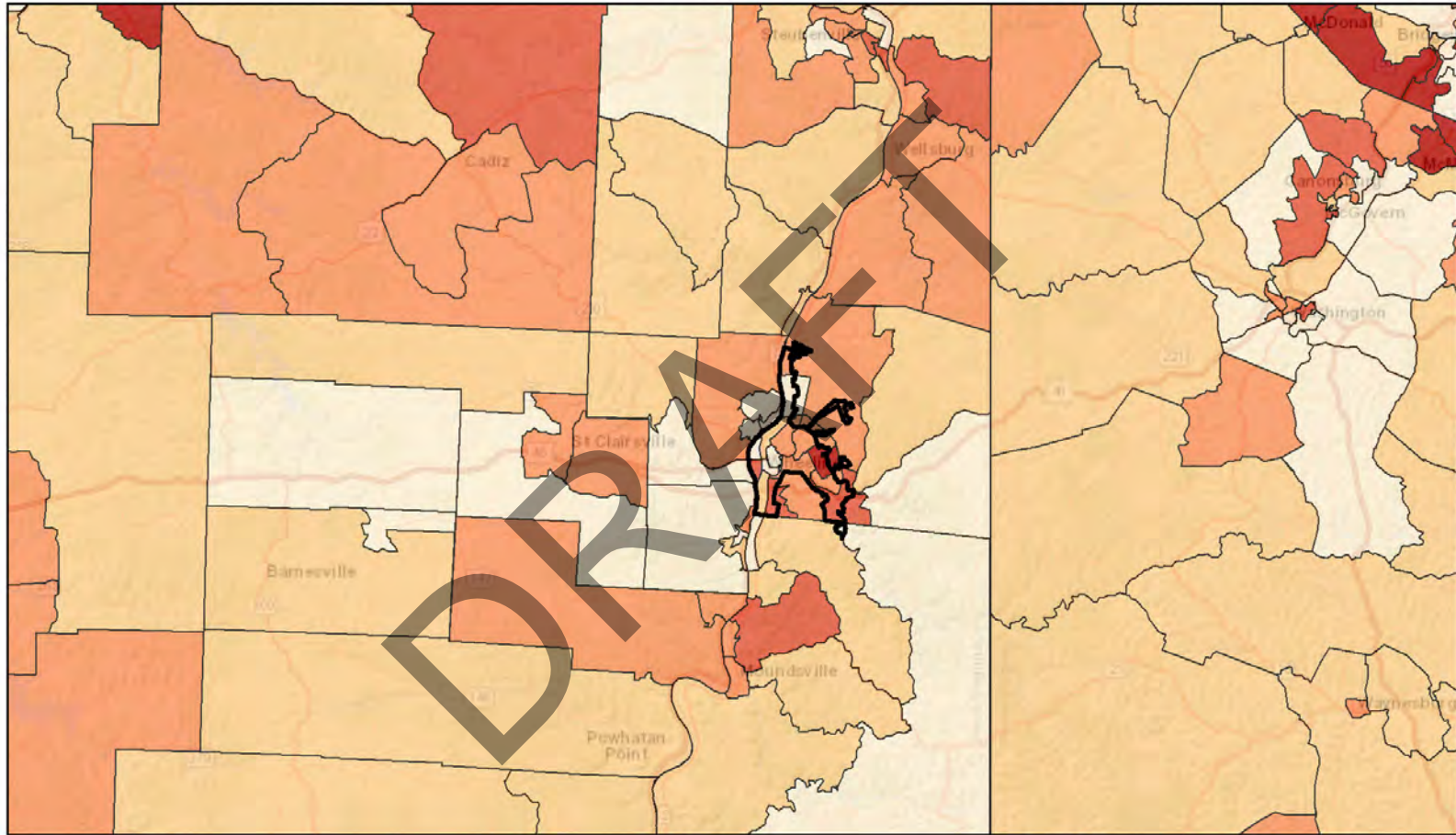
\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

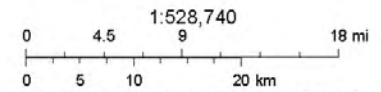
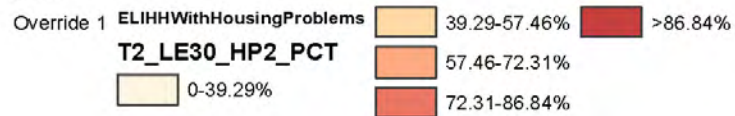
The following map illustrates the location by Census Tract where extremely low-income households have severe housing problems.



### % Extremely Low Income Households with Any of the 4 Severe Housing Problems - Wheeling, WV



March 4, 2020



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

**TABLE II-27 - 30%-50% of Area  
Median Income (Low-Income) – City of Wheeling**

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	775	720	0
White	700	710	0
Black / African American	50	4	0
Asian	4	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	15	4	0

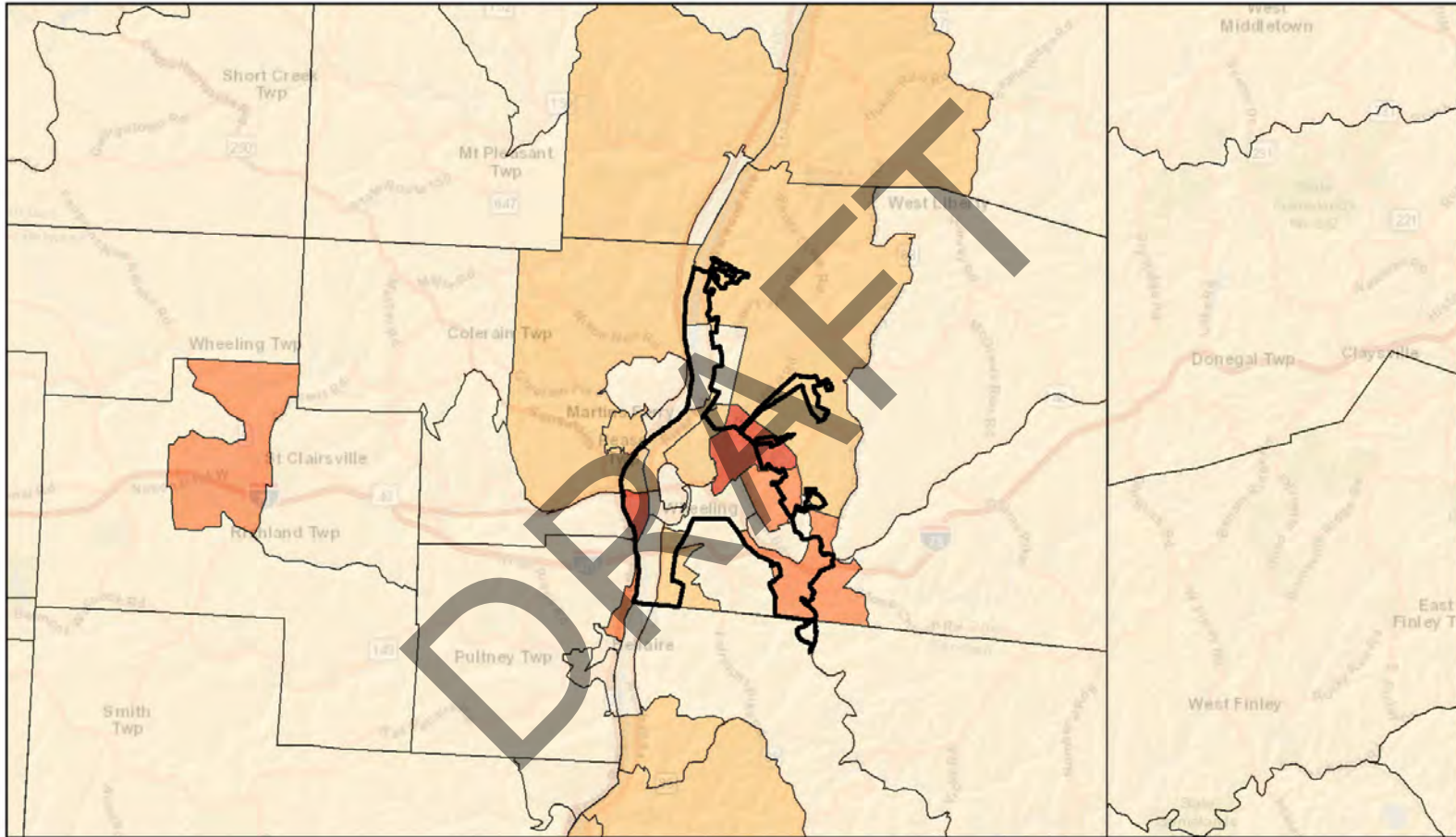
Data Source: 2011-2015 CHAS

\*The four housing problems are:

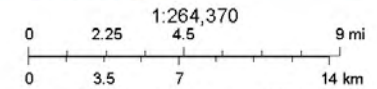
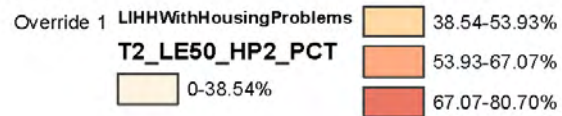
1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

The following map illustrates the location by Census Tract where very low-income households have severe housing problems.

% Low Income Households with Any of the 4 Severe Housing Problems - City of Wheeling, WV



March 4, 2020



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

**TABLE II-28 - 50%-80% of Area Median Income – City of Wheeling**

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	725	1,695	0
White	645	1,595	0
Black / African American	45	85	0
Asian	0	4	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	15	0	0

Data Source: 2011-2015 CHAS

\*The four housing problems are:

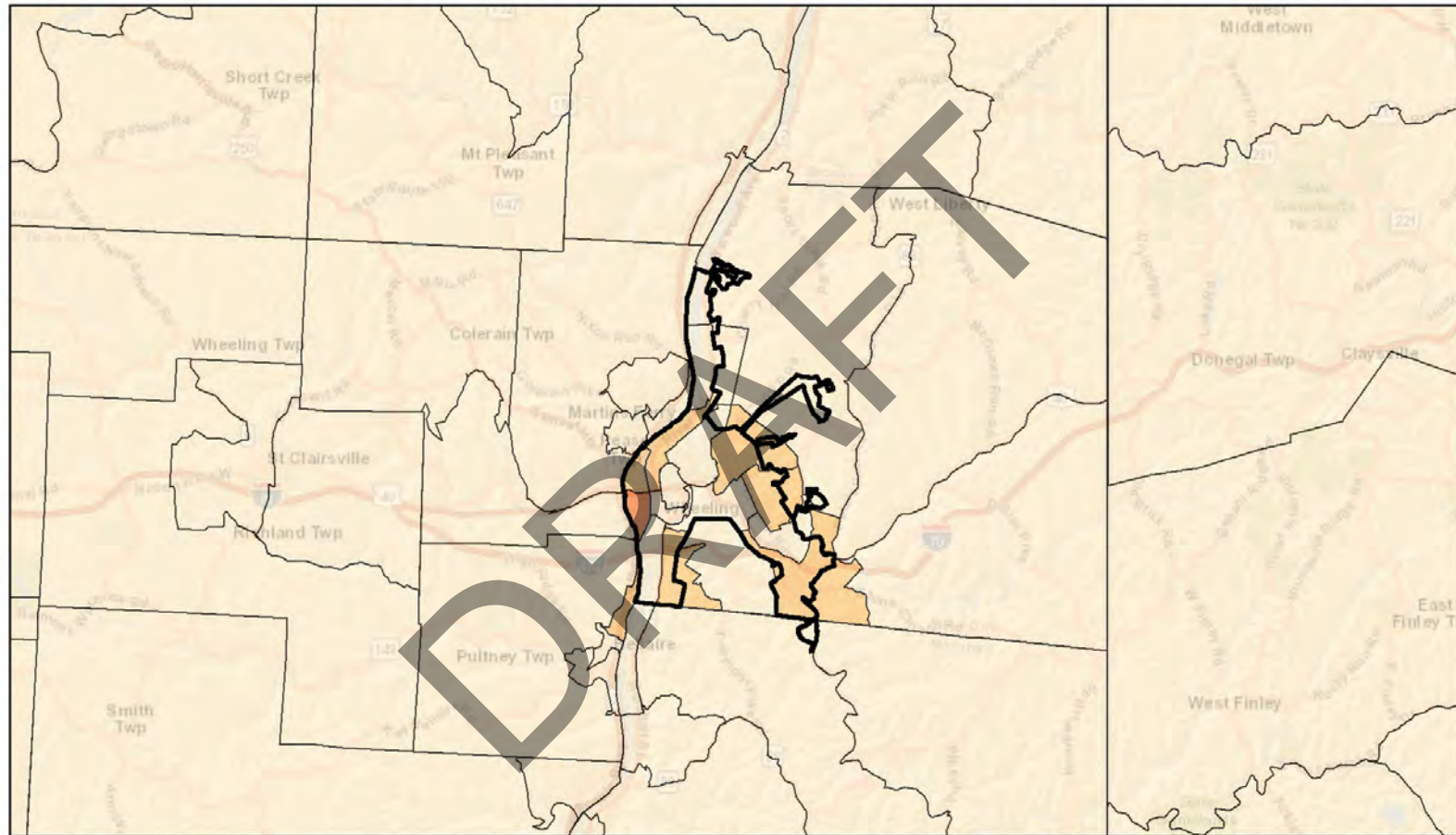
1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

The following map illustrates the location by Census Tract where low-income households have severe housing problems.

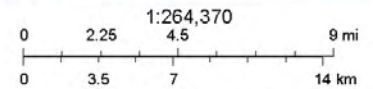
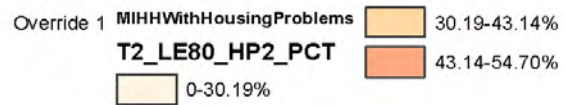
DRAFT



### % Moderate Income Households with Any of the 4 Severe Housing Problems - City of Wheeling, WV



March 4, 2020



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



**TABLE II-29 - 80%-100% of Area Median Income – City of Wheeling**

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	169	1,015	0
White	164	945	0
Black / African American	0	49	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	4	0

Data Source: 2011-2015 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

The racial composition of households in the City of Wheeling, according to the 2011-2015 American Community Survey, was 93.9% White; 4.4% African American/Black; and 0.4% Asian. The Hispanic or Latino population was 0.4%. In the 0-30% Area Median Income category, African American/Black households had one or more housing problems, with a disproportionate need at 14.5%. There are no other racial or ethnic groups with disproportionate need at other income levels.

## J. Segregation

The following maps will help give a visualization to any potential segregation that are in the City of Huntington.

### Racial Dot Map

The following map is a racial dot map representing one dot for every person counted during the 2010 Census. Each dot is color-coded by the individual's race and ethnicity. Whites are coded as orange; African-Americans, dark green; Asians, purple; Hispanics, blue; Native Americans, black; Other, red; and multi racial categories are coded as light green. The map was created by HUD through their Affirmatively Furthering Fair Housing Data and

Mapping Tool. The map provides a picture of any areas that may have a grouping of non-White residents. The majority of the City of Wheeling has a high concentration of white individuals, but there is a concentration of Blacks in the central areas of the city.

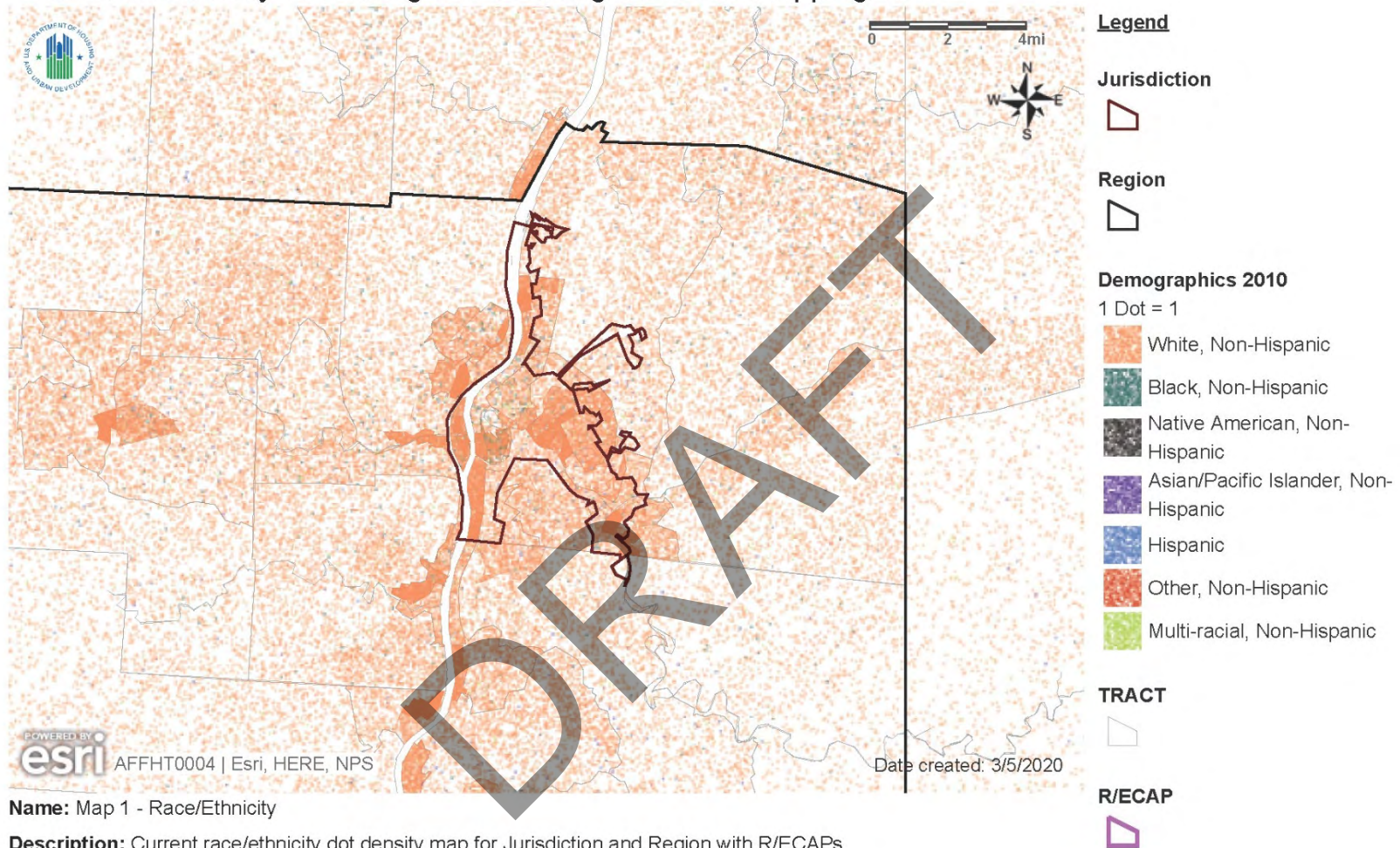
### **Diversity Index**

The following map calculates the diversity index per Census Tract in Huntington. "The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2013-2017. Lower index values between 0 and 20 suggest more homogeneity and higher index values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers. Data were obtained from the Census' American Community Survey 2013-2017 estimates and calculated by PolicyMap." (Source: PolicyMap.com) The majority of Huntington has a diversity index under 30, but the central part of the city has levels over 30 and even over 45. However, the map represents a high level of homogeneity in the City of Huntington.

### **Theil Index**

The following map provides the Theil Index calculations per Census Tract in Huntington. "The Theil Index is an index ranging from 0 to 1 that displays information about racial segregation. Lower index values below .20 suggest less segregation and higher index values above .40 suggest more segregation. The Theil Index is a measure of how evenly members of racial and ethnic groups are distributed within a region, calculated by comparing the diversity of all sub-regions (Census Blocks) to the region as a whole. Patterns of racial segregation can emerge as a result of systemic barriers and opportunities or localized individual preferences. For example, highly segregated areas may be indicative of discriminatory housing practices or other related barriers. Data used in the calculation of this index were derived from the U.S. Census Bureau's 2010 Decennial Census." (Source: PolicyMap.com) The Theil Index shows higher levels of segregation in the northern part, the south western part (portion bordering the Ohio River), and the south eastern part of the City of Wheeling.

### HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



**Name:** Map 1 - Race/Ethnicity

**Description:** Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

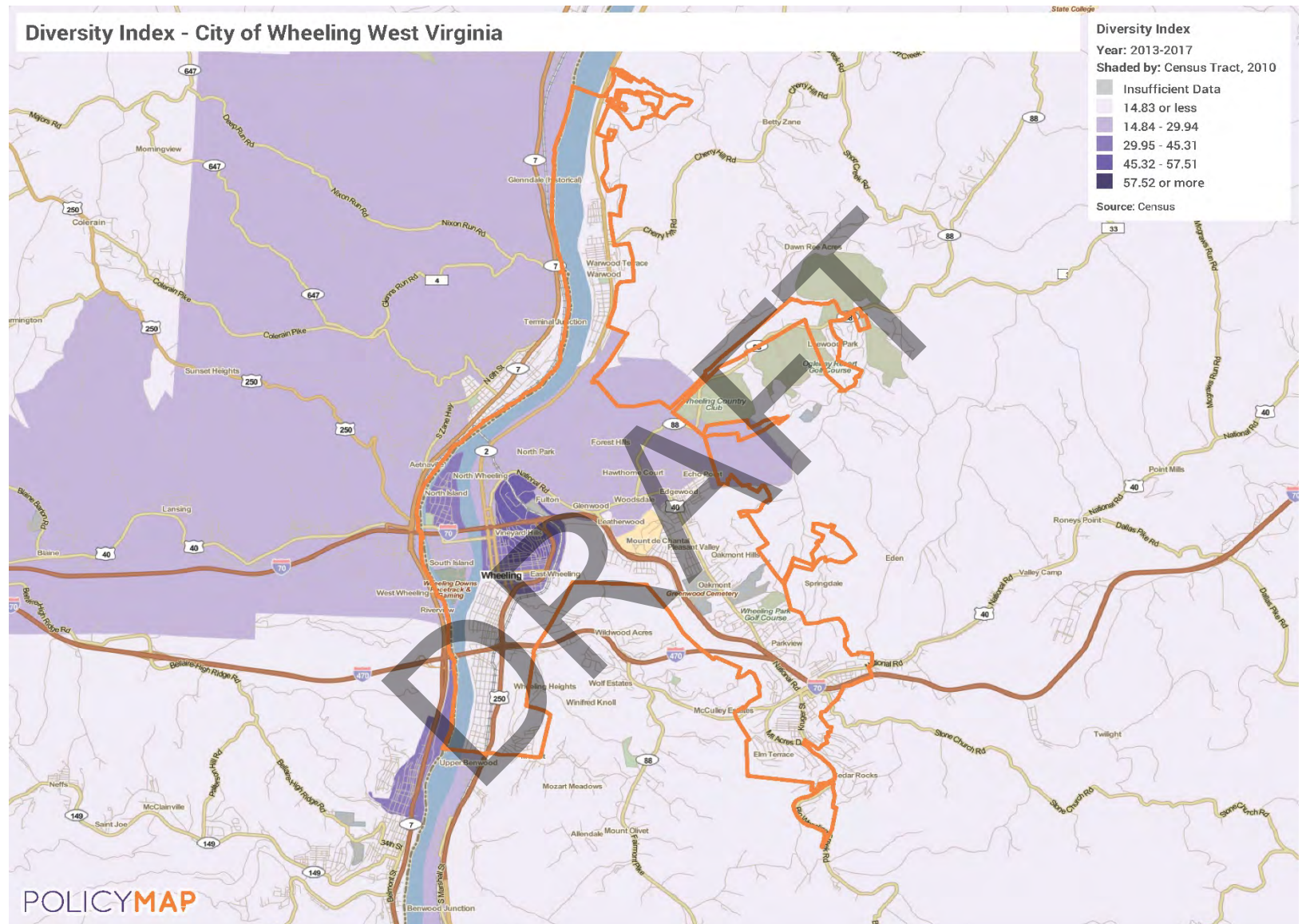
**Jurisdiction:** Wheeling (CDBG)

**Region:** Wheeling, WV-OH

**HUD-Provided Data Version:** AFFHT0004

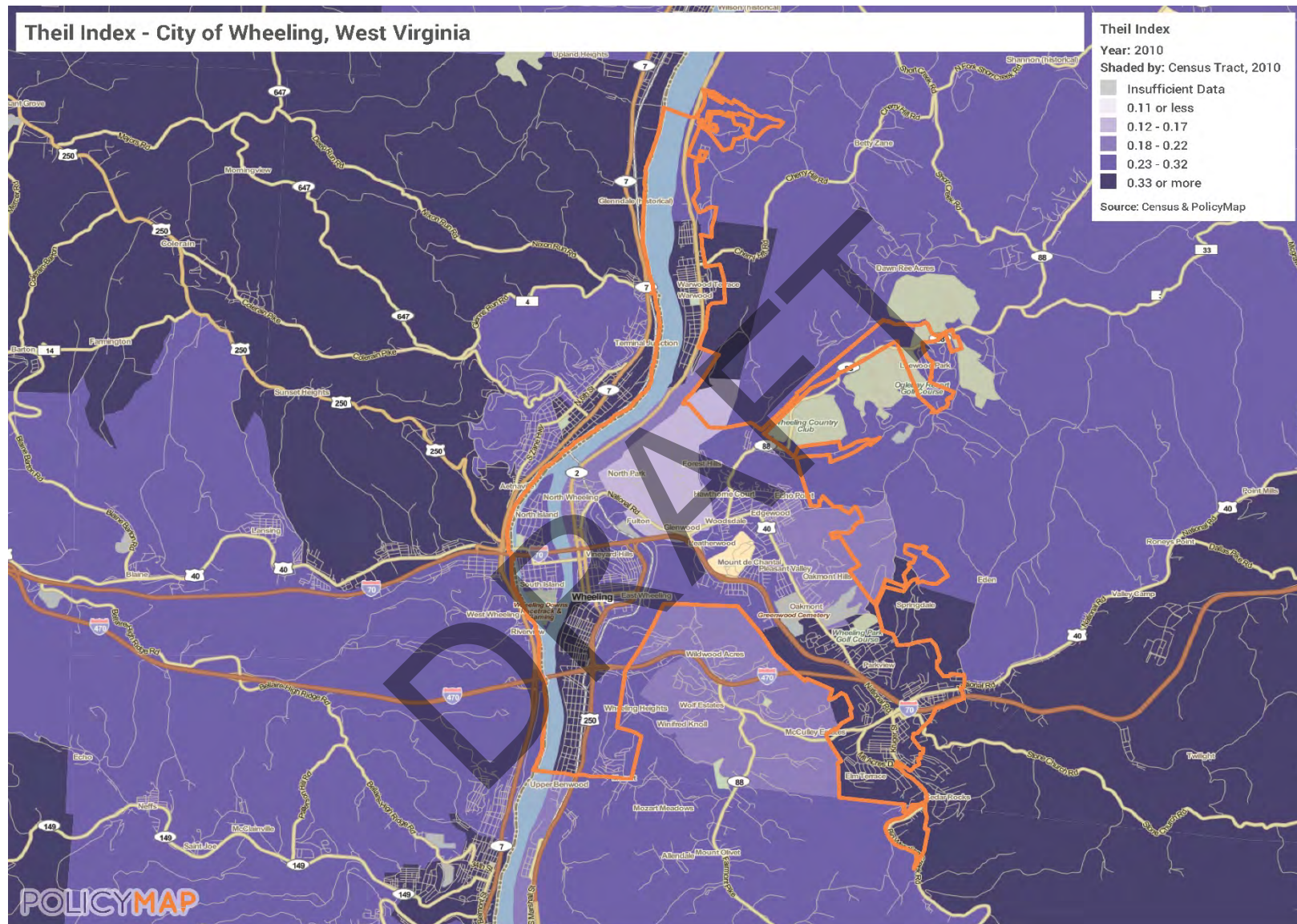
Source: <https://egis.hud.gov/affht/>





Source: <https://www.policymap.com/maps>





Source: <https://www.policymap.com/maps>

## K. Disabled Households

### Disabled Population

The following table includes the 2013-2017 ACS estimates for the number of disabled individuals in the City of Wheeling. The total population of disabled persons in Wheeling is estimated to be 4,472 persons which represents 16.6 percent of the total population of the City. The two largest disability types are ambulatory and cognitive difficulties.

**TABLE II-30 - Disabled Persons in the City of Wheeling**

Disability Status of the Civilian Non-Institutional Population	2013-2017 ACS	
	#	%
<b>Noninstitutionalized population</b>	4,472	16.6%
<b>SEX</b>		
Male	2,124	16.3%
Female	2,348	16.9%
<b>RACE AND ETHNICITY</b>		
White alone	4,258	17.4%
Black or African American alone	161	10.1%
American Indian and Alaska Native alone	9	18.8%
Asian alone	11	4.6%
Native Hawaiian and Other Pacific Islander alone	0	-
Some other race alone	0	0.0%
Two or more races	33	6.7%
White alone, not Hispanic or Latino	4,224	17.4%
Hispanic or Latino (of any race)	34	11.8%
<b>AGE</b>		
Under 5 years	0	0.0%
5 to 17 years	111	3.0%
18 to 34 years	386	7.3%
35 to 64 years	1,764	16.6%
65 to 74 years	972	31.8%
75 years and over	1,239	45.1%
<b>DISABILITY TYPE BY DETAILED AGE</b>		
<b>With a hearing difficulty</b>	<b>1,484</b>	<b>5.5%</b>
Population under 18 years	37	0.7%
Population under 5 years	0	0.0%
Population 5 to 17 years	37	1.0%
Population 18 to 64 years	485	3.1%
Population 18 to 34 years	77	1.5%

Population 35 to 64 years	408	3.8%
Population 65 years and over	962	16.6%
Population 65 to 74 years	340	11.1%
Population 75 years and over	622	22.6%
<b>With a vision difficulty</b>	<b>1,081</b>	<b>4.0%</b>
Population under 18 years	23	0.4%
Population under 5 years	0	0.0%
Population 5 to 17 years	23	0.6%
Population 18 to 64 years	537	3.4%
Population 18 to 34 years	117	2.2%
Population 35 to 64 years	420	4.0%
Population 65 years and over	521	9.0%
Population 65 to 74 years	221	7.2%
Population 75 years and over	300	10.9%
<b>With a cognitive difficulty</b>	<b>1,780</b>	<b>7.0%</b>
Population under 18 years	104	2.8%
Population 18 to 64 years	1,060	6.7%
Population 18 to 34 years	280	5.3%
Population 35 to 64 years	780	7.3%
Population 65 years and over	616	10.6%
Population 65 to 74 years	229	7.5%
Population 75 years and over	387	14.1%
<b>With an ambulatory difficulty</b>	<b>2,485</b>	<b>9.8%</b>
Population under 18 years	21	0.6%
Population 18 to 64 years	1,160	7.3%
Population 18 to 34 years	79	1.5%
Population 35 to 64 years	1,081	10.2%
Population 65 years and over	1,304	22.5%
Population 65 to 74 years	504	16.5%
Population 75 years and over	800	29.1%
<b>With a self-care difficulty</b>	<b>930</b>	<b>3.7%</b>
Population under 18 years	21	0.6%
Population 18 to 34 years	448	2.8%
Population 35 to 64 years	70	1.3%
Population 65 years and over	378	3.6%
Population 65 to 74 years	461	7.9%
Population 75 years and over	144	4.7%
<b>With an independent living difficulty</b>	<b>317</b>	<b>11.5%</b>
Population 18 to 64 years	1,631	7.5%
Population 18 to 34 years	758	4.8%
Population 35 to 64 years	153	2.9%
Population 65 years and over	605	5.7%
Population 65 to 74 years	873	15.0%
Population 75 years and over	202	6.6%

2013-2017 American Community Survey

The City of Wheeling recognizes the need for accessible and visitable housing units. The City ensures that multi-family housing developments which are rehabilitated or constructed using Federal funds, must comply with ADA requirements, and encourage visitable units beyond minimum requirements.

Another issue is a lack of affordable housing that is accessible. Public housing often has higher proportions of disabled residents and with most public housing consisting of 1-bedroom units, it is difficult for families and larger households with disabled members to find housing that is both accessible and affordable. The Wheeling Housing Authority responds to requests for reasonable accommodations and modifications in a timely manner.

While single-family housing is generally not accessible, the Fair Housing Act requires that multifamily properties built after 1991 meet Federal accessibility standards; therefore, multifamily housing units built after 1991 must be in compliance with Federal Law and meet the minimum level of accessibility. However, as 96.2% of housing units in the City of Wheeling were built prior to 1990, many of these units are more likely to have narrow halls, stairs, narrow doors, and little room for ramps to entrance doors.

The City of Wheeling funds a variety of home repair and rehabilitation programs for both renter- and owner-occupied housing. These programs will be used to make accessibility improvements to the existing housing stock.

#### **Government and Housing Authority Facilities:**

The City of Wheeling does not discriminate on the basis of disability for access, to nor operations of, its programs, services, or activities. Wheeling Housing Authority may provide reasonable modifications upon request. When a tenant requests an accommodation, the Housing Authority may verify the disability only to the extent necessary to ensure the applicants are entitled to the preference. However, the Housing Authority will not ask what the disability is. Once modifications are deemed reasonable, the work will be coordinated with the tenant; if the modifications are tantamount to those required for a fully accessible unit, the tenant/applicant will be placed on an Authority transfer/waiting list for the next available unit with the features requested, if so desired.

#### **Public Infrastructure:**

The City of Wheeling administers funds through the Federal Community Development Block Grant (CDBG) program to benefit low- and moderate-



income areas. The City of Wheeling promotes partnerships with organizations that make accessibility improvements to housing during housing rehabilitation, and meets all accessibility requirements for new rental housing development.

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### III. Review/Update to Original Plan

In FY 2015, the City of Wheeling, WV, partnered with the Northern Panhandle HOME Consortium, to create an Analysis of Impediments to Fair Housing Choice (AI) to evaluate the housing conditions in the region. The analysis was intended to focus on the region to serve as a basis for fair housing planning for the City's Federal Entitlement programs. The following paragraphs restate the identified impediments from the 2015 Analysis of Impediments to Fair Housing Choice and summarize the progress made on each for the time period of 2015 through 2018.

#### A. Summary of 2015 Impediments – City of Wheeling

- **Impediment 1: Housing Affordability**

Decent, safe, sound, and affordable housing remains a high priority to ensure fair housing choice, quality of life, and attractive neighborhoods.

**Goal:** Maintain the supply of decent, safe, sound, and affordable housing targeted to lower income households, both renters and owners.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **1-A:** Maintain the supply of available decent, safe, and affordable housing through code enforcement, rehabilitation, and support of the creation of and capacity building of Community Housing Development Organizations (CHDOs), both locally and throughout the Consortium Area.
- **1-B:** Maintain homeownership opportunities for LMI households by promoting available housing, requiring housing counseling, as well as downpayment and closing cost assistance through the Northern Panhandle HOME Consortium.
- **1-C:** Maintain and strengthen an effective property maintenance inspection and enforcement program in the City.
- **1-D:** Promote programs for accessibility, weatherization, insulation, storm windows, energy audits, etc. to help reduce energy costs for LMI households that are cost overburdened.

**2015 Accomplishments:**

- 1-A: Maintain the supply of available decent, safe, and affordable housing through assistance and support of the Community Housing Development Organizations (CHDOs), both locally and throughout the Consortium Area, to undertake rehabilitation and housing construction.

Accomplishments: There were 588 structures inspected for code compliance in low/mod areas in the City of Wheeling, while 157 housing units were rehabilitated and another 315 housing units are undergoing rehabilitation. During this CAPER period, CHANGE, Inc. completed a single family home rehabilitation which was sold to a low-moderate income buyer in February 2016. This project was completed in Weirton, WV.

- 1-B: Maintain homeownership opportunities for LMI households by promoting available housing, requiring housing counseling, as well as downpayment and closing cost assistance through the Northern Panhandle HOME Consortium.

Accomplishments: The City of Wheeling and the Northern Panhandle HOME Consortium funded the First Time Homebuyer Program, which provides downpayment and closing cost assistance in all of the Northern Panhandle HOME jurisdictions. There were 24 homeowners (6 in Wheeling) that received FTHB assistance in the consortium, all of whom received homebuyer education (a required component to receive the assistance).

- 1-C: Maintain and strengthen an effective property maintenance inspection and enforcement program in the City.

Accomplishments: There were 558 housing units inspected for code compliance in the City of Wheeling. All twenty-four (24) First Time Homebuyer properties were also inspected for code compliance.

- 1-D: Promote programs for accessibility, weatherization, insulation, storm windows, energy audits, etc. to help reduce energy costs for LMI households that are cost overburdened.

Accomplishments: Referrals were made to CHANGE, Inc. for weatherization/energy efficiency programs. The City did not fund any programs during this CAPER period.

### **2016 Accomplishments:**

- 1-A: Maintain the supply of available decent, safe, and affordable housing through assistance and support of the Community Housing Development Organizations (CHDOs), both locally and throughout the Consortium Area, to undertake rehabilitation and housing construction.

Accomplishments: 523 housing units were inspected for code compliance in the City of Wheeling, while 140 housing units were rehabilitated and another 280 units are undergoing rehabilitation. All First Time Homebuyer Homes are inspected throughout the Northern Panhandle HOME Consortium Area, prior to authorizing the purchase with HOME assistance.

During FY 2016, the Northern Panhandle HOME Consortium funded a project with FYs 2014 and 2015 CHDO set-aside funds to CHANGE, Inc., who is acquiring and rehabilitating a four-bedroom single-family home in Follansbee, WV, which will be rented to an eligible low-moderate income household. The project is currently underway.

- 1-B: Maintain homeownership opportunities for LMI households by promoting available housing, requiring housing counseling, as well as downpayment and closing cost assistance through the Northern Panhandle HOME Consortium.

Accomplishments: The City of Wheeling and the Northern Panhandle HOME Consortium funded the First Time Homebuyer Program which provides downpayment and closing cost assistance, in all of the Northern Panhandle HOME Jurisdictions. 23 homeowners (9 in Wheeling) received FTHB assistance in the consortium, all of whom received homebuyer education (a required component to receive the assistance).

- 1-C: Maintain and strengthen an effective property maintenance inspection and enforcement program in the City.

Accomplishments: There were 523 housing units inspected for code compliance in the City of Wheeling. All twenty-three (23) First Time Homebuyer properties were also inspected for code compliance.

- 1-D: Promote programs for accessibility, weatherization, insulation, storm windows, energy audits, etc. to help reduce energy costs for LMI households that are cost overburdened.

Accomplishments: Referrals were made to CHANGE, Inc. for weatherization/energy efficiency programs. In addition, referrals are made to Catholic Charities Neighborhood Center for the Energy Savers Program in the fall. House of Carpenter and Laughlin Memorial Chapel also provide limited repair assistance.

### **2017 Accomplishments:**

- 1-A: Maintain the supply of available decent, safe, and affordable housing through assistance and support of the Community Housing Development Organizations (CHDOs), both locally and throughout the Consortium Area, to undertake rehabilitation and housing construction.

Accomplishments: 437 housing units were inspected for code compliance in the City of Wheeling, while 120 housing units were rehabilitated and another 180 units are undergoing rehabilitation. This includes all 27 First Time Homebuyer homes which are inspected throughout the Northern Panhandle HOME Consortium area, prior to authorizing the purchase with HOME assistance.

During FY 2017, 18 new affordable housing units were completed at Wheeling Heights, a LIHTC funded project. In addition, 40 new affordable housing units became underway at LaBelle Greene, a LIHTC funded project. (This includes 26 2BR townhouses, and 14 3BR townhouses). There remains one affordable single-family home underway on Wheeling Island by Habitat for Humanity; ground was broken for that new home in April 2016, and the construction has not been completed as of the end of FY 2017.

During FY 2016, the Northern Panhandle HOME Consortium funded a project with FYs 2014 and 2015 CHDO set-aside funds to CHANGE, Inc., who is acquiring and rehabilitating a four-bedroom single-family home in Follansbee, WV, which will be rented to an eligible low-moderate income household. The project remains underway at the end of FY 2017, and a progress inspection was made at this unit on June 21, 2018.

- 1-B: Maintain homeownership opportunities for LMI households by promoting available housing, requiring housing counseling, as well as downpayment and closing cost assistance through the Northern Panhandle HOME Consortium.

Accomplishments: The City of Wheeling and the Northern Panhandle HOME Consortium funded the First Time Homebuyer Program which provides down payment and closing cost assistance, in all of the Northern Panhandle HOME jurisdictions. 27 homeowners (9 in Wheeling) received FTHB assistance in the consortium, all of whom received homebuyer education (a required component to receive the assistance).

- 1-C: Maintain and strengthen an effective property maintenance inspection and enforcement program in the City.

Accomplishments: The City of Wheeling has two full-time code enforcement officers. 437 housing units were inspected for code compliance in the City of Wheeling during FY 2017. The City also has a Vacant Building Registration Program, which encourages code-deficient vacant properties to be repaired and returned to use.

- 1-D: Promote programs for accessibility, weatherization, insulation, storm windows, energy audits, etc. to help reduce energy costs for LMI households that are cost overburdened.

Accomplishments: Referrals are made to CHANGE, Inc. for weatherization/energy efficiency programs. In addition, referrals are made to Catholic Charities Neighborhood Center for the Energy Savers Program in the fall. House of Carpenter and Laughlin Memorial Chapel also provide limited repair assistance. Rural inquiries are referred to USDA Rural Development for options.

**2018 Accomplishments:**

- 1-A: Maintain the supply of available decent, safe, and affordable housing through assistance and support of the Community Housing Development Organizations (CHDOs), both locally and throughout the Consortium Area, to undertake rehabilitation and housing construction.

Accomplishments: 477 housing units were inspected for code compliance in the City of Wheeling, while 144 housing units were rehabilitated and another 127 units are undergoing rehabilitation. This includes all 28 First Time Homebuyer homes which are inspected throughout the Northern Panhandle HOME Consortium area prior to authorizing the purchase with HOME assistance.

During FY 2018, one affordable single-family home became complete on Wheeling Island by Habitat for Humanity, and 40 new affordable housing units (26 are 2BR and 4 are 3BR townhouses) became complete at LaBelle Greene Phase III, a LIHTC funded project. La Belle Greene Phase II (another 40 units, also LIHTC funded) became underway in FY 2018.

During FY 2018, the Northern Panhandle HOME Consortium committed FYs 2017 and 2018 CHDO set-aside funds to the Greater Wheeling Coalition for the Homeless for rehabilitation of a single-family home in Triadelphia, WV, which will be sold to an eligible low-moderate income household.

The Northern Panhandle HOME Consortium previously funded a project with FYs 2014, 2015 and 2016 CHDO set-aside funds to CHANGE, Inc. for rehabilitation of a four-bedroom single-family home in Follansbee, WV, which will be rented to an eligible low-moderate income household. The project was nearing completion but still underway at the end of FY 2018.

- 1-B: Maintain homeownership opportunities for LMI households by promoting available housing, requiring housing counseling, as well as downpayment and closing cost assistance through the Northern Panhandle HOME Consortium.

Accomplishments: The City of Wheeling and the Northern Panhandle HOME Consortium funded the First Time Homebuyer Program which provides downpayment and closing cost assistance, in all of the Northern Panhandle HOME jurisdictions. 27 homeowners (13 in Wheeling) received FTHB assistance in the consortium, all of whom received homebuyer education (a required component to receive the assistance).

The Northern Panhandle HOME Consortium also committed FYs 2017 and 2018 CHDO set-aside funds to the Greater Wheeling Coalition for the Homeless for rehabilitation of a single-family home in Triadelphia, WV, which will be sold to an eligible low-moderate income household.

- 1-C: Maintain and strengthen an effective property maintenance inspection and enforcement program in the City.

Accomplishments: The City of Wheeling has two full-time code enforcement officers. 477 housing units were inspected for code compliance in the City of Wheeling during FY 2018. The City also has a Vacant Building Registration Program, which encourages code-deficient vacant properties to be repaired and returned to use. In May 2019, the City passed an ordinance that streamlined its enforcement of the property maintenance code.

- 1-D: Promote programs for accessibility, weatherization, insulation, storm windows, energy audits, etc. to help reduce energy costs for LMI households that are cost overburdened.

Accomplishments: Referrals are made to CHANGE, Inc. for weatherization/energy efficiency programs. In addition, referrals are made to Catholic Charities Neighborhood Center for the Energy Savers Program in the fall. House of Carpenter and Laughlin Memorial Chapel also provide limited repair assistance. Rural inquiries are referred to USDA Rural Development for options.

- **Impediment 2: Housing Accessibility**

There appears to be an unmet need for housing that is accessible to the older population, and persons with disabilities.

**Goal:** Increase the supply of housing that meets the accessibility, visitability, and quality of life needs of the older population and persons with disabilities.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **2-A:** Increase the supply of accessible owner-occupied housing by providing assistance to support the removal of architectural barriers.
- **2-B:** Enforce building codes to ensure that new multifamily construction meets the accessibility provisions of the Fair Housing Act.
- **2-C:** Promote education and awareness of the requirements for reasonable accommodations for persons with disabilities and the elderly in rental housing.

**2015 Accomplishments:**

- 2-A: Increase the supply of accessible owner-occupied housing by providing assistance to support the removal of architectural barriers.

Accomplishments: Referrals were made to the WV Division of Rehabilitation Services for this type of assistance.



- 2-B: Enforce building codes to ensure that new multifamily construction meets the accessibility provisions of the Fair Housing Act.

Accomplishments: The City of Wheeling Building Inspections office distributed the pamphlet "Before you Build: What you Need to Know about Fair Housing" to developers of multifamily housing.

- 2-C: Promote education and awareness of the requirements for reasonable accommodations for persons with disabilities and the elderly in rental housing.

Accomplishments: The City of Wheeling Building Inspections office made available the pamphlet Before you Build: What you Need to Know about Universal Design to all contractors applying for building permits. The City of Wheeling funds the Wheeling Human Rights Commission, which distributes the Tenants and Landlords in West Virginia: Rights and Responsibilities handbook in order to inform renters, including the elderly and disabled, of their housing rights. The HRC also distributed literature regarding disabilities as a protected class, and reasonable accommodations and modifications. The City of Wheeling hosted a Basic Overview of Fair Housing Training on April 26, 2016, conducted by the Fair Housing Action Network, and the content provided a special focus on assistance animals and reasonable accommodations.

**2016 Accomplishments:**

- 2-A: Increase the supply of accessible owner-occupied housing by providing assistance to support the removal of architectural barriers.

Accomplishments: Referrals were made to the WV Division of Rehabilitation Services for assistance with the removal of architectural barriers. Additionally, assistance may be available at the Northern WV Center for Independent Living (NWVCIL) and/or the West Virginia Assistive Technology System (WVATS) Center for Excellence in Disabilities at West Virginia University.

- 2-B: Enforce building codes to ensure that new multifamily construction meets the accessibility provisions of the Fair Housing Act.

Accomplishments: The City of Wheeling Building Inspections office distributed the pamphlet "Before you Build: What you Need to Know about Fair Housing" to developers of multifamily housing.

- 2-C: Promote education and awareness of the requirements for reasonable accommodations for persons with disabilities and the elderly in rental housing.

Accomplishments: The City of Wheeling Building Inspections office made available the pamphlet "Before you Build: What you Need to Know about Universal Design" to all contractors applying for building permits. The City of Wheeling funds the

Wheeling Human Rights Commission, which distributes the Tenants and Landlords in West Virginia: Rights and Responsibilities handbook in order to inform renters, including the elderly and disabled, of their housing rights. The HRC also distributed literature regarding disabilities as a protected class, and reasonable accommodations and modifications, and provides education and outreach regarding Fair Housing under its Agreement with Southwestern PA Legal Services.

**2017 Accomplishments:**

- 2-A: Increase the supply of accessible owner-occupied housing by providing assistance to support the removal of architectural barriers.

Accomplishments: Referrals are made to the WV Division of Rehabilitation Services for assistance with the removal of architectural barriers. Additionally, assistance may be available at the Northern WV Center for Independent Living (NWVCIL) and/or the West Virginia Assistive Technology System (WVATS) Center for Excellence in Disabilities at West Virginia University.

- 2-B: Enforce building codes to ensure that new multifamily construction meets the accessibility provisions of the Fair Housing Act.

Accomplishments: The City of Wheeling Building Inspections office distributes the pamphlet “Before you Build: What you Need to Know about Fair Housing” to developers of multifamily housing. In addition, inspections are done throughout the construction of projects to assure that all codes and accessibility provisions are being met.

- 2-C: Promote education and awareness of the requirements for reasonable accommodations for persons with disabilities and the elderly in rental housing.

Accomplishments: The City of Wheeling Building Inspections office makes available the pamphlet “Before you Build: What you Need to Know about Universal Design” to all contractors applying for building permits. The City of Wheeling funds the Wheeling Human Rights Commission, which distributes the “Tenants and Landlords in West Virginia: Rights and Responsibilities” handbook in order to inform renters, including the elderly and disabled, of their housing rights. The Wheeling HRC also distributes literature regarding disabilities as a protected class, and reasonable accommodations and modifications, and provides education and outreach regarding Fair Housing under its Agreement with the Fair Housing Law Center at Southwestern Pennsylvania Legal Services. Finally, on June 28, 2018, the Wheeling HRC and the Fair Housing Law Center co-hosted a Fair Housing training for landlords, entitled “Rent Smart: How to be a Good Landlord” at the Ohio County Public Library, which included training on reasonable accommodations.

**2018 Accomplishments:**

- 2-A: Increase the supply of accessible owner-occupied housing by providing assistance to support the removal of architectural barriers.

Accomplishments: Referrals are made to the WV Division of Rehabilitation Services for assistance with the removal of architectural barriers. Additionally, assistance may be available at the Northern WV Center for Independent Living (NWVCIL) and/or the West Virginia Assistive Technology System (WVATS) Center for Excellence in Disabilities at West Virginia University.

- 2-B: Enforce building codes to ensure that new multifamily construction meets the accessibility provisions of the Fair Housing Act.

Accomplishments: The City of Wheeling Building Inspections office distributes the pamphlet “Before you Build: What you Need to Know about Fair Housing” to developers of multifamily housing. In addition, inspections are done throughout the construction of projects to assure that all codes and accessibility provisions are being met.

- 2-C: Promote education and awareness of the requirements for reasonable accommodations for persons with disabilities and the elderly in rental housing.

Accomplishments: The City of Wheeling Building Inspections office makes available the pamphlet “Before you Build: What you Need to Know about Universal Design” to all contractors applying for building permits. The City of Wheeling funds the Wheeling Human Rights Commission, which distributes the “Tenants and Landlords in West Virginia: Rights and Responsibilities” handbook in order to inform renters, including the elderly and disabled, of their housing rights. The Wheeling HRC also distributes literature regarding disabilities as a protected class, and reasonable accommodations and modifications, and provides education and outreach regarding Fair Housing under its Agreement with the Fair Housing Law Center at Southwestern Pennsylvania Legal Services.

- **Impediment 3: Fair Housing Education, Advocacy, Monitoring, and Enforcement**

As in any community, there is a lack of awareness of the rights and responsibilities under the Fair Housing Act and a need to continually monitor and enforce the Fair Housing Act.

**Goal:** Increase the knowledge and awareness of the rights of individuals and the responsibilities of building owners in regard to the Fair Housing Act through educational advocacy, monitoring, and enforcement to eliminate discrimination in housing and providing fair housing choices for all individuals and families.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **3-A:** Support educational and training programs concerning the rights and responsibilities covered by the Fair Housing Act.
- **3-B:** Support local and Consortium efforts to strengthen efficient and effective fair housing monitoring, investigation, testing, and enforcement strategies.
- **3-C:** Support the delivery of fair housing advocacy services to at-risk groups and victims of housing discrimination.
- **3-D:** Promote the delivery of financial literacy counseling for LMI and minority households to combat predatory and subprime lending practices.

### **2015 Accomplishments:**

The City of Wheeling funds the Human Rights Commission, which conducts education and outreach regarding Human Rights and Fair Housing. The HRC recently fulfilled a contract with Southwestern PA Legal Services to conduct 30 hours of education and outreach in the City of Wheeling. The HRC paid for four (4) Fair Housing month billboards in the neighborhoods of Wheeling during April 2016.

Also during Fair Housing month, a Fair Housing Training was presented by Regina A. Mayolo, Technical Assistance Specialist with the West Virginia Assistive Technology System (WVATS)/Fair Housing Action Network (same training as in 2-C above).

- 3-B: Support local and Consortium efforts to strengthen efficient and effective fair housing monitoring, investigation, testing, and enforcement strategies.

Accomplishments: Southwestern PA Legal Services and the WV Fair Housing Action Network were available to conduct Fair Housing Monitoring, testing and enforcement in WV. The City of Wheeling Human Rights Commission and the WV Human Rights Commission also investigate housing related complaints.

- 3-C: Support the delivery of fair housing advocacy services to at-risk groups and victims of housing discrimination.

Accomplishments: On November 10, 2015, SWPALS and the HRC conducted a Fair Housing training at the Youth Services Systems for members of the Ohio County Family Resource Network, many of whom who deal with at-risk groups.

The City of Wheeling hosted a Basic Overview of Fair Housing Training on April 26, 2016, conducted by the Fair Housing Action Network; local housing providers were invited and in attendance.

- 3-D: Promote the delivery of financial literacy counseling for LMI and minority households to combat predatory and subprime lending practices.

Accomplishments: All First Time Homebuyer Applicants were required to attend homebuyer education classes. CHANGE, Inc. offered homebuyer education classes and also "Financially Fit" workshops. The City of Wheeling staff is involved in West Virginia Saves and the Earned Income Tax Coalitions, whom also promote financial literacy.

The Northern Panhandle HOME Consortium's First Time Homebuyer Program served the following LMI household types in FY 2015:

- City of Wheeling: One (1) Black/African American household; Four (4) female-headed households
- City of Weirton: One (1) Asian household; Two (2) female-headed households; One (1) disabled household
- Ohio County: Two (2) female-headed households
- Marshall County: Five (5) female-headed households; One (1) disabled household
- Hancock County: One (1) female-headed household
- Brooke County: One (1) female-headed household

**2016 Accomplishments:**

- 3-A: Support educational and training programs concerning the rights and responsibilities covered by the Fair Housing Act.

Accomplishments: The City of Wheeling funds the Human Rights Commission, which conducts education and outreach regarding Human Rights and Fair Housing. The HRC is currently under an Agreement with Southwestern PA Legal Services to conduct 30 hours of Fair Housing education and outreach in the City of Wheeling during 2017. As of the end of the reporting period, 24 of the committed hours had been achieved. Staff has offered availability of Fair Housing Training to the members of the Northern Panhandle HOME Consortium on February 15, 2017, and to the members of the Northern Panhandle Continuum of Care on May 2, 2017.

In addition, the City of Wheeling City Council proclaimed April as "Fair Housing Month" on April 4, 2017, and the HRC sponsored six Fair Housing month billboards in the neighborhoods of Wheeling, which promoted Fair Housing Month during April 2017.

Wheeling also was the location for the annual West Virginia Fair Housing Conference, which was attended by two members of the staff, as well as one

Commissioner of the HRC and the Chairman of the Northern Panhandle HOME Consortium

- 3-B: Support local and Consortium efforts to strengthen efficient and effective fair housing monitoring, investigation, testing, and enforcement strategies.

Accomplishments: Southwestern PA Legal Services and the WV Fair Housing Action Network were available to conduct Fair Housing Monitoring, testing and enforcement in the Northern Panhandle of WV. The City of Wheeling Human Rights Commission, the WV Human Rights Commission, and Southwestern PA Legal Services also investigated housing related complaints.

- 3-C: Support the delivery of fair housing advocacy services to at-risk groups and victims of housing discrimination.

Accomplishments: Staff to the Wheeling HRC attends the Northern Panhandle Continuum of Care meetings on a regular basis and at the meeting on May 2, 2017, offered the availability of Fair Housing training to the organizations represented, many of whom who deal with at-risk groups. The HRC has also maintained a presence in the community as an exhibitor with Fair Housing related literature, at events such as the Veterans Stand Down, the Health & Wellness Fair, the Arts & Culture Festival, and the Celebrate Youth Festival, which are local events organized by entities that serve at-risk populations and potential victims of housing discrimination.

- 3-D: Promote the delivery of financial literacy counseling for LMI and minority households to combat predatory and subprime lending practices.

Accomplishments: All First Time Homebuyer Applicants were required to attend homebuyer education classes. CHANGE, Inc. offered homebuyer education classes and also "Financially Fit" workshops. The City of Wheeling staff is involved in West Virginia Saves and the Earned Income Tax Coalitions, whom also promote financial literacy, and the First Time Homebuyer recipients are encouraged to utilize these resources.

**2017 Accomplishments:**

- 3-A: Support educational and training programs concerning the rights and responsibilities covered by the Fair Housing Act.

Accomplishments: The City of Wheeling funds the Wheeling Human Rights Commission, which conducts education and outreach regarding Human Rights and Fair Housing. The Wheeling HRC was under an Agreement with the Fair Housing Law Center at Southwestern Pennsylvania Legal Services to conduct 30 hours of Fair Housing education and outreach in the City of Wheeling during calendar year 2017, and is now under an Agreement to conduct 33.75 hours of Fair Housing education and outreach during calendar year 2018. As of the end of



the reporting period, the 2017 hours were well exceeded and 23.5 of the 2018 hours had been achieved. Staff offered availability of Fair Housing Training to the members of the Northern Panhandle Continuum of Care on April 10, 2018. Finally, on June 28, 2018, the Wheeling HRC and the Fair Housing Law Center co-hosted a Fair Housing training for landlords, entitled “Rent Smart: How to be a Good Landlord” at the Ohio County Public Library.

In addition, the City of Wheeling City Council proclaimed April as “Fair Housing Month” on April 17, 2018, and the HRC sponsored six Fair Housing month billboards in the neighborhoods of Wheeling, which promoted Fair Housing Month during April 2018.

Finally, the Northern Panhandle HOME Consortium’s First Time Homebuyer Program requires applicants to attend homebuyer education. Most applicants receive this training locally, through CHANGE, Inc., which includes Fair Housing education as a part of CHANGE’s curriculum. Students in this class are provided information such as the HUD brochures “Are you a Victim of Housing Discrimination?”, “Filing a Housing Discrimination Complaint”, and “Know the Signs of Housing Discrimination” at the training.

- 3-B: Support local and Consortium efforts to strengthen efficient and effective fair housing monitoring, investigation, testing, and enforcement strategies.

Accomplishments: The Fair Housing Law Center at Southwestern Pennsylvania Legal Services is available to conduct Fair Housing Monitoring, investigating, testing and enforcement in the Northern Panhandle of WV. The City of Wheeling Human Rights Commission and the WV Human Rights Commission also investigate complaints of discrimination in housing.

- 3-C: Support the delivery of fair housing advocacy services to at-risk groups and victims of housing discrimination.

Accomplishments: Staff to the Wheeling HRC attends the Northern Panhandle Continuum of Care meetings on a regular basis and at the meeting on April 10, 2018, offered the availability of Fair Housing training to the organizations represented, many of whom who deal with at-risk groups. The Wheeling HRC has also maintained a presence in the community as an exhibitor with Fair Housing related literature, while doing education and outreach at events such as the Veterans Stand Down, the Health & Wellness Fair, the Arts & Culture Festival, and the Celebrate Youth Festival, which are organized by entities that serve local at-risk populations and potential victims of housing discrimination.

- 3-D: Promote the delivery of financial literacy counseling for LMI and minority households to combat predatory and subprime lending practices.

Accomplishments: All applicants to the Northern Panhandle HOME Consortium's First Time Homebuyer Program are required to attend homebuyer education classes. CHANGE, Inc. offers homebuyer education classes and also "Financially Fit" workshops. The City of Wheeling staff is involved in West Virginia Saves and the Earned Income Tax Coalitions, whom also promote financial literacy; and First Time Homebuyer recipients are encouraged to utilize these resources.

**2018 Accomplishments:**

- 3-A: Support educational and training programs concerning the rights and responsibilities covered by the Fair Housing Act.

Accomplishments: The City of Wheeling funds the Wheeling Human Rights Commission, which conducts education and outreach regarding Human Rights and Fair Housing. The Wheeling HRC was under an Agreement with the Fair Housing Law Center at Southwestern Pennsylvania Legal Services to conduct 33.75 hours of Fair Housing education and outreach in the City of Wheeling during calendar year 2018, and is now under an Agreement to conduct 31 hours of Fair Housing education and outreach during calendar year 2019. The 2018 Agreement resulted in excess of 50 hours of Fair Housing Education and Outreach in the City of Wheeling.

In addition, the City of Wheeling City Council proclaimed April as "Fair Housing Month" on April 2, 2019, and the HRC sponsored six Fair Housing month billboards in the neighborhoods of Wheeling, which promoted Fair Housing Month during April 2019. See below.

Finally, the Northern Panhandle HOME Consortium's First Time Homebuyer Program requires applicants to attend homebuyer education. Most applicants receive this training locally, through CHANGE, Inc., which includes Fair Housing education as a part of CHANGE's curriculum. Students in this class are provided information such as the HUD brochures "Are you a Victim of Housing Discrimination?", "Filing a Housing Discrimination Complaint", and "Know the Signs of Housing Discrimination" at the training.

- 3-B: Support local and Consortium efforts to strengthen efficient and effective fair housing monitoring, investigation, testing, and enforcement strategies.

Accomplishments: The Fair Housing Law Center at Southwestern Pennsylvania Legal Services is available to conduct Fair Housing Monitoring, investigating, testing and enforcement in the Northern Panhandle of WV. The City of Wheeling Human Rights Commission and the WV Human Rights Commission also investigate complaints of discrimination in housing.

- 3-C: Support the delivery of fair housing advocacy services to at-risk groups and victims of housing discrimination.

Accomplishments: Staff of the Wheeling HRC attends the Northern Panhandle Continuum of Care meetings and the Ohio County Family Resource Network meetings on a regular basis and offers the availability of Fair Housing training to the organizations represented, many of whom who deal with at-risk groups. The Wheeling HRC has also maintained a presence in the community as an exhibitor with Fair Housing related literature, while doing education and outreach at events such as the Veterans Stand Down, the Health & Wellness Fair, the Arts & Culture Festival, and the Celebrate Youth Festival, which are organized by entities that serve local at-risk populations and potential victims of housing discrimination

- 3-D: Promote the delivery of financial literacy counseling for LMI and minority households to combat predatory and subprime lending practices.

Accomplishments: All applicants to the Northern Panhandle HOME Consortium's First Time Homebuyer Program are required to attend homebuyer education classes. CHANGE, Inc. offers homebuyer education classes and also "Financially Fit" workshops. The City of Wheeling staff is involved in West Virginia Saves and the Earned Income Tax Coalitions, whom also promote financial literacy; and First Time Homebuyer recipients are encouraged to utilize these resources.

- **Impediment 4: Accessibility of Public Facilities**

The accessibility of public facilities remains a fundamental quality of life issue for most communities, especially for the older population, and persons with disabilities.

**Goal:** Maintain and continue to upgrade municipal facilities, public spaces, and subrecipient facilities to make them accessible to persons with disabilities.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **4-A:** Continue to fund improvements and upgrades at public and community facilities to remove architectural barriers.
- **4-B:** Continue to monitor any accessibility constraints in the municipal facilities and managed public spaces utilizing both Federal and capital improvement funds to remove any potential architectural barriers.
- **4-C:** Evaluate the accessibility constraints of all sub-recipient and allied organizational facilities and assist these organizations to obtain funds for capital improvements to remove any existing architectural barriers.

**2015 Accomplishments:**

- 4-A: Continue to fund improvements and upgrades at public and community facilities to remove architectural barriers.

Accomplishments: During FY 2015, CDBG funds were allocated to the construction of a wheelchair ramp on a public facility, the WesBanco Arena.

- 4-B: Continue to monitor any accessibility constraints in the municipal facilities and managed public spaces utilizing both Federal and capital improvement funds to remove any potential architectural barriers.

Accomplishments: The City addressed the continuing need for accessibility improvements through funding the WesBanco Arena with CDBG funds for the construction of a ramp on the east side of the Arena, which was accomplished during this CAPER period.

The following West Virginia Department of Transportation (WVDOT) projects were underway during this reporting period:

- WVDOT completed ADA accessible sidewalk and curb ramps at all directions of the intersection of Kruger Street and Route 40, as well as eastward to the I-70 on- and offramps on both sides of Route 40.
- WVDOT continued its project to make all sidewalk and curb ramps along both sides of Route 40 from the Fulton neighborhood to the Elm Grove Neighborhood ADA accessible. This project is expected to be fully completed by the end of the 2016 calendar year.
- WVDOT continued its project to make all sidewalk and curb ramps along Route 2 in the Warwood neighborhood from Center Foundary to North 23rd Street ADA accessible. The project will connect many blocks within City neighborhoods, as well as connecting several neighborhoods to each other.
- 4-C: Evaluate the accessibility constraints of all sub-recipient and allied organizational facilities and assist these organizations to obtain funds for capital improvements to remove any existing architectural barriers.

Accomplishments: No projects were funded during this CAPER period.

**2016 Accomplishments:**

- 4-A: Continue to fund improvements and upgrades at public and community facilities to remove architectural barriers.

Accomplishments: No projects were funded during this CAPER period.

- 4-B: Continue to monitor any accessibility constraints in the municipal facilities and managed public spaces utilizing both Federal and capital improvement funds to remove any potential architectural barriers.

Accomplishments: No projects were funded during this CAPER period. The following West Virginia Department of Transportation (WVDOT) projects were underway during this reporting period:

- The WVDOT's project to make all sidewalk and curb ramps along both sides of Route 40 from the Fulton neighborhood to the Elm Grove Neighborhood ADA accessible, which is estimated by the City to be 3.07 miles in length. This project was completed during this CAPER period.

- Another project completed during this CAPER period is the WVDOT's project to make all sidewalk and curb ramps along Route 2 in the Warwood neighborhood from Center Foundary to North 23rd Street ADA accessible, which is estimated by the City to be 1.68 miles in length. The project is significant to the City, as it connects many blocks within neighborhoods, as well as connecting several neighborhoods to each other.

- 4-C: Evaluate the accessibility constraints of all sub-recipient and allied organizational facilities and assist these organizations to obtain funds for capital improvements to remove any existing architectural barriers.

Accomplishments: No projects were funded during this CAPER period.

**2017 Accomplishments:**

- 4-A: Continue to fund improvements and upgrades at public and community facilities to remove architectural barriers.

Accomplishments: The City funded ADA Improvements to the Miracle League Ballfields in FY 2017, where CDBG funds will be used to make handicap accessible sidewalks to link the several ballfields and provide handicap parking space in conformance with ADA requirements. The project is currently out to bid. The construction will be completed during the 2018 CAPER period.

- 4-B: Continue to monitor any accessibility constraints in the municipal facilities and managed public spaces utilizing both Federal and capital improvement funds to remove any potential architectural barriers.

Accomplishments: The City funded playground improvements at Jensen Playground in FY 2017. Playground improvements are reviewed to assure that they meet accessibility standards.

- 4-C: Evaluate the accessibility constraints of all sub-recipient and allied organizational facilities and assist these organizations to obtain funds for capital improvements to remove any existing architectural barriers.

Accomplishments: No projects were funded during this CAPER period.

**2018 Accomplishments:**

- 4-A: Continue to fund improvements and upgrades at public and community facilities to remove architectural barriers.

Accomplishments: The City funded ADA Improvements to the I-470 Ballfields in FY 2017, where CDBG funds will be used to make handicap accessible sidewalks to link the several ballfields and provide handicap parking space in conformance with ADA requirements. The project is currently out to bid.

- 4-B: Continue to monitor any accessibility constraints in the municipal facilities and managed public spaces utilizing both Federal and capital improvement funds to remove any potential architectural barriers.

Accomplishments: The City funded playground improvements at Fulton Playground in FY 2018. Playground improvements are reviewed to assure that they meet accessibility standards.

- 4-C: Evaluate the accessibility constraints of all sub-recipient and allied organizational facilities and assist these organizations to obtain funds for capital improvements to remove any existing architectural barriers.

Accomplishments: On site visits are made as part of routine monitoring of sub-recipients.

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## IV. Impediments to Fair Housing 2020

Housing barriers affecting residents of the City of Wheeling were identified through a robust citizen participation process, which included a series of one (1) public hearing, four (4) small interview sessions (with City Departments, Housing Authority Staff, housing residents, and local housing groups), and 164 completed resident surveys.

### A. Fair Housing Complaints

#### 1. City of Wheeling Human Rights Commission

The Wheeling Human Relations Division's Mission is "to encourage mutual respect among all racial, religious and ethnic groups within the City. The provision of equal opportunity in areas of employment, housing and places of public accommodations is the public policy of the City of Wheeling. Because the denial of these rights for discriminatory reasons is contrary to the principles of a free society, the City of Wheeling Human Rights Commission was created by ordinance to prevent and redress such instances." The Human Rights Commission investigates discrimination of fair housing and conducts trainings to educate landlords, tenants, and the general community on issues of fair housing and equal opportunity. The Wheeling Human Rights Commission partners with Southwestern PA Legal Services through a Fair Housing Education and Outreach Grant from HUD. Over the previous five year period, the Wheeling Human Rights Commission has received the following inquiries and/or housing complaints:

**City of Wheeling Human Rights Commission**  
 City-County Building  
 1500 Chapline Street  
 Wheeling, WV 26003  
 304-234-3609

#### Housing Complaints

2015: During this CAPER period, six (6) housing complaint forms were issued as a result of a complaint-related inquiry, and three (3) housing complaint forms were received by the office.

- **Housing Complaint 1:** The complaint form was received by the office on August 3, 2015, and that case was retained by the HRC, conciliated and finalized effective December 17, 2015.
- **Housing Complaint 2:** The complaint form was received by the office on October 22, 2015, and that case was determined not to

be a valid discrimination complaint within the HRC's jurisdiction and therefore was not accepted by the HRC.

- **Housing Complaint 3:** The complaint form was received on April 12, 2016, and that case was determined to be a criminal complaint that was not within the HRC's jurisdiction, and therefore was not accepted by the HRC.

2016: During this CAPER period, four (4) housing complaint forms were issued as a result of a complaint-related inquiry. However, no housing complaints were received.

2017: During this CAPER period, eight (8) housing complaint forms were issued as a result of a complaint-related inquiry, and one (1) housing complaint form was received by the office.

- **Housing Complaint 1:** The complaint form was received – on the basis of sexual orientation and disability – on February 20, 2018, and the HRC made a determination of No Probable Cause on June 21, 2018.

2018: During this CAPER period, fourteen (14) housing complaint forms were issued as a result of a complaint-related inquiry, and one (1) housing complaint form was received by the office.

- **Housing Complaint 1:** The complaint form was received with an undetermined basis on January 30, 2019, and the complainant resolved the issue and dropped the complaint on February 17, 2019 prior to any investigation.

### **Non-Complaint Related Inquiries, and/or Non-Jurisdictional Complaint Related Inquiries**

2015: During this CAPER period, 87 referrals were made to outside agencies.

2016: During this CAPER period, 82 referrals were made to outside agencies.

2017: During this CAPER period, 96 referrals were made to outside agencies.

2018: During this CAPER period, 76 referrals were made to outside agencies.

Any complaints can be directed to the City of Wheeling's Fair Housing Officer, who will direct complaints to the Wheeling Human Relations Department.

- **HRC Contact**  
**Melissa Thompson**  
[hrc@wheeling.gov](mailto:hrc@wheeling.gov)  
Phone: (304) 234-3609  
Fax: (304)234-3899

## 2. West Virginia Human Rights Commission

The West Virginia Human Rights Commission (WVHRC) is a subdivision of the West Virginia Department of Health & Human Resources. The mission statement of the WVHRC is as follows: The West Virginia Human Rights Commission will encourage and endeavor to bring about respect, tolerance, and mutual understanding among all citizens of West Virginia regardless of their race, gender, religious persuasion, ethnicity, or disability. The Commission administers and ensures adherence to, through education, investigation, mediation, and adjudication, the Human Rights Act which prohibits discrimination in employment, housing, and places of public accommodation.

**West Virginia Human Rights  
Commission**  
1321 Plaza East, Room 108A  
Charleston, WV 15301  
(304) 558-2616 (Voice)  
(304) 558-2976 (TDD)

In addition to its staff members, the WVHRC has seven (7) Commissioners. While the WVHRC's primary office is located in Charleston, WV, it is the role of the Commissioners to be active in their regions and promote awareness of the Commission. The WVHRC travels regularly to Morgantown and conducts trainings and presentations on Fair Housing, and it also conducts an Annual Fair Housing Conference that is offered to participants statewide. The WVHRC is a Fair Housing Assistance Program (FHAP) agency, and receives funding from HUD for a variety of fair housing administrative and enforcement activities, including complaint processing, training, implementation of data and information systems, and other special projects.

The Commissioners of the West Virginia Human Rights Commission in the past have voted unanimously to adopt a Resolution of the Commission to Prohibit Discrimination based on Sexual Orientation. However, to date, a bill in the West Virginia State Senate to adopt sexual orientation as a protected class under the Employment and Housing Nondiscrimination Act has not been adopted.

The WVHRC published an annual summary of docketed cases filed during the State's fiscal year (July 1st – June 30th). Table IV-1 below illustrates the trends for new complaints that were docketed and conciliated for the State of West Virginia from 2010 to 2014. In FY 2014, housing related complaints accounted for 9.3% of the total complaints. Since 2010, housing related complaints accounted for 10.6% of the total amount. Overall, the housing related complaints, and overall discrimination complaints, have decreased from 2010 to 2014 in West Virginia. However, since 2014, the WVHRC stopped publishing its annual report on its website. The tables below are provided to visualize past trends.

**Table IV-1 – WVHRC New Complaints Docketed**

Category	2010	2011	2012	2013	2014	Total
Employment	362	316	337	292	181	1,307
Housing	58	37	40	38	20	173
Public Accommodations	28	36	32	32	14	128
<b>TOTALS</b>	<b>448</b>	<b>389</b>	<b>409</b>	<b>362</b>	<b>215</b>	<b>1,608</b>

Source: West Virginia Human Rights Commission Annual Reports, 2010-2014

**Table IV-2 – WVHRC Complaints Closed**

Category	2010	2011	2012	2013	2014	Total
Employment	371	307	215	349	273	1,242
Housing	46	43	50	43	38	182
Public Accommodations	36	25	27	34	36	122
<b>TOTALS</b>	<b>453</b>	<b>375</b>	<b>292</b>	<b>426</b>	<b>347</b>	<b>1,893</b>

Source: West Virginia Human Rights Commission Annual Reports, 2010-2014

### 3. Southwestern PA Legal Services

Southwestern Pennsylvania Legal Services, Inc. and its partner organizations, seeks to eliminate discrimination in housing against all persons because of their race, color, religion, national origin, sex, disability or familial status, and to take all appropriate actions to ensure housing opportunities. In reaching this goal, West Penn Rural Fair Housing engages in activities designed to encourage fair housing practices through educational efforts in the community; assist persons who believe they have been victims of housing discrimination; and work to identify barriers to fair housing and to help counteract and eliminate any discriminatory housing practices.

Southwestern Pennsylvania  
Legal Services, Inc.

Southwestern PA Legal Services provides comprehensive legal advice and representation before: HUD, the PHRC (Pennsylvania Human Rights Commission) for cases filed in Pennsylvania; WVHRC (West Virginia Human Rights Commission) for cases filed in West Virginia; in mediation; and in State and Federal Court. They also provide assistance with reasonable accommodations and modifications. Southwestern PA Legal Services' area of operation includes Western Pennsylvania and Brooke, Hancock, Marshall and Ohio Counties in West Virginia.

During FY 2018, on June 10, 2019, the Wheeling Human Rights Commission entered into its fifth partnership with the Fair Housing Law Center at Southwestern PA Legal Services (SWPALS). The 2019 Agreement is to provide 31 hours of Fair Housing education and outreach in the City of Wheeling during one-year period, for reimbursement of \$75 per hour, for a total of up to \$2,325.00. The same expectations apply.

### 4. Legal Aid of West Virginia

Legal Aid of West Virginia provides free advocacy and legal services in three ways: Civil legal problems such as divorces, evictions, and welfare benefit problems; Assistance for residents of nursing homes, personal care homes, and long term care facilities and their families; and services to individuals who live with behavioral health challenges while residing in state operated psychiatric hospital and/or in the community.

Legal Aid of West Virginia –  
Wheeling Office  
The Mull Center, Suite 71  
1025 Main Street  
Wheeling, WV 26003  
Phone: (304) 232-1260

Legal Aid helps ensure fairness in the justice system by assisting vulnerable people and families with civil legal issues affecting their

health, safety, economic security, and other basic needs. Legal Aid does this by providing advice or representation by a Legal Aid attorney; engaging volunteer attorneys to provide pro bono services; and by offering easy-to understand information; as well as online access to legal templates. Legal Aid protects and advocates for women and children fleeing abuse, helps disabled veterans and seniors obtain health benefits, and assists families whose homes or financial livelihoods are in jeopardy.

Of the 12,686 cases handled in 2018 (the most recent Annual Report available), Legal Aid assisted 828 families settle housing issues. About 72% of Legal Aid of WV's clients are women living in poverty, and 7,718 children were served by Legal Aid. ([www.lawv.net](http://www.lawv.net)).

## 5. Fair Housing & Equal Opportunity (FHEO-HUD)

The U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Federal Fair Housing Act. From January 1, 2014 to May 3, 2019, 131 fair housing complaints originated within Ohio County. Attached is a listing for all the FHEO Complaints received and the status or resolution of the complaint.



The fair housing complaints in Ohio County that were filed with HUD are disaggregated in the following table to illustrate the most common basis of complaints. Complaints based on disability were the most common in the City of Wheeling, at 42.9%. Unsurprisingly, all of the housing complaints in Ohio County took place in the City of Wheeling, which is the largest municipality in the County.

The following table entitled "Basis for Housing Complaints" summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity between January 1, 2010 and October 7, 2018 in Ohio County and Wheeling.



**TABLE IV-3 - Basis for Housing Complaints Between 01/01/2010 to 10/07/2019 for City of Wheeling, West Virginia**

Basis	City of Wheeling	
	Count*	% of County Complaints
Race	1	14.3%
Disability	3	42.9%
Familial Status	2	28.6%
National Origin	0	0.0%
Retaliation	0	0.0%
Sex	1	14.3%
Color	0	0.0%
Religion	0	0.0%

Source: U.S. Department of HUD-FHEO, Chicago Regional Office

*\*Note: Each complaint may include multiple bases, so the counts do not add up to the total number of complaints*

Based on the previous table, disability was the most common basis for a fair housing complaint. This is in line with a national trend, where disability has overtaken race as the most common basis for a complaint. Disability discrimination complaints make up 42.9% of all complaints filed in Ohio County, with Familial Status (28.6%) as the second-most stated basis. Sex and Race were tied for fourth- as the most common basis for all complaints in the County.

The following table illustrates the dates complaints were filed in the City of Wheeling. The largest yearly number of complaints filed with HUD was in 2010 and 2013.

**TABLE IV-4 - HUD Date Filed of Complaints  
City of Wheeling, West Virginia**

HUD Date Filed	Ohio County	
	Count	% of County Complaints
2010	2	28.6%
2011	1	14.3%
2012	0	0.0%
2013	2	28.6%
2014	1	14.3%
2015	0	0.0%
2016	0	0.0%
2017	0	0.0%
2018	1	14.3%
2019	0	0.0%

Source: U.S. Department of HUD-FHEO, Pittsburgh Regional Office

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The following table entitled “HUD-FHEO Complaints” summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity between January 1, 2010 and October 7, 2019 in Wheeling, West Virginia.

**TABLE IV-5 - HUD-FHEO Complaints for Wheeling**

Violation State and County	Violation City	Case Number - HUD	Filing Date - HUD	Bases - Detail	Issues	Case Closure Type
West Virginia - Ohio County	Wheeling	03-10-0526-8	9/9/2010	Race - Black or African-American,	310 - Discriminatory refusal to rent, 382 - Discrimination in terms/conditions/privileges relating to rental,	No Cause
West Virginia - Ohio County	Wheeling	03-11-0084-8	12/6/2010	Retaliation	450 - Discriminatory acts under Section 818 (coercion, Etc.),	No Cause
West Virginia - Ohio County	Wheeling	03-11-0317-8	4/28/2011	Sex - Female,	480 - Discriminatory acts under Section 901 (criminal),	Conciliated/ Settled

West Virginia - Ohio County	Wheeling	03-13-0172-8	3/4/2013	Disability - Physical,	510 - Failure to make reasonable accommodation,	Conciliated/ Settled
West Virginia - Ohio County	Wheeling	03-14-0043-8	10/8/2013	Disability - Physical,	510 - Failure to make reasonable accommodation,	Administrative Closure
West Virginia - Ohio County	Wheeling	03-15-0027-8	10/17/2014	Familial Status - Under 18,	310 - Discriminatory refusal to rent,	No cause determination
West Virginia - Ohio County	Wheeling		2/02/2018	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution

Source: U.S. Department of HUD-FHEO, Pittsburgh Regional Office

### ***National Trends***

The U.S. Department of Housing and Urban Development (HUD) funds the Office of Fair Housing and Equal Opportunity (FHEO), whose mission is to eliminate discrimination, promote economic opportunity, and achieve diversity. FHEO leads the nation in the enforcement, administration, development, and public understanding of Federal fair housing policies and laws. FHEO enforces laws that protect people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. FHEO releases annual reports to Congress, which provides information regarding complaints received during that particular year. The following table highlights the frequency of such housing complaints for the years of 2014, 2015, 2016, and 2017, organized by basis of complaint.

**TABLE IV-6 - HUD and FHAP Housing Complaints Nationwide**

Basis	FY 2014		FY 2015		FY 2016		FY 2017	
	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total
Disability	4,621	41%	4,605	42%	4,908	45%	4,865	59%
Race	2,383	21%	2,291	21%	2,154	20%	2,132	26%
Familial Status	1,051	9%	1,031	9%	882	8%	871	11%
National Origin	1,067	9%	898	8%	917	8%	834	10%
Sex	879	8%	915	8%	800	7%	826	10%
Religion	223	2%	225	2%	204	2%	800	10%
Color	146	1%	151	1%	143	1%	232	3%
Retaliation	867	8%	832	8%	785	7%	192	2%
<b>Number of Complaints filed</b>	<b>11,237</b>		<b>10,948</b>		<b>10,793</b>		<b>8,186</b>	

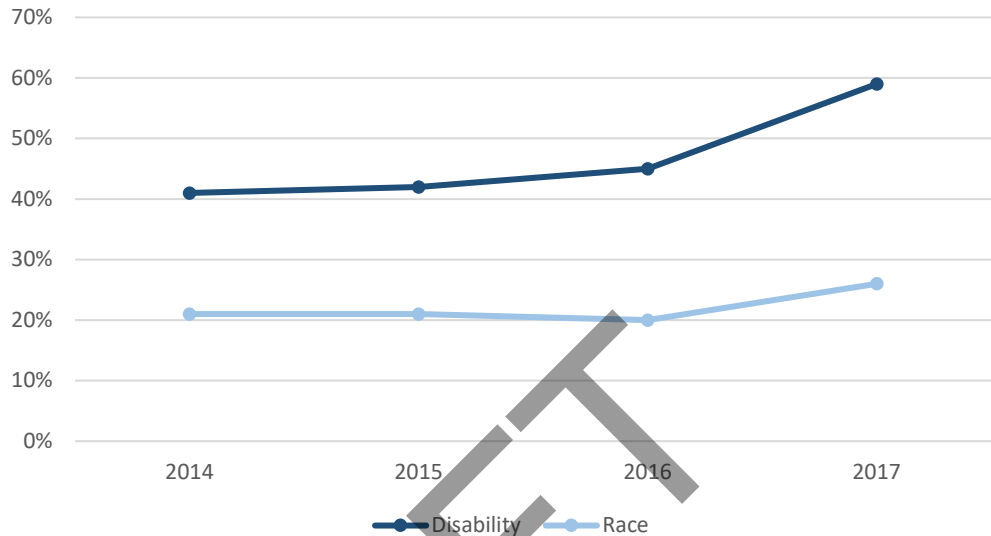
Source: HUD FY 2013-2017 Annual Reports on Fair Housing

*Note: Complaints often allege more than one (1) basis of discrimination, and each base is counted as a complaint.*

The majority of the HUD complaints filed nationwide in 2017 were on the basis of disability, making up 59% of all complaints received. Race was next, making up 26% of all complaints, followed by familial status at 11%. As illustrated in the next chart, disability has become the most

common basis of complaint, partially at the expense of racial complaints.

**Chart IV-1 – 5-Year Trends in Bases of Complaints**



Source: HUD Enforcement Management Systems (HEMS), FY 2017 FHEO Annual Report

The HUD housing complaints filed in Wheeling were primarily based on disability, which is consistently one of the most common causes for complaints across the nation as illustrated in the previous chart. Note: the percentages for each year do not equal 100% and the number of complaints each year do not equal the total complaints across all areas. This is because there is often more than one basis for the filing of a fair housing complaint.

#### a. **Housing and Human Services Agencies**

The City of Wheeling interviewed agencies offering housing and human services within the region to obtain their input and gain insight into potential impediments to fair housing. The following agencies participated in the information gathering through roundtable discussions, individual meetings, phone interviews, or through surveys:

- City of Wheeling Department of the City Manager
- City of Wheeling Department of Public Works
- City of Wheeling Police Department
- City of Wheeling Economic and Community Development



- City of Wheeling Housing Authority
- Greater Wheeling Coalition for the Homeless
- Belomar Regional Council
- Wheeling Heritage
- South Wheeling Preservation Alliance
- Regional Economic Development (RED)
- CHANGE, Inc.
- WesBanco
- Russell Nesbitt Services
- Woda Cooper Companies, Inc.
- Kennen & Kennen Realtors
- WYCA
- Project Hope
- Seeing Hand
- Ohio County Family Resource Network
- Family Service-Upper Ohio Valley
- Youth Service System
- House of the Carpenter
- Ohio County Board of Education
- West Virginia Northern Community College
- Bethlehem Temple
- Temple Shalom

Each of these agencies provided feedback on their experience with housing-related issues in the City of Wheeling. Complete summaries of meeting comments can be found in Appendix A. Below is a list of key points from each of the meetings.

### **Housing Issues**

- There appears to be a lack of affordable housing that is decent, safe, and sound in the City of Wheeling.
- There appears to be a lack of accessible housing in the City of Wheeling.
- There is a need to address housing in poor condition throughout the City.
- The housing supply is decreasing due to demand from fracking industry, leading to increased housing costs.
- There is a limited supply of land available which makes the creation of new affordable housing developments difficult.

- According to the 2013-2017 ACS, 44% of all renters are cost overburdened in the City.
- There is a lack of affordable housing for seniors.
- NIMBYism is preventing the development of affordable housing in some neighborhoods.
- There is a need for a weatherization program to help repair roofs, doors, windows, etc.
- Flooding and flood insurance are a large barrier to home ownership. FEMA Floodplains and insurance maps make new developments and rehabilitations much more difficult

### **Social Services**

- There are numerous social service programs provided in the City.
- There is a need for a family shelter in the City of Wheeling. Salvation army recently closed the only family shelter in the area.
- The homeless population in the area has become more visible, and there are many initiatives to serve this population.
- There CoC has a need for specialized services such as: recovery specialists and coaches, specialized staff to assist with the case management burden, and more oversight to ensure goals and outcomes are met.
- More social service programs are needed to assist the mentally ill, including people with addictions in the City.
- Women fleeing domestic abuse are unable to find affordable housing after shelter living.
- There is a need for additional permanent supportive housing with wraparound services to assist the homeless population with mental health issues.
- Additional services are needed for transient age youth who are “couch surfing” thus not technically homeless.
- Additional support services are needed for persons coming out of institutions including: hospitalization, correctional facilities, and mental healthcare.

### **Public Policies**

- The City of Wheeling recently adopted a change to its zoning ordinance that included the following definitions: Accessible/Accessibility, American with Disabilities Act (ADA),

- Developmentally Disabled, Fair housing Act (FHA), Family, Handicap, Homeless Persons, Protected Classes, and Visitability
- There is a continuing need for education and training on tenant's rights and landlord's responsibilities under the Fair Housing Act.
  - The City's Comprehensive Plan needs to be reviewed since it was approved.
  - There is a need to provide incentives to developers and businesses to create and develop affordable housing.

### **Transportation**

- The OVRTA/EORTA bus lines have limited hours.
- There are some public housing units that are not on bus routes.
- There is a need for routes that connect residential areas to areas with high concentrations of jobs for low- and moderate-income residents.
- AdVANtage is a curb-to-curb advanced reservation service provided to qualified persons with a disability.
- There is a need for multimodal transit that connects some portions of the City together.
- Bus passes should be able to be purchased online.

### **Economic Development**

- Businesses have a tendency to move out of the City and are not investing in the downtown area.
- A wealth gap exists in the City, where low wage earners are trapped in a cycle of poverty.
- Job training programs are not always accessible to individuals without a car. Public transit is inadequate to attend these programs.

## **6. Public Sector**

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The Local governments control land use and development through their comprehensive plans, zoning ordinances, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and various residential uses in a community. Local officials determine the

community’s commitment to housing goals and objectives. The local policies therefore determine if fair housing is to be promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the City’s policies to determine if there is a commitment to affirmatively further fair housing.

**a. CDBG Program**

The City of Wheeling annually receives from HUD approximately \$1,183,926 in CDBG funds. The City allocates its funds to housing construction, housing rehabilitation, operations for homeless shelters, public facilities, administration, and public services.

In particular, the City proposed to allocate FY 2020 CDBG funds as outlined in the following table to affirmatively further fair housing. The City of Wheeling anticipates a reduction in the annual CDBG allocation in the coming years as a result of further cuts in the Federal budget.

**TALBE IV-7 - FY 2020 CDBG Allocation for the City of Wheeling, WV**

<b>Community Development Block Grant Program (CDBG)</b>	
<b>CDBG Administration</b>	\$ 236,785
<b>Fair Housing</b>	\$ 5,000
<b>Operations for Homeless Shelters</b>	\$ 18,500
<b>Public Facilities</b>	\$ 50,000
<b>Public Infrastructure</b>	\$ 776,141
<b>Public Services</b>	\$ 97,500
<b>Total:</b>	<b>\$ 1,183,926</b>

In its FY 2020-2024 Five Year Consolidated Plan, the City of Wheeling identified several goals to prioritize funding and address housing needs during this five-year period, as outlined in the following table:

**TABLE IV-8 - City of Wheeling, WV- Five Year Objectives**

<b>Housing Strategy – HSS</b>
<i>Objective</i>
<b>HS-1 Homeownership</b> – Assist low- and moderate-income households to become homeowners by providing down payment assistance, closing cost assistance, and requiring housing counseling training.

**HS-2 Housing Construction/Rehabilitation** – Support and promote the development of decent, safe, sound, and accessible housing that is affordable to owners and renters in the City and the HOME Consortium through new construction and rehabilitation.

**HS-3 Neighborhood Revitalization** – Promote and support the revitalization of residential neighborhoods throughout the City and the HOME Consortium with new investment which will improve the existing housing stock, construct affordable housing, and remove blighting conditions.

**HS-4 Rental Assistance** – Provide for utilities, deposits, and rental fees for low-income households who are faced with the threat of eviction and who are at-risk of becoming homeless.

**Homeless Strategy – HMS**

*Objective*

**HMS-1 Operation/Support** – Promote and assist service providers through the Continuum of Care in the operation of housing and support services for the homeless and persons who are at-risk of becoming homeless.

**HMS-2 Housing** – Support the local agencies’ efforts to provide emergency shelter, transitional housing, and permanent supportive housing to persons experiencing homelessness.

**HMS-3 Prevention and Re-Housing** – Support the prevention of homelessness through anti-eviction activities and programs for rapid re-housing.

**HMS-4 Permanent Housing** – Support the development of permanent supportive housing for homeless individuals and families.

**Other Special Needs Strategy – SDS**

*Objective*

**SNS-1 Housing** – Provide funds to increase the supply of decent, safe, sound, accessible, and affordable housing for the elderly, frail elderly, persons with disabilities, victims of domestic violence, persons with HIV/AIDS, persons with alcohol/drug dependency, persons with developmental delays, and persons with other special needs through rehabilitation, new construction, and making reasonable accommodations to existing housing.

**SNS-2 Social Services** – Provide support social service programs and facilities for the elderly, frail elderly, persons with disabilities, victims of domestic violence, persons with HIV/AIDS, persons with alcohol/drug dependency, persons with developmental delays, and persons with other special needs.

**Community Development Strategy – SNS**

*Objective*

**CDS-1 Infrastructure** – Improve the City’s infrastructure through rehabilitation, reconstruction, and new construction of streets, sidewalks,

slopes, curbs, ADA curb cuts, retaining walls, sanitary sewers, water lines, storm water management, bridges, etc.

**CDS-2 Community Facilities** – Improve the City's parks, recreational centers, bike trails, green infrastructure, as well as public and community facilities through rehabilitation and new construction.

**CDS-3 Public Services** – Improve and increase public safety, provide programs for the youth, the elderly, disabled, and low- and moderate-income persons, recreational passes, transportation services, and social/welfare programs throughout the City.

**CDS-4 Clearance/Demolition** – Remove and eliminate slum and blighting conditions through demolition of vacant and abandoned structures throughout the City.

**CDS-5 Food Programs** – Provide assistance for food and nutritional programs to address the needs of the unemployed, underemployed, and homeless.

**CDS-6 Architectural Barriers** – Remove architectural barriers and make public and community facilities accessible to persons with physical disabilities.

**CDS-7 Public Safety** – Improve public safety through upgrades to facilities, purchase of new equipment, fire equipment, crime prevention, community policing, and ability to quickly respond to emergency situations.

**Economic Development Strategy – EDS**

*Objective*

**EDS-1 Employment** – Support and encourage new job creation, job retention, workforce development, and job training services.

**EDS-2 Financial Assistance** – Support the expansion, growth and new development of business and commercial enterprises through technical assistance programs, low interest financing and a façade improvement program.

**EDS-3 Redevelopment Program** – Plan and promote the development and redevelopment of vacant commercial and industrial sites and facilities, and the revitalization efforts in downtown..

**Administration, Planning & Management Strategy – AMS**

*Objective*

**AMS-1 Overall Coordination** – Provide program management and oversight for the successful administration of Federal, state, and local funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports, environmental reviews and clearance, fair housing, and compliance with all Federal, state, and local laws and regulations.

**AMS-2 Special Studies/Management** – Provide and promote funds to assist with the development of special studies, plans, and management activities related to these activities.



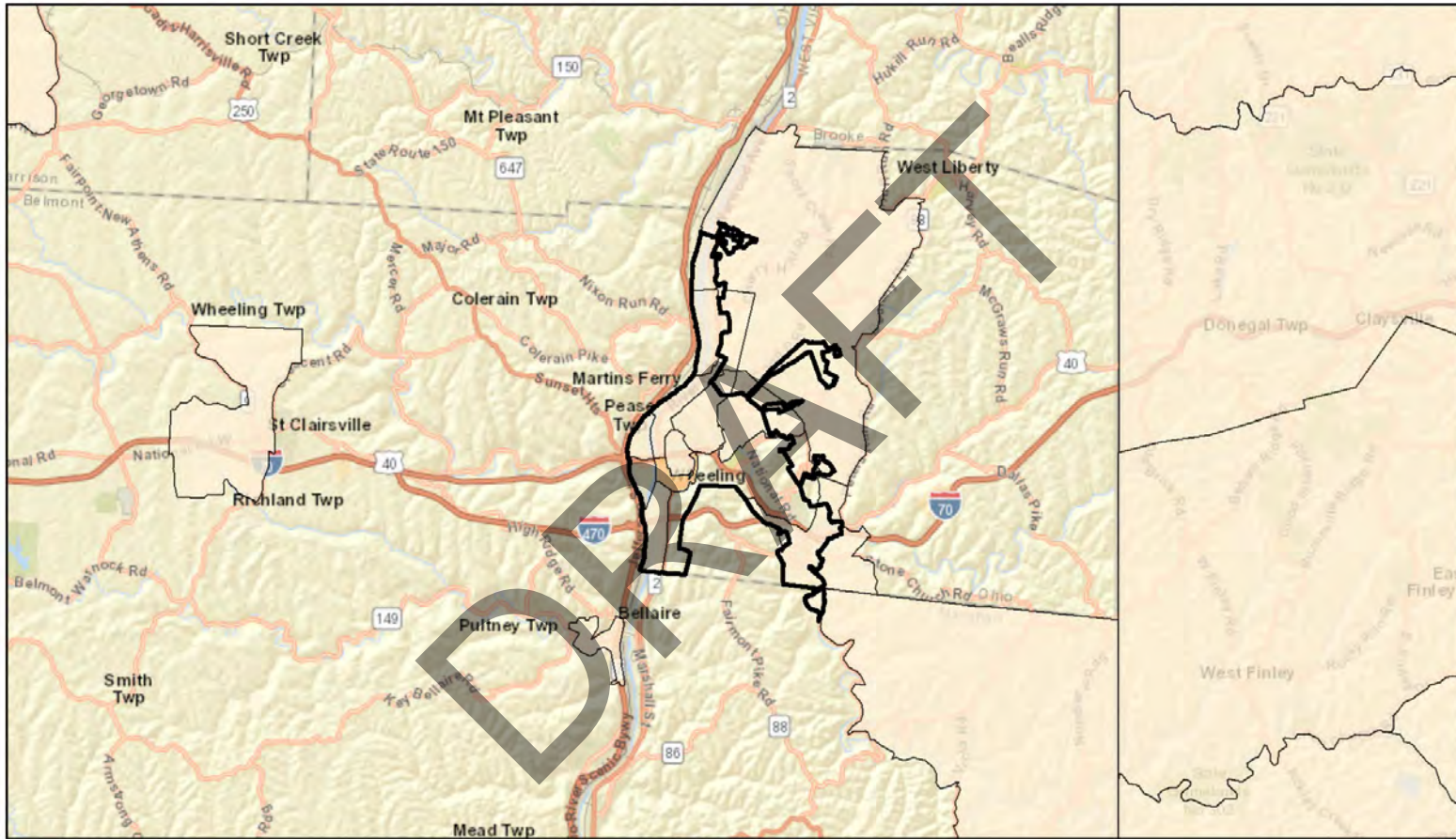
**AMS-3 Fair Housing** – Provide funds for training, education, outreach, testing, and monitoring to affirmatively further fair housing in the City of Wheeling and the HOME Consortium.

The following attached maps illustrate the locations of CDBG funded activities in the City of Wheeling:

- CDBG Activities Funding
- CDBG Acquisition Activities
- CDBG Economic Development Activities
- CDBG Housing Activities
- CDBG Public Improvement Activities
- CDBG Public Service Activities
- CDBG All Activities

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### CDBG Funding - City of Wheeling, West Virginia



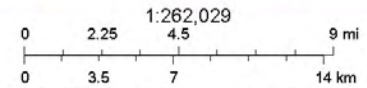
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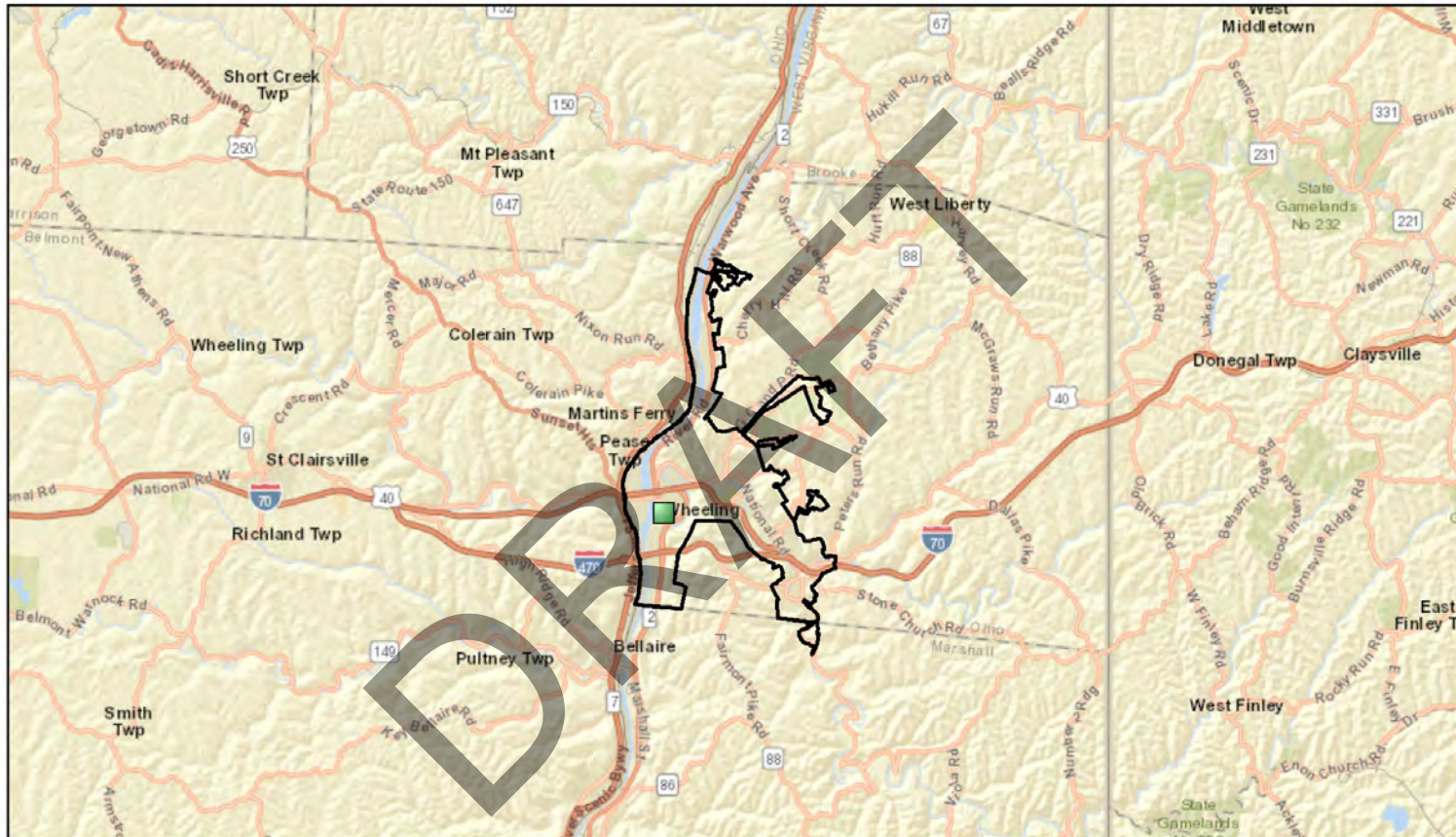
\$0-\$6,101,360.17

\$6,101,360.17-\$32,511,133.38



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

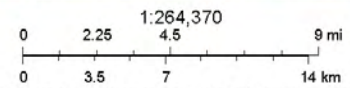
### CDBG Acquisition Activities - City of Wheeling, West Virginia



March 5, 2020

■ CDBG Activity (Acquisition)

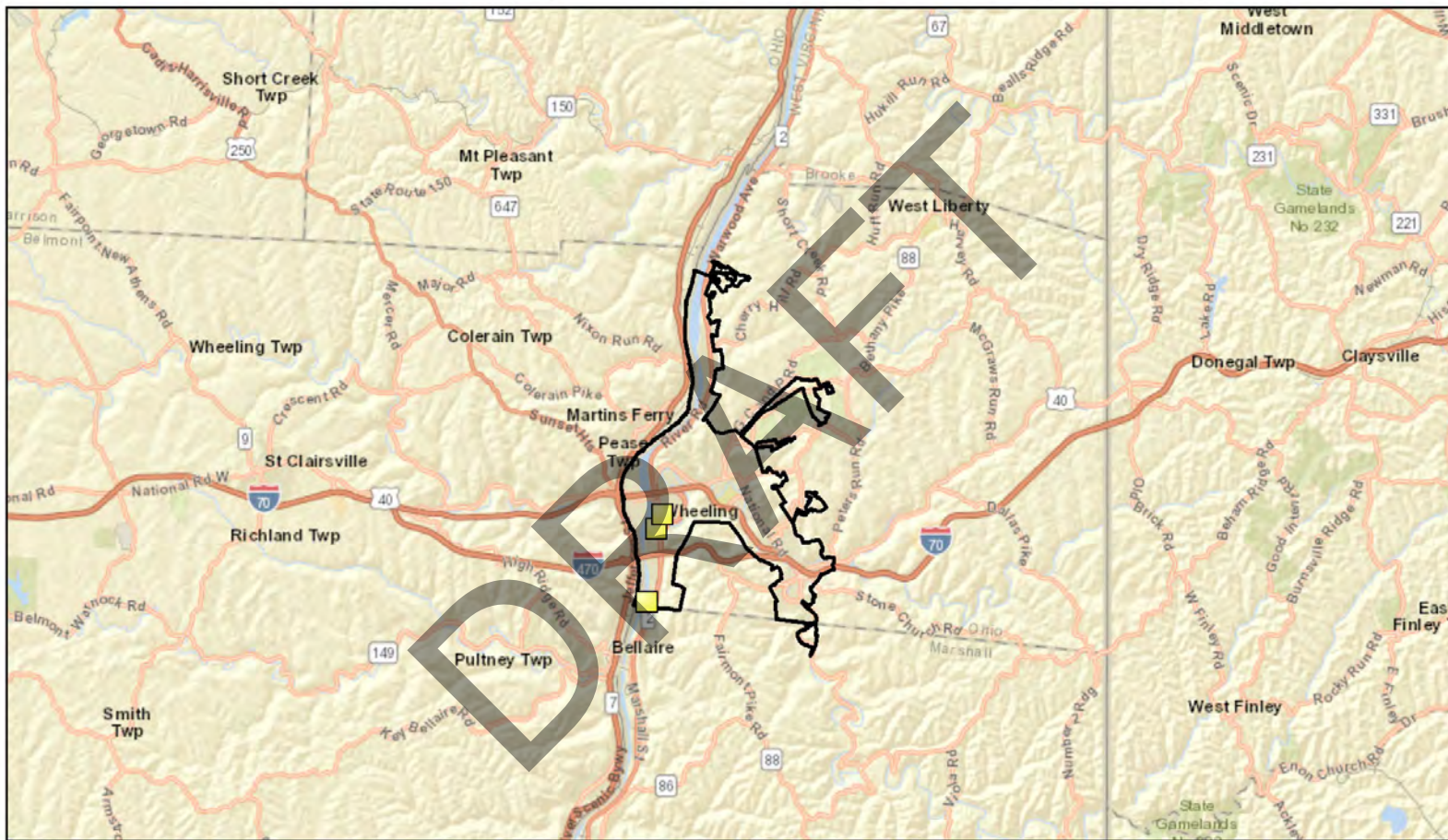
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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



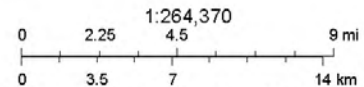
### CDBG Economic Development Activities - City of Wheeling, West Virginia



March 5, 2020

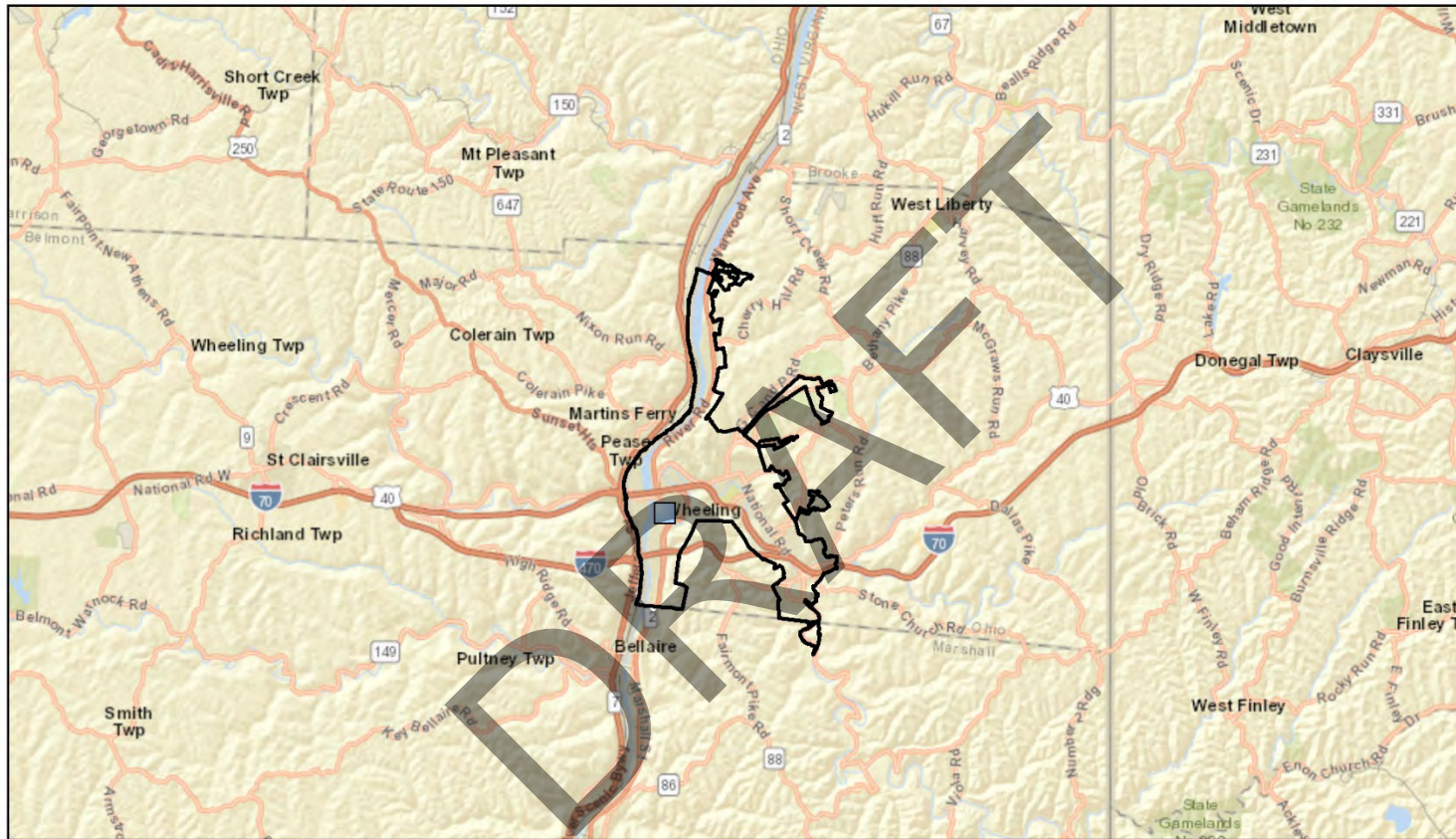
 CDBG Activity (Economic Development)

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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

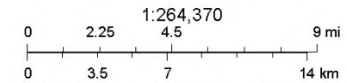
### CDBG Housing Activities - City of Wheeling, West Virginia



March 5, 2020

■ CDBG Activity (Housing)

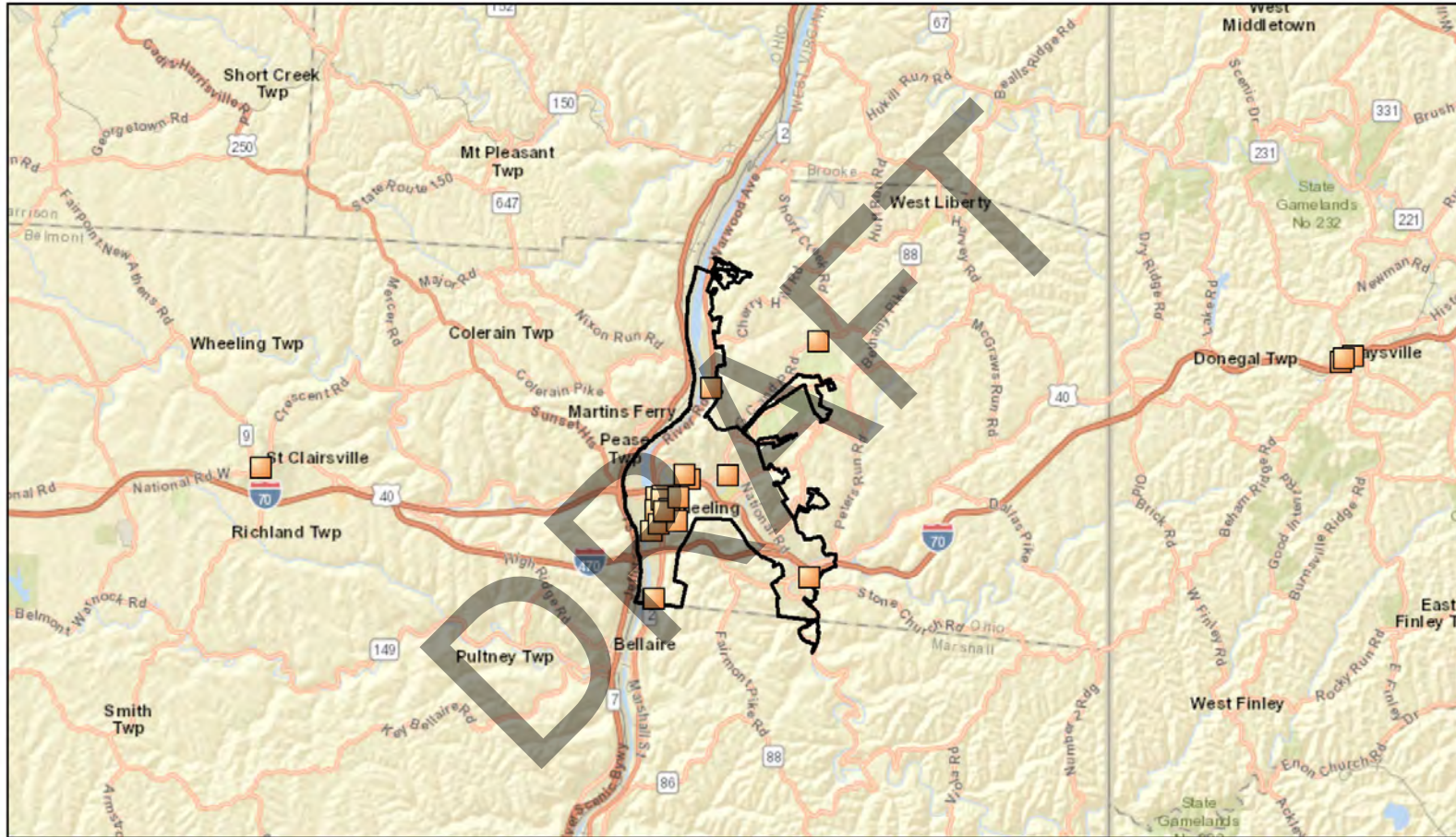
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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



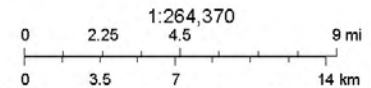
### CDBG Public Improvements Activities - City of Wheeling, West Virginia



March 5, 2020

Orange square: CDBG Activity (Public Improvements)

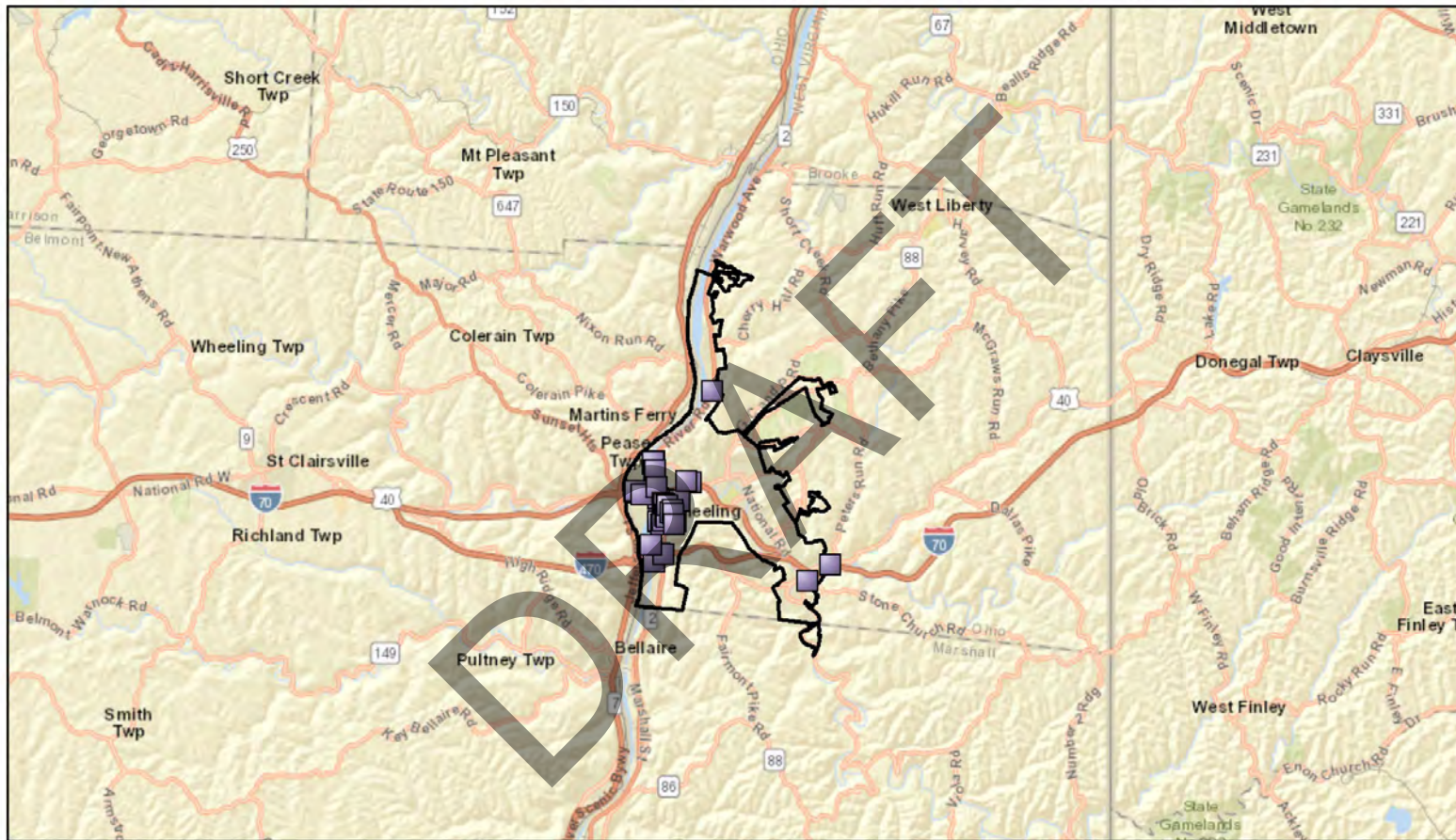
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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



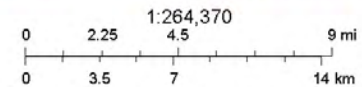
### CDBG Public Service Activities - City of Wheeling, West Virginia



March 5, 2020

■ CDBG Activity (Public Services)

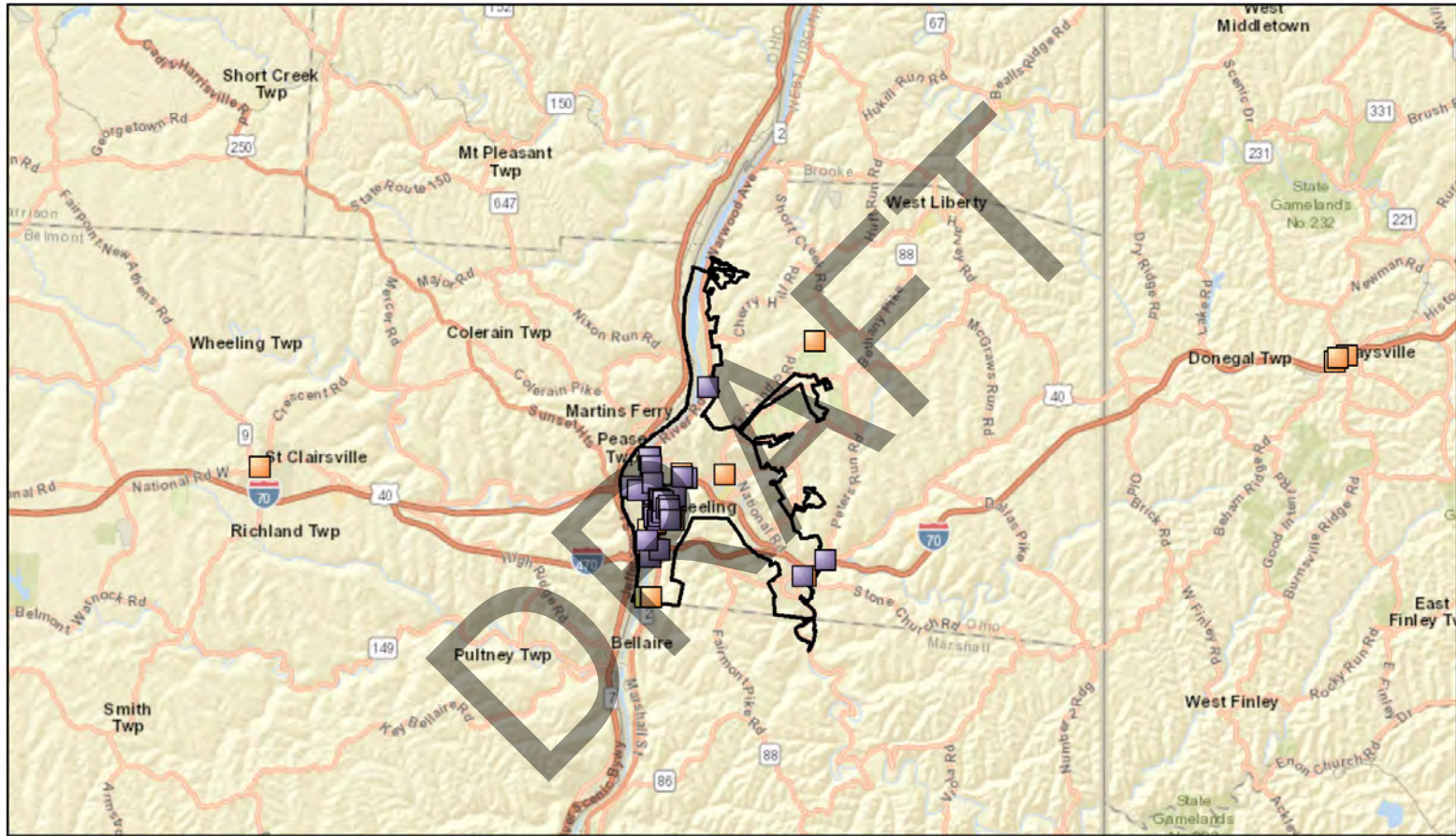
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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

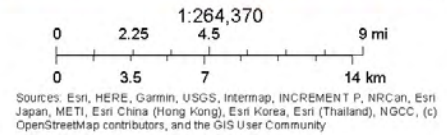


### CDBG All Activities - City of Wheeling, West Virginia



March 5, 2020

- CDBG Activity (Public Services)
- CDBG Activity (Public Improvements)
- CDBG Activity (Housing)
- CDBG Activity (Economic Development)
- CDBG Activity (Acquisition)
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**b. Northern Panhandle HOME Consortium -**

The Northern Panhandle HOME Consortium was established to create affordable housing opportunities in the Northern Panhandle of West Virginia. The Consortium's primary focus is to provide down payment and closing cost assistance to income-eligible first-time homebuyers who want to purchase a home within the Consortium's geographical region. The Northern Panhandle HOME Consortium is a group of six governmental entities that joined together to define a strategy and programs for funding for the annual use of HOME Investment Partnership Funds from the US Department of Housing and Urban Development. In order to access HOME funds, Hancock, Brooke, Ohio and Marshall Counties, and the Cities of Wheeling and Weirton, West Virginia entered into a consortium agreement. The resulting "Northern Panhandle HOME Consortium" has been able to draw HOME funds from HUD for housing programs to benefit income-eligible persons in the Consortium's service area. The Northern Panhandle HOME Consortium has developed a "First-time Homebuyer Program", in compliance with Federal guidelines, to provide up to \$10,000 of down payment and closing cost assistance to income-qualified first-time homebuyers who purchase a home within the areas served by the consortium. The HOME funds originally distributed to the six (6) member jurisdictions of the Northern Panhandle HOME Consortium based on the percentage of low- and moderate-income persons in each jurisdiction as compared to the HOME Consortium Area as a whole. Now, because of the reduced HOME allocation amount, funds are available on a first-come, first-served basis for homebuyers.

In particular, the City proposed to allocate FY 2020 HOME funds as outlined in the following table to affirmatively further fair housing. The City of Wheeling anticipates a reduction in the annual HOME allocation in the coming years as a result of further cuts in the Federal budget.

**TABLE IV-9 - FY 2020 HOME Allocation for the City of Wheeling, WV**

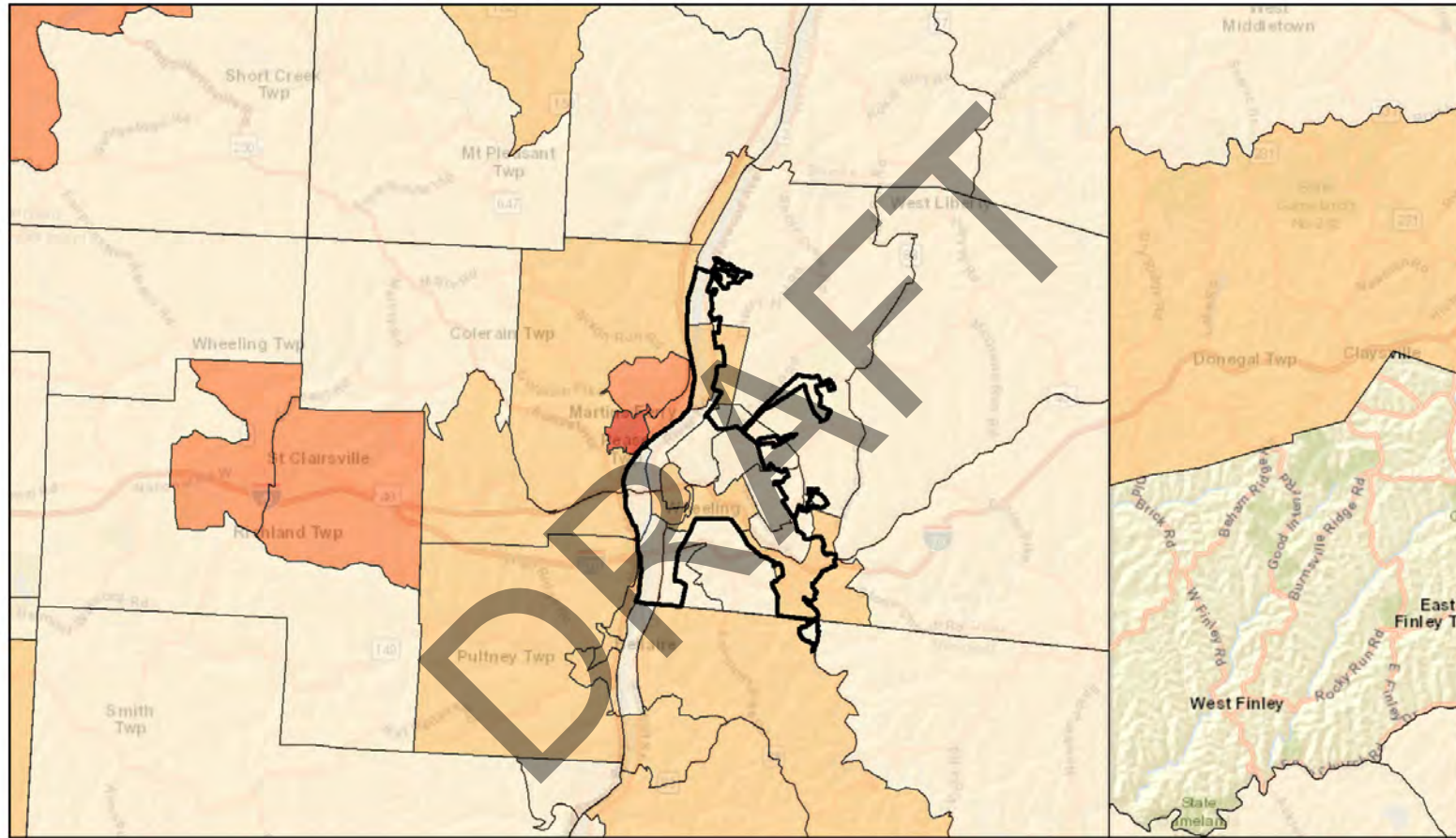
<b>HOME Investment Partnership (HOME) Program</b>	
<b>HOME Administration</b>	\$ 32,183
<b>CDHO Set-Aside</b>	\$ 48,276
<b>First Time Homebuyer Program</b>	\$ 241,376
<b>Total:</b>	<b>\$ 321,835</b>

The following attached map illustrates the locations of HOME funded activities in the City of Wheeling:

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### HOME Funding - City of Wheeling, West Virginia



March 5, 2020

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HOMEActivitiesFunding

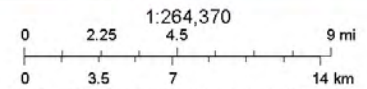
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\$227,178.01-\$631,104.19

\$631,104.19-\$1,341,325.94

\$1,341,325.94-\$2,825,811.01



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

**c. Continuum of Care (CoC)**

The Northern Panhandle Continuum of Care addresses homelessness throughout the region. The Continuum of Care is composed of a variety of stakeholders including churches, advocates, emergency shelters and other nonprofits, affordable healthcare providers, employment training programs, the Wheeling Housing Authority, the Greater Wheeling Coalition for the Homeless, and the City of Wheeling, in addition to similar organizations within the City of Wheeling and all of the Northern Panhandle.

**d. Wheeling Housing Authority –**

The Wheeling Housing Authority (WHA) is the primary provider of affordable housing in the City of Wheeling. It runs programs for both public housing and Section 8 Housing Choice Vouchers. All properties owned by WHA are public housing properties, and there are no project-based developments.

The Wheeling Housing Authority is recognized as a public body corporate and a “Public Housing Authority” of the U.S. Department of Housing and Urban Development and the State of West Virginia. The Housing Authority is considered a “standard performer” by HUD and its everyday operations are handled by an Executive Director.

The Wheeling Housing Authority’s mission is as follows: The Wheeling Housing Authority is committed to building stronger neighborhoods by providing quality housing options and professional services for eligible residents of Ohio County in partnership with the greater community. Respect for the dignity of the residents we serve is the foundation for all we do.

The Housing Authority of the City of Wheeling owns and professionally manages eight (8) family communities and elderly/disabled rental apartments. Within these communities are 688 public housing units.

There were 387 families/individuals on the waiting list for public housing as of June 22, 2020, of which 26 were elderly persons, and 23 were people with disabilities. The waiting list is open. The breakdown of the public housing waiting list is 6 for efficiency, 198 waiting for one-bedroom units, 157 for two-bedroom units, 20 for three-bedroom units, 4 for four-bedroom units, and 2 for five-bedroom units. Public housing occupancy is currently at 82.6%.



The Housing Authority of the City of Wheeling administers 569 Section 8 Housing Choice Vouchers as of June 22, 2020. There are currently 831 households on the Section 8 Housing Choice Voucher waiting list. There were 103 families/individuals on its Housing Choice Voucher waiting list. Of these, 12 are elderly and 5 are disabled.

**e. Federally Assisted Housing –**

• **Public Housing –**

The Wheeling Housing Authority (WHA) aims to address the needs of the extremely low-income, very low-income, and low-income residents of the City of Wheeling.

**Wheeling Housing Authority – Public Housing**

Community	Owner/Manager	Units
BOOKER T WASHINGTON PLAZA	Wheeling Housing Authority	107
HISTORIC NORTH WHEELING	Wheeling Housing Authority	39
RIVERVIEW TOWERS	Wheeling Housing Authority	100
GARDEN PARK TERRACE	Wheeling Housing Authority	178
JACOB STREET APARTMENTS	Wheeling Housing Authority	18
HIL-DAR	Wheeling Housing Authority	94
LUAU MANOR	Wheeling Housing Authority	105
WHEELING HEIGHTS	Wheeling Housing Authority	47

Source: Wheeling Housing Authority

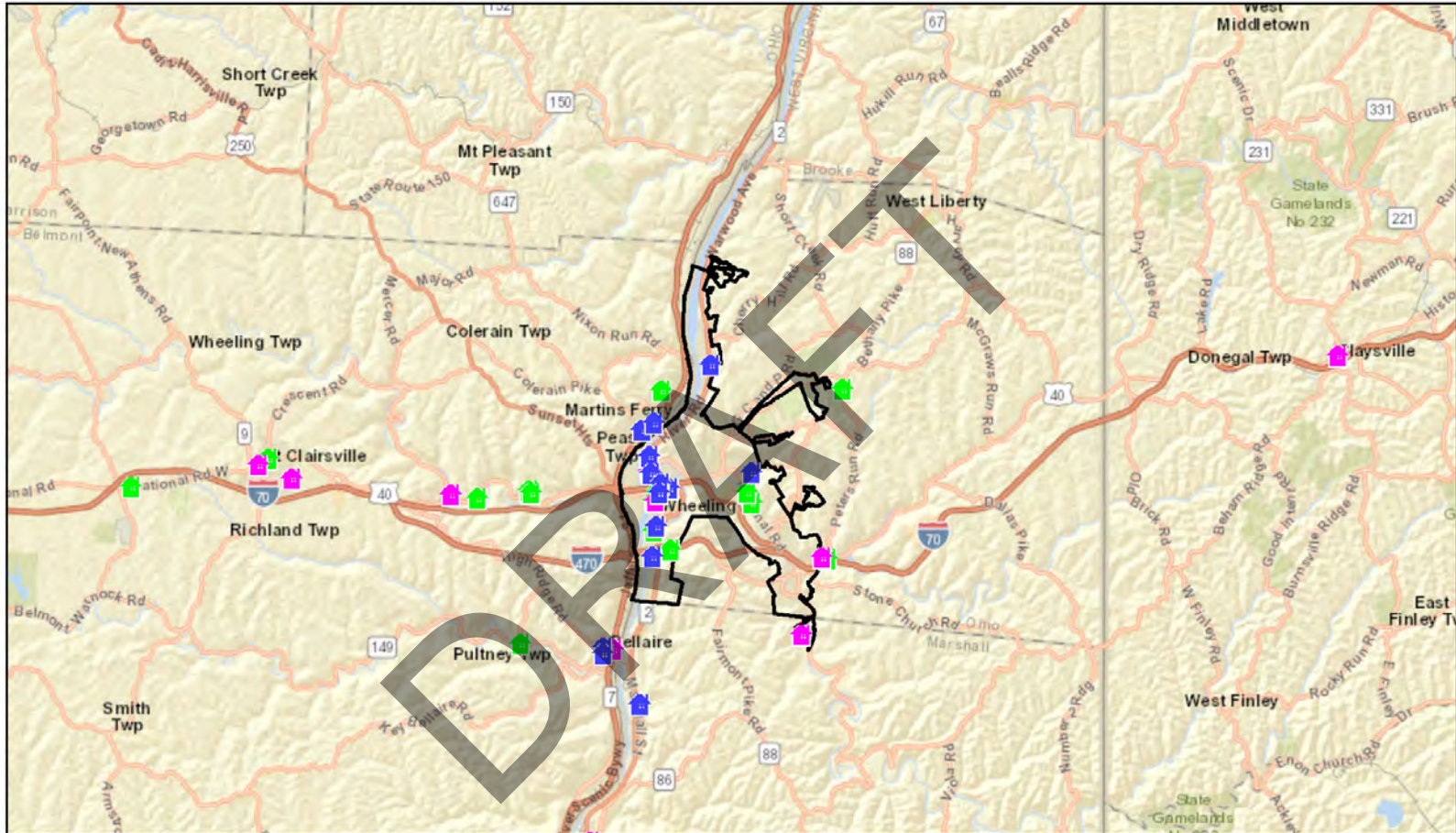
• **Section 8 –**

The Wheeling Housing Authority oversees the Section 8 Housing Choice Voucher Program. Eligible participants who receive vouchers may search on their own for privately owned housing. The Housing Authority encourages voucher holders to locate in areas of high opportunity and outside of areas outside of racial and ethnic concentrations of poverty.

The Wheeling Housing Authority will affirmatively market its housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

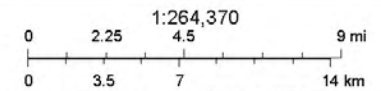
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### HUD Supported Housing - City of Wheeling, West Virginia



March 5, 2020

-  Public Housing Development
  -  LIHTC Property
  -  Multifamily Properties - Assisted
- Override 1



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS user community

- **Low Income Housing Tax Credit –**

The Low-Income Housing Tax Credit (LIHTC) Program was created under the Tax Reform Act of 1986 and is intended to attract private investment to develop affordable rental housing for low- and moderate-income households. This program provides a dollar-for-dollar tax credit to reduce the developer's Federal income tax. The City of Wheeling promotes the use of Low Income Housing Tax Credits. The following table shows LIHTC projects completed in the City of Wheeling.

**TABLE IV-11 - The City of Wheeling, WV LIHTC Projects**

HUD ID Number	Project Name	Project Address	Project City	Project State	Project ZIP Code	Total Number of Units	Total Low-Income Units
WVA20040060	WHEELING HEIGHTS LOWER GRANDVIEW HOPE PHASE VI	808 Walters Ave	Wheeling	WV	26003	28	27
WVA20050045	PROVIDENCE GREENE I	8 Fifth St	Wheeling	WV	26003	50	50
WVA20050065	WHEELING HEIGHTS UPPER GRANDVIEW HOPE PHASE VI		Wheeling	WV		15	14
WVA20060035	PROVIDENCE GREENE II	6 Fifth St	Wheeling	WV	26003	50	50
WVA19960005	129 15TH STREET APTS	129 15th St	Wheeling	WV	26003	3	3
WVA19980060	STACEY CROSSING APTS	1 Stacey Dr	Wheeling	WV		44	44
WVA20020035	NORTH WHEELING HOPE PHASE VI	101 Main St	Wheeling	WV	26003	39	39
WVA20040005	CANTERBURY PLACE	21 12th St	Wheeling	WV	26003	50	50
WVA20100040	JACOB STREET APTS-SOUTH WHEELING	A 3309 Jacob St	Wheeling	WV		18	18

WVA20130012	STACEY VILLAGE HOMES	23 Mountaineer Cir	Wheeling	WV	26003	19	19
WVA20140025	GLENN VIEW TOWNHOUSES	136 Cerise Ln	Wheeling	WV	26003	4	
WVA20150002	CAPITAL GREENE	2510 Lincoln Avenue	Wheeling	WV	26003	40	40
WVA20160001	GLENN VIEW II TOWNHOUSES	35 Cerise Lane	Wheeling	WV	26003	32	32
WVA20160003	LABELLE GREENE	180 Labelle Place	Wheeling	WV	26003	40	40
WVA20170008	WHEELING HEIGHTS PHASE II	GRANDVIEW, WALTERS, CHERRY STREET	WHEELING	WV	26003	18	18
WVA20040060	WHEELING HEIGHTS LOWER GRANDVIEW HOPE PHASE VI	808 Walters Ave	Wheeling	WV	26003	28	27

Source: <http://lihtc.huduser.org/>

There are sixteen (16) LIHTC projects with 471 units of affordable rental housing in the City.

- **Multi Family Housing –**

The following is a list of HUD Multifamily Housing in the City of Wheeling:

HUD ID	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	TOTAL UNITS	ASSISTANCE
800023553	Brookpark Place	1290 National Rd	Wheeling	WV	26003	152	Insured-Subsidized
800023583	Eagle Hollow Apartments	C RD#3	WHEELING	WV	26003	48	Subsidized, No HUD Financing
800023600	G.W. Petroplus Towers	1414 NATIONAL RD	WHEELING	WV	26003	161	Insured-Subsidized
800023628	Larkin Apartments	2344 CHAPLINE ST	WHEELING	WV	26003	10	202/811



800023645	Montani Towers	940 MARKET ST	WHEELING	WV	26003	101	Insured-Subsidized
800023652	North Park Apartments	EAGLE COURT	WHEELING	WV	26003	104	Subsidized - Previously Insured
800023691	Russell Nesbitt	501 N. MAIN ST.	WHEELING	WV	26003	8	Subsidized, No HUD Financing
800023704	St Paul Terrace	2546 NATIONAL RD	WHEELING	WV	26003	64	Insured-Subsidized
800023712	Tucker Rehabilitation	200 29TH ST	WHEELING	WV	26003	20	202/811
800023729	Wheeling Station	103 Station Ln	Wheeling	WV	26003	61	Insured-Subsidized
800023734	Windsor Manor	1143 Main St	Wheeling	WV	26003	109	Subsidized - Previously Insured

Source: [https://www.hud.gov/program\\_offices/housing/mfh/presrv/mfhpreservation](https://www.hud.gov/program_offices/housing/mfh/presrv/mfhpreservation)

There are ten (10) active HUD Multifamily Housing projects with 838 units in the City.

**f. Planning and Zoning –**

When the City completed its 2015 Analysis of Impediments to Fair Housing Choice it was identified that the City needs to update parts of its Zoning Ordinance.

The City of Wheeling passed Ordinance 14898 on December 6, 2016, which added and/or amended the following definitions to Sub-Part 1327.02:

• **Definitions:**

- **Accessible/Accessibility** - areas of a building that can be approached, entered and used by individuals with physical impairments.
- **American with Disabilities Act (ADA)** - prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government

services, public accommodations, commercial facilities, and transportation.

- **Developmentally Disabled** - a person with a severe chronic disability that: is attributable to a mental or physical impairment or combination of mental and physical impairments, is manifested before the person attains the age of twenty-two, is likely to continue indefinitely, results in substantial functional limitation in three or more of the following activities of major life activity: self-care, receptive and expressive language, learning, mobility, self-direction, capacity of independent living, economic self-sufficiency, and reflects the person's need for a combination and sequence of special, interdisciplinary, or generic care, treatment, or other services that are of lifelong or extended duration and are individually planned or coordinated.
- **Disability/Disabled** - a physical or mental impairment which substantially limits one or more of such person's major life activities or a record of having such an impairment. This term does not include the illegal use of or addiction to a controlled substance.
- **Fair Housing Act (FHA)** - protects people from discrimination based upon race, color, religion, sex, national origin, disability, or familial status in most housing and housing related transactions.
- **Family** - One or more persons occupying a single dwelling unit, provided that unless all members are related by blood, marriage, or legal adoption, no such family shall contain over three unrelated persons. However, where disability requires, up to 5 unrelated disabled persons living together shall be permitted and considered a family and not a group home. Requests for reasonable accommodations to this requirement can be made to the Board of Zoning Appeals.
- **Handicap** - (1) a physical or mental impairment which substantially limits one or more of such person's major life activities, (2) a record of having such an impairment, or (3) being regarded as having such an impairment, but such term does not include current, illegal use of or addiction to a controlled substance.
- **Homeless Persons** - Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who resided in an

emergency shelter or a place not meant for human habitation and who is exiting an institution where he or she temporarily resided.

- **Protected Classes** - Demographic categories of persons established by civil rights statutes against whom discrimination is prohibited. This includes race, color, religion, sex, national origin, familial status, and disability.
- **Visitability** - does not offer a completely accessible house, but rather the opportunity for a disabled person to visit the home of a friend without having to be lifted up the stairs, to enjoy a meal and be able to use the first-floor bathroom.

The Ordinance also amended Section 2. Section 1335.12(g) entitled "Residential Districts, Additional Residential Regulations, Group Homes" to read:

Under West Virginia State Law, group homes are an allowable use in all residential districts. A group home shall conform to the area and bulk requirements of the district in which it is proposed.

- **Comprehensive Plan:**

The City's comprehensive plan was last updated in 2014, and the City's Planning Department plans on updating it again in 2024. The purpose of the plan is to serve as a long-term planning tool that identifies the city's policies and strategies related to the physical, economic, and social development of Wheeling. The plan attempts to balance quality of life, livability, economic health, prosperity, private property needs, and public fiscal responsibility through a consensus building process that allowed the public to assist in directing how Wheeling will grow over the next 10 to 20 years. The development of this plan is guided by the following overarching vision statement that was defined after discussions with the public, various stakeholders, and the steering committee.

"Wheeling will be a forward-thinking, modern, and sustainable community with a diverse economy, support for local entrepreneurs, strong community partnerships, robust neighborhood and infrastructure investments, and an emphasis on embracing the area's unique heritage, culture, and recreational opportunities"

The intent of the document is to provide guidance on future decisions such as capital improvements, investment and reinvestment opportunities, zoning changes, and the general operations of the city. It is designed to provide a vision for the future

that will transcend any changes in leadership while remaining flexible enough to allow the city to address any unforeseen major events that could result in significant changes in the city's budget, staffing resources, or demographics of the community.

The comprehensive plan includes the following strategies, divided into Initiatives, and based on High, Medium, and Low Priority:

– **Plan Initiative: Modern and Sustainable, Diverse Economy, Neighborhoods, & Quality of Life (High Priority)**

- Implement a Future Land Use Plan;
- Update Zoning Ordinance;
- Changes to the Historic Building Code;
- Establish a Land Reuse Agency (Land Bank);
- Work on Efforts to Retain the Younger Population;
- Promote Entrepreneurial Efforts;
- Develop a Housing Market Study;
- Enhance Digital Mapping and Communications;
- Expand Access to Technology;
- Coordinate infrastructure Improvement;
- Establish Minimum Requirements for the Use of Green Infrastructure;
- Complete a Transit Study for the Region;
- Maintain Quality Levels of Safety and Educational Services;
- Focus on Priority Development Areas.

– **Plan Initiative: Modern and Sustainable, Neighborhoods, & Quality of Life (Medium Priority)**

- Utilize Vacant Lots;
- Be More Sustainable as a City;
- Focus on Local Business;
- Reevaluate the Economic Development Position in the City;
- Undertake a Neighborhood Assessment Program;
- Evaluate Programs to Enhance Property Maintenance;
- Continue with the On-Trac Program;
- Expand the Trail System;
- Promote Arts and Culture in Wheeling;
- Develop a Parks and Recreation Master Plan.

– **Plan Initiative: Modern and Sustainable, Neighborhoods, & Quality of Life (Low Priority)**

- Modernize the Downtown Streetscape;
- Develop Guidelines for Preservation of Historic Districts;
- Update and Expand the Wayfinding System;
- Evaluate Traffic Calming Techniques Along Major Truck Routes; and
- Promote New Leadership and Public Involvement

**g. U.S. Department of Housing and Urban Development (HUD) –**

HUD encourages its grantees to incorporate “visitability” principles into their designs. Housing that is “visitable” has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have 32-inch clear openings. At a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for disabled persons.

**h. Federal Requirements –**

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “*Section 504*” prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and/or hearing impairments.

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.



The Fair Housing Act was amended in 1988 to include persons with disabilities as a protected class, as well as to include design and construction requirements for housing developed with private or public funds. Specifically, this law requires property owners to make reasonable accommodations to units and/or public areas in order to allow the disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. As it relates to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

**i. Taxes –**

Real estate property taxes may also impact housing affordability. This may not be an impediment to fair housing choice, but it does impact the affordability of housing.

The following table shows the millage rates for the jurisdictions in Ohio County.

**TABLE IV-12 - Wheeling Property Taxes (Ohio County) - 2019**

Levying Body	Levy Rate
County	0.2554
Education Bond	0.092
Education Current	0.388
Education Excess	0.4384
Municipal Bond	0.0092
Municipal Current	0.2408
Municipal Excess	0.0816
State	0.005
<b>TOTAL</b>	<b>1.5104</b>

Source: Ohio County Assessor \*Levy rates based off of Class 2

Though the majority of the City of Wheeling lies in Ohio County, there are portions of the City in Marshall County.

**TABLE IV-13 - Wheeling Property Taxes (Marshall County) - 2019**

Levying Body	Levy Rate
State	.0050
County	.2198
School	.792
School Bond	
Municipal	.3316
<b>GRAND TOTAL</b>	<b>1.3484</b>

Source: Marshall County Assessor \*Levy rates based off of Class 2

**j. Transportation –**

Transportation plays an important aspect in determining where residents choose to live. Some families choose to live in an area that is more private than physically connected, while others place more emphasis on proximity to main arteries and highways for commuting to work.

- **OVRTA/EORTA**

The Ohio Valley Regional Transportation Authority (OVRTA) and the Eastern Ohio Regional Transportation Authority (EORTA) work together to provide transit services to the City of Wheeling and surrounding areas. OVRTA/EORTA’s mission “is to provide reliable, efficient, safe, clean and courteous transportation services to the citizens of the Wheeling Urbanized Area.”

Based on stakeholder meetings, public transportation is one of the greatest needs in the community. The greatest public transit needs in the area were: increased route frequency into later hours; additional bus drivers to drive those routes; and routes that connected residential areas to job centers.

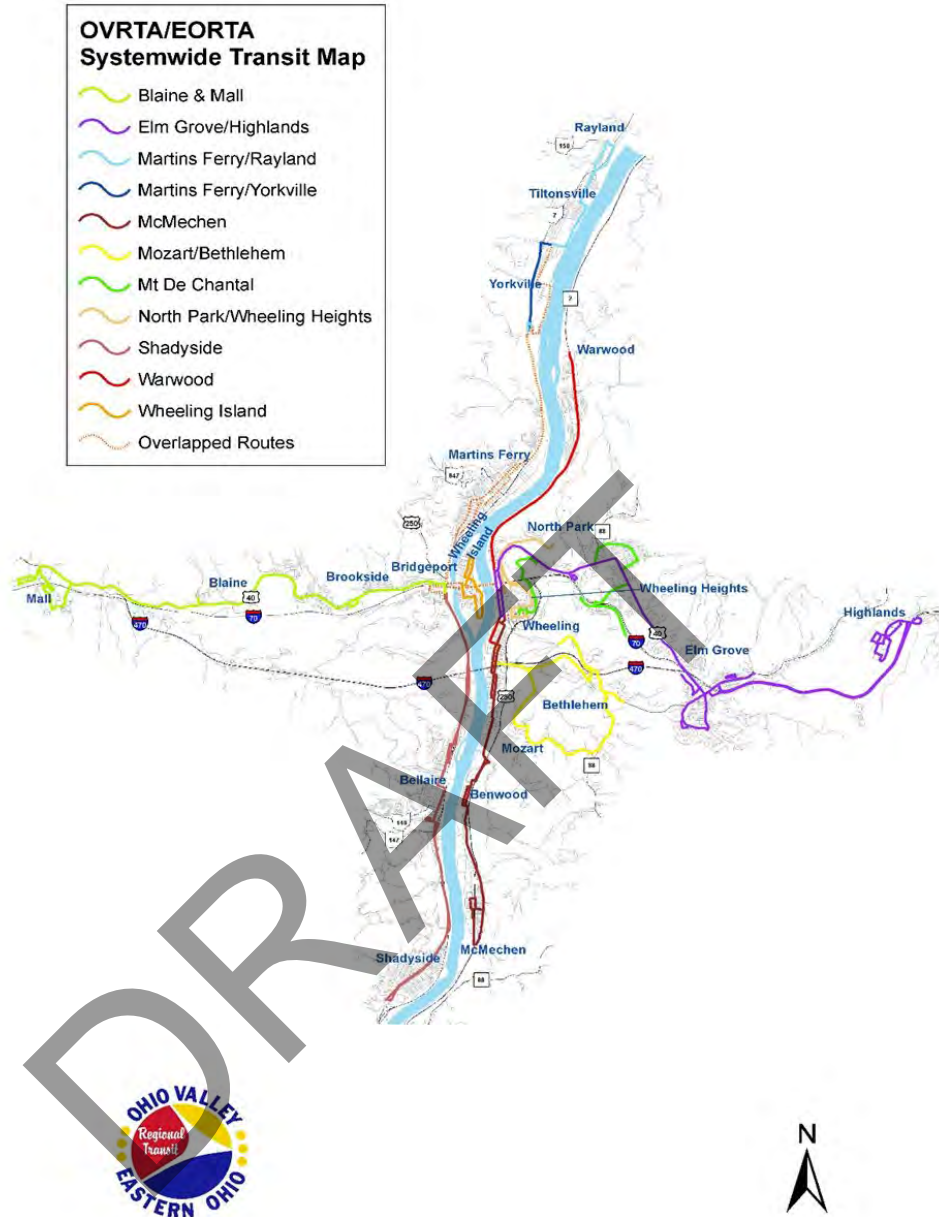
There are seven fixed routes operated by the OVRTA and four routes operated by EORTA. EORTA primarily serves Belmont and Jefferson Counties on the Ohio side, but does provide

service to and from downtown Wheeling on the other side of the river. There are currently no routes that run beyond 6:30PM. There is a need to extend these hours. Citizens have also mentioned that the regional nature of the service makes it difficult to get to and from work and that there could be improvements to the efficiency of services.

AdVANtage is a curb-to-curb advanced reservation service provided to qualified persons with a disability that prohibits them from using fixed routes on OVRTA and EORTA. From 6:00AM to 6:00PM on Monday through Saturday, riders can schedule trips of up to 1.5 miles from fixed routes within the OVRTA/EORTA service area. Despite the availability of this service, disabled and visually-impaired persons have reported that it is still difficult to access public transportation to and from work and the doctor.

The fixed route map for City of Wheeling Transit System is shown below:

DRAFT



FOR INFORMATION CALL (304) 232-2190

Source: <http://www.ovrta.org/schedule.htm>

**k. Belomar Regional Council –**

Belomar serves as the Metropolitan Planning Organization (MPO) for the Wheeling urbanized area by the Governors of West Virginia and Ohio. The Transportation Planning Department is responsible for maintaining a continuing, comprehensive and cooperative transportation planning process for Ohio, Marshall and Belmont

Counties. This process results in the development of the officially recognized transportation plans and programs for the area. Belomar's Geographic Information System (GIS) is jointly developed through the efforts of the Transportation Planning and Management Services Departments.

In 2016, Belomar put out their long range plan for Belmont (Ohio), Ohio (West Virginia), and Marshall (West Virginia) Counties. Belomar coordinated with the Federal Highway Administration, Federal Transit Administration, West Virginia Department of Transportation, Ohio Department of Transportation, local jurisdictions and other stakeholders. The plan is called "Transportation Plan for 2040".

The following goals were identified in the "Transportation Plan for 2040":

- **Goal: Promote efficiency of operation and emphasize preservation of existing transportation system.**
  - **Objectives:**
    - Improve traffic flow by operational improvements such as optimizing signal timings, channelization, spot improvements, and intelligent Transportation systems.
    - Facilitate maintenance strategies and schedules that area based on service life and degree of deterioration e.g. State Pavement Management Systems' based repairs.
    - Measures system's performance based on level of Service (LOS) criteria and strive to maintain an acceptable LOS
    - Promote transit and facilitate a planned fleet replacement schedule.
    - Preserve and enhance transit facilities and non-motorized facilities such as multi use trails.



- **Goal: Increase Safety**
  - **Objectives:**
    - Obtain and analyze accident data.
    - Participate in the identification of high hazard locations.
    - Facilitate the development of projects that enhance the safety of people and goods movement.
  
- **Goal: Increase Accessibility and mobility Options**
  - **Objectives:**
    - Improve the mobility of those traditionally underserved by existing transportation systems.
    - Maintain, enhance, and expand transit service.
    - Optimize service delivery by promoting coordination among providers.
    - Study accessibility of freight terminals and major generators in the area.
    - Review the functional class system.
    - Maintain, enhance, and expand existing multi-use trails with emphasis on developing interconnected network of trails.
  
- **Goal: Enhance Intermodal Connectivity and Integration**
  - **Objectives:**
    - Ensure viability and maintenance of existing intermodal facility.
    - Improve intermodal transfers where needed
    - Facilitate the development of an integrated multi-modal transportation system.
  
- **Goal: Support Economic Vitality by Enabling Competitiveness, Productivity, and Efficiency**
  - **Objectives:**
    - Identify the existing and future development areas and address transportation needs.
    - Develop transportation projects that enhance existing developments and promote future growth.
    - Optimize the use of existing networks to accommodate both existing and new developments
    - Improve travel time to major activity centers.
    - Identify projects that facilitate efficient freight movement to, from and through the area.

- **Goal: Protect and Enhance the Environment**

- **Objectives:**

- Identify ways to improve air quality.
- Develop strategies to reduce emissions.
- Ensure equity in the benefits of transportation system.
- Protect recreational and other environmentally sensitive areas.
- Promote consistency of transportation improvements with state and local plans.

- **Goal: Support Security**

- **Objectives:**

- Participate in the need assessment for systemwide security.
- Facilitate development of projects that enhance security of critical network links.
- Participate in the development of plans for mass movement of people during emergencies.
- Participate in the development of hazard mitigation plans for the area.

- **Goal: Accelerate Project Delivery**

- **Objectives:**

- Ensure delays if any, at regional level, are minimized.

**I. Jobs and Workforce Development –**

Access to good employment affects housing choice. However, there can be disparities in access to good jobs. Low wages in the City contributes to poverty, and a service-oriented economy provides residents who are living in poverty with little upward mobility. Organizations and programs that are in place to develop the City's workforce, with an emphasis on diversity, include:

- West Virginia Northern Community College offers a wide variety of programs and courses in the arts and sciences, career-technical education, developmental studies and community service. Under an open-door enrollment policy, the College admits all adults desiring postsecondary education. High school students recommended by their schools for early entrance are also admitted. Graduates receive Associate in Arts degrees, Associate in Science degrees, Associate in Applied Science

degrees and Certificates. Additionally, they have partnerships with local companies to work part-time during the schooling and receiving a full time job after graduation.

- Northern Panhandle Workforce Development Board oversees all American Job Center Activities and the Delivery of Training Programs and Services. As an example, the Board of Directors is responsible for selecting grant recipient(s), developing effective linkages to support employer utilization of the Local Workforce Development System and Local Workforce Investment Activities, and ensuring that Workforce Investment Activities meet the needs of employers and support economic growth in the region.

**m. Education –**

School districts, particularly “good” school districts, is an oft-cited reason for families to move to an area. In the past 15 years, the State of West Virginia and Cabell County have invest over one-hundred million dollars into the district.



This effort was an effort to help modernize the schools, and to foster a 21st century learning environment for students. The district’s focus and beliefs are to develop a culture that is “safe nurturing, compassionate, inviting” that respects both individuals and cultures, and their vision is that every graduate will be accepted into a career or post-secondary option.

**TABLE IV-14 - Assessment Achievement – Ohio County Schools**

Subject	Mastery Level	Mastery Pct
Mathematics	Does Not Meet Standard	22.13%
Mathematics	Exceeds Standard	20.97%
Mathematics	Meets Standard	23.14%
Mathematics	Partially Meets Standard	33.76%
Reading	Does Not Meet Standard	16.84%
Reading	Exceeds Standard	22.33%
Reading	Meets Standard	32.72%
Reading	Partially Meets Standard	28.11%
Science	Does Not Meet Standard	17.80%
Science	Exceeds Standard	12.97%
Science	Meets Standard	26.52%
Science	Partially Meets Standard	42.71%

**TABLE IV- 15 - Assessment Achievement – Marshall County Schools**

<b>Subject</b>	<b>Mastery Level</b>	<b>Mastery Pct</b>
Mathematics	Does Not Meet Standard	31.37%
Mathematics	Exceeds Standard	15.98%
Mathematics	Meets Standard	18.88%
Mathematics	Partially Meets Standard	33.77%
Reading	Does Not Meet Standard	29.04%
Reading	Exceeds Standard	14.77%
Reading	Meets Standard	26.23%
Reading	Partially Meets Standard	29.95%
Science	Does Not Meet Standard	33.26%
Science	Exceeds Standard	6.50%
Science	Meets Standard	17.27%
Science	Partially Meets Standard	33.26%

Source: West Virginia Department of Education

West Virginia's statewide assessments provide an opportunity for students to demonstrate what they know while providing information to students and parents about how well students are progressing toward mastering West Virginia's content standards. It is clear that Ohio County schools are performing better than Marshall County Schools. However, there is still room for improvement in both. In Ohio County, over 1/5 (22.33%) of students do not meet the standard in mathematics, nearly 1/6 (16.84%) of students do not meet the standard in reading, and nearly 1/6 (17.80%) of students do not meet the standard in science, and in Marshall County nearly 1/3 (31.37%) of students do not meet the standard in mathematics, just under 1/3 (29.04%) of students do not meet the standard in reading, and 1/3 (33.26%) of students do not meet the standard in science.

According to 2019 enrollment numbers from the West Virginia Department of Education, there are a total of 5,202 students enrolled in Ohio County Schools. 85.3 (4,436 students) of the student population are white; 6.5% (339 students) of the student population are Black or African American; 6.1% (322 students) of the student population are Multi-Racial; 1.5% (60 students) of the student population are Hispanic or Latino, 0.7%; and (37 students) of the student population are Asian.

According to 2019 enrollment numbers from the West Virginia Department of Education, there are a total of 4,420 students enrolled in Marshall County Schools. 95.7 percent (4,436 students) of the student population are white; 2.2% (97 students) of the student population are Multi-Racial; 0.8% (35 students) of the

student population are Hispanic or Latino; 0.8% (34 students) of the student population are Black or African American, 0.3%; and (14 students) of the student population are Asian.

**n. Section 3 –**

HUD's definition of Section 3 is:

*Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.*

The following are the guidelines that the City of Wheeling's Department of Community Development and Housing uses to accomplish Section 3 compliance:

- When a contract or project is put out for bid, as part of the bid-package, the advertisement contains the Section 3 information describing the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701U (Section 3). The first pages of this document are the actual wording of Section 3, including 25 CFR Part 135. These pages are to be read by and signed by all contractors bidding on City projects and contracts, stating that the contractor "will abide by and include in all subcontracts the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended." The "Estimated Work Force Breakdown" sheet requires the following: total estimated positions needed; number of positions occupied by permanent employees; number of positions not occupied; and number of positions to be filled with Section 3 residents. The "Section 3 Business Utilization" sheet is also included. This form asks for general contract information and requests the following: name of subcontractor; Section 3 business; address; trade/service or supply; contract amount; award date; and competitive or negotiated bid. It then asks for the total dollar amount awarded to Section 3 businesses. This form is then checked by the City's Labor Compliance Officer to ensure that it was

indeed filled out and signed by those contractors submitting bids.

- Once the contract is awarded to a contractor, a Pre-Construction Conference is then scheduled. At this conference the Labor Compliance Officer spends time going over all of the U.S. Department of Labor, U.S. Department of Housing and Urban Development, and State and local regulations and requirements with the contractor. The above stated Section 3 document is given to the contractor during the conference for a second time, and must be filled out, signed and sent to the Labor Compliance Officer with all the other documents/paperwork involved in the Pre-Construction Conference.
- Two other areas of concern are addressed during the Pre-Construction Conference: the requirement that contractors inform the Labor Compliance Officer (LCO) as to locations and times, once the work on a project begins, and a second piece that relates specifically to Section 3. Contractors are given a form with two sections to complete. The first requires the contractor to submit in writing where Section 3 “new hires” will be located and the source they were recruited from for the contract. The second section requires the contractor to confirm in writing if the crew-size for all work done on a project is sufficient and no new-hires of any kind will be needed. This is the case for a number of City construction contracts, as contractors have crews as small as two to four long time employees. This form is signed and returned to the LCO with all other requested written information for Section 3. The contractor is made aware that failure to submit all of the above will be considered non-compliance.
- Finally, in reference to the submission in writing that a sufficient crew exists and no new hires will be necessary, it is requested that contingent plans regarding the recruiting and hiring of Section 3 residents be considered.

During this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on Section 3 Requirements.



## 7. Private Sector

The private sector has traditionally been the greatest impediment to fair housing choice in regard to discrimination in the sale, rental, or advertising of dwellings, the provision of brokerage services, or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibits such practices as the failure to give the same terms, privileges, or information; charging different fees; steering prospective buyers or renters toward a certain area or neighborhood; or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, national origin, and sexual orientation.



### a. Real Estate Practices

The Wheeling Board of Realtors (WBOR) is a trade association that represents real estate professionals throughout the City. WBOR's mission "is to serve membership through benefits, support, education and representation; be responsive to member needs; encourage participation and cooperation; promote professionalism with strict adherence to National Association of Realtors (NAR) Code of Ethics; encourage and promote community service." As a requirement for membership in NAR, all members must complete a mandatory ethics training and abide by the National Association of Realtor's Code of Ethics.

Article 10 of the NAR Code of Ethics states that Realtors "shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. REALTORS® shall not be parties to any plan or agreement to discriminate against a person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, or gender identity." (<https://www.nar.realtor/sites/default/files/documents/2019-COE.pdf>)



WBOR ensures that new members are exposed to Fair Housing Training. However, there is a greater need for continuing education for Fair Housing. The REALTORS Code of Ethics Training for the maintenance of memberships is a periodic, hourly requirement, which is often inadequate.

**b. Newspaper Advertising**

Under Federal Law, no advertising with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols or other approaches that are considered discriminatory.

Real estate advertisements were reviewed for *The Wheeling Intelligencer/Wheeling News-Register*. The real estate and lender's advertisements in the newspaper publication's ads include the equal housing opportunity logo, and many of the larger Classified ads for Real Estate brokers contained the logo. None of the advertisements contained language that prohibited occupancy by any group. However, some of the rental ads contained language prohibited pets.

Although "no pet policies" are commonplace for rentals, the advertisement of these policies could be problematic, as many persons with disabilities rely on service animals and therapeutic pets to achieve independent lives. Statements prohibiting or limiting pets may discourage persons with disabilities that require service or therapeutic animals from applying for, or even inquiring about, these rental units. According to Fair Housing groups in the area, "the current consensus of thought is, on the surface, a "no pets policy" is not discriminatory or a barrier. Landlords have the right not to allow pets in their units. However, the hope is that the individual, the potential tenant, has some knowledge of their rights under Fair Housing and knows they can request a reasonable accommodation for a support or service animal. Education for landlords and tenants on support and service animals is the key.

### c. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at [www.ffiec.gov/hmda/](http://www.ffiec.gov/hmda/) and is included in Part VII, Appendix C of this Analysis of Impediments. This analysis uses 2018 HMDA data to identify any discriminatory lending patterns between minority and non-minority households. The following two (2) tables provide an analysis of the HMDA data in the Wheeling, WV-OH Metropolitan Statistical Area (MSA).

The following table compares lending in Ohio County to the Wheeling, WV-OH MSA. Lending in Ohio County has been extracted from the MSA data based on census tract. Conventional loans in Ohio County comprised 22.3% of the number of such loans in the MSA as a whole and 29.6% of the value of such loans.

**TABLE IV-16 - HMDA Data Analysis for 2018**

	Home Purchase Loans							
	FHA, FSA / RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	\$ Amount*	#	\$ Amount*	#	\$ Amount*	#	\$ Amount*
Ohio County	217	28,075,000	926	145,220,000	159	53,535,000	150	8,930,000
MSA/MD	971	121,935,000	3,124	372,540,000	649	104,595,000	437	24,815,000
% of metro area lending in Ohio County	22.3%	23.0%	29.6%	39.0%	24.5%	51.2%	34.3%	36.0%

Source: <https://www.ffiec.gov/hmda/>

The following table shows the conventional loan applications in **Ohio County**. A total of 611 of the MSA's 3,124 mortgage applications came from Ohio County, which is 19.6% of applications. More than half (66.0%) of the loan applications in the County were originated, while less than one fifth (16.8%) were denied. County applicants had a slightly higher origination rate than the MSA as a whole, which comprised 62.1% of all loans originated, an a lower denial rate than the MSA as a whole, which comprised of 19.0% of denied applications.

**TABLE IV-17 - Disposition of Conventional Loans**

	Ohio County		
	Count	% of Ohio County Applications	% of Total MSA Applications
Loans Originated	611	66.0%	19.6%
Approved, Not Accepted	22	2.4%	0.7%
Applications Denied	156	16.8%	5.0%
Applications Withdrawn	62	6.7%	2.0%
File Closed for Incompleteness	23	2.5%	0.7%

Source: <https://www.ffiec.gov/hmda/>

DRAFT

The following table outlines the disposition of conventional loans in Ohio County, WV by income level (data for only the City of Wheeling is not available). Loan applications from low-income households have the highest denial rates by a large margin, while upper-income households have the lowest denial rates and highest origination rates. The percentage of loans originated and percentage of applications denied are both correlated with income, whereas the higher the income level, the more likely the application will be approved and the loan originated.

**TABLE IV-18 - Disposition of Conventional Loans by Income Level in Ohio County, WV– 2018**

Income Level	Applications Received		Loans Originated		Applications Approved, Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
	Count	% of Total	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level
Less than 50% of MSA Median	989	15.1%	498	50.4%	32	3.2%	329	33.3%	93	9.4%	37	3.7%
50-79% of MSA Median	1,595	24.4%	1,015	63.6%	53	3.3%	341	21.4%	139	8.7%	47	2.9%
80-99% of MSA Median	472	7.2%	311	65.9%	14	3.0%	94	19.9%	40	8.5%	13	2.8%
100-119% of MSA Median	1,156	17.7%	784	67.8%	36	3.1%	189	16.3%	112	9.7%	35	3.0%
120% or More of MSA Median	2,324	35.6%	1,653	71.1%	58	2.5%	360	15.5%	193	8.3%	60	2.6%
<b>Total</b>	<b>6,536</b>	<b>100.0%</b>	<b>4,261</b>	<b>65.2%</b>	<b>193</b>	<b>3.0%</b>	<b>1313</b>	<b>20.1%</b>	<b>577</b>	<b>8.8%</b>	<b>192</b>	<b>2.9%</b>

Source: <https://www.ffiec.gov/hmda/>

The following tables show the disposition of conventional loans where the race of the applicant was reported, disaggregated by minority status and income level for Ohio County, WV. The number of applications for conventional loans submitted by White applicants outnumbers minority applicants in each income level analyzed. White applicants have the highest origination rate 50% below median income. Hispanic or Latino applicants have a disproportionately high denial rate at this level. However, the low number (4) of Hispanic or Latino applicants must be considered before drawing conclusions.

**TABLE IV-19 - Loan Disposition Rates by Minority Status, Less than 50% of County Median Income**

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	6	0.6%	1	16.7%	0	0.0%	2	33.3%	3	50.0%	0	0.0%
Asian	2	0.2%	1	50.0%	0	0.0%	0	0.0%	1	50.0%	0	0.0%
Black or African American	5	0.5%	2	40.0%	0	0.0%	2	40.0%	0	0.0%	1	20.0%
Native Hawaiian or Other Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-
White	484	48.9%	246	50.8%	16	3.3%	161	33.3%	42	8.7%	19	3.9%
Hispanic or Latino	4	0.4%	1	25.0%	0	0.0%	2	50.0%	1	25.0%	0	0.0%
Not Hispanic or Latino	488	49.3%	247	50.6%	16	3.3%	162	33.2%	46	9.4%	17	3.5%
<b>Total</b>	<b>989</b>	<b>100.0%</b>	<b>498</b>	<b>50.4%</b>	<b>32</b>	<b>3.2%</b>	<b>329</b>	<b>33.3%</b>	<b>93</b>	<b>9.4%</b>	<b>37</b>	<b>3.7%</b>

Source: <https://www.ffiec.gov/hmda/>



In this income category, American Indian or Alaskan Native and Hispanic or Latino applicants have a disproportionately higher denial rate (100.0% and 33.3%). However, the low number (2 and 3) of American Indian or Alaskan Native and Hispanic or Latino applicants must be considered before drawing conclusions. as do Hispanic or Latino applicants. Asian applicants have the highest origination rate at 75.0% of applicants.

**TABLE IV-20 - Loan Disposition Rates by Minority Status, 50-79% of County Median Income**

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	2	0.1%	0	0.0%	0	0.0%	2	100.0%	0	0.0%	0	0.0%
Asian	4	0.3%	3	75.0%	0	0.0%	0	0.0%	1	25.0%	0	0.0%
Black or African American	7	0.4%	2	28.6%	0	0.0%	1	14.3%	3	42.9%	1	14.3%
Native Hawaiian or Other Pacific Islander	0	-	0	-	0	-	0	-	0	-!	0	-
White	790	49.5%	504	63.8%	27	3.4%	168	21.3%	67	8.5%	24	3.0%
Hispanic or Latino	3	0.2%	2	66.7%	0	0.0%	1	33.3%	0	0.0%	0	0.0%
Not Hispanic or Latino	789	49.5%	504	63.9%	26	3.3%	169	21.4%	68	8.6%	22	2.8%
<b>Total</b>	<b>1595</b>	<b>100.0%</b>	<b>1015</b>	<b>63.6%</b>	<b>53</b>	<b>3.3%</b>	<b>341</b>	<b>21.4%</b>	<b>139</b>	<b>8.7%</b>	<b>47</b>	<b>2.9%</b>

Source: <https://www.ffiec.gov/hmda/>

In this income category, American Indian or Alaskan Native, Native Hawaiian or Other Pacific Islander, and Hispanic or Latino applicants have a disproportionately higher denial rate (100.0%, 100.0%, and 100.0%). However, the low number (1,1, and 1) of American Indian or Alaskan Native, Native Hawaiian or Other Pacific Islander, and Hispanic or Latino applicants must be considered before drawing conclusions.

**TABLE IV-21 - Loan Disposition Rates by Minority Status, 80-99% of County Median Income**

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	1	0.2%	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
Asian	1	0.2%	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Black or African American	1	0.2%	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Native Hawaiian or Other Pacific Islander	1	0.2%	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
White	231	48.9%	153	66.2%	7	3.0%	44	19.0%	20	8.7%	7	3.0%
Hispanic or Latino	1	0.2%	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
Not Hispanic or Latino	236	50.0%	156	66.1%	7	3.0%	47	19.9%	20	8.5%	6	2.5%
<b>Total</b>	<b>472</b>	<b>100.0%</b>	<b>311</b>	<b>65.9%</b>	<b>14</b>	<b>3.0%</b>	<b>94</b>	<b>19.9%</b>	<b>40</b>	<b>8.5%</b>	<b>13</b>	<b>2.8%</b>

Source: <https://www.ffiec.gov/hmda/>

In this income category, American Indian or Alaskan Native, Black or African American, and Hispanic or Latino applicants have a disproportionately higher denial rate (100.0%, 50.0%, and 50.0%). However, the low number (1,4, and 6) of American Indian or Alaskan Native, Black or African American, and Hispanic or Latino applicants must be considered before drawing conclusions.

**TABLE IV-22 - Loan Disposition Rates by Minority Status, 100-119% of County Median Income**

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	2	0.2%	0	0.0%	0	0.0%	2	100.0%	0	0.0%	0	0.0%
Asian	1	0.1%	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Black or African American	4	0.3%	2	50.0%	0	0.0%	2	50.0%	0	0.0%	0	0.0%
Native Hawaiian or Other Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-
White	575	49.7%	390	67.8%	18	3.1%	92	16.0%	57	9.9%	18	3.1%
Hispanic or Latino	6	0.5%	1	16.7%	0	0.0%	3	50.0%	1	16.7%	1	16.7%
Not Hispanic or Latino	568	49.1%	390	68.7%	18	3.2%	90	15.8%	54	9.5%	16	2.8%
<b>Total</b>	<b>1156</b>	<b>100.0%</b>	<b>784</b>	<b>67.8%</b>	<b>36</b>	<b>3.1%</b>	<b>189</b>	<b>16.3%</b>	<b>112</b>	<b>9.7%</b>	<b>35</b>	<b>3.0%</b>

Source: <https://www.ffiec.gov/hmda/>

In this income category, American Indian or Alaskan Native and Hispanic or Latino applicants have a disproportionately higher denial rate (50.0% and 44.4%). However, the low number (2 and 9) of American Indian or Alaskan Native and Hispanic or Latino applicants must be considered before drawing conclusions.

**TABLE IV-23 - Loan Disposition Rates by Minority Status, 120% or More of County Median Income**

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	2	0.1%	1	50.0%	0	0.0%	1	50.0%	0	0.0%	0	0.0%
Asian	4	0.2%	4	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Black or African American	3	0.1%	2	66.7%	1	33.3%	0	0.0%	0	0.0%	0	0.0%
Native Hawaiian or Other Pacific Islander	0	-	0	-	0	-	0	-	0	-	0	-
White	1158	49.8%	821	70.9%	28	2.4%	181	15.6%	97	8.4%	31	2.7%
Hispanic or Latino	9	0.4%	5	55.6%	0	0.0%	4	44.4%	0	0.0%	0	0.0%
Not Hispanic or Latino	1148	49.4%	820	71.4%	29	2.5%	174	15.2%	96	8.4%	29	2.5%
<b>Total</b>	<b>2324</b>	<b>100.0%</b>	<b>1653</b>	<b>71.1%</b>	<b>58</b>	<b>2.5%</b>	<b>360</b>	<b>15.5%</b>	<b>193</b>	<b>8.3%</b>	<b>60</b>	<b>2.6%</b>

Source: <https://www.ffiec.gov/hmda/>

The following offers a closer look at the denial rates of conventional loans by denial reason and income level. For applicants earning up to 99% of median income, the most common reason for denial is credit history, followed by collateral. Overall, the most common reason for denial of conventional loans in the Ohio County, WV is credit history (35.4%), followed by collateral (25.5%) and debt-to-income ratio (18.4%).

**TABLE IV-24 - Conventional Loan Denial Rates by Denial Reason and Income Level**

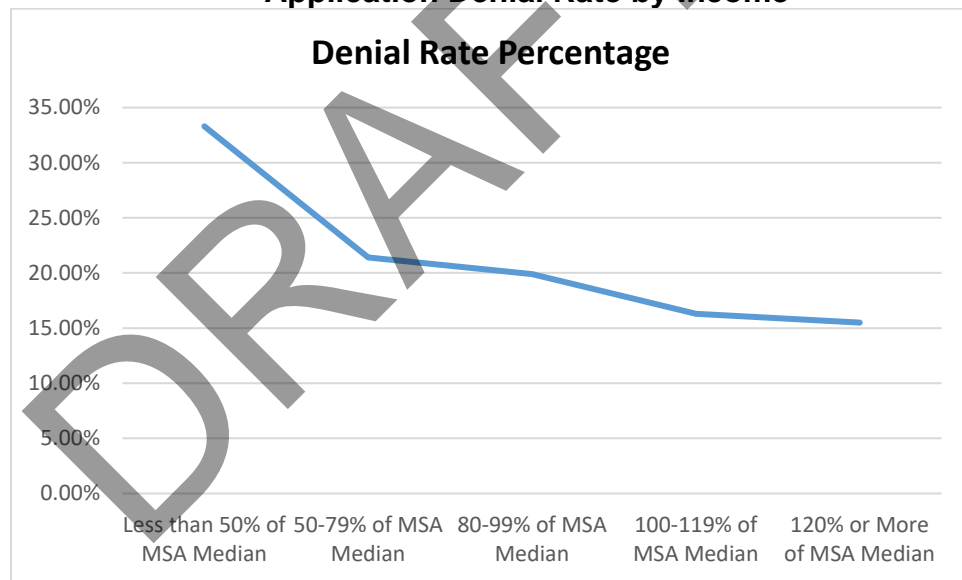
	Less than 50% Low		50-79% Middle		80-99% Upper- Middle		100-119% Upper		120% or More High		Income Not Available		Total Denials	
	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Total
Debt- to-Income Ratio	5	10.6%	19	12.3%	32	27.1%	30	21.3%	12	16.7%	4	19.0%	102	18.4%
Employment History	0	0.0%	2	1.3%	2	1.7%	2	1.4%	0	0.0%	0	0.0%	6	1.1%
Credit History	19	40.4%	52	33.5%	37	31.4%	48	34.0%	34	47.2%	6	28.6%	196	35.4%
Collateral	18	38.3%	50	32.3%	23	19.5%	33	23.4%	17	23.6%	0	0.0%	141	25.5%
Insufficient Cash	0	0.0%	1	0.6%	2	1.7%	0	0.0%	0	0.0%	2	9.5%	5	0.9%
Unverifiable Information	2	4.3%	8	5.2%	4	3.4%	5	3.5%	1	1.4%	2	9.5%	22	4.0%
Credit Application Incomplete	0	0.0%	13	8.4%	6	5.1%	14	9.9%	4	5.6%	2	9.5%	39	7.0%
Mortgage Insurance Denied	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	-
Other	3	6.4%	10	6.5%	12	10.2%	9	6.4%	4	5.6%	5	23.8%	43	7.8%
<b>Total Denials and % of Total</b>	<b>47</b>	<b>8.5%</b>	<b>155</b>	<b>28.0%</b>	<b>118</b>	<b>21.3%</b>	<b>141</b>	<b>25.5%</b>	<b>72</b>	<b>13.0%</b>	<b>21</b>	<b>3.8%</b>	<b>554</b>	<b>100.0%</b>

Source: <https://www.ffiec.gov/hmda/>

In summary, the HMDA data shows that two-thirds (66.0%) of the loan applications in the County were originated, while less than one fifth (16.8%) were denied. County applicants had a slightly higher origination rate than the MSA as a whole, which comprised 62.1% of all loans originated, and a lower denial rate than the MSA as a whole, which comprised 19.0% of denied applications.

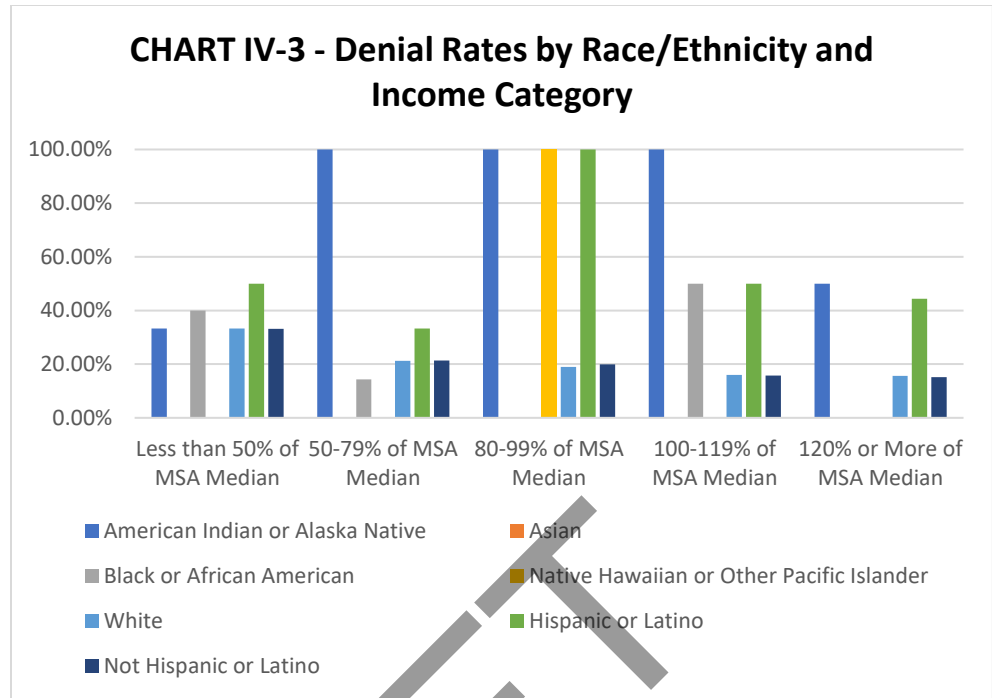
In Ohio County, WV the number of white applicants greatly exceeds the number of minority applicants. As incomes decrease, denial rates increase, often due to these applicants being first-time homebuyers with little to no collateral, poor credit history, and other debt. While denial rates decrease as income increases, minorities have higher denial rates even within the same income groups.

**CHART IV-2 - Conventional Loan Application Denial Rate by Income**



Source: <https://www.ffiec.gov/hmda/>





Source: <https://www.ffiec.gov/hmda/>

Based on this data analysis, there is the possibility that there are discriminatory lending practices in Ohio County, as there are disparities between the origination and denial rates of minority and non-minority households. In every income category, White applicants have a lower denial rate than minority applicants. While denial rates decrease as income increases, minorities have higher denial rates even within the same income groups.

While this data provides an insight into lending patterns in Ohio County, WV it should be noted that data identifying race that is unique to the City level would yield more conclusive findings and provide a more accurate understanding of any existing lending issues in the City. However, that data is not available. Additionally, the low number of minority applicants makes it difficult to draw fair conclusions about the lending practices.

## 8. Citizen Participation

The City of Wheeling's Department of Economic and Community Development undertook a broad participation strategy for this Analysis of Impediments to Fair Housing Choice to engage as many individuals, organizations, and agencies as possible.

**Stakeholders:** The City of Wheeling developed a list of stakeholders with direct knowledge of, and experience in, the housing market and issues affecting fair housing. Identified stakeholders were divided into the following categories:

- City Departments
- Wheeling Housing Authority
- Health Service Providers
- Direct Housing Stakeholders
- Social Service Providers
- Fair Housing Agencies
- Planning Organizations
- Workforce & Economic Development Organizations

**Agency/Organization/Stakeholder Meetings:** The City of Wheeling contacted all identified organizations and agencies to set up smaller meetings consisting of similar organizations to hold more in-depth conversations.

- City of Wheeling Departments – December 4, 2019
- Economic Development & Job Training – December 6, 2019
- Education Providers – December 6, 2019
- Wheeling Human Rights Commission – December 5, 2019
- Fair Housing Services – December 5, 2019
- Homeless Services – December 5, 2019
- Housing Providers – December 5, 2019
- Wheeling Housing Authority – December 5, 2019
- Faith-Based Organizations – December 6, 2019
- Social Services – December 5, 2019

Any identified stakeholders that were not available to attend the meeting, as well as some of the aforementioned stakeholders, were then called to either (1) follow-up if they participated in either of the Community Meetings

or (2) discussed fair housing issues with agencies/individuals who were unable to attend one of the Public Meetings.

**Public Hearing:** The City of Wheeling held one (1) Public hearing to engage the public and local organizations/agencies and help identify issues impacting Fair Housing Choice. The Public Hearing was held on Wednesday, December 4, 2019 in City Council Chambers.

There were no residents attending the public hearing held on Wednesday, December 4, 2019. Additionally, the fifteen (15) scheduled meetings with various government staff, social service organizations, housing agencies, and realtors were well-attended. Public Meetings were advertised in the “The Intelligencer,” the largest English-language newspaper in circulation in the area.

- The City of Wheeling emailed Public Meeting and Stakeholder Meeting invitations to:
  - Wheeling Housing Authority
  - Community Organizations
  - Economic Development Organizations
  - Education Providers
  - Fair Housing Organizations
  - Housing Providers
  - Health Care Organizations
  - Homeless Service Providers
  - Public Safety
  - Social Service Providers

**Additional Outreach:** The City of Wheeling also employed the following to encourage extensive engagement and participation:

- Invitations to the stakeholder meetings were sent out by the Cities prior to the meetings.

**Resident Surveys:** The survey was available online in English, and physical copies were placed on public display to encourage resident input.

The online survey produced 164 responses. Actions to spread knowledge of the surveys included sending the survey to neighborhood organizations and associations for distribution, and emailing the link to interested parties. The information provided in these anonymous surveys were crucial in developing an accurate assessment of fair housing issues in the City.

The following is a summary of the 164 responses received:

### **Notable Characteristics**

Some of the notable characteristics of respondents included (as a percentage of those that answered each question):

- The majority of respondents are female at 64.66%.
- The vast majority (96.43%) of respondents are White.
- Just over one-half of the respondents were over the age of 50 (52.58%). More than two-thirds of respondents were over the age of 40 (67.24%).
- Of those that answered the question, 58.41% were either a two-person or three-person household.
- 41.18% of respondents felt that residents of the City did not know how to report fair housing violations, and 19.12% thought fair housing complaints were not reported due to distrust of the process.

The following is a list of needs/issues associated with different areas of community and economic development. Values were calculated as a percentage of those that answered each question.

#### **Accessibility:**

- 43.84% of respondents believe that there is a need for curb and sidewalk improvements in the City.
- 11.64% of respondents believe there is not enough handicap access in their neighborhoods.
- 20.83% of respondents believe there is a need for ADA surfacing at recreational facilities.
- 22.92% of respondents believe there is a need for more ADA equipment at recreational facilities.

#### **Employment:**

- 62.20% of respondents believe that there is a lack of job opportunities.
- 39.37% of respondents cite the lack of transportation as a barrier to employment.
- 31.37% of respondents cite lack of childcare as a barrier to employment.

#### **Housing:**

- 61.15% said that there is a need for more affordable housing.
- 69.43% said that negligent landlords were a major issues in the City.
- 41.44% said there is a need for major housing rehabilitation.
- 24.84% of respondents believe that there is a lack of housing options.
- 12.10% of respondents cite lead-based paint and lead pipes as a health problem.

**Fair Housing:**

- Only 19.35% of respondents are aware that residents can make reasonable housing accommodation requests to their landlords.
- 45.81% believed residents did not know who to contact, and 36.77% were unsure of who to contact to report a fair housing complaint.

**Reasons Fair Housing Complaints Are Not Reported:**

- 14.71% specifically mentioned fear of retaliation, including eviction, legal reprisal, and poor treatment.
- 41.18% point to a lack of knowledge in reporting practices as a cause.
- 4.41% of respondents believed the process took too long.
- 19.12% of respondents believed that distrust of the process contributes to the lack of reporting.

**Transportation:**

- 61.79% of respondents stated believe that there are not enough service hours for public transit.
- 36.59% of respondents believed that there is a lack of parking in the City.
- 34.96% of respondents believe that the City needs to become more walkable.
- 25.20% of respondents felt that the bus routes are too disconnected.

**Other:**

- 15.15% of respondents use some type of medical or mental health social service.
- 92.62% of respondents believed that drugs are a crime issue in the City.

The following table illustrates the results of the survey that may result in further discriminatory practices and/or barriers to fair housing in the City of Wheeling:

**TABLE IV-25 - Resident Survey Results**

	Strongly Agree	Agree	Neutral / Unsure	Disagree	Strongly Disagree
<b>State or Local Laws and policies that limit housing choice</b>	10.78%	9.80%	57.84%	9.80%	11.76%
<b>Lack of fair housing organizations in the City</b>	14.42%	19.23%	38.46%	15.38%	12.50%
<b>Lack of knowledge among bankers/lenders regarding fair housing</b>	10.58%	18.27%	43.27%	17.31%	10.58%

<b>Lack of knowledge among landlords and property managers regarding fair housing</b>	20.95%	36.19%	27.62%	4.76%	10.48%
<b>Lack of Knowledge among real estate agents regarding fair housing</b>	10.58%	20.19%	42.31%	17.31%	9.62%
<b>Lack of knowledge among residents regarding fair housing</b>	29.81%	42.31%	20.19%	0.00%	7.69%
<b>Lack of accessible housing for persons with disabilities</b>	17.48%	31.07%	33.01%	12.62%	5.83%
<b>Lack of accessibility in neighborhoods (i.e. curb cuts)</b>	19.61%	25.49%	32.35%	17.65%	4.90%
<b>Lack of fair housing education</b>	26.21%	35.92%	26.21%	4.85%	6.80%
<b>Lack of affordable housing in certain areas</b>	44.34%	32.08%	12.26%	7.55%	3.77%
<b>Concentration of subsidized housing in certain neighborhoods</b>	26.73%	28.71%	33.66%	5.94%	4.95%
<b>Other barriers</b>	12.00%	13.33%	65.33%	2.67%	6.67%

Source: Citizen Survey

### Public Meeting on the Draft AI Public Comments

The 2020-2024 Analysis of Impediments to Fair Housing Choice was made available on the City of Wheeling's website at <https://www.wheelingwv.gov/>.

The document was on public display for a period of thirty (30) days. Residents were encouraged to submit written or oral feedback on the Analysis of Impediments.

Based on the citizen participation process and fair housing analysis, the City of Wheeling staff identified the following fair housing issues:

- **Housing Opportunities:**
  - There is a shortage of affordable housing in the City of Wheeling that is decent, safe, and sanitary.
  - There is a shortage of affordable housing units in areas of opportunity where low-income persons and households may move.
  - The population and the housing supply of the City of Wheeling have been decreasing. However, the population is decreasing at a faster rate.
  - The number of renter-occupied and owner-occupied units have been decreasing in the City of Wheeling.



- **Cost Burdened:**
  - Lower-income household create cost burdened housing conditions; approximately 14.0% of homeowners and 44% of renters in the City are cost burdened by 30% or more.
  - Individuals and families in the lowest-income areas struggle to find higher paying jobs.
  - The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs.
- **Disability/Accessibility:**
  - There is a lack of housing in the City that is accessible and affordable for the elderly, the disabled, and persons with special needs.
  - The denial by some landlords to make reasonable modifications and accommodations limits the amount of accessible units in the City that are for rent for persons with special needs.
- **Fair Housing:**
  - Tenants and homebuyers do not always file housing discrimination complaints when they have been discriminated against, either because they do not know about the Fair Housing Act or they do not know where to report complaints.
  - There is a lack of awareness of tenants' rights and landlords' responsibilities, including what are reasonable modifications and accommodations.
- **Access/Mobility:**
  - The limited public transportation network in the City is not convenient for lower income households to go to: work, health care, shopping, etc., which limits the choices where a low-income household can live.
  - The City of Wheeling is not designed for walkability, and there is a need for sidewalks in many portions of the City.
  - Landlords will frequently refuse to make reasonable modifications and accommodations, and they discriminate against elderly tenants.

The City of Wheeling held a Public Hearing on the “draft” 2020-2024 Analysis of Impediments on Tuesday, August 4, 2020.

## V. Actions and Recommendations

The following impediments to fair housing choice and recommendations are presented by the City of Wheeling as evidence of the City's commitment to affirmatively further fair housing. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment. New and carried over impediments to Fair Housing Choice are presented on the pages that follow. Of the previously identified impediments, racial segregation, a lack of accessible housing, and economic barriers for racial and ethnic minorities are still present in the City of Wheeling, despite the City's best efforts, and based on economic conditions, still need to be addressed by the City of Wheeling.

Below is a list of impediments that were developed by the City of Wheeling for the 2020 Analysis of Impediments to Fair Housing Choice.

### A. Impediments to Fair Housing Choice

The City of Wheeling developed the following impediments for the 2020-2024 Analysis of Impediments to Fair Housing Choice and defined specific goals and strategies to address each impediment.

#### • Impediment 1: Housing Affordability

Decent, safe, sanitary, and affordable housing remains a problem in finding fair housing choice as well as the, quality of life and attractive neighborhoods.

**Goal:** Increase the supply of decent, safe, sound, and affordable housing targeted to lower income households, both renters and owners.

**Strategies:** To meet this goal, the following activities and strategies may be undertaken by the City of Wheeling.

- **1-A:** Maintain the supply of available decent, safe, sanitary, and affordable housing through code enforcement, rehabilitation, and support of the creation of and capacity building of Community Housing Development Organizations (CHDOs), both locally and throughout the HOME Consortium Area.
- **1-B:** Increase homeownership opportunities for LMI households through the purchase of available housing, requiring housing counseling, as well as

providing downpayment and closing cost assistance through the Northern Panhandle HOME Consortium.

- **1-C:** Support and strengthen an effective property maintenance inspection program and code enforcement in the City.
- **1-D:** Promote programs for accessibility, weatherization, insulation, storm windows, energy audits, etc. to help reduce energy costs for LMI households that are cost burdened.

- **Impediment 2: Housing Accessibility**

There is a lack of housing that is accessible to the older population, and persons with disabilities which limits their choice of housing.

**Goal:** Increase the supply of housing that meets the accessibility, visitability, and quality of life needs of the older population and persons with disabilities.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **2-A:** Increase the supply of accessible owner-occupied housing by providing financial assistance to support the removal of architectural barriers.
- **2-B:** Enforce building codes to ensure that new multifamily construction meets the accessibility provisions of the Fair Housing Act.
- **2-C:** Continue to promote education and awareness of the requirements for reasonable accommodations for persons with disabilities and the elderly in rental housing.
- **2-D:** Encourage the development of new construction of housing that is accessible and affordable to the elderly and disabled.

- **Impediment 3: Fair Housing Education, Advocacy, Monitoring, and Enforcement**

There is a lack of awareness of tenant rights and landlord responsibilities under the Fair Housing Act, and a need to continually monitor and enforce the Fair Housing Act.

**Goal:** Increase the knowledge and awareness of the rights of individuals and the responsibilities of building owners in regard to the Fair Housing Act through education advocacy, monitoring, and enforcement to eliminate discrimination in housing and providing fair housing choices for all individuals and families.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **3-A:** Continue to support educational and training programs concerning the tenant rights and landlord responsibilities covered by the Fair Housing Act.
- **3-B:** Continue to support local and Consortium efforts to strengthen efficient and effective fair housing monitoring, investigation, testing, and enforcement strategies.
- **3-C:** Continue to support the delivery of fair housing advocacy services to at-risk groups and victims of housing discrimination.
- **3-D:** Continue to promote the delivery of financial literacy counseling for LMI and minority households to combat predatory and subprime lending practices.

#### • **Impediment 4: Cost Burden**

Both homeowners and renters are cost burdened by the monthly cost of housing which affects fair housing choice.

**Goal:** Reduce the amount of households which are cost burdened in the City and the HOME Consortium area.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **4-A:** Provide financial assistance to homebuyers to lower the cost of buying a home and thus reducing their monthly housing costs to within 30% of income.
- **4-B:** Promote the development of new affordable rental units under the LIHTC program, bond issues, Federal subsidized housing program, etc. to reduce a renter households' monthly housing cost to within 30% of their income.
- **4-C:** Promote the development of mixed income housing by private developers by offering financial incentives and density bonuses.

#### • **Impediment 5: Income vs. Housing Choice**

There is a lack of economic and job opportunities in the City of Wheeling and the HOME Consortium area which prevents low-income households from increasing their income and ability to choose to live outside areas of concentrated poverty.

**Goal:** The local economy will improve which will create new job opportunities and in turn increase household income.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **5-A:** Strengthen partnerships with area businesses and firms to expand the local tax base and create a more sustainable economy.
- **5-B:** Support workforce development and skills training that results in increased job opportunities and higher wages.
- **5-C:** Support programs that promote entrepreneurship and small business development for the retention and creation of job opportunities for low-income businesses and minority and women-owned businesses.

• **Impediment 6: Impacted Areas**

There are specific areas in the City of Wheeling where there is a concentration of low-income households and minorities.

**Goal:** Promote the deconcentration of low-income people and minorities from impacted areas and provide housing choice outside these areas.

**Strategies:** In order to meet this goal, the following activities and strategies should be undertaken:

- **6-A:** Support, promote, and encourage affordable housing developments that are constructed outside impacted areas.
- **6-B:** Continue to market and promote the homebuyer program to minority families and low-income households so they can afford to buy a home outside areas of impactation.

**B. Activities and Recommendations to Affirmatively Further Fair Housing**

To affirmatively further fair housing, the following actions have, and will be, implemented by the City of Wheeling through its Fair Housing Plan through various activities noted below:

1. The City of Wheeling Human Rights Commission addresses Fair Housing Complaints in the City of Wheeling. The City will continue to support the Human Relations Commission.
2. The City of Wheeling Human Rights Commission will continue to enforce fair housing through public education and outreach.
3. The City will reach out to WV Legal Aid to assist low income residents with free legal assistance to ensure that they will have fair housing.

4. The City will continue to provide funds to report housing discrimination complaints.
5. The City will encourage testing and auditing of fair housing practices through its regional fair housing providers.
6. The City of Wheeling and the Wheeling Human Rights Commission will continue to educate and attempt to overcome any remaining “Not in My Back Yard” attitudes in the City.
7. The City of Wheeling will continue to demolish vacant structures, acquire vacant land, and assemble parcels for affordable housing development.
8. The City of Wheeling will continue to pursue affordable housing development within neighborhoods of choice.
9. The City of Wheeling Human Relations Department and Wheeling Housing Authority will continue to promote integration of public housing outside areas of low-income concentration.
10. The City of Wheeling will promote trainings of appraisers to eliminate discriminatory practices.
11. The City will continue to promote economic development programs to assist in providing quality jobs to residents that will enable them to access more housing options.
12. On an annual basis, the City of Wheeling will continue to declare April to be Fair Housing Month via proclamation, in conjunction with holding an annual fair housing workshop with partners.
13. The City of Wheeling Human Rights Commission will continue to perform outreach to the public by providing updated housing discrimination information.
14. The City of Wheeling will continue to support housing rehabilitation problems to assist homeowners and renters in attaining safe, decent, affordable housing.
15. The City of Wheeling will continue to support the Northern Panhandle HOME Consortium by providing downpayment and closing cost assistance to low- and moderate-income households to purchase a home.



## VI. Certification

### Signature Page:

I hereby certify that this 2020-2024 Analysis of Impediments to Fair Housing Choice is in compliance with the intent and directives of the Community Development Block Grant (CDBG) Program and HOME Investment Partnership (HOME) Program regulations.

**City of Wheeling, WV:**

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Glenn Elliott, Mayor

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Date

DRAFT

**A RESOLUTION OF THE COUNCIL OF THE CITY OF WHEELING  
APPROVING THE FISCAL YEAR 2020 COMMUNITY DEVELOPMENT  
BLOCK GRANT (CDBG) AND HOME INVESTMENT PARTNERSHIPS  
(HOME) PROGRAMS, AND AUTHORIZING THE FILING OF THE  
FY 2020-2024 FIVE YEAR CONSOLIDATED PLAN, THE FY 2020  
ANNUAL ACTION PLAN, & THE FY 2020 ANALYSIS OF IMPEDIMENTS  
TO FAIR HOUSING CHOICE WITH THE U.S. DEPARTMENT OF  
HOUSING AND URBAN DEVELOPMENT (HUD).**

**WHEREAS**, under Title I of the Housing and Community Development Act of 1974, as amended, the Secretary of the U.S. Department of Housing and Urban Development is authorized to extend financial assistance to communities in the prevention or elimination of slums or urban blight, or activities which will benefit low- and moderate-income persons, or other urgent community development needs; and

**WHEREAS**, under the HOME Investment Partnerships Program created by the National Affordable Housing Act of 1990, as amended, the Secretary of HUD is authorized to extend financial assistance to participating jurisdictions to expand the supply of decent, safe, sanitary, and affordable housing; and

**WHEREAS**, the City of Wheeling in cooperation with the City of Weirton and the Counties of Ohio, Marshall, Brooke, and Hancock, WV have joined together to form the Northern Panhandle HOME Consortium and the City of Wheeling was designated as the Representative Member to apply for funds as a participating jurisdiction; and

**WHEREAS**, the U.S. Department of Housing and Urban Development has advised the City of Wheeling that under Fiscal Year 2020, the City is eligible to apply for an entitlement grant under the Community Development Block Grant (CDBG) Program in the amount of \$1,183,926 and \$321,835 under the HOME Investment Partnerships Program (HOME); and

**WHEREAS**, the City of Wheeling's Department of Economic and Community Development has prepared a FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and Analysis of Impediments to Fair Housing Choice for FY 2020, which proposes how the entitlement grant funds will be expended to address the housing and community development needs identified in the City's Five Year Consolidated Plan; and

**WHEREAS**, a draft of the FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and FY 2020 Analysis of Impediments to Fair Housing Choice was on public display from Friday, July 17, 2020 through Monday, August 17, 2020, and the City held a series of public meetings and hearings on the said Plans and the comments of various agencies, groups, and citizens were taken into consideration in the preparation of the final documents.

**NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF WHEELING, OHIO COUNTY, WEST VIRGINIA, AS FOLLOWS:**

**SECTION 1.** That the FY 2020-2024 Five Year Consolidated Plan, the FY 2020 Analysis of Impediments to Fair Housing Choice, and the FY 2020 Annual Action Plan for the FY 2020 CDBG and HOME Programs is hereby in all respects APPROVED.

**SECTION 2.** That the City is COGNIZANT of the conditions that are imposed in the undertaking and carrying out of the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs with Federal financial assistance, including those relating to (a) the relocation of site occupants, (b) the prohibition of discrimination because of race, color, age, religion, sex, disability, familial status, or national origin, and (c) other assurances as set forth under the certifications.

**SECTION 3.** That the City Manager, on behalf of the City of Wheeling, West Virginia, is AUTHORIZED to file an Application for financial assistance with the U.S. Department of Housing and Urban Development which has indicated its willingness to make available funds to carry out the CDBG Program in the amount of \$1,183,926; and the HOME Program in the amount of \$321,835; and is further AUTHORIZED to act as the representative of the City of Wheeling to sign any and all documents in regard to these programs.

**SECTION 4.** That the City Manager, on behalf the City of Wheeling, West Virginia, is AUTHORIZED to provide assurances and/or certifications as required by the Housing and Community Development Act of 1974, as amended; and any other supplemental or revised data which the U.S. Department of Housing and Urban Development may request in review of the City's Application.

**ADOPTED INTO A RESOLUTION THIS 18<sup>TH</sup> DAY OF AUGUST 2020 BY THE COUNCIL OF THE CITY OF WHEELING, WEST VIRGINIA.**

IN WITNESS WHEREOF, I, Glenn Elliott, Mayor of the City of Wheeling, West Virginia have hereunto set my hand and caused the official seal of the City of Wheeling to be affixed this 18<sup>th</sup> day of August 2020.

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Glenn Elliott, Mayor

## VII. Appendix

The following items are in the appendix:

- Appendix A – Agency/Organization Meetings & Additional Consultations
- Appendix B – Resident Surveys and Agency Surveys
- Appendix C – Public Comments

DRAFT

## **A. Appendix A – Agency/Organization Meetings**

Attached are the stakeholders summary meeting minutes.

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## Tuesday, December 4, 2019

### 9:30 A.M. – Fire Chief Larry Helms

- Fire Dept. has been purchasing equipment, some trucks over 30 years old and has an aging fleet.
- Currently leasing a ladder truck for the next five years
- CDBG has helped keep newer equipment in low-mod income areas.
- Trying to replace a different engine every 5 years, received thermal imaging equipment for low/mod income areas
- Likely that Fire dept will continue to request newer trucks/ladder truck rental images
- Asked about outreach programs through CDBG, example Fire Safety Trailer to help raise awareness in schools
- Need to look at station upgrades in Low/Mod income areas
- Biggest need is continuing to replace and upgrade engines in low/mod income areas
- Some areas where water mains need to be replaced: Mozart, National Road (Fulton area)
- Retrofit existing hydrants with new connector to alleviate need for large adapters.
- Most needs are facility-based or structure-based.
- Asked about EMS services, two primary services based out of South and North Wheeling. Need for new cardiac monitors on tertiary ambulances.
- Fire department carries Narcan and administers it.
- 138 calls for Narcan in 2018
- Around 150 structure fires a year, 7,000 total incidents a year
- About 4,200 of 7,000 are EMS related
- Wheeling Island and North Wheeling heavy area usage
- Units of 4 or more are inspected by the Fire Department - in smaller units notice rare instances of smoke detectors being inoperable or missing. Require landlords to install 10-year smoke detectors that are tamper proof.

### 10:00 A.M. Planning Department – Tom C.

- Comprehensive Plan needs to be reviewed in 2024 and needs to be included in con-plan. Will cost approximately \$80,000.00.
- Need for City-wide GIS system. Assistant City Manager met with Department of Water to start work but the City does not have a solid source of funding.
- South Wheeling has been changed by WODA three-phase development; population could increase with 160 new units of Low/Mod income residents.
- Age is showing and lack of maintenance in nearly everybody neighborhood. Parts of Woodsdale and Dimmydale becoming low/mod income.



- Seems like Wheeling is becoming more stratified with many people either upper middle income, lower income or retired.
- Potential to use an NRSA in areas that are starting to fall behind and prevent them from becoming fully low income.
- Loss of mid-range local contractors, creating backlogs of work in the City.
- Business has a tendency to sprawl, not investing in downtown area. Residents investing in housing stock if possible, however many residents unable to upkeep. No vacant land to build new subdivisions.
- No effort being put into new annexations in the City. Issues with new “oxford” houses that cater to disabled recovering drug and alcohol addicts.
- Working with Oxford house to try to avoid further issues in with NIMBY neighborhood groups.
  - Zoning Code allows for 5 disabled individuals living in the house.
- Need for fair housing training.

#### **10:45 A.M. Economic and Community Development**

- YMCA planning to apply for CDBG funds, scholarship for low/mod income children or scholarships for YMCA summer camp. Both qualify if the membership is the same
- YSS planning to ask for funding for winter freeze shelter December to March presumed benefit to homeless persons.
- Homeless population is increasing.
- Freeze shelter willing to allow people to enter the shelter without accepting services.
- Homeless encampments have quadrupled over the past year.
- Ohio Valley Medical Center closed and only Wheeling Hospital acts as hospital for the entire City.
- Need for mental health facilities, lost one with hospital closure.
- Need for infrastructure improvements (roads, sidewalks, water and sewer lines, hillside slip repairs) Other roads going to see increased traffic due to I-70 closures.
- Inquiries for rehabilitation projects from City residents.
- Possible Weatherization programs could be implemented to increase energy efficiency, roof, doors, windows, furnaces etc.

#### **1:00 P.M. Inspection Division**

- Lots of dilapidated property throughout the City of Wheeling
- Increase of low/moderate income developments through WODA
- Emergence of WODA and better enforcement has lessened the number of complaints by tenants towards landlords
- Vacant properties have also increased since WODA projects began
- Inspections completes HOME inspections for first time home-buyer program, reduces mortgage costs to less than rental costs. Need to continue program

- Most owners do not have the financial ability to keep up with repairs.
- Investments in houses may not be feasible given cost of contracting and sale prices of houses
- Vacant house program has helped to curb negligent owners
- Speculators come and buy multiple properties to flip but ignore some dilapidated structures
- Department is both proactive and reactive, in looking for violations
- Largest complaints are high grass, abandoned cars etc.
- Usually structural issues require a complaint
- Removed 100 abandoned vehicles through the citation process
  - People do not have the funds or ability to fix broken down abandoned cars
- 3-1-1 system used to file complaints
- Some older homeowners are unable to maintain their house
- Mostly exterior housing issues
- Large need for a weatherization program to repair roofs, etc.
- People would be interested in using program funds for roof repairs
- Hundreds of structures need roofing repairs
- Furnace replacements/Hot Water Tanks replacements on Wheeling Island
  - Extra costs due to floodplain can kill projects in need area
- Many sidewalks are deteriorated making enforcement difficult
- 200 houses need to be demolished in the City
- 200 houses torn down over the past 8 years
- Wheeling Island, North Wheeling and South Wheeling are areas of highest complaint, as well as Center Wheeling
- 50 Mixed-use commercial structures need torn down throughout the City
- Need more affordable housing like WODA and Hope Six projects
- Need to utilize the River more, developing waterfront property, only can get to Wheeling Island via I-70
- Possible issue with fair housing in the City, one instance of a transgender man finding housing

### **3:00 P.M. Parks and Recreation**

- Has Five Year Vision Plan that involves using CDBG funding
- All projects are visitable and ADA accessible
- Possible need for wheelchair accessible swing
- Need to be aware of service area for city-wide vs. neighborhood parks
- Potential issues with Wheeling Island Marina
- Sidewalks to fishing pier at Wheeling Island Marina need work
- Nelson Jordan Center needs improvements or to be closed and relocated

- All swimming pools have handicapped lifts
- Possible shared access with local community college
- YMCA has reached out to the City about working together, possible merger with rec department
- ADA accessibility requirements
- No other community/senior citizen centers owned by the city
- Nelson Jordan Center C.T. is roughly 46% minority in a low/mod income area
- \$33,000 a year to the Nelson Jordan Center
- No after-school or senior programming via the City rec department
- Basketball, Soccer, Baseball, Tennis and learn to swim programs
  - Scholarship program for low/mod income residents
  - \$30 to \$35 dollars per week
- Pools cost \$1 for entry, lowest in W.V. by \$1.50
  - 4 Pools in the City
- Oglebay/Wheeling Park go through DHHR for vouchers to larger pools
- Wheeling Island has a splash pad and a newer pool; Grandview has a large grass field
- South Wheeling has a large pool used by mostly low/mod income residents
- Worwood pool is above income
- Over 30 public spaces, 22 playgrounds, 13 miles of rail trails
- Every citizen within Wheeling is .5 miles within a playground
- City handles field care
- Serious issue tenting in parks and public spaces, discourages use of parks
- Possible sale of drugs on playground equipment
- 3 separate pieces of playground equipment constitutes a school for drug offenses
- Shade structures near pools and in parks
- Grandview park shade/bus shelter
- Most parks are accessible via sidewalk however improvements can be made
- Fencing for ball fields
- Safety lighting in multiple parks
- Upgrade to lights, LED conversion and push button lights
- Possible increase of summer food programs
- Possible need for more affordable housing
- Template for bid in Belle Isle Park.
- Bike lanes need restriped
- 10 bikes for bike share

#### **4:00 P.M. Chief of Police**

- Police department is short-staffed at this point
- City of Wheeling selected for DoJ grant to reduce gun violence and illegal gun ownership

- City has a crime analyst
- Wheeling hired a Victim advocate through a DoJ grant
- Develop a program to clean up blighted houses
- Possible funding a new position to create a new task force
- Could use more pole cameras or mobile cameras.
- No contract with Wheeling Housing Authority
- Possible to partner with Housing Authority to provide housing for Police officers
- Uses in Sync for record management
- Crime mapping coming through Motorola
- Narcotics use increasing, human trafficking slight increase, concern about increase of Methamphetamine
- No reported instances related to fair housing concerns

#### **4:30 P.M. Public Works Department**

- Need for paving and ADA compliance
- ADA ramps increasing cost
- Paving streets is very political
- Need for an ADA ramp project
- Any additional paving funds makes a difference
- ADA ramps should be their own project
- Slip areas
- Lots of rentals in neighborhoods
- Sewer/Sanitary authority is enterprise funds and may not need support of CDBG funds

## **Wednesday, December 5, 2019**

#### **9:30 A.M. – Wheeling Housing Authority**

- A need for affordable housing in the City of Wheeling, 22 vacancies between Section 8, LIHTC and public housing, 10 vacancies at Garden Park.
- 615 unduplicated individuals on waiting list for housing.
- Two biggest needs are more public housing and decent rental units
- Some vacancies are due to necessary renovations or that people that do not meet requirements
- If people leave lease early, they must keep possessions for 30 days by W.V. law, whole process takes 60 to 90 days
- Asbestos abatement in Garden Park, any vacancies in the building go through abatement upon vacancy
- Trouble finding suitable candidates
- HOME vouchers utilization is up but not quite at standard 93%

- Trouble with absorbing housing vouchers
- Housing Authority has 469 HOME Vouchers available
- Low income housing is a huge need
- Have done a decent job maintaining public housing
- Difficulty finding Units that accept Section 8 Vouchers
  - Clients have at most 120 days to find an apartment
- Maintenance needed around Wheeling, private landlords having trouble maintaining properties
- Trouble finding contractors to work on little projects
- Need for an incubator system in the City of Wheeling
  - Could be used for maintenance, cleaning or other upkeep
- No connections with Section 3 or MBE businesses
- Is now reestablishing a relationship with the Continuum of Care
- Vacant buildings can be used to create a single owner business on the ground floor with public housing on the top, mixed use commercial residential
  - Housing Authority has ability to partner but not to take on the project in full
- Housing Authority projects have cameras
- Drug elimination programs would have a large impact on the Authority and the City as a whole
- Possibility of Police living in units
- Garden Park lost designation of elderly only and the units have remained vacant, long standing issue with quality of units and upkeep
- Riverview is an elderly only building
- Jacobs Street is the only property that is 100% visitable
- WHA is at 5% accessibility in accordance with Section 504
- Have made living accommodations as needed for walk-in showers, ramps, etc.
- Priority given to veterans and victims of Domestic Violence, but the violence must be within 6 months, if DV occurs within units the couple are split, the victim is not put out.
- Homeless does not get a priority
- Needed increase of services for people in units
- Two crimes are denied without hearing: production of Methamphetamine or Sex Offenses
- Do not have any homeownership programs
  - Would consider homeownership programs
  - Using Section 8 vouchers to buy housing
- Authority has an FSS at Hill dev. but does not have a ROSS Grant, and is reapplying
- Need for Grocery Stores, some food deserts in the City
- Not seeing many Fair Housing Issues, some NIMBY problems

- WHA advertises for Fair Housing, Authority could partner with the City in their fair housing event
- 3 new landlords for Section 8 vouchers in past 6 months

### **10:30 A.M. Housing Agencies**

- Need for a rehabilitation program, houses are older, and people are having difficulty with upkeep.
- Need a rehab project
- Prices are going up but need to have property rehabbed despite increased cost
- Two rehab projects that could be defunct: one through Bel-O-Mar the other through the City of Steubenville, OH
- WesBanco could offer loans to match
- Change, INC offers a weatherization program and has an 18-month waitlist, about 60% of houses do not meet state minimum standards
  - Funded by the State, they don't quantify labor costs or administrative
  - Usually do about 50 homes per year
  - \$6,800 per home for materials only
- \$5,000 may not be enough to make a significant difference with lead abatement necessities
- Need for places to build new homes due to fracking production
  - Could raise housing prices with new productions coming to the state
  - Average selling price is \$175,000
  - Could exacerbate affordable housing cost
- Houses assessed on a three-year recurrent basis
- Very static housing market in Wheeling
- Property values have increased due to increased fracking and have made affordable housing developments more difficult
- Many people applying for Loughlin Loans due to higher rents and not able to find other suitable affordable houses
- City has helped with down payment assistance for 900 homes since 1996
- Trouble finding accessible rental units, House of the Carpenter has a ramp program
- Full accessibility is very difficult to find
  - Tough due to terrain
  - Extra costs make accessibility difficult to obtain
- Habitat for Humanity is more active in the City than county
  - Barriers are funds and finding qualified candidates
  - Roughly doing one home every other year
  - Requires 500 hours for married couple, 250 for single family
- Need for Homeless shelters and the Salvation Army only accept Men who can only stay 21 days



- 49 Women and Children were kicked from shelter upon closure
- Catholic Neighborhood Center is a day shelter for the homeless
- Freeze Shelter opened a month early to try to accommodate
  - Only opened at night
- Some transient homeless population and a lack of shelters leading to tent cities
- YSS helping with rental for some families
- Homelessness worse because of closure of mental health facilities
- High demand drives affordable houses off the market very quickly, missing transition from larger home to “ranch” style house
- 60 units full in new lofts developed by WODA
- Transportation is an issue, in some parts of the City
- Difficult for Low/Mod income residents to work steadily due to transportation
- Oglebay Station could be potential site for a new development
- Tough to find support for affordable housing in certain neighborhoods due to NIMBYism
- Would like to see everyone have the same amenities
- Land availability makes new affordable housing developments difficult
- Market Study has supported need for affordable housing
- To receive points for tax credits developers, go to required training for Fair Housing
- Feeling that the Government can be reckless in ADA compliance in general
- WODA has looked into Clay School Site
  - Site issues make development difficult
- Things to see:
  - New developments in the City
  - Things to drive new developments

### **1:00 P.M. Social Services Agencies**

- Family resource network works to help close gaps in services, transportation is a barrier to many efforts, comes up at nearly every meeting across all services
  - Desire for annual bus passes
  - Demand for buying online passes
  - Seniors unable to make it to the few bus stops in the City
  - Both access to use bus and access to more routes
  - Some public housing not on bus routes
  - Only some routes run the entire 6 A.M. to 6 P.M hours. No Sunday services
- Seniors unable to find affordable housing, some seniors don't feel safe in mixed generational development
  - Fear of being with younger people who may be classified as disabled due to drug and alcohol problems
- FEMA Floodplains and insurance make new developments and rehabilitations much more difficult

- House of Carpenter lost 2 million dollars' worth of funding due to floodplain and insurance
- Flood insurance is a large barrier to homeownership
- Flooding on Wheeling Island mostly comes up through basement
- Flooding is a huge problem
- Food is a need in the City
  - 90,000 meals a year between seniors and head start program
  - Seniors struggling between high prescription and insurance costs and cost of food
  - Food pantries are available but are localized and can be tough to reach for some people
  - House of the Carpenter food pantry use has risen 20% in the past year
  - Seniors unable to retire because of high costs of living
- Women fleeing domestic abuse unable to find affordable housing after shelter living
- Large problem with finding affordable housing across all demographics
  - YWCA having people in shelters 3,000 nights a year
- Average house in Wheeling needs roughly \$90,000 worth a work
- Project HOPE and Youth Services paying to keep families in hotels and off of the streets
- Agreement with the McClure Hotel to house homeless people for low payments
- Elderly people forced to live in hotels due to inability to find affordable housing
- Seniors afraid to live in high-rises due to increases in addiction-type services
- Need places for homeless populations to go other than encampments
- Open and available affordable housing is secluded from transportation
- 105 homeless people living in the City
- Homeless coming to the City of Wheeling due to closure of New Martinsburg facility
- 47 women sleeping outside, 5 pregnant
- Some chronic homelessness as well as more people becoming homeless
- Some homeless people stuck due to policies of origination of homeless rule
- Encourages homeless people to go to coalition, Homeless shelters not equipped to take care of people that need medical, mental or addiction services
  - No places able to provide care as needed
- Mental health care is severely lacking in the City
- Winter Freeze Shelter:
  - Not equipped to handle permanent shelter
  - Not under YSS mission statement
  - Funds not sufficient to support year-round shelter
  - No remote access to homeless shelter, must be at the intake between 2 to 4 P.M. Monday to Friday
- Salvation Army closed only family shelter in the City of Wheeling
- Transportation and Housing issues have been long standing issues

- \$750 rent in WODA apartments
- Frustration with barriers to reach CHDO status
- Voucher wait times can make it difficult to get into affordable housing
- Lack of housing makes children's academic lives more difficult
- Grant funding is strict and can only provide so much help
- Increase in senior citizens becoming homeless
  - Supporting grandchildren due to drug abuse of parents
  - Burden on teenagers to become caregivers for grandparents
- Adult literacy rate in the state of West Virginia just above 80%
- Education is a large barrier to incarcerated/addict recovery
  - Average women's education age in YWCA is 14 Years Old
  - Incarcerated population needs medical, educational, housing and dental support
  - System provides barriers to people trying to reintegrate people into society
  - Links back to transportation issues - YWCA spends thousands of dollars in transportation
- Need changes in state laws to support the homeless populations
- Hospitals discharging at-risk people into homelessness
- Teenagers becoming caregivers for elderly grandparents
  - Disrupts education and adds more burden to children
- Need for Family Shelters

### **3:00 P.M. Northern Panhandle Continuum of Care**

- Greater need for specialized services
  - Recovery specialists/coaches
  - Case management is burdened without extra specialized help
  - More staff oversight needed to ensure goals and outcomes are reached
  - Uses Housing First model, works well in counties outside of Ohio County
  - Also funds transitional housing based on ability/needs of people striking a balance based on needs of people
- Admission policies in transitional homes have been modified in response to closure of Salvation Army Family Shelter
  - Allows women and families to be moved into transitional housing directly from intake
  - After 21 days in Salvation Army, sheltered people can be moved into transitional housing
- Most grants want people housed within 30 days
- Chronically homeless coming back over and over to shelters
- Discharge planning to ensure people leaving institutions are not dumped on the streets
- 28 more homeless people in the past year
- Funds only allocated to people in only the northern panhandle

- Limited by HUD requirements on who can be helped, Coalition maintains count on others so that other groups can use them as a basis to apply for further funding
- Needs assessment of clients (1-day assessment of caseload, excluding children)
  - 96% of cases were affected in some way by Opioid use
  - Received a one-time grant but still need further support
  - 51% of the people affected were non-users of Opioids but still dealing with some other substance abuse
  - Alcohol, Methamphetamine and other substances make up the 51% of users
- Need to improve homeless management information system (HMIS)
- HMIS was in bottom of tier 2 in funding (Tier 1 is nearly guaranteed, Tier 2 more competitive)
- Loss of HMIS will lose the CoC 1.5 Million dollars
- 4 different agencies use HMIS and could be at risk of losing funds
- Transitional housing has a 92% success rate since its inception in 2001
- Transportation is a major issue and a barrier to employment
  - Public transit is lacking which provides a barrier to meaningful jobs
  - Looking for services to connect jobseekers with employers
- Fair Market Rent/Rent reasonableness makes affordable housing difficult to find
  - Wheeling Housing Authority granted waiver to go 10% above Fair Market Rent Costs
- Know to report fair housing concerns, no issues with fair housing noticed by the coalition
- Transitional housing prioritizes Domestic Violence and Families for housing
- Lack of other resources for domestic violence
- Closing to OVMC and Hillcrest has played a role in slight increase in homelessness
- Conducts street outreach in 3 prong approach
  - Connect weekly with landlords
  - Connect weekly with community partners
  - Connect weekly with clients
- Virtual intake is currently in development establishing connections with public libraries
- Intake is 2-4 p.m. Monday to Friday only one family member needs to be present try to get I.D. if the person has it
- Try diversion to resolve conflicts if safety is not an issue and strategically spend money over the course of the year

#### **4:00 P.M. Fair Housing Agencies**

- Human rights commission refers potential complaints to Southwest PA/Legal services
- HRC has one current case about reasonable accommodation
- People are unaware of rights being violated
- Need more education outreach about Fair housing

- City working on doing a landlord training in April
  - Happens roughly every two years
  - Should be partnered with Housing Authority
- Education through the Fair Housing Law Center
- Could do a sexual harassment-based seminar to raise awareness
- Seeing uptick in cases involving DV, and re-entry/recovery groups
- Need to find a way to reach tenants
  - Outreach through youth fair
  - Community college fair
  - Fair housing billboard in April
  - Arts/Multi-cultural festival
- Some agencies don't understand impediments to Fair Housing
  - Accessibility
- Units that are large enough for families
- Older housing stock
- Need to update tenant-landlord law codes
  - Information is sought after in the City

## Friday, December 6, 2019

### 9:30 A.M. Education Groups

- WVNCC offers two year programs and certificates, offers night classes and online classes
- Certain communities would need more help than others
  - Costs have risen Special Ed, Behavioral programs, could be caused by Opioid crisis and its effects
  - Need to generate funds for extra staff to handle unique challenges
  - Flexible with open-dates, and try to accommodate as best as possible
  - Every school has free lunch and free breakfast under CEP program
  - Cost has risen but it is offset by assistance from the Federal Government
  - Roughly 5,500 students in Ohio County District added half-million dollars to budget
  - 98% graduation rate, highest in the State of West Virginia
- Most WVNCC students are traditional students, draw mostly from local high school, 3 campuses, Wheeling, Martinsville and Weirton
- 68% traditional students on campus
- High school partners with local colleges to provide college credit
- Opportunity to expand early entrance to some more average students that would attend WVNCC
- WVNCC has articulation agreements with many other local schools

- Partnerships with local companies to work part time and get a full-time job upon graduation
- Challenges dealing with Oil & Gas Industry
- Push for trades program through Ohio County Schools, can leave school certified welders assistance, large automotive program, and an electrician program
- New industrial Tech center on WVNCC campus, 21 welding booths seeing growth in welding and petroleum tech industry
- Shift away from four-year degrees to more job training and completion program
- Enrollment has been stagnant although population has declined
- 1- and 2-year certificates allow for quick training and higher earning potential
- WV Vest grant program allow for free programs with some stipulations
- Ohio County schools still working to find best way to utilize WV Vest grant
- 300-400 students took advantage of Vest grant
  - 99% passed drug test needed for programs
- Full-time attendance director tries to ensure children are attending school directly
- Small impact from funding with some transient populations
- Elm Grove Elementary has been affected somewhat due to influx of oil and gas workers with families
- Some homeless populations coming to WVNCC for classes
  - Offers services through academic center, counseling
  - Students sometimes drop out
  - WVNCC offers emergency assistance when possible, more money is available to be utilized
- Parent education needs to be improved in order to provide better schooling
  - School has had difficulty getting parents to attend counseling/training sessions
- Biggest challenges
  - Economy is currently offering good jobs but that may go away in a downturn
  - Enrolled students biggest challenge is mental health support – no mental health counselor on campus
    - Issue has grown
- Mental Health is a large challenge in Ohio County started a counseling program for elementary students
- Not seeing impacts from hospital closure at this time
- Ohio County has seen some impacts with closure of local mental health facilities
  - Delays process sometimes
- Students and professors having difficulty finding housing in the City
- Wheeling Island, South Wheeling, and East Wheeling appear to be areas of largest need in housing and mental health services as well
- Have to overpay to get into desired areas, could have found more for the cost in places outside of Wheeling



- Potential for housing in Centre Market in Wheeling
- Pay makes it difficult to attract and keep quality teachers in Wheeling and the State
- In search for WVNCC president some national candidates were negative in perception of City
- Affordability is the largest impediment to fair housing

### **10:30 A.M. Economic Development Organizations**

- Lack of nightlife in the City
- World-class symphony, musicals and other cultural events through universities
- Downtown density could be improved
- Could increase development on vacant lots in the lots
- Negative image of downtown Wheeling, many people that live in the City view downtown as a dangerous place
- Issues with perceptions with the City of Wheeling about neighborhoods
- Code Enforcement needs to be improved and demolish blighted properties
- Property laws make it difficult to prosecute out of state entities
- Events draw people downtown, not restaurants, stores and bars
- Difficultly competing with St. Clairsville and Highlands retail/restaurant scenes
- Most new developments are directed to the Highlands
- Downtown projects face hurdles
  - Appear riskier
  - Financing issues
  - People give up on business due to regulations
  - Difficult to run store fronts with rental units on the upper floors
  - Difficulty finding contractors
- City infrastructure poses a barrier to further development
- WODA has helped to slowly change perceptions but progress has been slow
- Trouble finding affordable rents and housing, could utilize Downtown to alleviate problems
- General Downtown has a need of more affordable rentals
- Most homes are either below \$100,000 and need rehabs of above \$500,000. Lack of moderately priced businesses
- Could be lack of skilled workers in the City
- Growing companies having trouble finding skilled workers to fill positions
- Most trades jobs staying in the City of Wheeling
- Oil and Gas jobs are more transient
- Occupancy at highlands has dropped over the past few months
- Need for new modern housing developments in the City
- New Cracker plant has some detractors, could cause prices to rise due to speculators

- Sprawl of the City makes new businesses impact felt
- OVMC closure has caused some people to lose jobs and have had an impact across the City
  - Competition and Mismanagement led to closure
  - Seems to be a need another hospital in the City of Wheeling
- WVU could develop hospital and the old OVMC site is not desirable
- Non-profit hospitals are completely tax exempt
- City misses resources due to poor tax system
- County could help to neutralize large property tax increase
- Paving downtown could help improve image of the downtown
  - Sidewalks are not ADA compliant
  - Design makes accessibility poor
  - Most businesses have become ADA compliant; Curb Cuts are bigger issue than step-ups
- Could help improve appearance and air quality with a beautification project through implementation of trees
- Affordable/Low-income housing is not connected to sidewalk or transit system
  - Public transit system makes employment tougher
  - Separation of jobs and affordable housing exacerbates transportation issue

#### **1:00 P.M. Faith Based Groups**

- Public safety building cost and location has become controversial
  - Superfund/Brownfield site
  - Similar projects should be based more downtown
- Reopening of Suspension bridge
- ADA Curb Cuts throughout parts of the City
- More museums in the city
- 24-hour bus facilities, difficult to get access to hospitals and malls
- Wheeling Health Right has helped to arrange a ride sharing
- OVMC closure has made medical access more difficult
- More minority inclusion throughout City offices
  - Trying to recruit more minority people into roles within the City
  - Some minority people don't feel welcome in the City due to lack of inclusion
- Storm sewer improvements
- Seniors having difficulty getting into public
- Lack of affordable housing throughout the City
- Church recently bought the Dream Center
  - Have been approached two different times to sell the land to developers but developers have been denied for tax credit and moved on

- Closing of OVMC has left many needing mental help that are unable to receive inpatient help that they need
- Better mental health care needed in the City
- Need for a senior citizens center
- Asked about becoming a CHDO in order to create a new Senior Citizens Building
- Church has land and buildings but does not have funds or experience in order to provide housing
- Large amounts of parks, however access to some of the best parks is limited
- Some issues with people yelling racial insults and racial intimidation in the City of Wheeling, letters from hate groups, KKK.
- Continuing issues in Jewish and African American groups dealing with threats and burning down of a church building
  - Youth Center building burned down 12-15 years ago
- Not feeling welcome in the City in the of Wheeling if you are a minority
- People buying rentals in residential neighborhoods and turning them into duplexes

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## **B. Appendix B – Resident Surveys and Agency Surveys**

Attached are copies and summaries of the following surveys:

- Residential Survey
- Agency Survey
- Survey Results

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**CITY OF WHEELING, WEST VIRGINIA – CONFIDENTIAL RESIDENT QUESTIONNAIRE**

The City of Wheeling, West Virginia is conducting a survey to identify residents' needs in the community and fair housing concerns, such as acts of discrimination or barriers that might limit the housing choices of families and individuals. This survey will help the city prepare its Five-Year Consolidated Plan, Annual Action Plan and its Analysis of Impediments to Fair Housing Choice. Please take a few minutes and complete this **confidential questionnaire**. When completed, please return the survey to the **Wheeling Community Development Department, 1500 Chapline Street, Suite 305, Wheeling, WV 26003**. The City would appreciate your response by **January 31, 2020**.

1. **Identify housing/rental issues in the City of Wheeling (Choose all that apply):**  
 Affordability  Minor Rehabilitation  Major Rehabilitation  Code Enforcement  ADA Accessibility  
 Historic Preservation  Negligent Landlords  Asbestos/Mold  Lead Paint/Pipes  Other\_\_\_\_\_
  2. **Identify any needs or improvements to parks/recreational facilities. (Choose all that apply):**  
 Playground Equipment  Benches & Picnic Tables  Basketball Courts  Tennis Courts  
 ADA Surfacing  ADA Equipment  Open Grass Fields  Splash Pads  Pools  Skateparks  
 Walking/Biking Trails  Ice Skating  Other\_\_\_\_\_
  3. **Are there any problems in your neighborhood with the following (choose all that apply):**  
 Streets  Curbs/Sidewalks  Handicap Access  Parking  Flooding  Traffic  Storm Sewers  
 Sanitary Sewers  Litter  Property Maintenance  Public Safety  Crime  Other\_\_\_\_\_
  4. **Identify any crime issues within the City of Wheeling.**  Theft  Drugs  Violent Crime  Gangs  
 Domestic Violence  Graffiti  Vandalism  Loitering  Sexual assault  Hate Crimes  
 Other\_\_\_\_\_
  5. **Do you use any of the social services programs available in the City? (Choose all that apply)**  
 Medical  Mental health  Homeless  Senior Services  Legal  Addiction  Employment  
 Disabled  Youth services  Education/Job Training  Food Access  Warming shelters  
 Childcare  Immigrant  LGBTQIA  None  Other\_\_\_\_\_
  6. **Are there any programs or services that are missing or under-funded in the City? Please list:**  
\_\_\_\_\_  
\_\_\_\_\_
  7. **Identify any employment issues in the City of Wheeling (Choose all that apply):**  
 Lack of Job Opportunities  Discriminatory Practices  Lack of Job Training  Legal Barriers  
 Lack of Accommodation  Lack of Childcare  Lack of Transportation  Other\_\_\_\_\_
  8. **Identify transportation issues in the City of Wheeling (Choose all that apply):**  
 Not Reliable Public Transit  Not enough service hours  Cost of service  Disconnected routes  
 Unsafe public transit  Bike routes/lanes  Lack of Parking  Walkability  Other\_\_\_\_\_
  9. **Identify any blight (clearance/demolitions) issues in the City of Wheeling? (Choose all that apply):**  
 Open Dumping Grounds  Uncut Lawns  Vacant Lots  Squatting  Vacant Commercial  
Structures  Vacant Residential Buildings  Fire Risk  Pest Control  Site Pollution  Other:\_\_\_\_\_
- Fair Housing impediments include any act of discrimination or barrier that limits the housing choices of families and individuals. The Fair Housing Act protects people from discrimination based on race, color, national origin, religion, sex, familial status or disability, when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities.**
10. **In your opinion, are residents of the City of Wheeling aware of how to report fair housing violations?**  
 Yes  No  Unsure **To whom should you report?**\_\_\_\_\_

(Turn Over to Complete)

11. **Identify the reasons why fair housing complaints may not be reported? (Choose all that apply):**  
 Fear  Retaliation  Don't know how  Reporting process  Distrust of process  Other: \_\_\_\_\_
12. **If you are a renter, has your landlord refused to make a reasonable accommodations for a disability?**  
 Yes  No **If 'Yes' what was the request?** \_\_\_\_\_
13. **Have you faced housing discrimination based on any of these characteristics? (Check all that apply):**  
 Race  Color  National Origin  Religion  Sex  Familial Status  Disability  
 Gender Identity  Source of Income  Sexual Orientation  Transgender Status  Other: \_\_\_\_\_
14. **Please evaluate whether the following situations result in further discriminations and/or barriers to fair housing in the City of Wheeling:**

	Strongly Agree	Agree	Neutral/ Unsure	Disagree	Strongly Disagree
State or Local laws and policies that limit housing choice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of fair housing organizations in the City	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of knowledge among bankers/lenders regarding fair housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of knowledge among landlords and property managers regarding fair housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of knowledge among real estate agents regarding fair housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of knowledge among residents regarding fair housing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of accessible housing for persons with disabilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of accessibility in neighborhoods (i.e. curb cuts)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of fair housing education	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lack of affordable housing in certain areas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Concentration of subsidized housing in certain neighborhoods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other barriers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

15. **Are there any additional comments or concerns that you wish to share?**
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

**Please take a minute to tell us about yourself:**

16. **What is your street name and ZIP Code where you live in the City of Wheeling?**  
 Street Name: \_\_\_\_\_ ZIP Code: \_\_\_\_\_ Neighborhood: \_\_\_\_\_
17. **Gender:**  Male  Female  Non-binary/Gender Queer  Gender non-conforming  
 Gender Expansive  Describe: \_\_\_\_\_
18. **Race/Ethnicity (choose all that apply):**  White  Black or African-American  Native Hawaiian/  
 Pacific Islander  Asian  American Indian/Alaskan Native  Another Race  Two or more Races
19. **Ethnicity:**  Hispanic or Latino  Not Hispanic or Latino
20. **Age:**  17 or younger  18-20  21-29  30-39  40-49  50-59  60 or older
21. **Number of persons living in your household?**  One  Two  Three  Four  Five  Six +
22. **Based on the number of persons living in your household check whether you are over or under the listed income?**

1 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$36,550	4 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$52,150
2 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$41,750	5 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$56,350
3 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$46,950	6 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$60,500

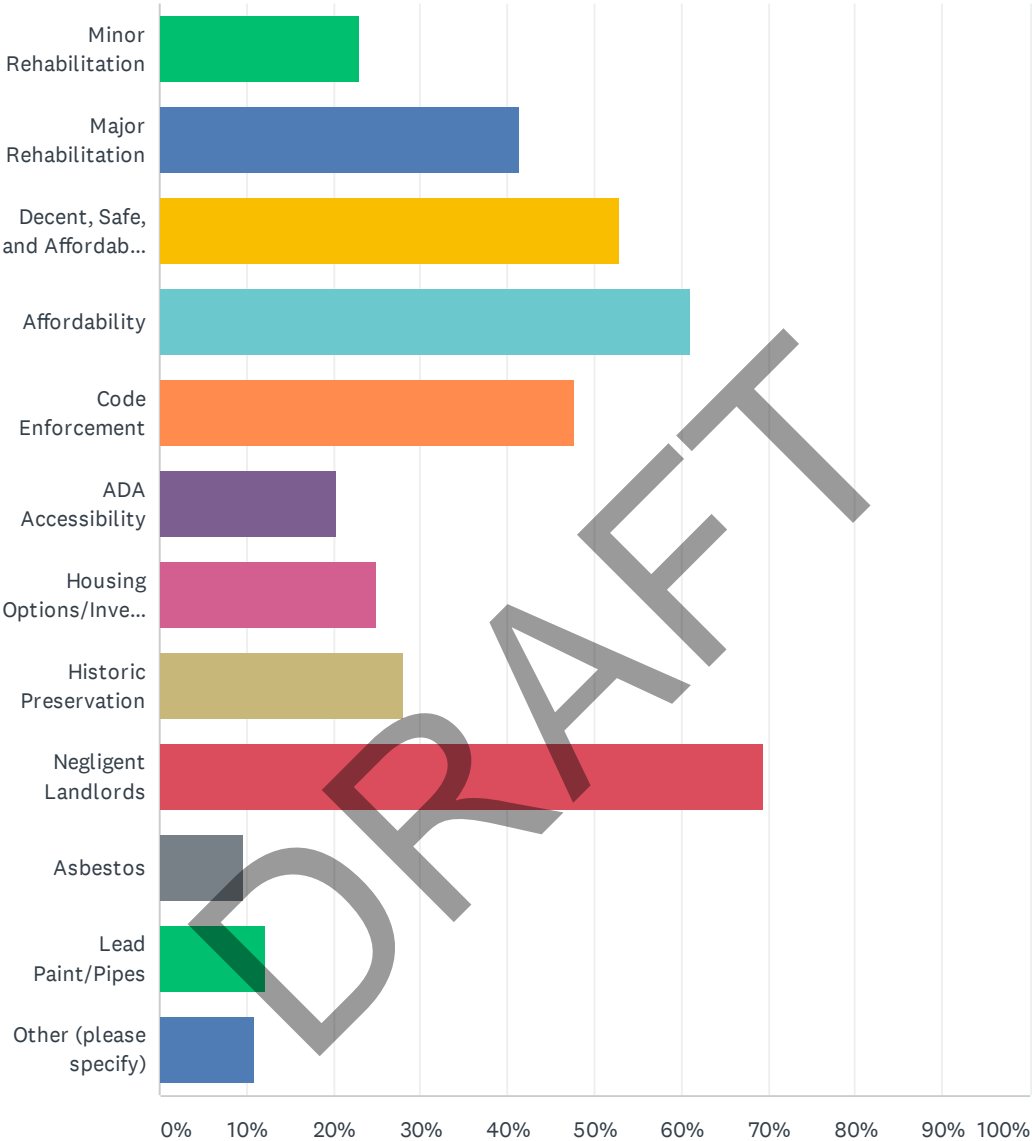
23. **Choose your housing status:**  Homeowner  Renter  Homeless  Living with friends/relatives  
 Temporary Shelter  Hotel/Motel  Mobile Home  Vehicle  Other: \_\_\_\_\_

(Turn Over to Complete)



# Q1 Identify housing/rental issues in the City of Wheeling (Choose all that apply)

Answered: 157 Skipped: 7



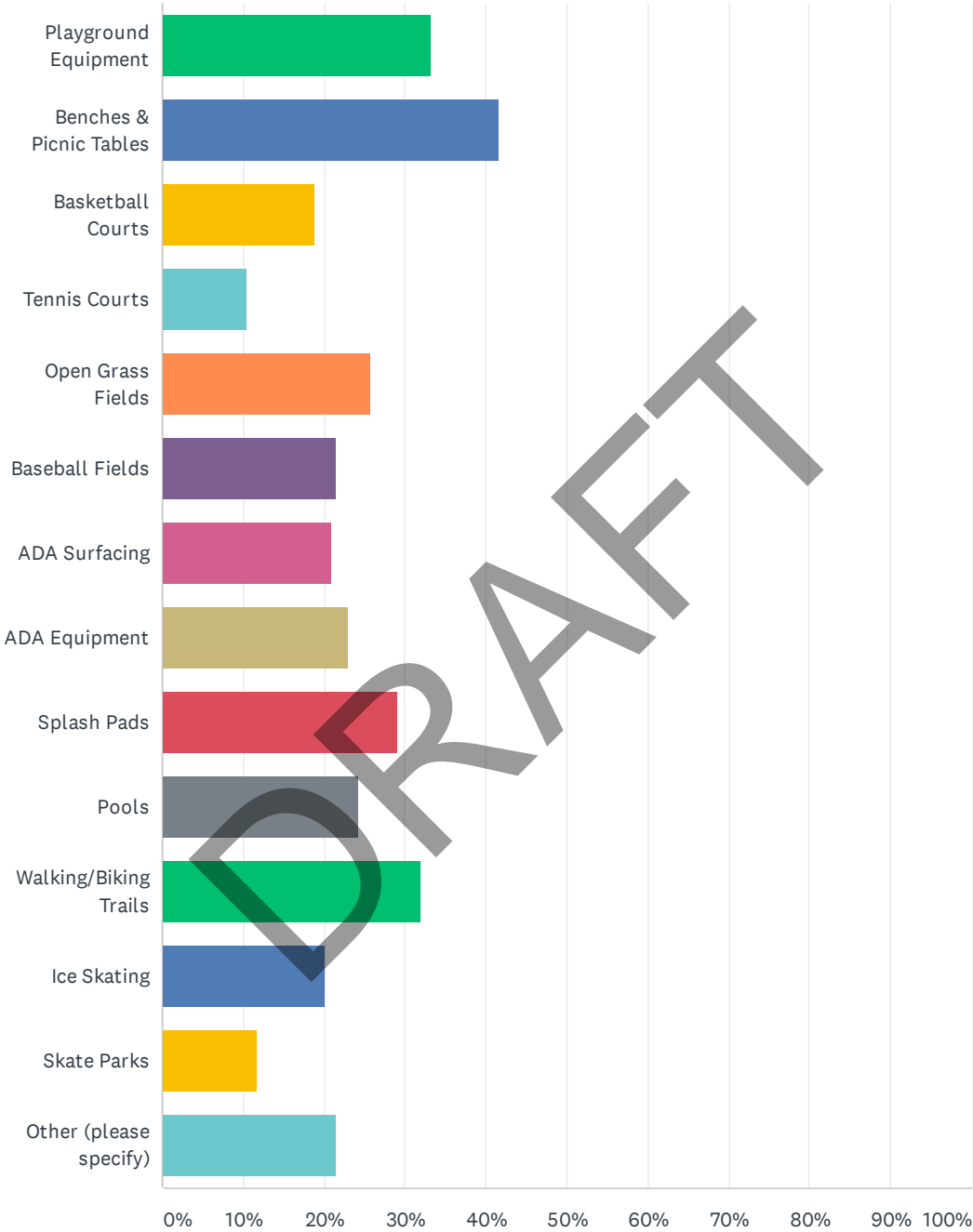
Confidential Resident Survey

ANSWER CHOICES	RESPONSES	
Minor Rehabilitation	22.93%	36
Major Rehabilitation	41.40%	65
Decent, Safe, and Affordable Rental Units	52.87%	83
Affordability	61.15%	96
Code Enforcement	47.77%	75
ADA Accessibility	20.38%	32
Housing Options/Inventory	24.84%	39
Historic Preservation	28.03%	44
Negligent Landlords	69.43%	109
Asbestos	9.55%	15
Lead Paint/Pipes	12.10%	19
Other (please specify)	10.83%	17
Total Respondents: 157		

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## Q2 Are there any needs or improvements to recreational facilities that you would like to see? (Please check all applicable boxes):

Answered: 144 Skipped: 20



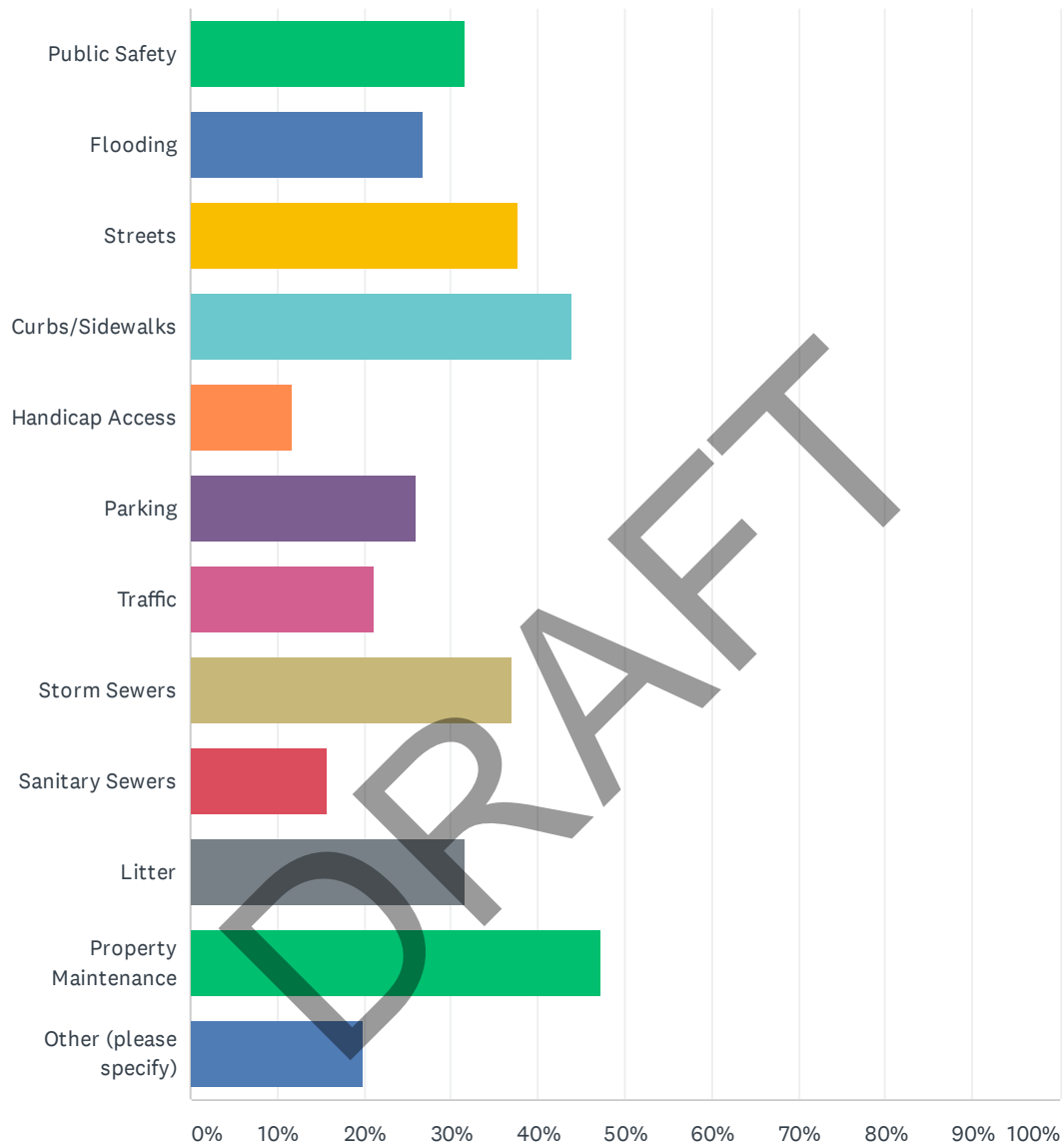
Confidential Resident Survey

ANSWER CHOICES	RESPONSES	
Playground Equipment	33.33%	48
Benches & Picnic Tables	41.67%	60
Basketball Courts	18.75%	27
Tennis Courts	10.42%	15
Open Grass Fields	25.69%	37
Baseball Fields	21.53%	31
ADA Surfacing	20.83%	30
ADA Equipment	22.92%	33
Splash Pads	29.17%	42
Pools	24.31%	35
Walking/Biking Trails	31.94%	46
Ice Skating	20.14%	29
Skate Parks	11.81%	17
Other (please specify)	21.53%	31
Total Respondents: 144		

DRAFT

### Q3 Are there any problems in your neighborhood with the following? (Choose all that apply):

Answered: 146 Skipped: 18



Confidential Resident Survey

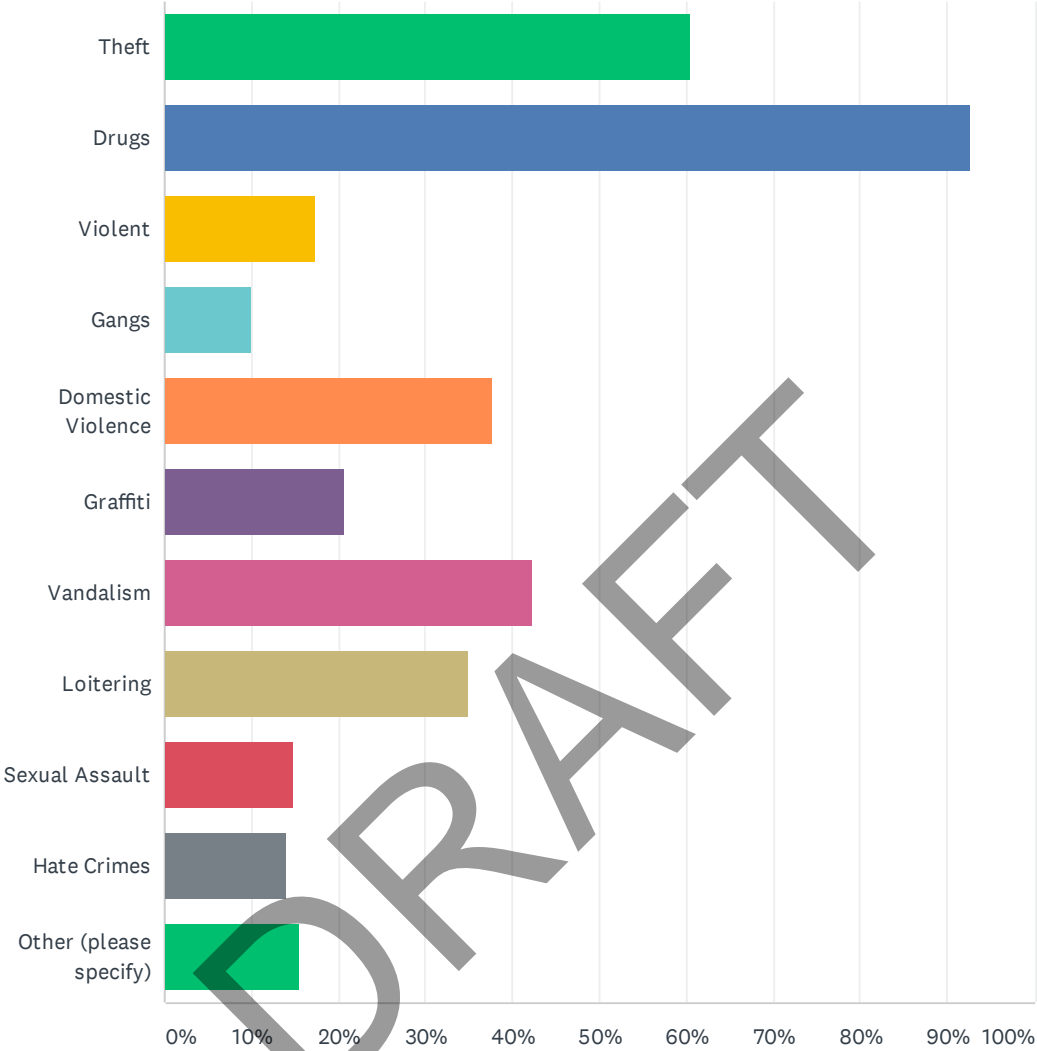
ANSWER CHOICES	RESPONSES	
Public Safety	31.51%	46
Flooding	26.71%	39
Streets	37.67%	55
Curbs/Sidewalks	43.84%	64
Handicap Access	11.64%	17
Parking	26.03%	38
Traffic	21.23%	31
Storm Sewers	36.99%	54
Sanitary Sewers	15.75%	23
Litter	31.51%	46
Property Maintenance	47.26%	69
Other (please specify)	19.86%	29
Total Respondents: 146		

DRAFT



### Q4 Identify any crime issues within the City of Wheeling.

Answered: 149 Skipped: 15



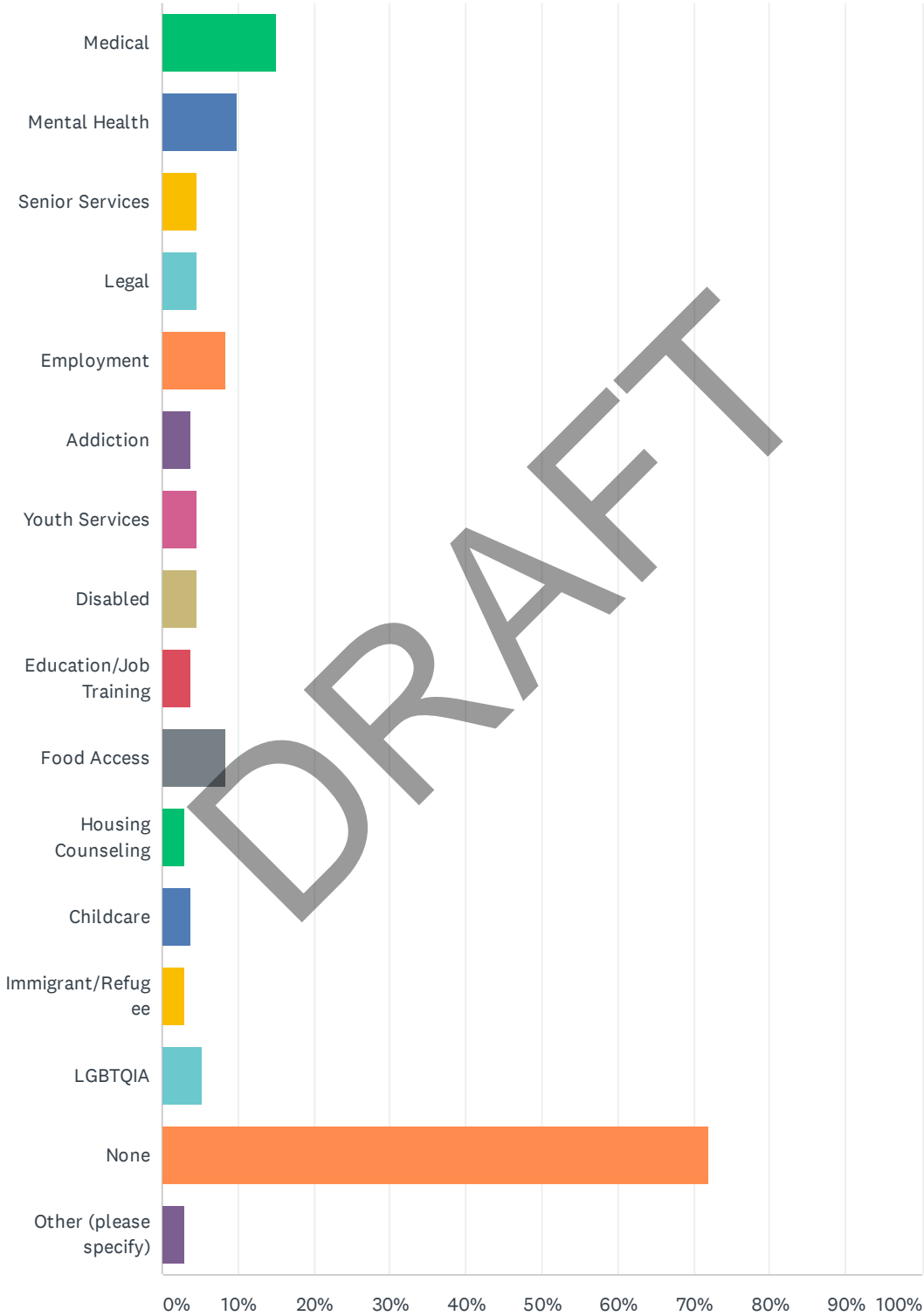
Confidential Resident Survey

ANSWER CHOICES	RESPONSES	
Theft	60.40%	90
Drugs	92.62%	138
Violent	17.45%	26
Gangs	10.07%	15
Domestic Violence	37.58%	56
Graffiti	20.81%	31
Vandalism	42.28%	63
Loitering	34.90%	52
Sexual Assault	14.77%	22
Hate Crimes	14.09%	21
Other (please specify)	15.44%	23
Total Respondents: 149		

DRAFT

### Q5 Do you use any of the social service programs available in the City? (Choose all that apply):

Answered: 132 Skipped: 32



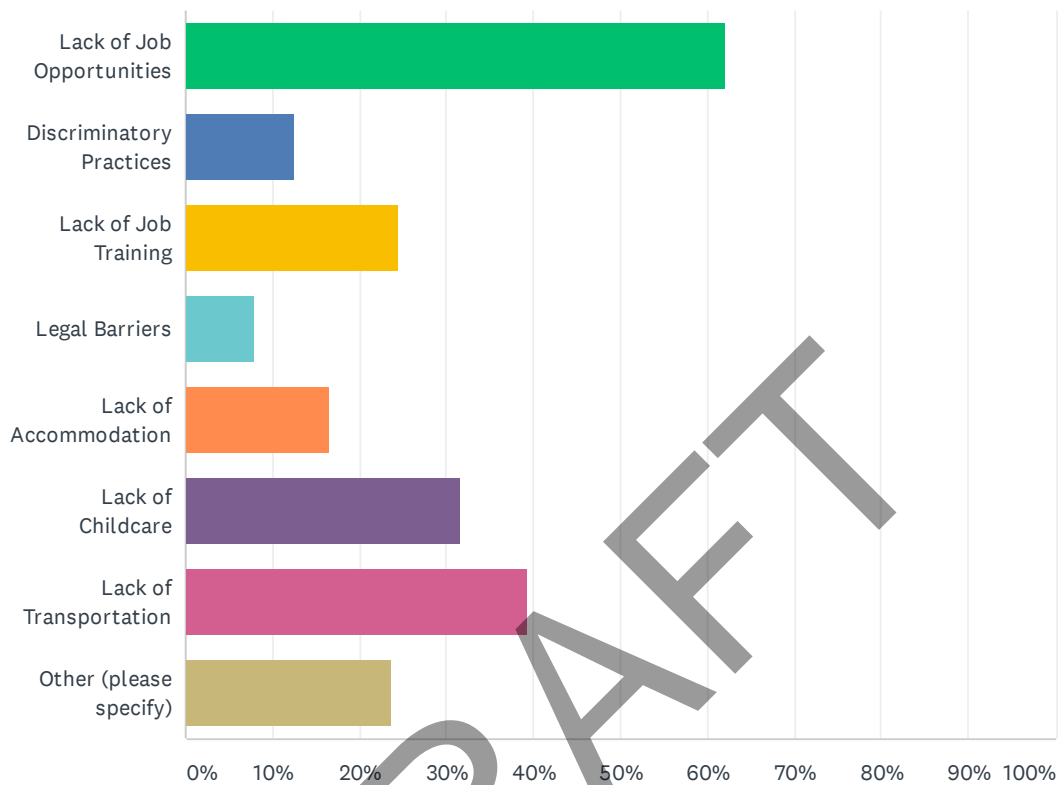
Confidential Resident Survey

ANSWER CHOICES	RESPONSES	
Medical	15.15%	20
Mental Health	9.85%	13
Senior Services	4.55%	6
Legal	4.55%	6
Employment	8.33%	11
Addiction	3.79%	5
Youth Services	4.55%	6
Disabled	4.55%	6
Education/Job Training	3.79%	5
Food Access	8.33%	11
Housing Counseling	3.03%	4
Childcare	3.79%	5
Immigrant/Refugee	3.03%	4
LGBTQIA	5.30%	7
None	71.97%	95
Other (please specify)	3.03%	4
Total Respondents: 132		

DRAFT

## Q6 Identify any employment issues in the City of Wheeling? (Choose all that apply)

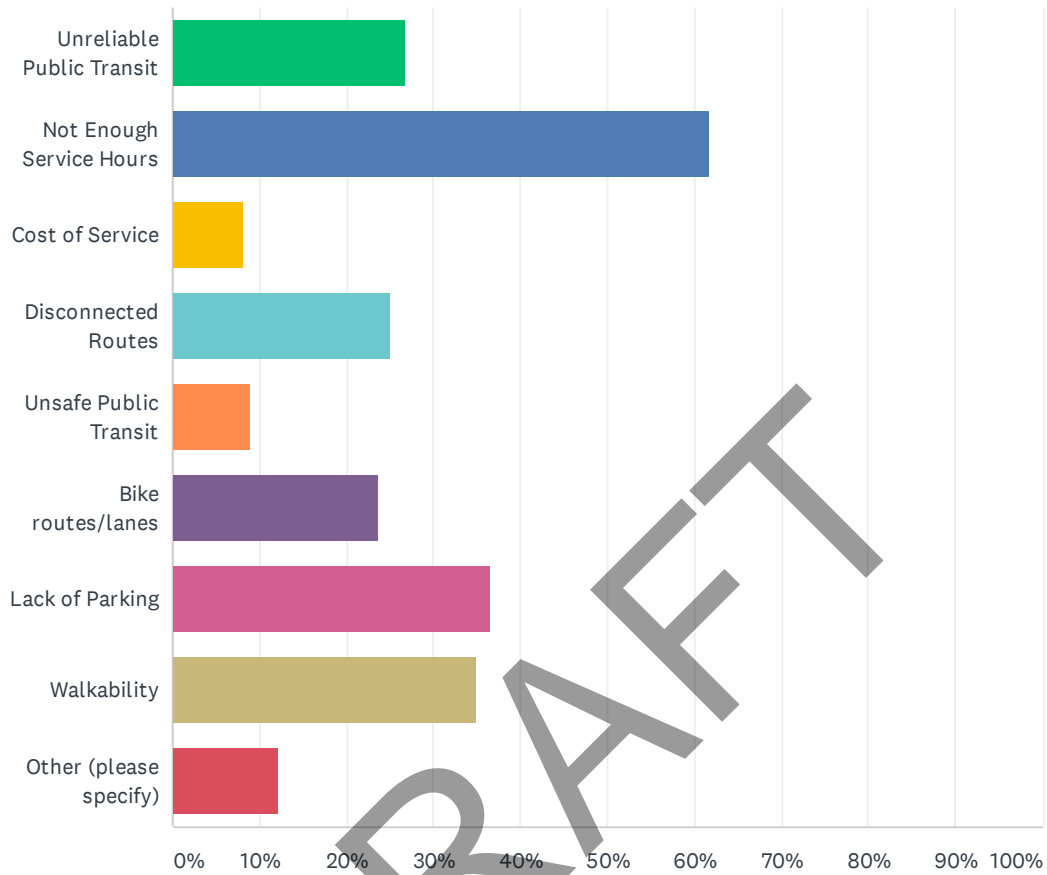
Answered: 127 Skipped: 37



ANSWER CHOICES	RESPONSES
Lack of Job Opportunities	62.20% 79
Discriminatory Practices	12.60% 16
Lack of Job Training	24.41% 31
Legal Barriers	7.87% 10
Lack of Accommodation	16.54% 21
Lack of Childcare	31.50% 40
Lack of Transportation	39.37% 50
Other (please specify)	23.62% 30
Total Respondents: 127	

## Q7 Identify any transportation issues in the City of Wheeling.

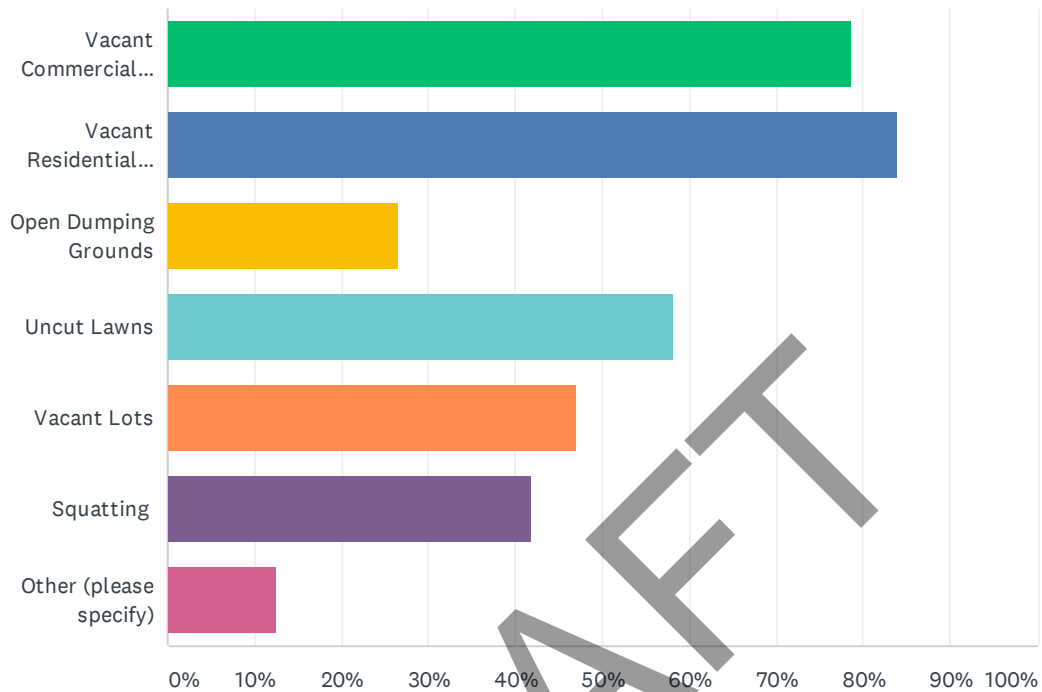
Answered: 123 Skipped: 41



ANSWER CHOICES	RESPONSES	
Unreliable Public Transit	26.83%	33
Not Enough Service Hours	61.79%	76
Cost of Service	8.13%	10
Disconnected Routes	25.20%	31
Unsafe Public Transit	8.94%	11
Bike routes/lanes	23.58%	29
Lack of Parking	36.59%	45
Walkability	34.96%	43
Other (please specify)	12.20%	15
Total Respondents: 123		

## Q8 Are there any blight (clearance/demolitions) issues in the City? (Choose all that apply):

Answered: 136 Skipped: 28



ANSWER CHOICES	RESPONSES	
Vacant Commercial Structures	78.68%	107
Vacant Residential Structures	83.82%	114
Open Dumping Grounds	26.47%	36
Uncut Lawns	58.09%	79
Vacant Lots	47.06%	64
Squatting	41.91%	57
Other (please specify)	12.50%	17
Total Respondents: 136		



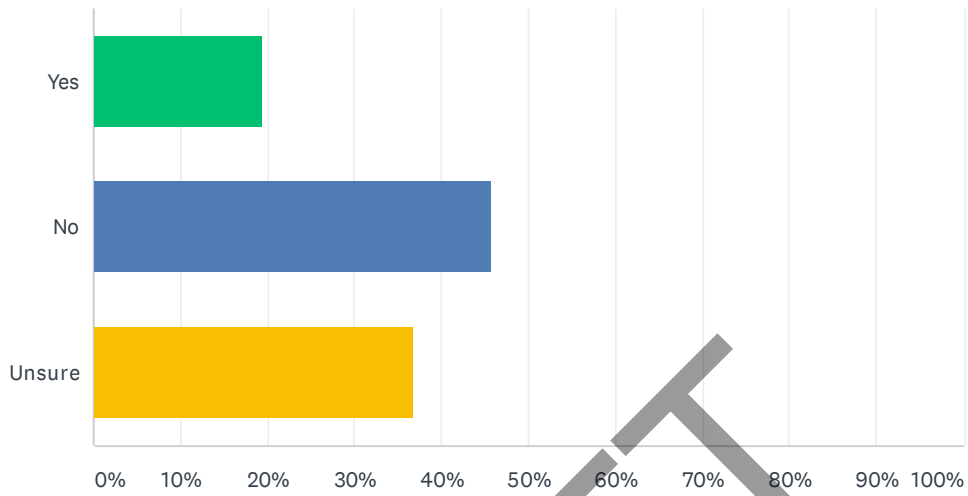
Q9 Are there any programs or services that are missing or under-funded in the city? Please list:

Answered: 52 Skipped: 112

DRAFT

### Q10 In your opinion, are residents of the City of Wheeling aware of how to report fair housing violations or concerns?

Answered: 155 Skipped: 9



ANSWER CHOICES	RESPONSES	
Yes	19.35%	30
No	45.81%	71
Unsure	36.77%	57
Total Respondents: 155		

DRAFT

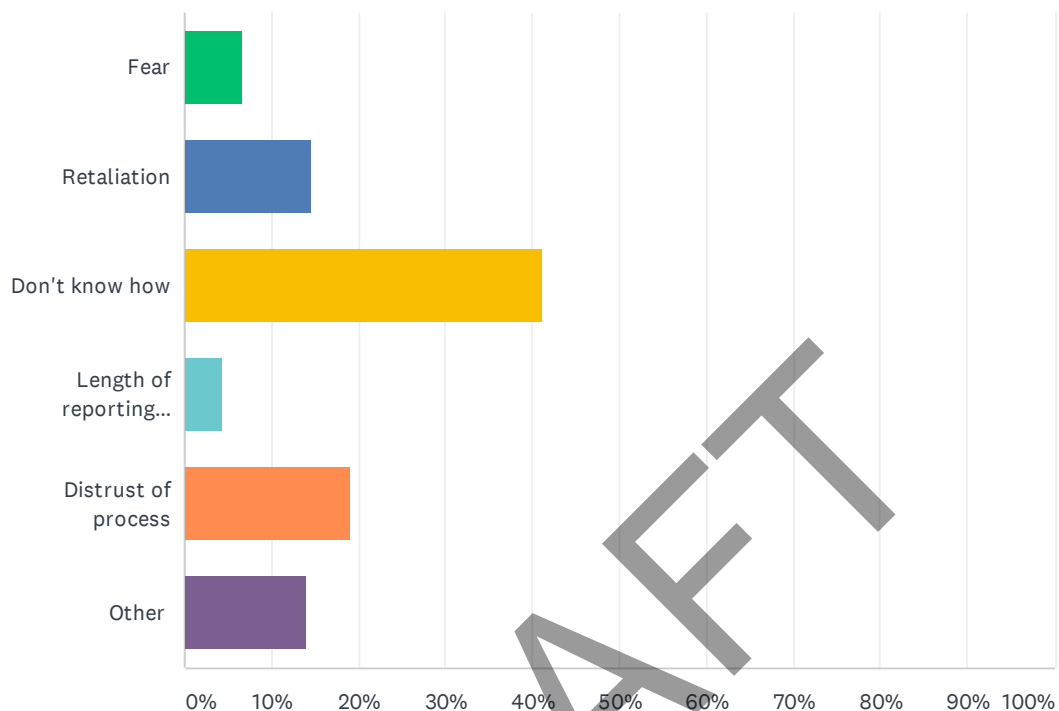
## Q11 To whom should you report fair housing violations or concerns?

Answered: 80 Skipped: 84

DRAFT

## Q12 What do you think are the primary reasons why fair housing complaints are not reported?

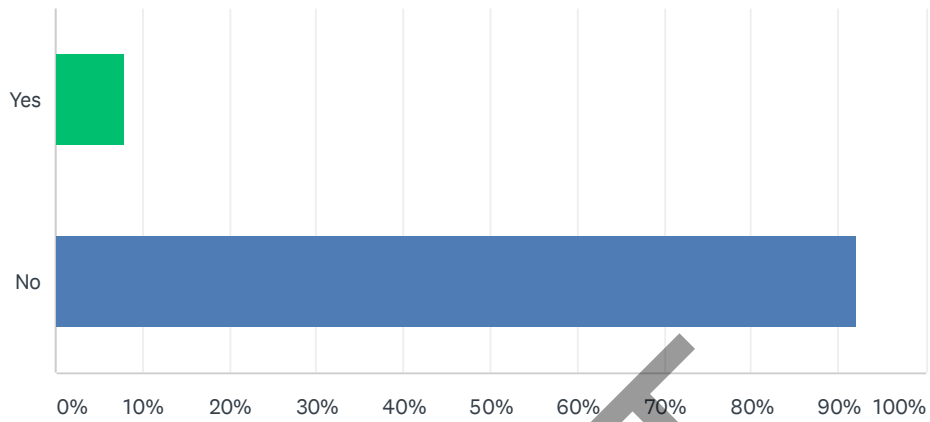
Answered: 136 Skipped: 28



ANSWER CHOICES	RESPONSES
Fear	6.62% 9
Retaliation	14.71% 20
Don't know how	41.18% 56
Length of reporting process	4.41% 6
Distrust of process	19.12% 26
Other	13.97% 19
<b>TOTAL</b>	<b>136</b>

### Q13 If you are a renter, has your landlord refused to make a reasonable accommodation for a disability?

Answered: 63 Skipped: 101



ANSWER CHOICES	RESPONSES	
Yes	7.94%	5
No	92.06%	58
TOTAL		63

DRAFT

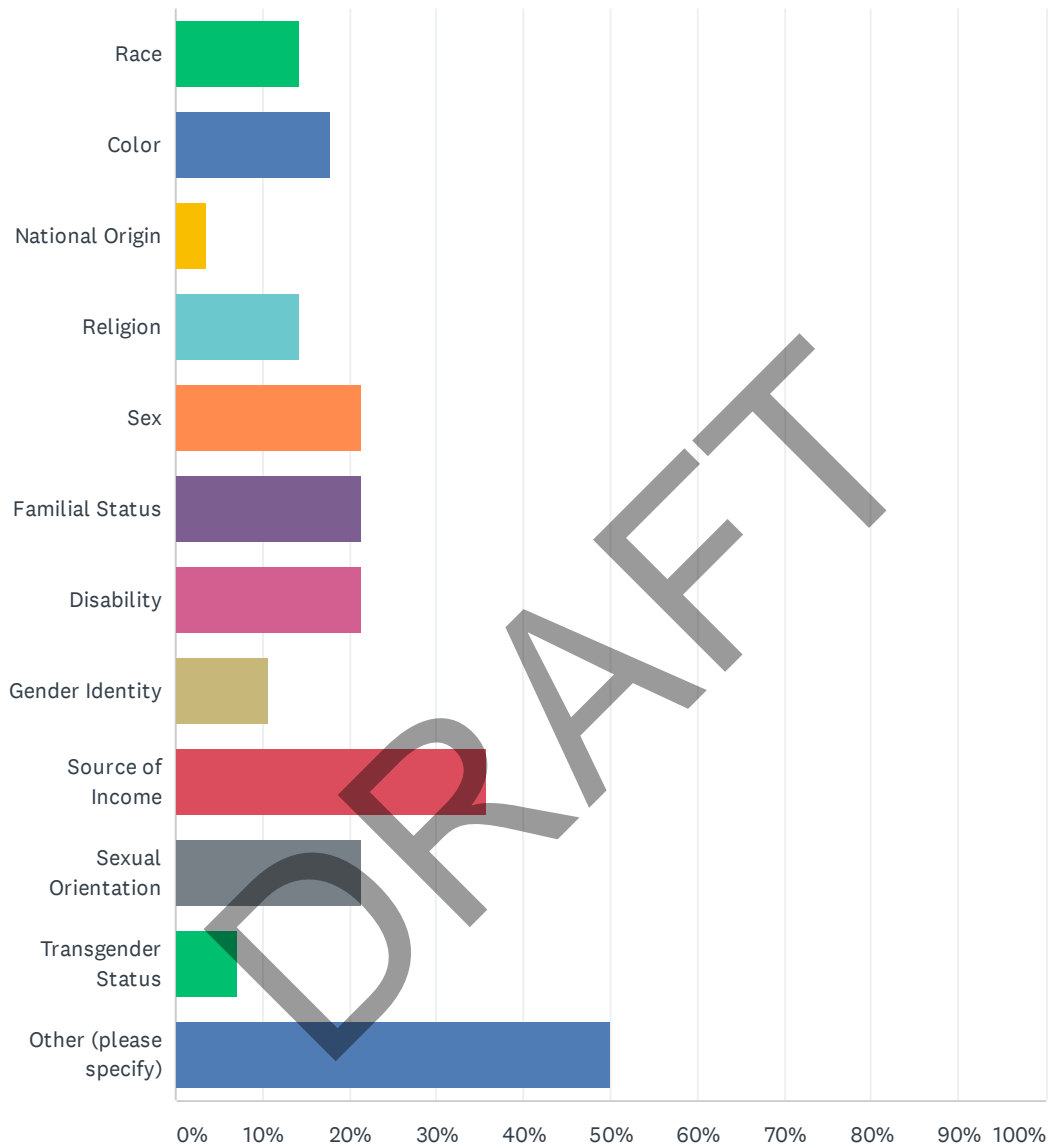
## Q14 If 'Yes' what was the request?

Answered: 6 Skipped: 158

DRAFT

### Q15 Have you faced housing discrimination based on any of these characteristics? (Check all that apply):

Answered: 28 Skipped: 136





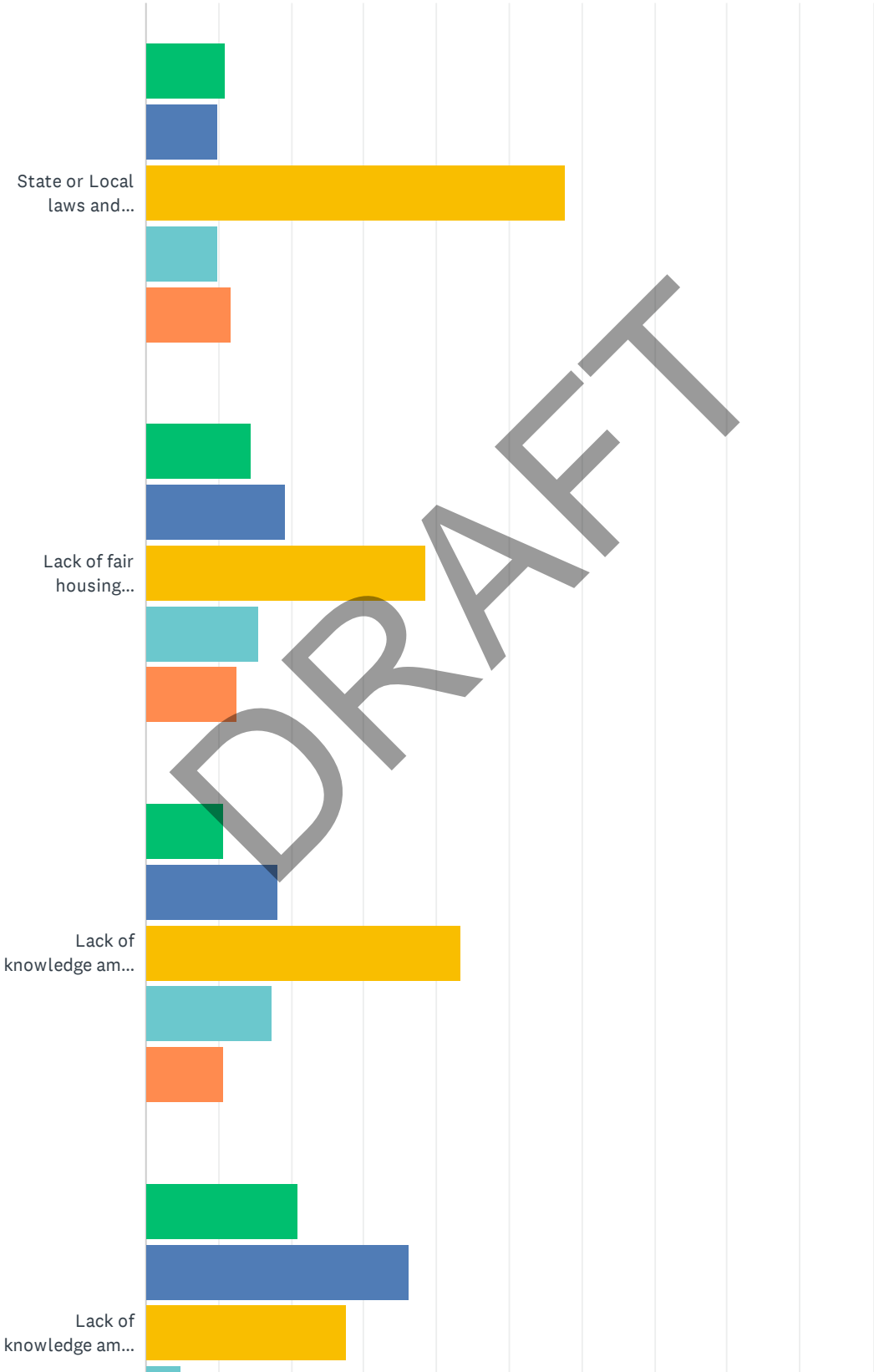
Confidential Resident Survey

ANSWER CHOICES	RESPONSES	
Race	14.29%	4
Color	17.86%	5
National Origin	3.57%	1
Religion	14.29%	4
Sex	21.43%	6
Familial Status	21.43%	6
Disability	21.43%	6
Gender Identity	10.71%	3
Source of Income	35.71%	10
Sexual Orientation	21.43%	6
Transgender Status	7.14%	2
Other (please specify)	50.00%	14
Total Respondents: 28		

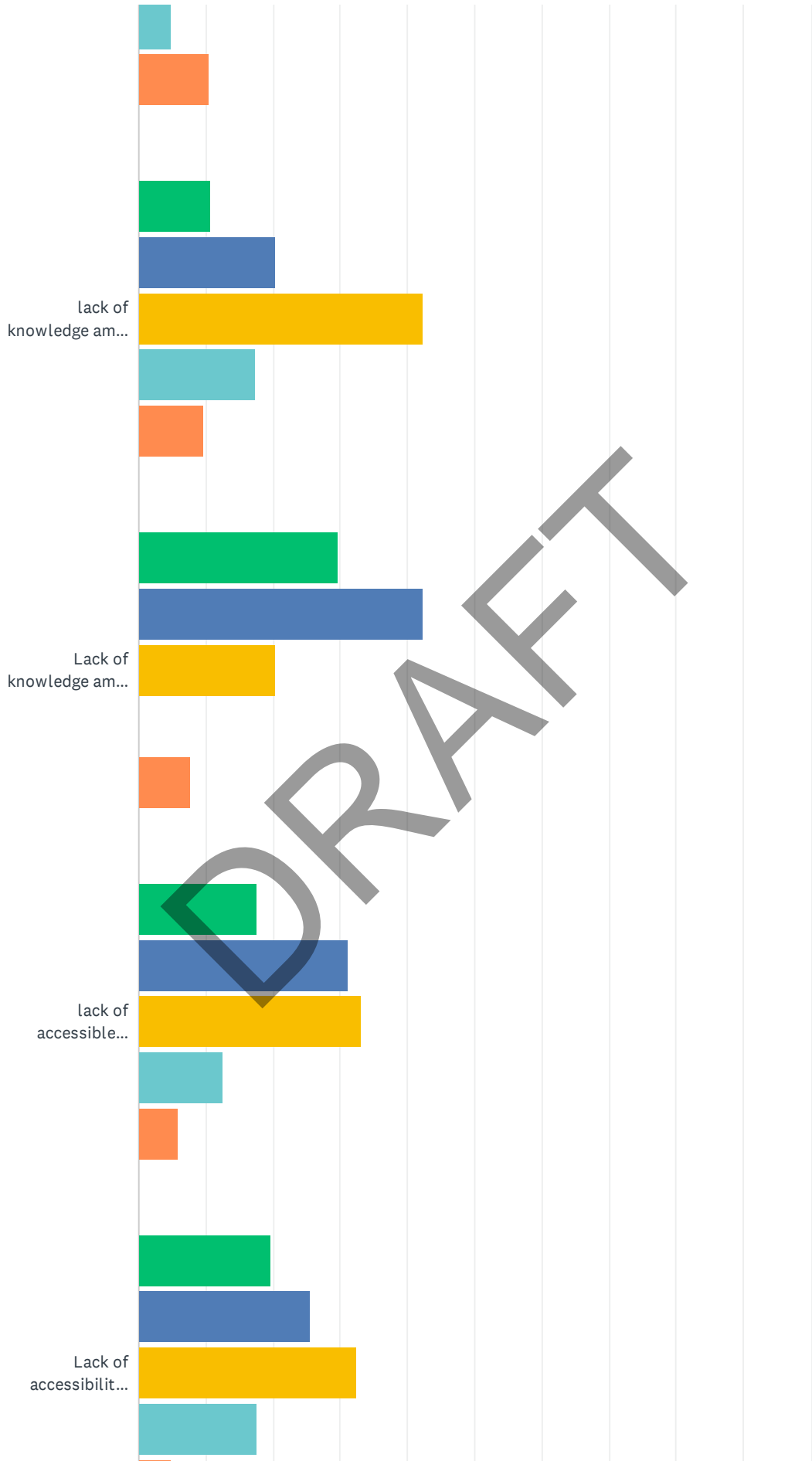
DRAFT

# Q16 Please evaluate whether the following situations result in further discrimination and/or barriers to fair housing in the City of Wheeling

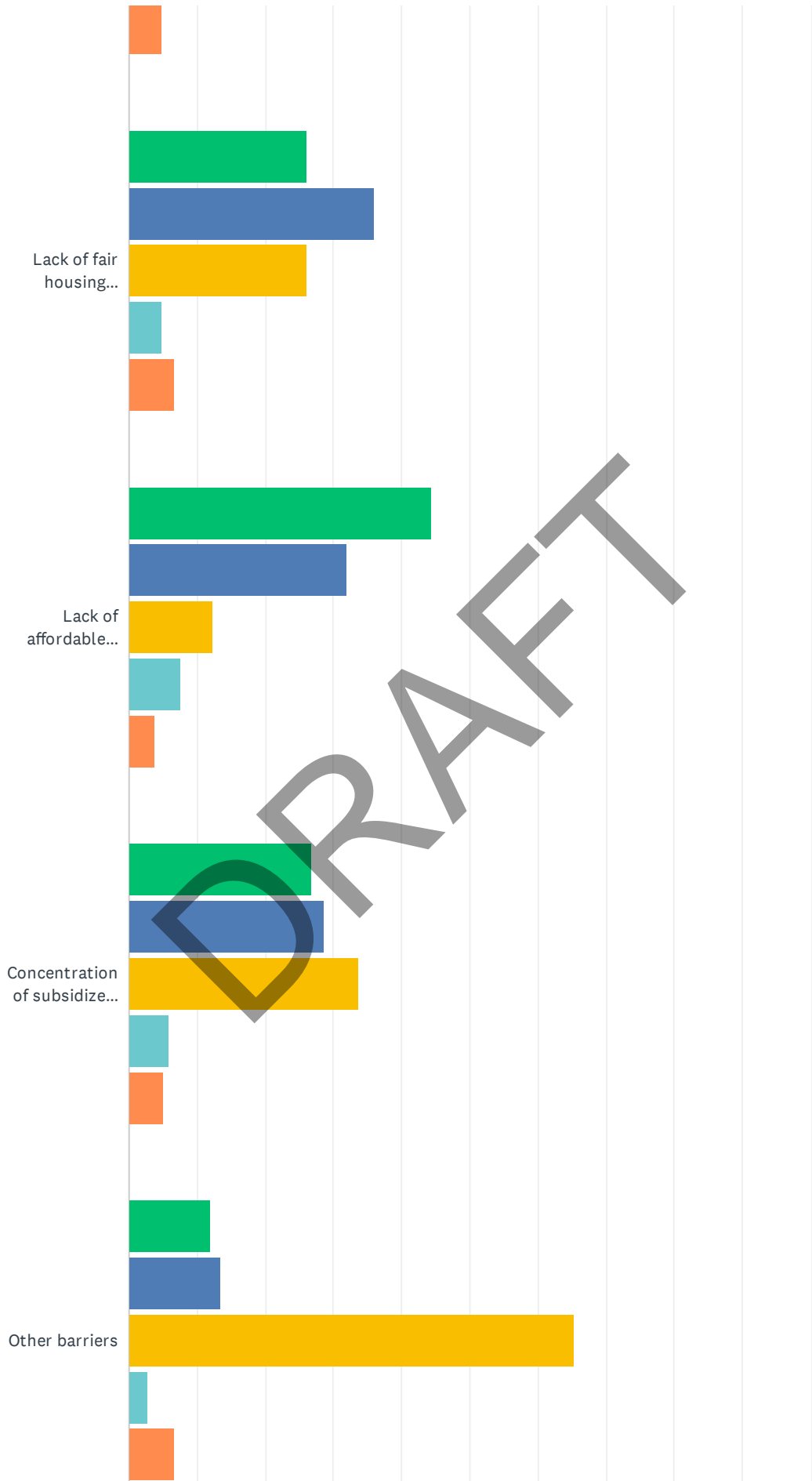
Answered: 109 Skipped: 55



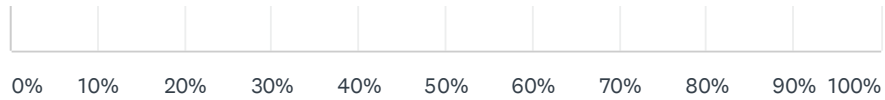
Confidential Resident Survey



Confidential Resident Survey



## Confidential Resident Survey



■ Strongly Agree   
 ■ Agree   
 ■ Neutral/Unsure   
 ■ Disagree  
■ Strongly Disagree

	STRONGLY AGREE	AGREE	NEUTRAL/UNSURE	DISAGREE	STRONGLY DISAGREE	TOTAL
State or Local laws and policies that limit housing choice	10.78% 11	9.80% 10	57.84% 59	9.80% 10	11.76% 12	102
Lack of fair housing organizations in the city	14.42% 15	19.23% 20	38.46% 40	15.38% 16	12.50% 13	104
Lack of knowledge among bankers/lenders regarding fair housing	10.58% 11	18.27% 19	43.27% 45	17.31% 18	10.58% 11	104
Lack of knowledge among landlords and property managers regarding fair housing	20.95% 22	36.19% 38	27.62% 29	4.76% 5	10.48% 11	105
lack of knowledge among real estate agents regarding fair housing	10.58% 11	20.19% 21	42.31% 44	17.31% 18	9.62% 10	104
Lack of knowledge among residents regarding fair housing	29.81% 31	42.31% 44	20.19% 21	0.00% 0	7.69% 8	104
lack of accessible housing for persons with disabilities	17.48% 18	31.07% 32	33.01% 34	12.62% 13	5.83% 6	103
Lack of accessibility in neighborhoods (i.e. curb cuts)	19.61% 20	25.49% 26	32.35% 33	17.65% 18	4.90% 5	102
Lack of fair housing education	26.21% 27	35.92% 37	26.21% 27	4.85% 5	6.80% 7	103
Lack of affordable housing in certain areas	44.34% 47	32.08% 34	12.26% 13	7.55% 8	3.77% 4	106
Concentration of subsidized housing in certain neighborhoods	26.73% 27	28.71% 29	33.66% 34	5.94% 6	4.95% 5	101
Other barriers	12.00% 9	13.33% 10	65.33% 49	2.67% 2	6.67% 5	75

Q17 Are there any additional comments or concerns that you wish to share?

Answered: 16 Skipped: 148

DRAFT

# Q18 What is your street name and ZIP Code where you live in the City of Wheeling?

Answered: 109 Skipped: 55

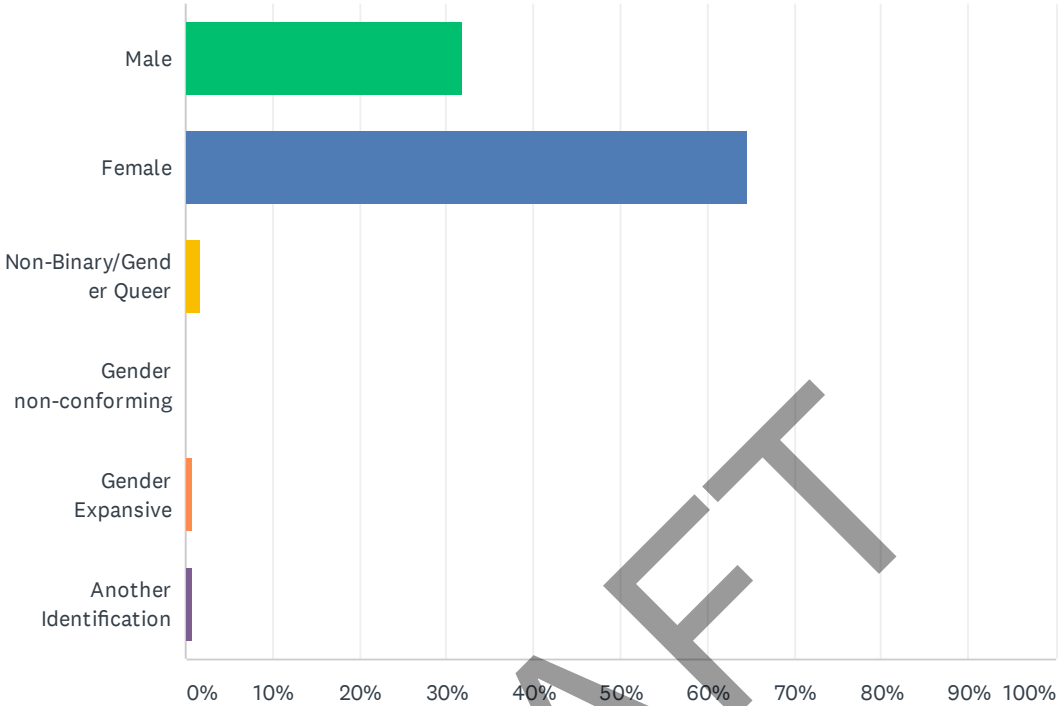
ANSWER CHOICES	RESPONSES	
Street Name	88.07%	96
ZIP Code	95.41%	104
Neighborhood	85.32%	93

DRAFT



# Q19 Gender

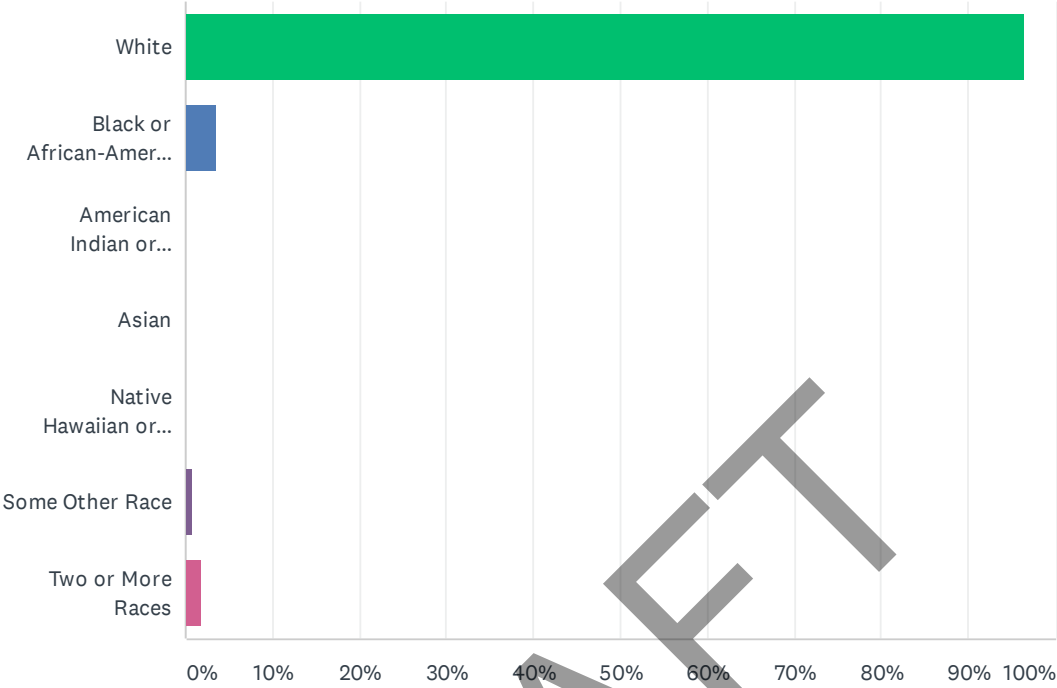
Answered: 116 Skipped: 48



ANSWER CHOICES	RESPONSES	
Male	31.90%	37
Female	64.66%	75
Non-Binary/Gender Queer	1.72%	2
Gender non-conforming	0.00%	0
Gender Expansive	0.86%	1
Another Identification	0.86%	1
<b>TOTAL</b>		<b>116</b>

### Q20 Race

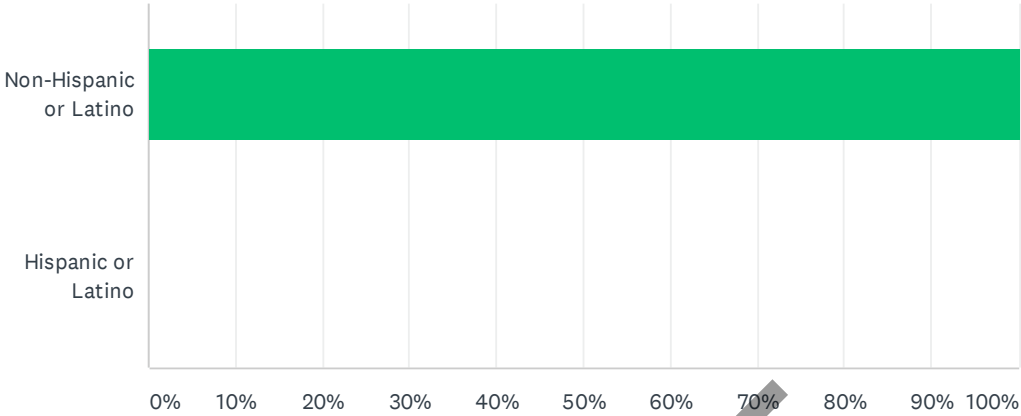
Answered: 112 Skipped: 52



ANSWER CHOICES	RESPONSES	
White	96.43%	108
Black or African-American	3.57%	4
American Indian or Alaskan Native	0.00%	0
Asian	0.00%	0
Native Hawaiian or other Pacific Islander	0.00%	0
Some Other Race	0.89%	1
Two or More Races	1.79%	2
Total Respondents: 112		

### Q21 Ethnicity:

Answered: 91 Skipped: 73

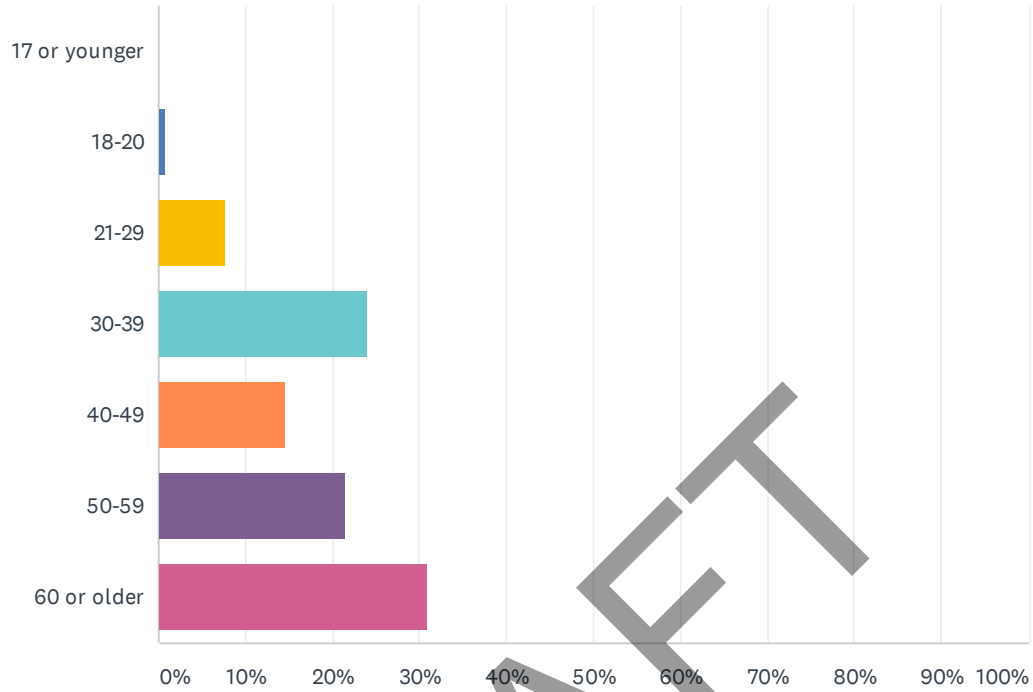


ANSWER CHOICES	RESPONSES	
Non-Hispanic or Latino	100.00%	91
Hispanic or Latino	0.00%	0
Total Respondents: 91		

DRAFT

## Q22 Age

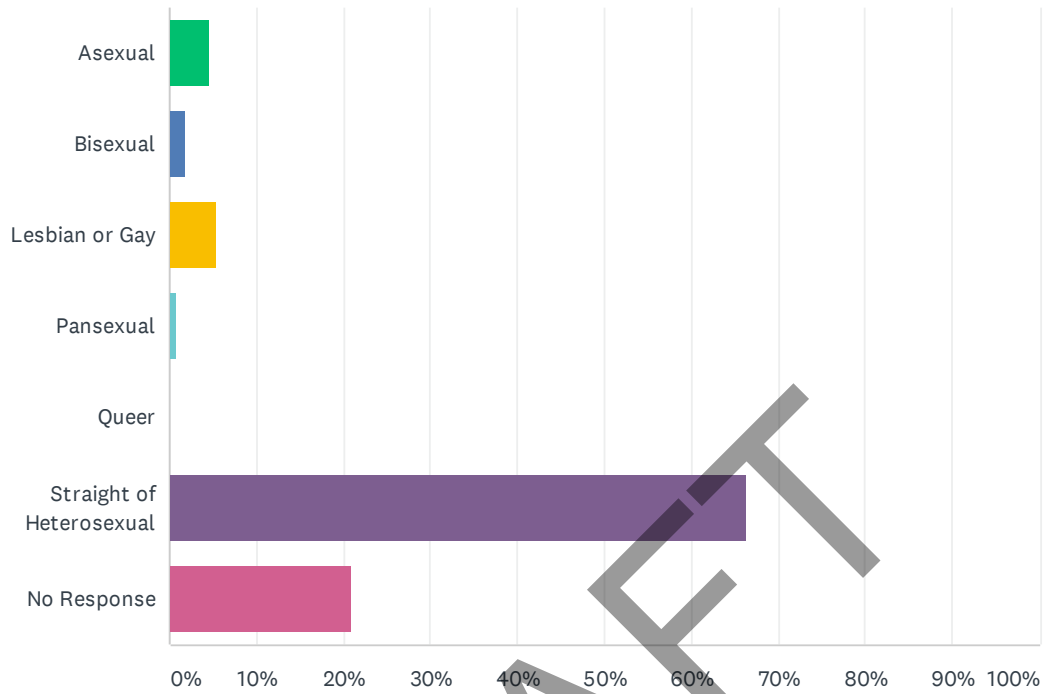
Answered: 116 Skipped: 48



ANSWER CHOICES	RESPONSES
17 or younger	0.00% 0
18-20	0.86% 1
21-29	7.76% 9
30-39	24.14% 28
40-49	14.66% 17
50-59	21.55% 25
60 or older	31.03% 36
<b>TOTAL</b>	<b>116</b>

## Q23 What is your sexual orientation?

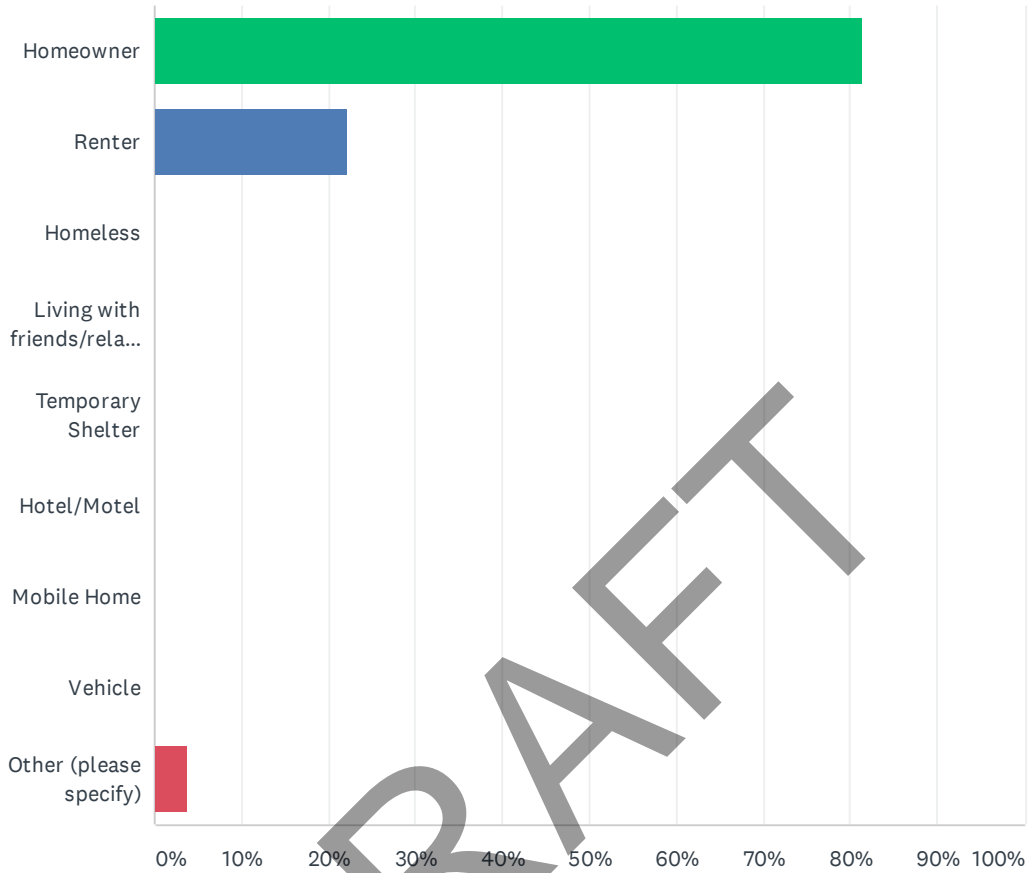
Answered: 110 Skipped: 54



ANSWER CHOICES	RESPONSES
Asexual	4.55% 5
Bisexual	1.82% 2
Lesbian or Gay	5.45% 6
Pansexual	0.91% 1
Queer	0.00% 0
Straight of Heterosexual	66.36% 73
No Response	20.91% 23
<b>TOTAL</b>	<b>110</b>

## Q24 Choose your housing status:

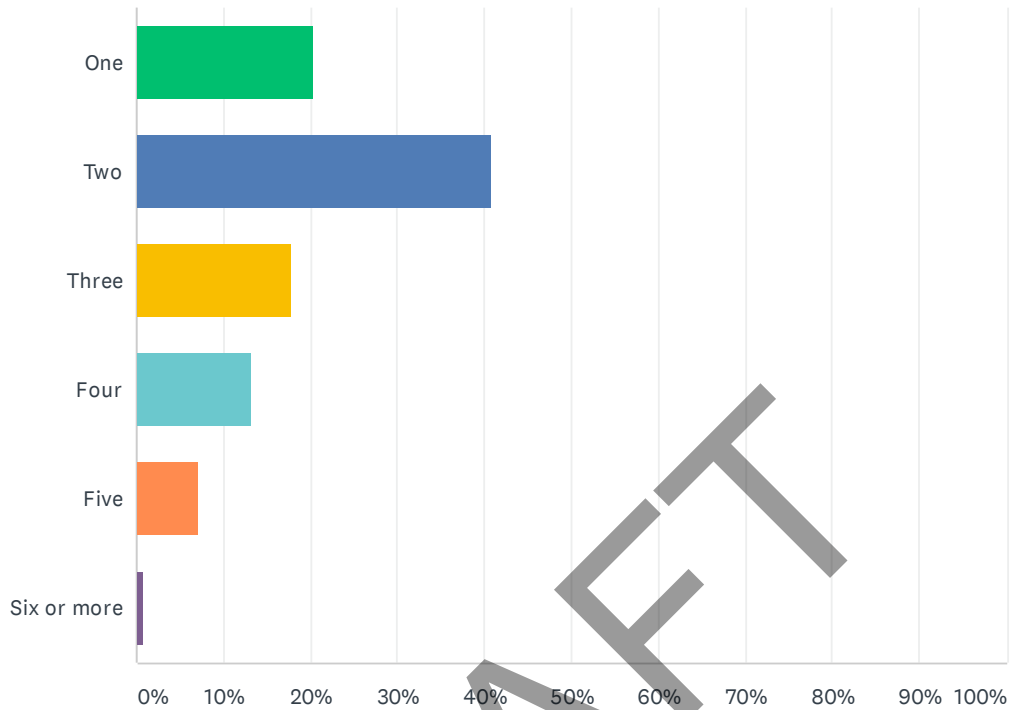
Answered: 27 Skipped: 137



ANSWER CHOICES	RESPONSES	
Homeowner	81.48%	22
Renter	22.22%	6
Homeless	0.00%	0
Living with friends/relatives	0.00%	0
Temporary Shelter	0.00%	0
Hotel/Motel	0.00%	0
Mobile Home	0.00%	0
Vehicle	0.00%	0
Other (please specify)	3.70%	1
Total Respondents: 27		

## Q25 Number of persons living in your household?

Answered: 113 Skipped: 51

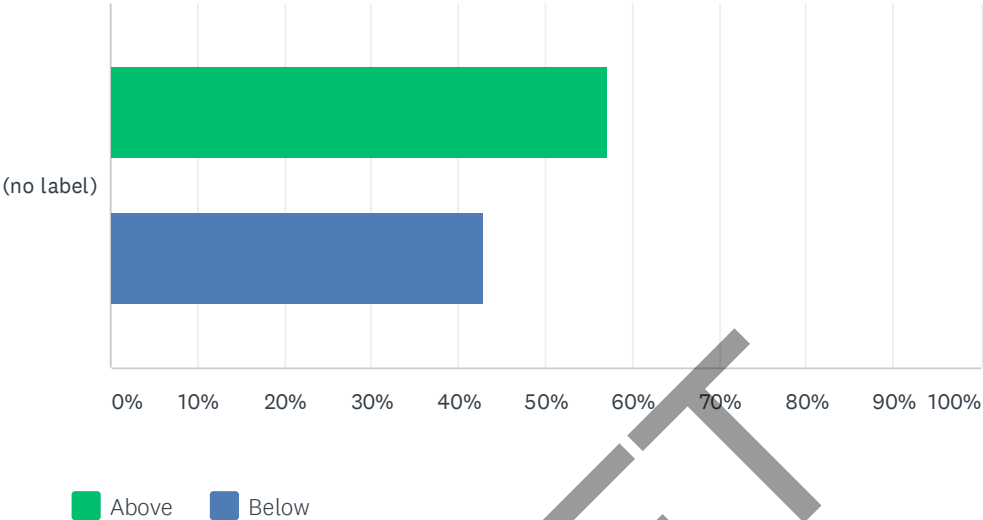


ANSWER CHOICES	RESPONSES	
One	20.35%	23
Two	40.71%	46
Three	17.70%	20
Four	13.27%	15
Five	7.08%	8
Six or more	0.88%	1
<b>TOTAL</b>		<b>113</b>



### Q26 If you are a one (1) person household, is your total household income above or below \$36,550 per year?

Answered: 28 Skipped: 136

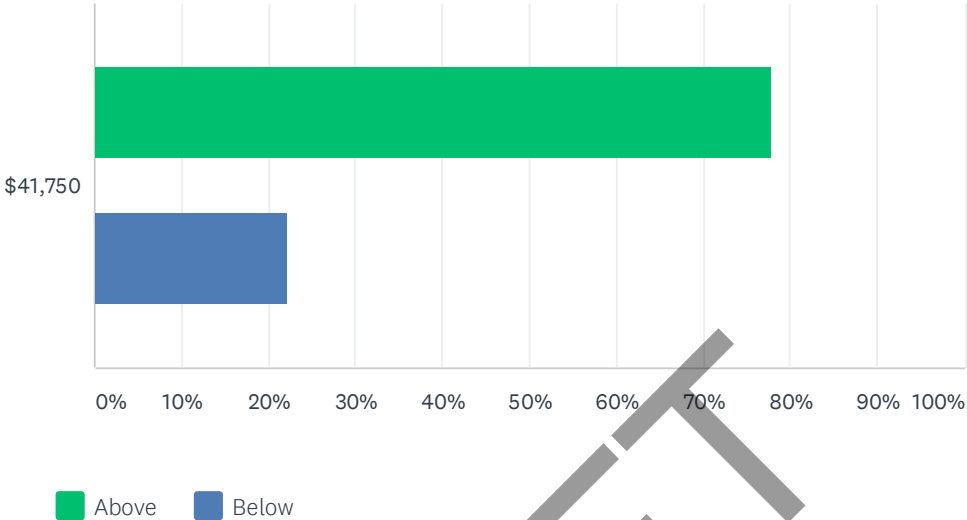


	ABOVE	BELOW	TOTAL	WEIGHTED AVERAGE
(no label)	57.14% 16	42.86% 12	28	1.43

DRAFT

### Q27 If you are a two (2) person household, is your total household income above or below \$41,750 per year?

Answered: 45 Skipped: 119

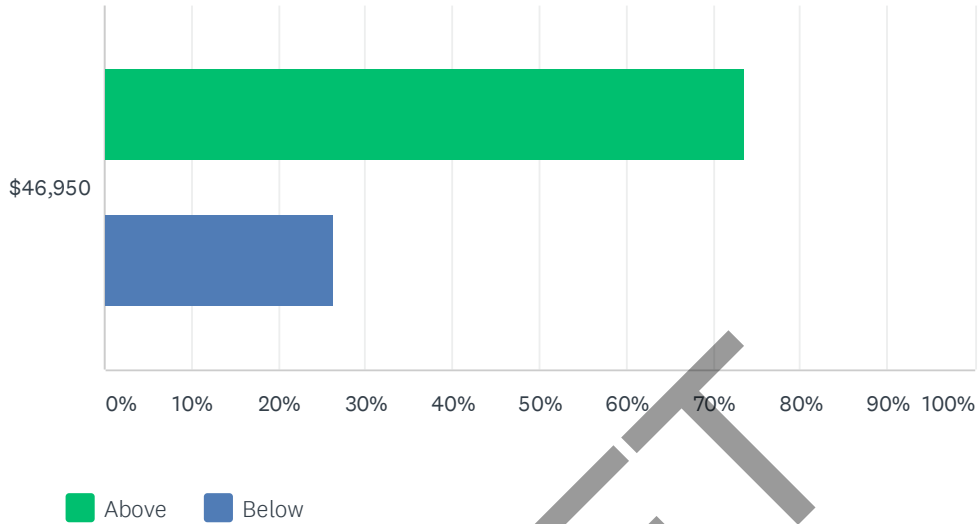


	ABOVE	BELOW	TOTAL
\$41,750	77.78% 35	22.22% 10	45

DRAFT

### Q28 If you are a three (3) person household, is your total household income above or below \$46,950 per year?

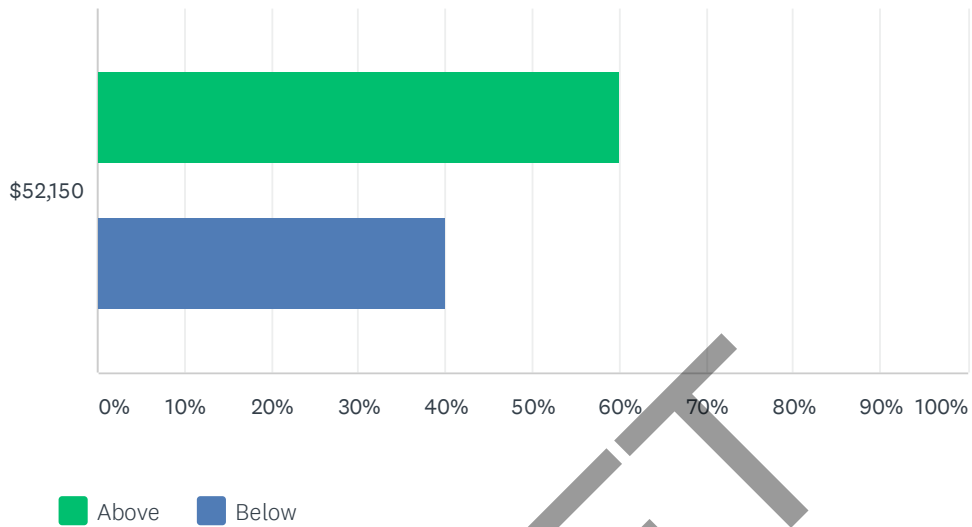
Answered: 19 Skipped: 145



	ABOVE	BELOW	TOTAL
\$46,950	73.68% 14	26.32% 5	19

### Q29 If you are a four (4) person household, is your total household income above or below \$52,150 per year?

Answered: 15 Skipped: 149

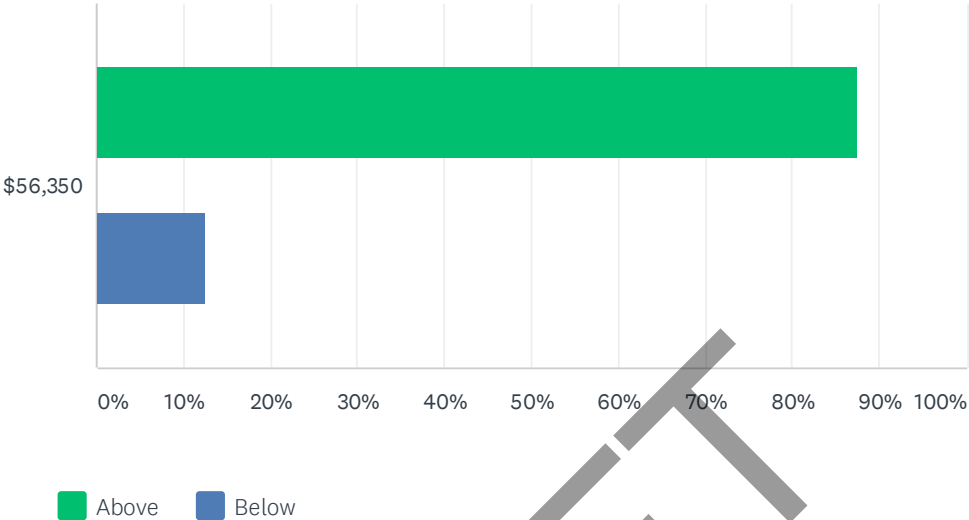


	ABOVE	BELOW	TOTAL
\$52,150	60.00% 9	40.00% 6	15

DRAFT

### Q30 If you are a five (5) person household, is your total household income above or below \$56,350 per year?

Answered: 8 Skipped: 156

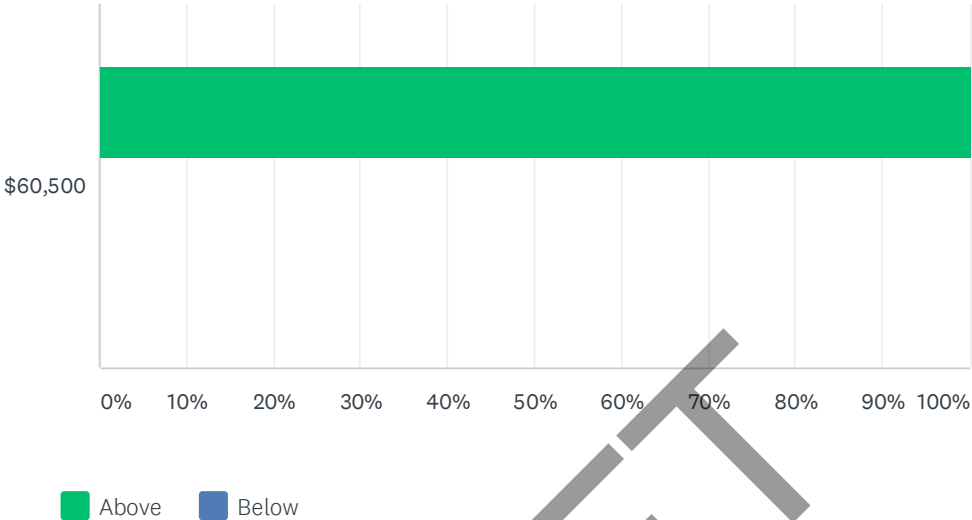


	ABOVE	BELOW	TOTAL
\$56,350	87.50% 7	12.50% 1	8

DRAFT

### Q31 If you are a six (6) person household, is your total household income above or below \$60,500 per year?

Answered: 1 Skipped: 163



	ABOVE	BELOW	TOTAL
\$60,500	100.00% 1	0.00% 0	1

DRAFT

**CITY OF WHEELING, WEST VIRGINIA  
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND  
HOME INVESTMENT PARTNERSHIP (HOME) PROGRAMS  
AGENCIES/ORGANIZATIONS NEEDS SURVEY**

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**Name of Agency/Organization:**

**Address:**

**Name:**

**Title:**

**Phone:**

**E-Mail:**

**Description of programs/services your agency provides: (Attach any brochures)**

**Does your organization provide any services or programs for the following?**

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Social/Human Services | <input type="checkbox"/> Housing              | <input type="checkbox"/> Planning            |
| <input type="checkbox"/> Community Development | <input type="checkbox"/> Economic Development | <input type="checkbox"/> Business Loans      |
| <input type="checkbox"/> Job Training          | <input type="checkbox"/> Public Health        | <input type="checkbox"/> Justice/Corrections |
| <input type="checkbox"/> Policy Research       | <input type="checkbox"/> Advocacy             | <input type="checkbox"/> Other: _____        |

**Please respond to the following questions if they apply to your agency or organization.**

**The clientele your program(s) serve?**

- |   |   |                                   |
|---|---|-----------------------------------|
| <input type="checkbox"/> Low Income               | <input type="checkbox"/> Immigrants     | <input type="checkbox"/> Families |
| <input type="checkbox"/> Incarcerated Individuals | <input type="checkbox"/> Disabled       | <input type="checkbox"/> Elderly  |
| <input type="checkbox"/> Communities              | <input type="checkbox"/> Children/Youth | <input type="checkbox"/> Homeless |
| <input type="checkbox"/> LGBTQIA                  | <input type="checkbox"/> Other: _____   |                                   |



**What are the unmet community and economic development needs in the City?**

**What are the unmet housing needs in the City?**

**What are the unmet social service needs in the City?**

**Are there any Fair Housing issues in the City?**

**Does your organization have plans to add new or expand existing programming?  
In what ways?**

**Other Comments/Suggestions:**

DRAFT

## **C. Appendix C – Public Comments**

Attached are summaries of the following meetings:

- Monday, December 9, 2019 Public Hearing

DRAFT

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# FIRST PUBLIC HEARING

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**PUBLIC HEARING NOTICE  
CITY OF WHEELING, WEST VIRGINIA  
FY 2020 COMMUNITY DEVELOPMENT BLOCK GRANT &  
HOME INVESTMENT PARTNERSHIP PROGRAMS**

Notice is hereby given that the City of Wheeling, WV will hold a public hearing on **Wednesday, December 4, 2019 at 5:00 PM**, prevailing time, the Wheeling City Council Chambers, City-County Building, 1500 Chapline Street, Wheeling, WV 26003. Council Chambers are accessible to persons with physical disabilities. If special arrangements need to be made to accommodate residents in order for them to participate in the public hearing, including translation services, please call Ms. Nancy Prager, Economic & Community Development Director, City of Wheeling, at (304) 234-3701 to make those arrangements, or for the hearing-impaired call 7-1-1 for TDD.

*The Intelligencer  
and  
Wheeling News-Register  
Nov. 19, 2019*

The purpose of this public hearing is to gather information for the City's Five-Year Consolidated Plan for FY 2020-2024, the Annual Action Plan for FY 2020, and the City's Analysis of Impediments to Fair Housing Choice (A.I.), which the City must prepare and submit the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG) and the HOME Investment Partnership (HOME) Entitlement Funds. Additionally, the hearing will be used to solicit the views and comments of individuals and organizations concerning the housing, community and economic development, and fair housing needs in the City of Wheeling and the Northern Panhandle HOME Consortium.

As part of the planning process, the City is conducting a survey to identify residents' needs in the community, ideas on how residents would like to see funds budgeted under the CDBG and HOME Programs, and fair housing concerns, such as acts of discrimination or barriers that might limit the housing choices of families and individuals. Please take a few minutes and complete this confidential survey to the best of your ability. The link to the resident survey is: <https://www.surveymonkey.com/r/WHEELINGCDBG>.

The City of Wheeling anticipates, based on last fiscal year's allocation, that it may receive an estimated CDBG entitlement grant in the amount of approximately \$1,163,000 and an estimated HOME entitlement grant in the amount of \$318,000 for FY 2020. These funding levels are contingent upon the final approval of the Federal Budget for FY 2020. The City doesn't anticipate notice of its funding allocation until Spring of 2020. In order to receive those funds, the City of Wheeling must prepare a Five-Year Consolidated Plan and a One-Year Annual Action Plan for the use of the CDBG and HOME funds. At least 70% of the CDBG funds must benefit low- and moderate-income persons living in the City of Wheeling. In preparing its CDBG application the City intends to afford citizens, local agencies, and interested parties the opportunity to become involved in the planning process.

The following types of activities may be eligible for funding under the CDBG program:  
Acquisition of property; disposition costs; improvements to public facilities, including the removal of architectural barriers; demolition and environmental clean-up; public services that are new or a quantifiable increase in the level of service; interim assistance; relocation payments for persons displaced as a result of a CDBG activity; rehabilitation of houses; code enforcement; special economic development activities; special activities undertaken by a community based development organization; home ownership assistance for purchase; planning; environmental reviews; program administration; audit; and other miscellaneous activities.

If the City would undertake an activity that would result in the displacement of families or individuals, then the City would utilize its policy for minimizing such displacement. Furthermore, the City is responsible for replacing all low- and moderate-income housing units that may be demolished or converted as a result of CDBG funds.

The Analysis of Impediments will focus on the status and interaction of six (6) fundamental conditions within the community:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

All interested citizens are encouraged to attend this public hearing and they will be given the opportunity to present oral or written testimony concerning the needs of the City of Wheeling and the use of CDBG and HOME funds to address those needs over the next five (5) years. Written comments may be addressed to Ms. Nancy Prager, Economic & Community Development Director, City of Wheeling, 1500 Chapline Street, Suite 305, Wheeling, WV, 26003 or via phone at (304) 234-3701.

Ms. Nancy Prager  
Economic & Community Development Director  
City of Wheeling, WV

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As part of the planning process, the City is conducting a survey to identify residents' needs in the community, ideas on how residents would like to see funds budgeted under the CDBG and HOME Programs, and fair housing concerns, such as acts of discrimination or barriers that might limit the housing choices of families and individuals. Please take a few minutes and complete this confidential survey to the best of your ability. The link to the resident survey is: <https://www.surveymonkey.com/r/WHEELINGCDBG>.

The City of Wheeling anticipates, based on last fiscal year's allocation, that it may receive an estimated CDBG entitlement grant in the amount of approximately \$1,163,000 and an estimated HOME entitlement grant in the amount of \$318,000 for FY 2020. These funding levels are contingent upon the final approval of the Federal Budget for FY 2020. The City doesn't anticipate notice of its funding allocation until Spring of 2020. In order to receive those funds, the City of Wheeling must prepare a Five-Year Consolidated Plan and a One-Year Annual Action Plan for the use of the CDBG and HOME funds. At least 70% of the CDBG funds must benefit low- and moderate-income persons living in the City of Wheeling. In preparing its CDBG application the City intends to afford citizens, local agencies, and interested parties the opportunity to become involved in the planning process.

The following types of activities may be eligible for funding under the CDBG program: Acquisition of property; disposition costs; improvements to public facilities, including the removal of architectural barriers; demolition and environmental clean-up; public services

that are new or a quantifiable increase in the level of service; interim assistance; relocation payments for persons displaced as a result of a CDBG activity; rehabilitation of houses; code enforcement; special economic development activities; special activities undertaken by a community based development organization; home ownership assistance for purchase; planning; environmental reviews; program administration; audit; and other miscellaneous activities.

If the City would undertake an activity that would result in the displacement of families or individuals, then the City would utilize its policy for minimizing such displacement. Furthermore, the City is responsible for replacing all low- and moderate-income housing units that may be demolished or converted as a result of CDBG funds.

The Analysis of Impediments will focus on the status and interaction of six (6) fundamental conditions within the community:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

All interested citizens are encouraged to attend this public hearing and they will be given the opportunity to present oral or written testimony concerning the needs of the City of Wheeling and the use of CDBG and HOME funds to address those needs over the next five (5) years. Written comments may be addressed to Ms. Nancy Prager, Economic & Community Development Director, City of Wheeling, 1500 Chapline Street, Suite 305, Wheeling, WV, 26003 or via phone at (304) 234-3701.

Ms. Nancy Prager  
Economic & Community Development Director  
City of Wheeling, WV



# ELIGIBLE CDBG FUNDED ACTIVITIES

## §570.201 Basic Eligible Activities:

- (a) **Acquisition** – By purchase, long-term lease and donation of real estate.
- (b) **Disposition** – Through sale, lease and donation of real property acquired with CDBG funds, including reasonable costs for temporary management
- (c) **Public Facilities and Improvements** – Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements, including removal of architectural barriers. This includes streets, curbs, walks, parks, recreational facilities, etc.
- (d) **Clearance** – Demolition and removal of buildings and improvements.
- (e) **Public Services** – Labor, supplies and materials for public services concerned with employment, crime prevention, child care, health, drug abuse, education, fair housing counseling, energy conservation, welfare, etc.
- (f) **Interim Assistance** – Activities that require immediate action to arrest deterioration and that permanent improvements will be carried out as soon as practicable; including clean-up, clearance, etc.
- (g) **Payment of Non-Federal Share** – Funds for the local share of eligible type activities and projects from other Federal or State Programs.
- (h) **Urban Renewal Completion** – Payment of the cost of completing an urban renewal project.
- (i) **Relocation** – Payments and other assistance for permanently and temporarily relocating individuals, families, businesses, non-profit organizations, and farm operations as a result of a CDBG funded activity or project.
- (j) **Loss of Rental Income** – Payments to housing owners for loss of rental income incurred in holding, for temporary periods, housing units to be used for the relocation of individuals and families displaced by program activities.
- (k) **Housing Services** – Housing counseling in connection with tenant – based rental assistance and affordable housing projects.



- (l) **Privately Owned Utilities** – Funds for acquisition, construction, reconstruction, rehabilitation, or installation of distribution lines and facilities of privately owned utilities.
- (m) **Construction of Housing** – Funds for the rehabilitation of housing under Section 17 of the Housing Act of 1937, as amended.
- (n) **Homeownership Assistance** – Funds may be used to provide direct homeownership assistance to low- and moderate-income households to subsidize payments for homeowners, finance acquisition, mortgage guarantees, down payment assistance, and closing costs.
- (o) **Microenterprise Assistance** – Provide financial assistance for small enterprises including credit, grants, loans, guarantees, technical assistance, etc.
- (p) **Rehabilitation and Preservation** – Funds to finance the rehabilitation of privately owned buildings and improvements for single family residential properties, low-income public housing, public or privately owned commercial or industrial buildings, manufactured housing, etc.
- (q) **Code Enforcement** – Cost incurred for inspection for code violations and enforcement of codes, limited to salaries and related expenses of code enforcement and legal proceedings.
- (r) **Historic Preservation** – Funding for the rehabilitation, preservation, or restoration of historic properties.
- (s) **Special Economic Development Activities** – Funds may be used for an economic development activity, including loans and grants to a for-profit business.
- (t) **Special CBDO Activities** – Funds may be used as grants or loans to a Community Based Development Organization (CBDO) to carryout neighborhood revitalization, community or economic development, or an energy conservation project.
- (u) **Planning and Management** – Funds may be used for planning activities which consist of all costs of data gathering, studies, analysis, preparation of plans and applications, environmental review records, mapping, etc.
- (v) **Administration** – Funds may be used for the reasonable administrative costs for general management, oversight, and coordination of the CDBG Program.



# INELIGIBLE CDBG FUNDED ACTIVITIES

## §570.207 Ineligible Activities:

- (a) **General Rule** – Any activity that is not authorized as an “eligible activity.”
- (b) **Government Buildings** – Funds cannot be used for improvements to a public building used for the general conduct of government.
- (c) **General Government Expenses** – Funds cannot be used for expenses that are considered the regular responsibilities of the local government.
- (d) **Political Activities** – Funds cannot be used to finance the use of facilities or equipment for political purposes or to engage in other partisan political activities.
- (e) **Purchase of Equipment** – The purchase of equipment is generally ineligible, which includes construction equipment, motor vehicles, furnishings, or personal property. The only exception is fire equipment assigned to a low- and moderate-income area.
- (f) **Operating and Maintenance Expenses** – The general rule is that any expense associated with repairing, operating, or maintaining public facilities, improvements, and services is ineligible.
- (g) **New Housing Construction** – Funds cannot be used for the construction of new permanent residential structures or for any program to subsidize or consist such new construction except by a CBDO. However, the cost of site assemblage, clearance, and site improvements are eligible activities.
- (h) **Income Payments** – Funds cannot be used for subsistence – type grant payments for food, clothing, housing, or utilities.



# MEETING A NATIONAL OBJECTIVE

National Objective Subcategory	Conditions for Eligibility	Example
Low-Moderate Income (LMI) Area Benefit	<p>A facility or improvement will be used for a purpose that benefits all residents in a defined area primarily residential in which at least 51% are LMI households.</p> <p>Paying all or part of a special assessment on behalf of LMI Households qualifies under this objective.</p>	<p>The Installation of paved streets, sidewalks, curbs and gutters in a predominantly LMI household neighborhood.</p> <p>CDBG funds pay the assessment made to Low-Mod Income household homeowners when a new water/sewer system is installed in their neighborhood.</p>
Low-Moderate Income Limited Clientele	<p>The majority of public service activities qualify under this national objective.</p> <p>Services provided to a specific group of people who are comprised of at least 51% LMI households.</p>	<p>Home ownership counseling provided to a group of LMI individuals.</p> <p>Renovation or expansion of a food pantry.</p>
Low-Moderate Income Housing	<p>The facility or improvement exclusively benefits housing to be occupied by LMI households.</p>	<p>A parking lot and landscaping are improved on the site of a rental property with 51% LMI households paying affordable rents.</p>
Low-Moderate Income Jobs	<p>Public improvement is for an economic development project that creates or retains permanent jobs.</p> <p>In order for a CDBG funded economic development activity to qualify as an activity that benefits low and moderate income persons, at least 51% of the jobs created or retained (full time equivalent basis) will be held by or made available to low and moderate income persons.</p>	<p>A new water tower will enable factory expansion and owners to commit to hiring at least 51% of new permanent jobs to LMI persons.</p>
Area Blight	<p>Public improvements and facilities are in a designated blighted area and activity addresses conditions that contributed to blight.</p>	<p>An outdated fire hall is rehabilitated and equipment is updated to prevent further loss of life and property due to fires.</p>
Spot Blight	<p>Public improvements or facility is outside designated blighted area and activity is limited to eliminate specific conditions of blight or decay.</p>	<p>Historic library building located outside a designated area is rehabilitated.</p>
Urgent Need	<p>Acquisition, construction, or reconstruction of a public facility or improvement that is designated to alleviate recent serious and imminent threat to public health and safety and no other funds are available.</p>	<p>A storm sewer system is reconstructed after a severe flood damaged it. All other funding sources are unavailable or exhausted.</p>



# HOME INVESTMENT

## PARTNERSHIP PROGRAM

### ☐ Eligible HOME Activities and Costs

- **Hard Costs**

- New construction of affordable housing
- Rehabilitation of affordable housing
- Reconstruction of affordable housing
- Conversion to affordable housing
- Site Improvements related to the development of affordable housing

- **Refinancing of existing debt secured by a housing project that is being rehabilitated w/ HOME Funds**

- Refinancing of debt on a single-family (one to four family) owner occupied housing that is being rehabilitated with HOME funds and the refinancing will reduce the overall monthly housing cost to make it affordable

- **Acquisition Costs**

- Improved or unimproved
- Purchase of property by home buyers

- **Soft Costs necessary for the financing, development, rehabilitation or acquisition of housing using HOME Funds**

- Architectural, engineering, and related professional services
- Costs to process and settle the financing for a project such as lender origination fees, appraisal fees, etc.
- Project audit costs and certification of costs by a CPA
- Costs to provide information services such as affirmative marketing and fair housing information
- Costs of funding an initial operation deficit reserve during the period of initial project rent-up but not to exceed 18 months
- Staff and overhead costs directly related to carrying out the project such as work specifications, loan processing inspections, housing consultation, etc.
- Cost for the payment of impact fees that the local jurisdiction changes for all housing projects

- Cost of environmental review and release of funds
- **CHDO Costs**
  - Cost of project-specific technical assistance and site control loans
  - Project feasibility costs, consulting fees, legal fees, architectural and engineering fees, property options, site control, and title clearance
  - Project specific seed money loans for preconstruction costs that are customary and reasonable such as costs of obtaining firm financing, construction loan commitments, architectural plans and specifications, zoning approvals, legal fees, etc.
- **Relocation costs for displaced households**
  - Relocation payments and other relocation assistance for persons displaced by the housing project
  - Replacement housing payments, moving expenses and payment for reasonable out-of-pocket costs incurred in the temporary relocation of persons
  - Other relocation assistance such as staff and overhead costs directly related to providing advisory and other relocation services to displaced persons
- **Administrative and planning costs**
  - General management, oversight and coordination
  - Staff and overhead costs
  - Public information costs in the planning and implementation of projects
- **Other Costs**
  - Fair housing activities to affirmatively further fair housing
  - Indirect costs as part of a cost allocation plan
  - Preparation of the consolidated plan
  - Compliance and reporting in reference to Federal requirements
  - Tenant-based rental assistance (TBRA)
  - Rental assistance and security deposit payments
  - Utility deposit assistance only if rental or security deposit payments are made
  - Cost of inspecting the housing and determining income eligibility of the household
  - Troubled HOME-assisted rental housing projects
    - Applies to only an existing HOME assisted rental project

- Project is no longer financially viable during the HOME 20-year affordability period for rental projects
- Operating costs significantly exceed the operating revenue
- HUD must approve this cost to preserve an affordable rental project
- Additional HOME Funds and original HOME Funds may not exceed the maximum amount of per-unit subsidy [Section 221 (d)(3)(ii)]

**❑ Ineligible HOME Activities**

**• HOME funds may not be used to:**

- Provide project reserve accounts, except for new construction or rehabilitation of an initial operating deficit reserve during the period of project read-up (not to exceed 18 months)
- Provide tenant-based rental assistance for the special purpose of the existing Section 8 Program
- Provide non-Federal matching contribution required under another Federal Programs
- Provide assistance for uses authorized by Public Housing Capital and Operating Funds
- Prepayment of Low Income Housing Mortgages
- Provide assistance to a homebuyer to acquire housing previously assisted with HOME funds during the period of affordability
- Provide funds for the acquisition of property owned by the participating jurisdiction (P.J.) except for property acquired by the P.J. with HOME funds, or property acquired in anticipation of carrying out a HOME project
- Pay for delinquent taxes, fees or charges on properties to be assisted with HOME funds
- Pay for any cost that is not listed as eligible under the HOME Regulations



**PUBLIC HEARING ON NEEDS REGARDING  
CDBG AND HOME FUNDS FOR  
FY 2020-2024 FIVE-YEAR CONSOLIDATED PLAN,  
FY 2020 ANNUAL ACTION PLAN, AND  
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

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**Wednesday, December 4<sup>th</sup>, 2019 at 5:00 pm**  
Council Chambers  
1500 Chapline Street  
Wheeling, WV 26003

**Opening Remarks** – Ms. Nancy Prager

*Department of Planning and Community Development*

**Overview** – UDV Staff

- What is a Five-Year Consolidated Plan, an Annual Action Plan, and an Analysis of Impediments to Fair Housing Choice?

**Eligible CDBG Activities** – UDV Staff

CDBG funds may be used for activities which include, but are not limited to:

- acquisition of real property;
- relocation and demolition;
- rehabilitation of residential and non-residential structures;
- construction of public facilities and improvements, such as water and sewer facilities, streets, neighborhood centers, and the conversion of school buildings for eligible purposes;
- public services, within certain limits;
- activities relating to energy conservation and renewable energy resources; and
- provision of assistance to profit-motivated businesses to carry out economic development and job creation/retention activities.

**Ineligible CDBG Activities** – UDV Staff

Generally, the following types of activities are ineligible:

- acquisition, construction, or reconstruction of buildings for the general conduct of government;
- political activities;
- certain income payments; and
- construction of new housing by units of general local government.

**Eligible HOME Activities – UDV Staff**

HOME funds may be used for activities which include, but are not limited to:

- new construction of affordable housing, rehabilitation of affordable housing, reconstruction of affordable housing, conversion to affordable housing;
- site improvements related to the development of affordable housing;
- refinancing of debt on a single-family (one to four family) owner occupied housing that is being rehabilitated with HOME funds and the refinancing will reduce the overall monthly housing cost to make it affordable;
- acquisition costs (improved or unimproved); purchase of property by home buyers;
- soft costs such as architectural, engineering, and related professional services;
- costs to provide information services such as affirmative marketing and fair housing information;
- CHDO costs such as cost of project-specific technical assistance and site control loans;
- relocation costs for displaced households;
- administrative and planning costs.

**Estimated FY 2020 Allocations – UDV Staff**

The City of Wheeling anticipates that it will receive the following allocations:

Entitlement Funds	Estimated Amount
FY 2020 CDBG Funds	\$ 1,163,000*
FY 2020 HOME Funds	\$ 318,000*
<b>Total:</b>	<b>\$ 1,481,000</b>

*Note: \*Amount subject to change based on HUD's FY 2020 allocation of funds.*

**Review of Past Performance – UDV Staff**

**Public Comments – UDV Staff**

- What does Wheeling need to be a better place to live, work, and play?
- What are the needs in your neighborhood?
- What do you know about fair housing?
- Have you or someone you know experienced any housing discrimination?

**Adjournment – Ms. Nancy Prager**

*Department of Planning and Community Development*



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# SECOND PUBLIC HEARING

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**NOTICE OF DISPLAY OF PLANS AND PUBLIC HEARING  
FOR FY 2020-2024 FIVE YEAR CONSOLIDATED PLAN,  
FY 2020 ANNUAL ACTION PLAN, AND  
FY 2020 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE  
CITY OF WHEELING, WEST VIRGINIA**

Notice is hereby given that the City of Wheeling, WV has prepared a Five Year Consolidated Plan for FY 2020-2024, an Annual Action Plan for FY 2020, and an Analysis of Impediments to Fair Housing Choice. In accordance with the regulations and requirements of the U.S. Department of Housing and Urban Development (HUD), these plans will be on public display for a period of 30 days, beginning Friday, July 17, 2020 through Monday, August 17, 2020 at [www.wheelingwv.gov](http://www.wheelingwv.gov).

The Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Program budgets for FY 2020 can be accessed at the City of Wheeling's website: [www.wheelingwv.gov](http://www.wheelingwv.gov). These plans will be presented for approval at the August 18, 2020 City Council Meeting at 5:30 PM.

It is anticipated that at its August 18, 2020 meeting, the City Council will approve and adopt the FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and FY 2020 Analysis of Impediments to Fair Housing Choice and will authorize the proper City Officials to submit the plans to the U.S. Department of HUD for Fiscal Year 2020.

A public hearing will be held on Tuesday, August 4, 2020 at 12:00 PM. To participate in the City Council Meeting and Public Hearing, please call (304) 234-6401 or email [bdelbert@wheelingwv.gov](mailto:bdelbert@wheelingwv.gov).

The purpose of the public hearing is to present the FY 2020-2024 Five Year Consolidated Plan for the City's housing and community development needs, the FY 2020 Annual Action Plan for the use of Community Development Block Grant (CDBG) funds in the amount of \$1,183,926 and for the use of HOME Investment Partnerships Program (HOME) funds in the amount of \$321,835, and the FY 2020 Analysis of Impediments to Fair Housing Choice as the City's commitment to affirmatively further fair housing. The City-County Building and the City Council Chambers are accessible to persons with physical disabilities. If special arrangements are needed to accommodate residents with disabilities, those with hearing or vision impairment, or those with limited English proficiency in order for them to participate in the public hearing, please contact the Economic and Community Development Department at (304) 234-3701 to make those arrangements. The City intends to submit these documents to HUD on or before August 24, 2020.

The Proposed Five Year Consolidated Plan, FY 2020 Annual Action Plan, and Analysis of Impediments to Fair Housing Choice were prepared after conducting a public hearing on housing and community development needs, meetings with stakeholders, meetings with housing provider agencies, meetings with the City's staff and officials, and the result of a community wide resident survey questionnaire.

If the City would undertake an activity that would result in the displacement of families or individuals, then the City would utilize its policy for minimizing such displacement. Furthermore, the City is responsible for replacing all low- and moderate-income housing units that may be demolished or converted as a result of CDBG or HOME Funds.

All interested persons, groups, and organizations are encouraged to attend this public hearing and will be given the opportunity to present oral or written testimony concerning the proposed plans and use of Federal funds under the FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and Analysis of Impediments to Fair Housing Choice. Written comments or oral comments may be addressed to Ms. Nancy Prager, Director of Economic and Community Development, City of Wheeling, City-County Building, 1500 Chapline Street, Wheeling, WV 26003, (304) 234-3701, [nprager@wheelingwv.gov](mailto:nprager@wheelingwv.gov). Persons with hearing and/or speech impediments may contact the City via 711.

Robert Herron  
City Manager

July 16, 2020  
The Intelligencer  
and  
Wheeling News-Register

**NOTICE OF DISPLAY OF PLANS AND PUBLIC HEARING  
FOR FY 2020-2024 FIVE YEAR CONSOLIDATED PLAN,  
FY 2020 ANNUAL ACTION PLAN, AND  
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Robert Herron  
City Manager

**NOTE: Publish only one time as a Class 2 Block Ad on Thursday, July 16, 2020.  
Please provide a Certificate of Publication.**

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