



**Analysis of Impediments to Fair Housing Choice 2022-2026**



**City of Gary**

**Jerome A. Prince, Mayor**

**Department of Community Development**

**Arlene Colvin, Esq. Director**

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**August 2022**

**The Arsh Group Inc.**

Planners, Landscape Architects, Development Consultants  
Merrillville, Indiana



JEROME PRINCE  
Mayor

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August 12, 2022

Ms. Beverly Noble  
Equal Opportunity Specialist  
Office of Fair Housing and Equal Opportunity  
U.S. Department of Housing and Urban Development  
575 Pennsylvania Street, Suite 655  
Indianapolis, IN. 46204

**Subject: 2022-2026 Analysis of Impediments**

Dear Ms. Noble:

The City of Gary is pleased to submit its 2022-2026 Analysis of Impediments study for your review and approval. In the development of this document, the City of Gary has utilized the guidelines provided by the Department of Housing and Urban Development. We have also facilitated several meetings with stakeholders and conducted focus group conversations to solicit input and to collect information. In addition, comments received through a community survey questionnaire helped to identify many of the concerns addressed in the AI.

The City of Gary held a public meeting on July 11, 2022 for the study to get input from the citizens. In this meeting, we distributed a summary of the AI and discussed the findings. The participants were afforded an opportunity to comment on the study and to provide input.

The Gary 2022 AI has identified seven impediments and contains an implementation matrix for the next five years. The City of Gary will aim to implement the recommendations contained in the study and look forward to working with you to further fair housing in the City of Gary. I would also like to take this opportunity to acknowledge the support we have received from you over the years and we look forward to working with you in the future.

Should you require further information, please do not hesitate to contact me.

Sincerely,

Arlene Colvin, Esq.  
Director  
Enclosure(s)

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# Chapter I

## Introduction and Executive Summary

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In an effort to end housing segregation, the U.S. Congress passed Title VIII of the Civil Rights Act of 1968, making acts of housing discrimination based on race, sex, national origin, religion, or ethnicity illegal. Congress amended this landmark legislation in 1988 making acts of discrimination against families with children and people with mental or physical illness equally unlawful.

Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, requires that the U.S. Department of Housing and Urban Development (HUD) implement its programs in a manner that affirmatively furthers fair housing. Until recently, only general guidelines were provided to CDBG grantees in fulfilling the AFFH requirement. In 1989, HUD required CDBG grantees to undertake an Analysis of Impediments to Fair Housing Choice (AI). Grantees are now required to report on progress in meeting the actions to eliminate fair housing impediments in their Consolidated Plan Annual Performance Report (CAPER).

The Consolidated Plan's Certification to "Affirmatively Furthering Fair Housing" requires entitlement communities to undertake Fair Housing Planning. The Analysis of Impediments to Fair Housing should be viewed as part of the City's Consolidated Plan.

This report has been completed to meet requirements of the Housing and Community Development Act, as amended, and the HUD regulations governing the preparation of the "Consolidated Plan." The Gary Department of Community Development conducted this analysis to identify impediments to fair housing in Gary, Indiana. The City is committed to taking the appropriate actions to overcome the effects of any impediments identified through this analysis, and will maintain records reflecting the analysis and actions taken in this regard.

Fair Housing choice is a complex issue involving diverse and wide-ranging considerations. It is important to distinguish between the "impediments to fair housing choice" and "barriers to affordable housing". Affordability in the market is largely dependent upon supply and demand and proximity to public transportation. Therefore, the purpose of Fair Housing laws extends beyond the basic issues of economics to consider discrimination within the housing delivery system that impedes a household's ability to make a personal housing choice that is within their economic means.

Impediments to Fair Housing Choice are defined as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict the availability of housing choice. It also includes any actions, omissions, or decisions that have this effect. Discrimination includes discriminatory rental, real estate, and lending practices, and exclusionary zoning regulations, that limit housing choices for minorities, families with

children, and other protected classes. This analysis attempts to examine the impediments to housing choice within that context.

Although the barriers to affordable housing are related to fair housing choice, this document will focus on the impediments to fair housing. The barriers to affordable housing are addressed extensively in the City's Consolidated Plan document.

## **A. STATEMENT OF PURPOSE**

The Analysis of Impediments to Fair Housing (AI) is a study that is required by the Department Housing and Urban Development (HUD) to be submitted once every five years, by the City to meet funding requirements for several federal programs. The study provides an objective analysis of access to housing in the City as it relates to the Fair Housing policies of the federal government. Specifically, the study examines current housing conditions and how they address Section 808 (e) (5) of the Fair Housing Act of 1968, and the 1988 amendments. These laws outline the guidelines for program administrators to address housing and related concerns in a manner to affirmatively further the objectives of the Act.

Communities receiving HUD funds, as part of this certification for "Affirmatively Furthering Fair Housing" are required to:

- Conduct an Analysis of Impediments to Fair Housing Choice ("AI");
- Take actions to address the Impediments Identified in the "AI";
- Maintain records and sources in accordance with 24 CFR 91.225(a).

The federal laws provide that any persons regardless of race, color, religion, sex, disability, familial status or national origin must have access to the same housing choices as any other group. Any actions, omissions or decisions taken because of race, color, religion, sex, national origin, disability or familial status that restrict housing choice or the availability of housing choice qualifies as an Impediment to Fair Housing Choice.

The City of Gary is a recipient of HUD funded Community Development Block Grant (CDBG) and Home Investment Partnership Act (HOME) entitlement grants. As a recipient of these funds, the City must complete and submit an Analysis and Plan of Action report. The Analysis report will address the issues identified and propose recommendations to address them. Each area of concern identified must be addressed with a corrective action. It is the City's responsibility to maintain records of the actions taken and results of those actions for the five years that the study is in effect. The City further must take action to ensure that the Analysis is accessible to the protected classes.

The Analysis of Impediments will be shared with all City departments, agencies, and subrecipients who are receiving entitlement funds. Recipients of any federal funds administered throughout the City are responsible for compliance with all legislative

mandates for protected classes. In addition to the Fair Housing Act, these mandates include, but are not limited to:

- Section 504 of the Rehabilitation Act of 1973;
- Americans with Disabilities Act of 1973; and
- Americans with Disability Act of 1990.

The Analysis of Impediments to Fair Housing Choice (AI) supplements the 2021-2025 Consolidated Plan document by providing additional data which can be used to expand the City's efforts to remove impediments in the community and expand housing choice.

The Department of Housing and Urban Development (HUD) encourages a lead agency be designated to oversee the (AI) process. The City of Gary Department of Community Development was the facilitator for both the Analysis of Impediments and Consolidated Plan coordination process. The Department desired to provide an independent assessment of the conditions in the City. In addition, the current work load of staff prompted the department to seek outside resources to prepare both documents.

The City of Gary process for procurement requires that the Department complete A Request For Proposal (RFP) procedure. The scope of work for the Request included both Analysis of Impediments to Fair Housing and Fair Housing Choice (AI) and the 2022 Annual Action Plan. At the conclusion of the process the City of Gary selected The Arsh Group Inc. as the consultant to complete both the Analysis of Impediments and the 2022 Annual Action Plan.

## **B. DEFINITION OF TERMS**

### **1. Objectives of Affirmatively Furthering Fair Housing**

- Reducing or eliminating housing discrimination;
- Providing opportunity for racially and ethnically *inclusive* occupancy patterns;
- Promoting fair housing choice;
- Providing accessibility options for persons with disabilities;
- Identify impediments to fair housing choice within the jurisdiction;
- Outlining appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintaining records reflecting the analysis and actions taken.

### **2. Housing Problems**

The Department of Housing and Urban Development (HUD) uses unambiguous terms to define housing related issues. These conditions are commonly used to demonstrate the extent of housing problems and needs for low-income households. The Comprehensive Housing Affordability Strategy (CHAS) and United States Census Data are the sources used to measure if a household can be identified as having a housing problem. Conditions in this

category are commonly identified by the following circumstances:

<b>Overcrowding</b>	More than 1 person per room (bathrooms, halls, utility rooms and storage areas are not counted as rooms). Extreme overcrowding exists if there are more than 1.5 persons per room.
<b>Cost Burden</b>	Housing expenditures exceed 30 percent of income. Severe cost burden is realized when 50 percent of income is spent on housing.
<b>Substandard Conditions</b>	Lack of either complete plumbing or kitchen facilities, or both.

### 3. Impediments

The Analysis of Impediments to Fair Housing and Fair Housing Choice addresses similar concerns prescribed under the Fair Housing Act and other legislations. A number of areas, more clearly defined are:

i.

<b>Familial Status</b>	<ul style="list-style-type: none"><li>▪ A single person.</li><li>▪ An expecting woman or a household with children under 18 living with parents</li><li>▪ Legal custodians who might experience housing discrimination.</li></ul>
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ii.

<b>Persons with Disabilities</b>	<ul style="list-style-type: none"><li>▪ Federal law defines a 'disability' or 'handicap' as being: A physical or mental impairment which substantially limits one or more of such person's major life activities.</li><li>▪ A record of having such an impairment.</li><li>▪ Being regarded as having such impairment.</li></ul>
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iii.

<b>Protected Classes</b>	<ul style="list-style-type: none"><li>• Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.</li></ul>
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## C. DESCRIPTION OF THE PROCESS, PARTICIPANTS AND METHODOLOGY

### 1. Participants in the Analysis

A critical element of the Analysis of Impediments to Fair Housing Choice and the Plan of Action was collection of data and input from stakeholders. This process involved a considerable amount of effort to schedule and coordinate conversations with several agencies that were deemed necessary to provide input.

The City of Gary Department of Community Development served as the lead agency under the direction of Ms. Arlene Colvin. With the support of the Director, stakeholder coordination, public participation, interviews and focus group meetings, were facilitated by the Department and conducted by the City's consultant, the Arsh Group Inc. Participants were comprised of twenty-three individuals, representing twenty agencies.

The City requested participation and received input from a full range of stakeholders and interested agencies. The participants included financial institutions, housing providers, educators, community service groups, homeless organizations, and government officials. The community input efforts consisted of group discussions, one-on-one-interview, and a public hearing. Stakeholders that participated in the process are listed in Table 1.

**Table 1- List of Participants**

<b>City Departments</b>			
1	Community Development	Arlene Colvin	Director
2	Planning Department	Gregory H. Jenkins	Director
3	Zoning Department	Eric Boria	Administrator
4	Gary Housing Authority	Taryl Bonds	Executive Director
5	Health & Human Services	Veronica Collins	Executive Director
6	Human Relations Commission	Haneefah Khaaliq	Executive Director
<b>Special Needs/ Health Agencies</b>			
7	Mayor's Organization on Disabilities	Dr. Edward Williams	Chairman
8	Mayor's Organization on Disabilities	Jackie Bennett	Administrator/Secretary
9	Edgewater Systems for Balanced Living	Chris Carroll	Chief of Clinical
<b>Business, Banking</b>			
10	Chamber of Commerce	Charles "Chuck" Hughes	Executive Director
11	Centier Bank (HQ)	Yolanda Davis	Vice Pres./Comm. Reinvest. Ofcr
12	Horizon Bank	Kenneth Winston	Chief Community Devel. Ofcr
<b>Homeless</b>			
13	Sojourner Truth House	Angela Curtis	Executive Director
14	Sojourner Truth House	Pamela Key	Client Services Director
15	Sojourner Truth House	Arlandra Gilbert	Staff
16	Crisis Center "Alternative House"	Felicia Evans	Program Manager
<b>Social Services Providers</b>			
17	Meals on Wheels	Sandra Noe	Executive Director
18	Indiana Parenting Institute	Laura Wynn	Chief Operating Officer
<b>Realtors</b>			
19	Wright Realty	Candice Wright	Broker
20	Blessed Realty	LaVonne Hoskins	Broker
<b>Housing Services Organizations</b>			
21	Broadway Area CDC	Vernita Leslie	Executive Director
22	CR Works CDC	Sandra Dafiaghor	Executive Director
23	Habitat for Humanity of NWI	Wende Burbridge	Development Director

## **2. Methodology Used to Complete the Analysis**

Early in the process, the City established three goals for the 2022 Analysis of Impediments. These goals are:

1. Ensure access and choice in housing for all residents
2. Support availability of affordable housing for all residents
3. Confirm Fair Housing Enforcement, Outreach Capacity, and Resources

Collection of the data and an objective review of information, consistent with above goals, are the main components for the preparation of the Analysis study and Plan of Action. Varying types of statistical data are taken into consideration when determining the impact of local and national conditions.

In an effort to involve a diverse group of participants in the process, a number of methods was used. The efforts consisted of the following:

- Interviews with key community housing organizations;
- Focus group conversations with several social services organizations;
- Research and analysis of publicly available data;
- Meetings with relevant City departments;
- Review of financial lending practices and statistics;
- Review of complaint files for the past five years;
- Information from print from daily newspapers, newsletters, media and various other periodicals; and
- Review of Fair Housing Survey questionnaire as completed by participants.

The responses from the participants were necessary to generate a document that identifies conditions impacting housing choice in the City of Gary. Specific methods used for the development of the analysis are described as follows:

### **2.1 Interviews**

A series of interviews were conducted facilitated by the Department of Community Development over a period of three weeks. A total 23 participants representing 20 agencies or services contributed and provided varying perspectives on the fair housing and related issues.

Participants were comprised of public officials, housing providers, educators, community service groups, business community, homeless agencies and government officials. The diverse representation offered a mixture of ideas, perspectives and views relating to the approach to address the provision of housing in the City Gary.

### **2.2 Community Questionnaire**

The City of Gary prepared a fair housing survey questionnaire to get input from both stakeholders and community at large. The tabulated results of this survey is in the

attachment section of this report. The findings of survey were helpful in refining the issues and impediments.

### **2.3 Public Meeting**

The Department of Housing and Urban Development (HUD) requires the initial findings to be presented to residents, and that residents are allowed a comment period. A summary of the report was distributed to the residents in a public meeting held on July 11, 2022. Attendees in this meeting were also asked to complete the Fair Housing Survey. No comments were received from the attendant in this meeting.

### **2.4 Data Collection and Analysis**

The Arsh Group, Inc. collected data, reviewed various documents, and examined information related to fair housing conditions used in the development of this report. Resources and information that were collected, reviewed and analyzed for this report include the following:

- U. S. Census 2020 American Community Survey (ACS) Estimates
- U. S. Census 2010 Decennial Count
- U. S. Census 2020 Decennial Count
- Demographic data and income/employment/age characteristics
- Housing profiles, number of units and type of housing
- Public Housing information
- Racial and ethnic composition and concentration
- Identification of special needs populations or disproportionate needs
- Focus group discussions, interviews with financial institutions, housing providers, community service groups, and government officials
- Review of judicial findings related to Section 504 of the Rehabilitation Act of 1973, Americans with Disabilities Act of 1990.
- Human Relations Commission general enforcement case information regarding discrimination and housing complaints filed
- Indiana Workforce Development Labor Statistics
- Home Mortgage Disclosure Act (HMDA), FFIEC
- Lake County Sheriff Tax Sale information

## **3. Funding Sources**

Funding to complete the Analysis of Impediments to Fair Housing Choice (AI) and the Plan of Action were from the City's appropriations of HUD entitlement dollars.

## **D. ASSESSMENT OF PAST GOALS, STRATEGIES**

### **1. Fair Housing Goals Participated**

The City of Gary prepared an Analysis of Impediments to Fair Housing study in 2016. This document identified six impediments for the City of Gary. The impediments identified are:

- Impediment 1: Fair Housing Education and Outreach
- Impediment 2: Need for Decent, Safe, Sound, and Affordable Housing
- Impediment 3: Need for Accessible Housing Units
- Impediment 4: Economic Issues May Affect Housing Choice
- Impediment 5: Private Lending Practices
- Impediment 6: Need for a Regional Approach to Affirmatively Furthering Fair

The study further identified a set of strategies to implement for the following five years. These strategies were included in the goals of the 2016-2020 Consolidated Plan. Specifically for each impediment, the Consolidated Plan implemented affiliated goals that aimed to support elimination or mitigation of the impediment.

Impediment		Consolidated Plan Goal
1	Fair Housing Education and Outreach	<ul style="list-style-type: none"> <li>▪ <b>HS-4 Fair Housing</b> - Promote fair housing choice in the City through education, outreach, enforcement of and compliance with the Fair Housing Act, and providing seminars, training, and informational material.</li> </ul>
2	Need for Decent, Safe, Sound, and Affordable Housing	<ul style="list-style-type: none"> <li>▪ <b>HS-1 Housing Rehabilitation</b> - Continue to rehabilitate the existing residential housing stock for homebuyers and tenants in the City to correct code violations, promote energy efficiency, weatherization, and accessibility improvements.</li> <li>▪ <b>HS-2 Housing Construction</b> - Increase the supply of affordable, decent, safe, accessible, and sound housing through new construction for home owners and rental housing.</li> <li>▪ <b>HS-3 Home Ownership</b> - Assist lower-income homebuyers to purchase a home with down payment and closing cost assistance, including housing counseling services.</li> </ul>
3	Need for Accessible Housing Units	<ul style="list-style-type: none"> <li>▪ <b>SN-2 Housing</b> - Increase the supply of affordable, decent, safe, accessible, and sound housing for the elderly, persons with disabilities, victims of domestic violence, and persons with other special needs through rehabilitation, new construction, and making reasonable accommodations to existing housing.</li> </ul>
4	Economic Issues May Affect Housing Choice	<ul style="list-style-type: none"> <li>▪ <b>CD-6 Revitalization</b> - Promote neighborhood revitalization activities in strategic areas through housing development, infrastructure improvements, code enforcement, targeted acquisition, and demolition.</li> <li>▪ <b>ED-1 Employment</b> - Support and encourage new job</li> </ul>



		creation, job retention, and employment.
5	Private Lending Practices	<ul style="list-style-type: none"> <li>▪ <b>HS-2 Housing Construction</b> - Increase the supply of affordable, decent, safe, accessible, and sound housing through new construction for home owners and rental housing.</li> <li>▪ <b>HS-3 Home Ownership</b> - Assist lower-income homebuyers to purchase a home with down payment and closing cost assistance, including housing counseling services.</li> </ul>
6	Need for a Regional Approach to Affirmatively Furthering Fair	<ul style="list-style-type: none"> <li>▪ <b>HS-4 Fair Housing</b> - Promote fair housing choice in the City through education, outreach, enforcement of and compliance with the Fair Housing Act, and providing seminars, training, and informational material.</li> </ul>

**2. Progress Made**

Over the past five years despite the impact of COVID pandemic, the City made significant efforts to address identified impediments. The accomplishment include:

- The City funded the Gary Human Relations Commission (GHRC) in its efforts to promote fair housing and employment. These efforts resulted in 737 cases of assistance to families and individuals consisting of 656 employment cases and 27 fair housing cases.
- The City funded Tenant Based Rental Assistant to prevent very low-income families to become homeless. This program at least assists 10-15 families annually.
- The City provided housing assistance to senior citizens to address a variety of housing issues and including accessibility issue. This program typically assisted 10-15 senior families every year.
- The City has funded Neighborhood Conservation and Code Enforcement and Demolition programs for the last five years to address neighborhood decline and remove blighting effects. The Neighborhood Conservation regularly resolves more than a thousand code violation cases every year, while demolition program, generally demolishes more than 30 structures every year.
- The City funds several housing programs. All these programs aim to provide affordable housing to residents. These programs generally assist in rehab or building of new housing. The number of housing units assisted typically range up to five units annually.
- The City funded Homeownership Opportunity Network (HON) on an annual basis. This program provides assistance to about 30 residents to become homeowners annually.
- Through other programs, i.e., HOME or ESG, the City further provide assistance for homeless prevention as well as downpayment assistance to first time homebuyers.

### **3. Future Road Map**

The City of Gary continues to face job losses, and its consequence of population losses. The population loss results in many homes becoming vacant which in turn create a wide variety of issues and challenges for the community. This is a difficult challenge that the City of Gary cannot address by itself. Additional resources and cooperation are required, most of which has to be done with regional collaboration, both in the public sector as well as private sector.

In another area, the City's efforts were curtailed to a great degree with the COVID pandemic. The City will need to look back to restart many efforts in outreach and counseling, particularly those related to regional outreach, training, and local coordination. The experience of last three years, also has given rise to a variety of issues, i.e., shortages in housing, foreclosures and difficulties in obtaining loans, that will require further assessment. The City's goals for the next five years will be to address these issues in a more comprehensive manner.

### **E. CONCLUSIONS OF ANALYSIS**

Several factors are responsible for impediments to fair housing and housing choice in the City of Gary. The most challenging barrier identified is the lack of income growth which is placing pressure on affordability of many homes despite relatively low cost of typical home in the City. An abundance of vacant and abandoned structures, vacant schools, overgrown parks are all contributing to the neighborhood conditions that often negatively influence the viability of the neighborhood. This condition augmented by lack of new modern housing in the City, often force homebuyers to seek housing outside the City despite affordability of existing housing stock. The weak education system is further influencing the overall sense of community. Lastly duality of housing market in the region, distorts the free housing market choice in the City and the region often forcing segregation.

The study identifies the most critical barriers and impediments to fair housing in the City of Gary as:

1. Insufficient Income Growth
2. Neighborhood Obsolescence.
3. Dual Housing Market
4. Shortage of Affordable Housing Units
5. Lending Practices
6. Accessing to Fair Housing Information
7. ADA Compliance.

## **IMPEDIMENTS AND RECOMMENDATIONS**

### **1. Insufficient Income Growth**

The median household income of Gary is reported to be about \$ \$31,400. Among homeowners about 36.2% are cost burdened while 55.8% of renters in the City are paying

more than 30% of their income for housing.

The Census reports for 2020 indicate that the average income deficit for a Gary family is about \$14,002. Such a large income deficiency makes most homes unaffordable for the average family.

**Actions to be Taken:**

- Strengthen City's economic base to create more job opportunities for residents.
- Promote business development and entrepreneurship to create opportunities in the City and expand neighborhood livability.
- Support education and training programs to expand opportunity for employment
- Provide social services support to enable residents to seek and access employment outside the City of Gary.

## **2. Neighborhood Obsolescence**

Loss of population in the City, has affected many neighborhoods character in the City. The Census report for 2020, shows the City has about 10,917 vacant housing units. According to 2020 the City has lost more than 13% of its population for the last decade. The impact of deteriorating neighborhoods is not limited to appearance alone. The conditions discourage investment and reduce sense of community.

**Actions to be Taken:**

- Concentrate development efforts to provide housing opportunities in target areas.
- Focus on the target areas to demolish dilapidated property and return vacant lots to public green spaces, i.e., natural and community gardens.
- Work with developers to build new infill housing and subdivisions, particularly in those areas that are within established neighborhoods such as former school sites and in target areas.
- Expand code enforcement and zoning compliance to ensure viability of neighborhoods.
- Work with financial institutions to ensure REO properties are appropriately maintained.
- Develop plans for adaptive reuse of the vacant school sites and other larger sites for redevelopment.
- Expand lead removal efforts in rehabilitation of homes to make them available for families.
- Develop strategies to promote the City's affordable housing and attract buyers.
- Encourage mixed-use development to ensure adequate neighborhood facilities such as grocery stores and other essential services.

### 3. Dual Housing Market

The dual housing market that dominates the Gary metropolitan area may be the most substantial impediment to fair housing choice that the City of Gary continue to face. A review of the regional development landscape indicates the existence of divergent housing market in the region. Existence of a market duality severely distorts the free housing market in the region. Such dual market trend is largely responsible for the intense level of racial segregation throughout the Gary metro region.

#### **Actions to be Taken:**

- Institute a regional approach to fair housing
- Expand opportunity for housing choice in Gary
- Promote Fair Housing Regionally

### 4. Shortage of Affordable Housing Units

A limited number of housing units are available that can be afforded by most families particularly those larger families with children. Renters from outside the City that can pay higher rents, often compete for available units. New mixed-use developments are typically designed to capitalize on the market potentials of the development in the City, while serving affordable housing needs for the whole market rather than a targeted population.

#### **Actions to be Taken:**

- Collaborate with GHA in development of diverse housing units
- Expand supply of large family housing unit
- Collaborate with local developers and CDCs to construct new housing units.
- Prevent deterioration of existing rental properties.

### 5. Lending Practices

Access to mortgage in the City of Gary continues to pose a serious obstacle to fair housing choice. Controlling for all variables, it can be argued that mortgage availability for Gary residents is a harder task than for the remaining residents of the Lake County.

#### **Actions to be Taken:**

- Financial Counseling and Education
- Expand Partnership with Financial Institutions
- Expand homeownership incentives programs

## 6. Accessing Fair Housing Information

Conversations with several organizations, indicate that an expanded outreach may be desirable as lack of general knowledge about the fair housing may be an impediment to housing choice in the City of Gary. To improve access to information and fair housing, several strategies must be applied to remove this barrier.

- Expand local capacity to promote fair housing, outreach and education
- Convene regular focus group meetings and conversation
- Expand testing of financial and other housing services providers

## 7. ADA Compliance

The City of Gary prepared in 2012, its last ADA Transition Plan. Since the adoption of this plan, several policy changes have occurred that would make it desirable to update the current ADA plan. The City also lacks guidelines regarding visitability/accessibility that go beyond what is required by the basic “handicapped accessibility” laws for CDBG and HOME funded residential development of more than four units.

### **Actions to be Taken:**

- Update current ADA transition plan for the City of Gary while incorporating visibility guideline as a strong element of the Plan.
- Develop a priority plan to modify a number of facilities annually to ensure compliance.
- Coordinate and provide resource information to connect agencies offering transportation service with the disabled.
- Support programs which expand the supply of accessible housing units for residents, particularly those for the elderly.

## **OTHER FACTORS**

## 8. Zoning and Code Enforcement

In recent years, a substantial increase in the number of vacant structures and related violations have placed extraordinary demand on limited zoning and code enforcement resources. The overwhelming number of cases is beyond the capacity of current City staff to process. In most cases, the violations are not identified.

### **Actions to be Taken:**

- Expand capacity to enforce zoning and code violations and legal processing.
- Work with neighborhood groups, block clubs, urban League and others to promote neighborhood conservation.

## 9. Land Use Practices

In practice Gary's Comprehensive Plan and Zoning Code do not exclude housing affordable to households of modest means. However, existing land use conditions and age of housing often become barriers to access to development of modern housing.

### **Actions to be Taken:**

- Bring fair housing into land use decisions
- Ensure availability and development of diverse housing
- Update Gary Zoning Code with full consideration for housing equity.

# Chapter II

## Jurisdictional Background Data

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### A. DEMOGRAPHIC DATA

#### 1. Community Profile

Historically Gary, Indiana was known as the "City of the Century", the outcome of being founded by the United States Steel Corporation in 1906. The Corporation acquired the land located at the southern tip of Lake Michigan in 1905 to build a steel mill. The city was named after Elbert Henry Gary, a lawyer and founding chairman of the US Steel Corporation. Gary would also represent early industrial urban planning. By 1908 the City was laid out with neighborhoods for workers and supervisors and the population had increased to between five to six thousand people. Most of population consisted of immigrants and migration of workers from the South.

Substantial growth continued with the building of schools and ethnically diverse communities. By 1930 the city's population increased to 100,426. Development of the City, however, was not without its challenges. Conflict between management at US Steel Corporation and workers resulted in the 1919 strike. Race relations was also contentious due to ethnic diversity and built-in separation amount workers and others as well as among races. Growth continued between 1930 and 1960 during the boom years of the steel mills. In 1960 the city experienced the pinnacle of its population growth at 178,320.

By 1990, a shift in the industrial and manufacturing businesses significantly impacted industrial employment with regular layoffs at the steel mill and related companies. Without a diverse local economy, the city began to experience continued job and population loss. Each decade in the city shows decline, 11.92% between 1990 and 2000. Loss of population increased during the next decade to about 21.85%. The loss of industrial jobs and consequent population losses, also impacted neighboring communities where they also show significant decline and outmigration.

Technological advance has changed the method of business in manufacturing and industrial sectors, including the delivery of services. Work from home became the norm as a result of the COVID-19 worldwide pandemic. The impact of technology and the COVID-19 pandemic further exacerbates issues related to outmigration in the City of Gary.

The loss of population created a snowball effect of issues; increase in vacant structures, school closures, neighborhood decline, decrease in tax revenue to maintain infrastructure, and an increase in the need for social services. As one of the results, the City agencies for the last several decades, have been forced to make tough decisions related to the allocation of very limited resources and addressing the needs of the community.

### 1.1 Population

Both the City of Gary and Lake County began to experience population decline starting in 1970’s. The decline appeared more sever during 1980-1990, where Gary and Lake County recorded the largest loss of population at 23.23% and 9.06% respectively.

Over the following decades, Lake County reversed the population decline trend and experienced small gains. Population of the County as a whole increased in 2000 by 1.89% and in 2010 by 1.37%. The City of Gary in contrast, continued to lose residents by double digits; during the same period. Gary's decline was 11.9% in 2000 and 21.85% in 2010. The most recent population data, 2020 Decennial Count, shows the continuation of trends that started more than forty years. According to the Decennial Census, City’s population declined by more than 13% during the last decade to 69,093.

**Table 1 - Population**

Year	Gary		Lake County	
	Total	% Change	Total	% Change
1980	151,953	--	522,965	-4.30%
1990	116,649	-23.23%	475,594	-9.06%
2000	102,746	-11.92%	484,564	1.89%
2010	80,294	-21.85%	491,203	1.37%
2020 (est.)	75,486	-5.99%	485,493	-1.16%
<b>2020 Decennial</b>	<b>69,093</b>	<b>-13.95%</b>	<b>487,536</b>	<b>0.42%</b>

Source: U.S. Census Bureau Decennial and 2020 ACS 5-Year Estimates

Table 1 illustrates population trends for Gary and Lake County spanning forty years. The City of Gary lost 82,860 residents over a period of 40 years. Lake County during the same period experienced two decades of growth, but has a net loss of 35,429 residents according to the Census.

### 1.2 Population Change by Race

Available jobs in Gary attracted both European immigrants as well as African-Americans who migrated from the South. This diversity, created by industrial growth, lead to a growing city that was full of beautiful churches, civic buildings and entertainment venues as well as diverse neighborhoods. New schools were built that were known for their renown curriculums. This growth continued from the early 1909 until the late 1970. According to a recent publication by Natasha Ishak in December of 2019, there were 32,00 steel workers in Gary in 1970, with a population of 175,415 residents. By 2005, steel workers accounted for only 7,000 jobs.

The character of many neighborhoods in the City have changed significantly over the years as a direct result of the loss of jobs and population decline. Areas with well maintained homes,



parcs and other amenities began to fall into disrepair. The increase in the number of vacant properties, limited retail markets and neighborhood obsolesces also contributed to population loss, particularly the white immigrant population over the last thirty years.

**Table 2 - Population by Race**

Year	Population	White	%	African American	%	Hispanic	%
1990	116,649	16,043	13.8%	93,119	79.8%	6,690	5.7%
2000	102,746	10,338	10.1%	85,704	83.4%	5,065	4.9%
2010	80,294	8,619	10.7%	68,107	84.8%	4,128	5.1%
2020 (est.)	75,486	10,978	14.5%	58,809	77.9%	6,718	8.9%
<b>2020 Decennial</b>	<b>69,093</b>	<b>7,339</b>	<b>10.6%</b>	<b>55,444</b>	<b>80.2%</b>	<b>5,221</b>	<b>7.6%</b>

Source: U.S. Census Bureau Decennial and 2020 ACS 5-Year Estimates

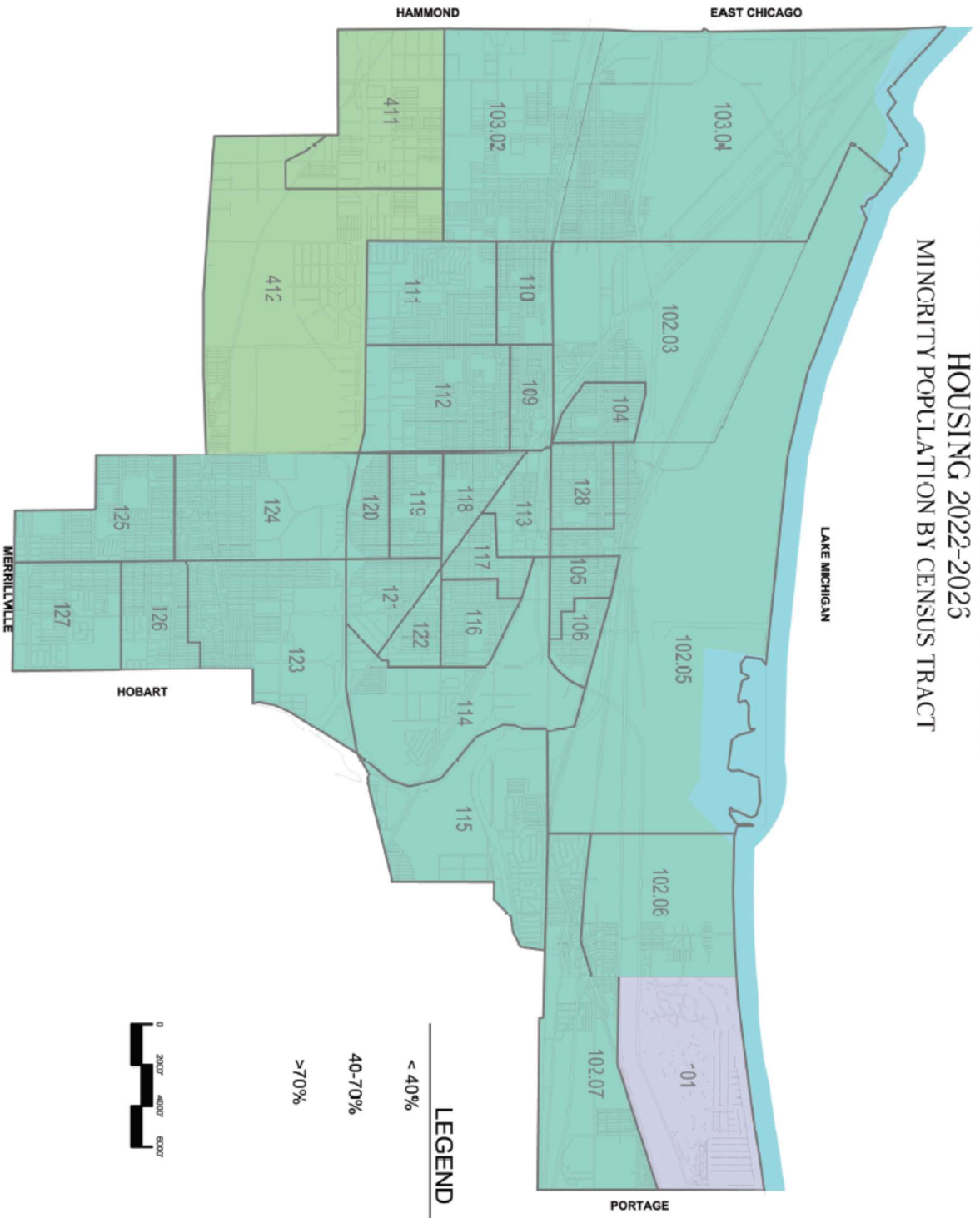
Population realignment took place in Gary not only due to changing market conditions with competition from foreign steel producers overseas, but also automation. During this time there was also an ethnic shift which lead to a significant number of white residents relocating to Merrillville and other surrounding communities.

The White population decreased by 5,705 between 1990 and 2000, according to the Census. During the same period, the African American population increased to 83.4% of the City's population in 2000. Hispanic population dropped by 1,625 between 1990 and 2000.

Although the City has lost population between 2010 and 2020, the White population continues to represent a slightly over ten percent. According to the 2020 Decennial Census report the White population in Gary is 10.6%. African-Americans continue to be the majority in the City at 80.2%. The Hispanic population recorded their highest rate of 7.6% of the City's total population over the last thirty years.

According to the Census minorities in the City of Gary represent over 70% of the population in the majority of the Census Tracts. Census Tracts 411 and 412 are the only tracts where there are less than 40% minorities living in the community.

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 MINORITY POPULATION BY CENSUS TRACT



**Table 3 - Population by Gender**

Year	Overall Population	% Change	Male	%	% Change	Female	%	% Change	Elderly > 65	%	% Change
2010 (est)	84,407	n/a	38,789	46%	n/a	45,618	54%	n/a	12,135	14%	n/a
2020 (est.)	75,486	-10.57%	34,890	46%	-10.05%	40,596	54%	-11.01%	14,603	20%	20.34%

Source: U.S. Census Bureau ACS 5-Year Estimates

In each decade of 2010 and 2020, the male population represented 46% of the total population while the female population represented 54% according to 2020 Census estimates. With the City's loss of population there has been corresponding loss in both the male and female population. Between 2010 and 2020 the male population dropped by 10.5% and the female population by 11.01%

Similar to population, household size in Gary continues to become smaller with each decade passing. As a whole the membership in households declined by about 0.3 person during the last two decades. This generally indicates lesser number of children per families. During the same period, the Owner-occupied households experienced a slightly higher decline. Household numbers for owner-occupied units in 2010 was 2.37 down to 2.20 in 2020. The average renter-occupied unit and household size experienced a 0.15% drop over the same period. Renter-occupied units went from 2.72 to 2.57 and average household size dipped from 2.54 to 2.39.

**Table 4 - Household Change**

Decription	2020	2010	2000
Average household size of owner-occupied unit	2.20	2.37	2.66
Average household size of renter-occupied unit	2.57	2.72	2.68
Average household size	2.39	2.54	2.66

Source: U.S. Census Bureau ACS 5-Year Estimates

### 1.3 Age Distribution

While the median age of the City has relatively stayed the same, the overall population decline has had major impact on the population characteristics of the City. This impact is evident among the 25-44 age group where this group experienced the second largest population increase from 21.65 % to 23.36%. Maintaining and increasing the 25-44 age group is critical for growth in the City as this is typically the time to start a family.

For the senior population, the Census reports an increase of about 4.4% over the last decade. This age group represents the largest increase for all age groups among the population groups between 2010 to 2020. Significantly ahead of the 25-44-year age group at 1.71%.

The middle age or established age group 45-64, experienced the greatest decline over the last decade. This age group typically include working families with school age children. In 2010 this age group represented 28.53 % of the total population while in 2020 it represents

about 23% of the total population. Total population of middle and younger age groups as consistently experienced declined over the last thirty years.

**Table 5 - Age Distribution**

Age	2010	%	2020	%
	Number		Number	
0-14	17,211	21.29%	16,202	21.46%
15-24	11,022	13.63%	9,578	12.69%
25-44	17,504	21.65%	17,635	23.36%
45- 64	23,067	28.53%	17,464	23.14%
65 - over	12,036	14.89%	14,603	19.35%
Median Age	37.6		37.5	
<b>Total</b>	<b>80,840</b>	<b>100.00%</b>	<b>75,482</b>	<b>100.00%</b>

Source: U.S. Census Bureau ACS 5-Year Estimates

## 1.4 Income

Median Family Income (MFI) in Gary increased between 2010 and 2020 by 11.1%. For households, the median income rose slightly higher to about 12.5% during the decade. The largest increase in income is reported to be among married couple families at about 19%. Non-family group, also saw similar increase, but the income level is considerably low.

**Table 6 – Income**

Household Type	2020	2010	% Change
Households	\$ 31,315	\$ 27,846	12.5%
Families	\$ 36,885	\$ 33,198	11.1%
Married-couple families	\$ 61,519	\$ 51,617	19.2%
Nonfamily households	\$ 22,601	\$ 18,971	19.1%

Source: U.S. Census Bureau ACS 5-Year Estimates

Comparison of income growth between the City of Gary and Lake County as whole, show a significant disparity for income growth. During the last decade, Lake County experienced an increase in MFI of more than 21.6%. The Household income in the County increased by 18.1% for the decade. Both of these show a larger growth in income in the County compared to the City of Gary.

**Table 7 – Income Comparison**

Area	2020		2010		% Change	
	Family	Household	Family	Household	Family	Household
Gary	\$36,885	\$31,315	\$31,198	\$27,846	18.2%	12.5%
Lake County	\$71,632	\$57,530	\$58,931	\$48,723	21.6%	18.1%

Source: U.S. Census Bureau, ACS 5-Year Estimates

Setting the income growth aside, the disparities in the total income is even more apparent between the City and County. The Median Family Income (MFI) for the County is reported as

being \$71,632 in 2020. In comparison to Gary's MFI of \$36,885. For households, the median income is \$57,530 a difference of about \$26,215. For families this gap is even higher at \$34,747, indicating families in Gary earn almost one half of the families in Lake County.

It should be noted that although income is low in the City of Gary, home prices remain relatively low in comparison with the rest of the County. The median value of a home is reported to be about \$68,000 in Gary, while the same is about \$165,000 in the County. It should be further noted that homes in Gary are typically have a much higher maintenance cost due to their age.

### 1.5 Areas of Low and Very Low Income

The Department of Housing and Urban Development (HUD) issues income distribution data for families on an annual basis. This data is typically used to establish eligibility for HUD funding eligibility. These income categories are described as: Extremely low income (0 to 30% Median Family Income), Very low income (31% to 50% Median Family Income), Low income (51% to 80% Median Family Income) and Moderate income (80% to 95% MF Median Family Income.)

**Table 8 – Low/Moderate Income Population**

Year	Gary			Lake County		
	Low Mod Pop	Total Population	Percent Low/Mod	Low Mod Pop	Total Population	Percent Low/Mod
2020	54,560	77,680	70.24%	211,710	485,750	43.58%
2010	53,760	82,955	64.81%	193,465	488,010	39.64%

Source: US Department of Housing and Urban Development

Families with incomes that fall in the extremely low category of 0-30% of the Area Median Income (AMI) and those within 31% to 50% category are extremely vulnerable to any fluctuation in the market that may affect household budget. Minimal increases in utility or transportation costs may cause severe hardship.

**Table 9- Income Distribution by Tenure**

Income Distribution Overview	Owner	Renter	Total
Household Income <= 30% HAMFI	2,900	6,925	9,825
Household Income >30% to <=50% HAMFI	2,555	3,060	5,615
Household Income >50% to <=80% HAMFI	3,660	2,495	6,155
Household Income >80% to <=100% HAMFI	1,375	1,065	2,440
Household Income >100% HAMFI	5,895	1,605	7,500
<b>Total</b>	<b>16,385</b>	<b>15,150</b>	<b>31,535</b>

Source: HUD Housing Affordability Strategy (CHAS) Data, 2020

The City's overall percentage of the low- and moderate-income population has increased by about 6% over the course of the last decade from 64% to 70%. Today more than two third of the population in the City consist of low- and moderate-income families and individuals. The percent of concentration is about 27% higher than the County as whole. The increase in the

low- and mod-income population is consistent with the earlier report indicating the income disparity that exists in the City.

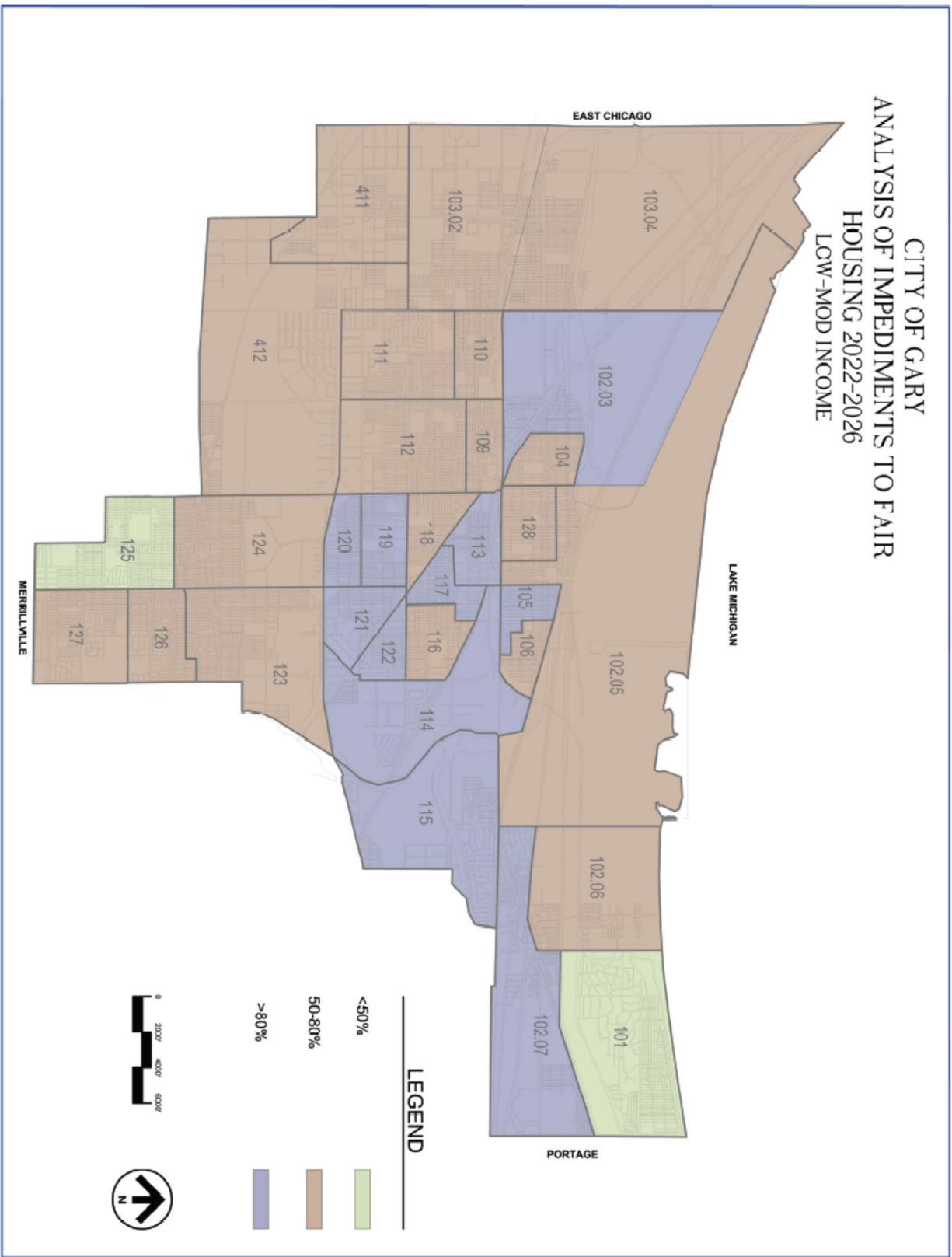
According to the Comprehensive Housing Affordability Strategy (CHAS) Data reported by HUD, Gary has 9,825 family households that are extremely low and very low income. The City of Gary has more extremely low, very low families than any other income groups with 15,440 of its population falling in these categories (48%). The needs of this group households for housing often places significant strain on limited City resources. Moderate income families represent about 20% of the City's households. Low- and moderate-income households in general comprise nearly 70% of all households in Gary.

**Table 10 – Low- and Moderate-Income Concentration by Census Tract**

Census Tract	Low/ Mod Population	Total Population	% LM
101	1,510	4,510	<b>33.48%</b>
102.03	2,205	2,710	81.37%
102.05	835	1,120	74.55%
102.06	1,660	2,675	62.06%
102.07	2,310	2,875	80.35%
103.02	2,130	3,320	64.16%
103.04	2,420	3,205	75.51%
104	1,710	2,825	60.53%
105	930	1,075	86.51%
106	1,205	1,535	78.50%
109	680	865	78.61%
110	1,195	1,775	67.32%
111	2,870	4,480	64.06%
112	3,145	4,365	72.05%
113	1,405	1,735	80.98%
114	1,275	1,565	81.47%
115	2,365	2,870	82.40%
116	1,615	2,060	78.40%
117	690	840	82.14%
118	1,075	1,620	66.36%
119	1,235	1,415	87.28%
120	690	850	81.18%
121	705	835	84.43%
122	1,415	1,590	<b>88.99%</b>
123	2,180	2,795	78.00%
124	3,160	4,560	69.30%
125	2,310	4,735	<b>48.79%</b>
126	2,025	2,565	78.95%
127	2,610	3,435	75.98%
128	1,660	2,330	71.24%
411	1,730	2,395	72.23%
412	1,615	2,140	75.47%
<b>Total</b>	<b>54,565</b>	<b>77,670</b>	<b>70.25%</b>

Source: US Department of Housing and Urban Development

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**LOW-MOD INCOME**





The distribution of low- and moderate-income families can be generally described as uniform, throughout the City as with the exception of two census tracts, 101 and 125, all other tracts have a concentration of low-and moderate-income households. The Miller Neighborhood, Census Tract 101, has the lowest percentage of low- and moderate-income families at 33.4%. Tract 101 also has the highest median family income at \$94,644. West Glen Park is the other community with less than 50% low-and moderate-income families (CT 125). The median family income in Tract 125 is reported at \$62,816. The highest income disparity is observed in census tract, 122, where almost 89% of the total population is low income. This tract has a median family income of \$14,644.

**1.6 Poverty**

The total population living in poverty in Gary in 2020 is reported by Census as being about was 33.1% or 24,737 individuals. The majority African American population constitutes the largest group living at or below poverty at 82.27%. According to the 2020 Census African Americans comprise 80.2% of Gary's population. The poverty rates for African American is reported to be about 33.2% while poverty rates for Whites and Hispanics is reported to be lower at 30.5% and 35.2% respectively. Whites and Hispanics account for over 18% of the population of the City.

**Table 11- Poverty Rate by Family**

Category	2020	2010
All families	28%	27.6%
Married-couple families	9.9%	14.3%
Families with Children under 18 years	44.8%	45.4%
Female Head of Households	42.5%	39.3%
65 and over Households	8.9%	13.3%
<b>City of Gary</b>	<b>30.0%</b>	<b>38.30%</b>
Owner occupied		11.8%
Renter Occupied		33.1%
<b>Mean income deficit for families</b>		<b>\$14,002</b>

Source: U.S. Census Bureau, 2019 ACS, 1-Year Estimates

The poverty rate among all races appear to indicated that minorities in the City are not disproportionately impacted by poverty. Among different population groups however, it appears that families with children have the highest poverty rate at about 44%. The lowest poverty rate is observed among the elderly with a rate of about 9% living below poverty. As a whole among different age groups, the families with children less than 18 years old, exhibit the highest level of poverty in the City.

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**Table 12 – Poverty Rate for Families By Age Group 2020**

Families At or Below Poverty			
Age	Population	#	%
< 18	18,843	10,317	54.8%
18-64	41,424	12,516	30.2%
65>	14,356	1,904	13.3%
<b>Total Population</b>	74,623		

Source: U.S. Census Bureau, 2020 ACS, 5-Year Estimates ( Mo. poverty)

## 1.7 Employment

The economy over the past three years, both locally and nationally, has experienced a downturn that began in 2019 due primarily to COVID. COVID notwithstanding, within the past twenty years, the City's unemployment rate has fluctuated from a low of 7.8% a high of 16.2%. Many industrial and manufacturing-based communities like Gary have continued to experience above average job loss. In Gary the labor pool has declined by more than 30% over the last twenty years with substantial impact on employment in the City of Gary.

**Table 13 - Employment Change**

Year	Labor Force	Employed	Unemployed	Rate
2000	39,646	36,546	3,100	7.8
2010	28,031	24,158	3,873	13.8
2020	27,004	22,620	4,384	16.2
% Change from 2000 to 2020	-31.9%	-38.1%	41.4%	8.4

Source: Department of Workforce Development

The service jobs that have replaced the manufacturing job base typically offer much lower pay. To earn higher wages, residents have relocated to other metropolitan areas in Illinois, downstate Indiana, or other States outside the area. Some of the residents have remained in the area due to close proximity to downtown Chicago and accessibility of the South Shore Commuter line. The following table 13, compares changes in available jobs in the City of Gary.

The rate of unemployment in Gary has consistently been higher than other communities in the region. A comparison of unemployment rates in between Gary and the Lake County shows a much higher rate in Gary at 6.4%.

For nearly the last four decades, the City of Gary and Northwest Indiana have seen declines in the manufacturing and industrial jobs base. These occupations once provided high wages in the community. The majority of these jobs have moved off shore, and manufacturing and industrial jobs have been replaced by service-related jobs.

**Table 14 – Unemployment**

Area	Rate Percent - April 2022	Rate Percent - April 2021	% Change April 2021-2022
Gary	6.4%	14.2	-99.55%
Lake County	3.9%	7.1	-99.45%
U.S.	3.3%	5.7	-99.42%

Source: Indiana Department of Workforce Development

Every job category has been impacted by the shift in the employment capacity of the City. While professional and management opportunities have increased for the last decade, most of these jobs require advance degrees and training. The other category of job growth has been in the area of transportation and logistics. The labor pool in this area has increased slightly by about 2%. Recent report for transportation facilities in the region indicate that substantial growth potential existing in the areas of transportation, logistics and distribution. Construction activities also continue to expand and provide job for the resident. Job losses in the City are primarily center around employment opportunities in manufacturing, whole sale trades and services.

**Table 15 – Gary Occupational Skills**

Occupation	2020	2010	% Change
Agriculture, forestry, fishing and hunting, and mining	33	40	-17.5%
Construction	924	789	17.1%
Manufacturing	3,200	3,683	-13.1%
Wholesale trade	329	451	-27.1%
Retail trade	3,004	2,723	10.3%
Transportation and warehousing, and utilities	1,863	1,823	2.2%
Information	234	401	-41.6%
leasing	886	1,358	-34.8%
administrative and waste management services	2,790	2,434	14.6%
assistance	6,822	7,184	-5.0%
accommodation and food services	3,082	3,453	-10.7%
Other services, except public administration	1,040	1,541	-32.5%
Public administration	1,114	1,531	-27.2%
Civilian employed population 16 years and over	25,321	27,411	-7.6%

Source: Department of Workforce Development

## 1.8 Crime

Table 16 provides most recent data available for the City of Gary. As indicated, the incidents of crime have generally gone down substantially in the recent years. Nonetheless Gary remains to be a City with high per capita crime incidents. A comparison of the data show Gary had lower overall incidents of crime than Hammond and East Chicago per population. The City experienced fewer assaults and larceny-thefts than Hammond. With the exception of the murder, City of Gary has less incidence in most categories than adjoining communities.

**Table 16 – Incidence of Crime**

Offense	Gary	%	Hammond	%	East Chicago	%
Murder	57	1.8%	9	0.3%	7	0.5%
Rape	21	0.7%	27	0.9%	8	0.6%
Robbery	175	5.7%	110	3.5%	78	6.0%
Assault	161	5.2%	169	5.4%	108	8.3%
Burglary	567	18.3%	334	10.7%	80	6.2%
Theft	1,599	51.7%	2,194	70.3%	859	66.2%
Auto Theft	490	15.9%	264	8.5%	155	12.0%
Arson	21	0.7%	13	0.4%	2	0.2%
Total	3,091	4.0%	3,120	4.0%	1,297	4.7%
Population	77,909		78,384		27,817	

Source: City-Data.com, 2019

## 1.9 Education

The stability of a community is often tied to the strength of the educational system. Neighborhoods with low performing schools have lost population as many families have moved to communities with better performing schools. The quality of education has influenced outmigration and increased the concentration of poverty.

Five years ago, in an effort to address Gary School District’s substantial financial difficulties, the State of Indiana began an aggressive process to transform the Gary School District by taking over the control of the District and appointing a manager to administer the operation of the school system and resolve its financial debts. This process still continues and most recently the private manager contract was extended to bring the school district into financial stability.

Over the past two decades, the Gary public school system has had a declining enrollment. In 2021 the District’s enrollment was 4,770. The District had an enrollment of 6,480 in 2016 and 15,119 in 2006. The loss of enrollment is primarily due to loss of population. But even many of the families with children who live in Gary, shun the school district. It is reported that more than half the Gary public school students go to charter schools, which are independently managed, or go to other nearby districts. The Gary School District as a whole is considered to be economically disadvantaged.

**Table 17 – Enrollment 2012-2021**

2021	2020	2019	2018	2017	2016	2015	2014	2013	2012
4,770	4,850	5,010	5,228	5,823	6,480	7,566	8,594	8,922	9,164

Source: Indiana Department of Education 2020

The loss of student population combined with financial difficulties, and lack of stable management of the school district, appears to have exacerbated performance of the school and the district as a whole. This instability, appears to have negatively impacted the graduating rates of the schools.

**Table 18 - Graduation Rates 2012-2020**

2020	2019	2018	2016	2015	2014	2013	2012
63.3	58.5	89.1	85.9	82.1	85.5	68.9	60.3

Source: Indiana Department of Education 2020

The City of Gary's school population that is eligible for free or reduced-price lunch was about 86% in 2022. All schools typically show a high level of participation by student. Among schools the highest number of students receiving free/reduced lunch is Williams School. As a general rule, the Free/Reduced Lunch rate is much higher than other school district by more than twice in Gary. This level of participation in the free or reduced lunch program is a typical indicator of poverty.

## **B. HOUSING MARKET PROFILE**

### **1. Housing Supply**

The 2020 Census data shows an overall reduction in both owner and renter occupied housing units. According to these data, occupied housing inventory in the City of Gary in 2010 was about 31,380 units. The Census also reports about 10,070 vacant housing units in the City. In 2020, the total number of housing units have slightly declined, from 2010. However, the number of rental units have sharply increased while owner-occupied homes have declined. This indicates that a large number of homes may have become rental units.

**Table 19 – Housing Tenure**

Description	2020	2010
Occupied housing units	31,207	31,380
Owner-occupied	15,693	16,529
Renter-occupied	15,514	14,851
Vacant	10,917	10,070

Source: U.S. Census Bureau, ACS 5-Year Estimates

Rental housing gained about 663 units during the last decade while the owner-occupied property was reduced by 836 units. Vacant housing now accounts for 26% of the City's total housing inventory. Development of additional housing in the City has been very limited consisting primarily of multifamily and a few affordable single-family homes. The Gary Housing Authority's Broadway Lofts is expected to be completed this year. That development will create 38 new housing units in a mixed-use development. Other revitalization efforts through Broadway Community Development Corporations (CDC's) and Habitat for Humanity are also underway and are expected to generate about 5-7 units in the upcoming years in the Midtown area.

The population out migration and loss of jobs further has impacted the overall household size in the City. Today the City has smaller families and smaller number of households. The

average household size has declined by about 0.15 person for the last decade.

**Table 20- Households**

Description	2020	2010
Average household size of owner-occupied unit	2.22	2.37
Average household size of renter-occupied unit	2.57	2.72
<b>Average household size</b>	<b>2.39</b>	<b>2.54</b>

Source: U.S. Census Bureau, ACS 5-Year Estimates

Table 21 shows that Gary's estimated population by tenure in 2020. Owner-occupied population experienced a decline of about 9,486 persons (21%) while renters experienced a gain of 1,247 person. The increase in foreclosures and aging of homeowners may be contributing to the loss in the owner-occupied households and conversion of single-family homes to rental units.

**Table 21 – Population by Tenure**

Tenure	Persons in Unit		Change	% Change
	2020	2010		
Owner occupied	34,796	44,282	-9,486	-21.4%
Renter occupied	39,913	38,666	1,247	3.2%
Total Population	74,709	82,948	-8,239	-9.9%

Source: U.S. Census Bureau, ACS 5-Year Estimates

Home values in Gary continue to be depressed locally. This is primarily due to age and condition of neighborhoods and to some degree issues related to the educational system in Gary. With the exception of couple of neighborhoods, housing values in Gary are also impacted by the pervasive dual market conditions, that exists in Northwest Indiana and inherently diminish the value of most home in comparison with similar homes in suburban communities.

**Table 22 - Owner Occupied Housing Values**

Value	Number	Percent
< \$50,000	5,211	33.2%
\$50,000 to \$99,999	6,436	41.0%
\$100,000 to \$149,999	1,789	11.4%
\$150,000 to \$199,999	1,205	1.8%
\$200,000 to \$299,999	508	3.2%
\$300,000 to \$499,999	329	2.1%
\$500,000 to \$999,999	191	1.2%
\$1,000,000 >	24	0.2%
Total	15,693	(X)
<b>Median (dollars)</b>	<b>68,400</b>	

Source: U.S. Census Bureau, 2020 ACS 5-Year Estimates

The suppressed home values have created several concerns and difficulties for homeowners, investors and developers. From one stand point, the low home values make the units more affordable. On the other hand, most homes require substantially higher level of maintenance, thus making them more expensive. From the investment point of view, the return on investment is often not as great, or even may not be there. This in affect impacts financing of homes in most neighborhoods.

Recent trends in the housing market, that is shortage of available units and increase in the cost of homes, have not impacted Gary as the rest of the region as the housing market in the Gary has been marginalized for a number of years. Trends in the market which began to impact housing values in 2020 did not have the same impact in Gary. Rising home values in the City of Gary occurred primarily in the Miller and to some extent in Small Farms communities. Other areas in the City remain very much affordable with low home values.

Table 23 details the occupied housing inventory by year built. The majority of the housing built in Gary predates 1980. Housing conditions for homes built over thirty years ago without maintenance and upkeep are considered substandard.

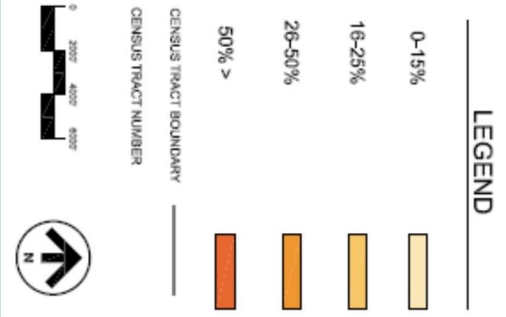
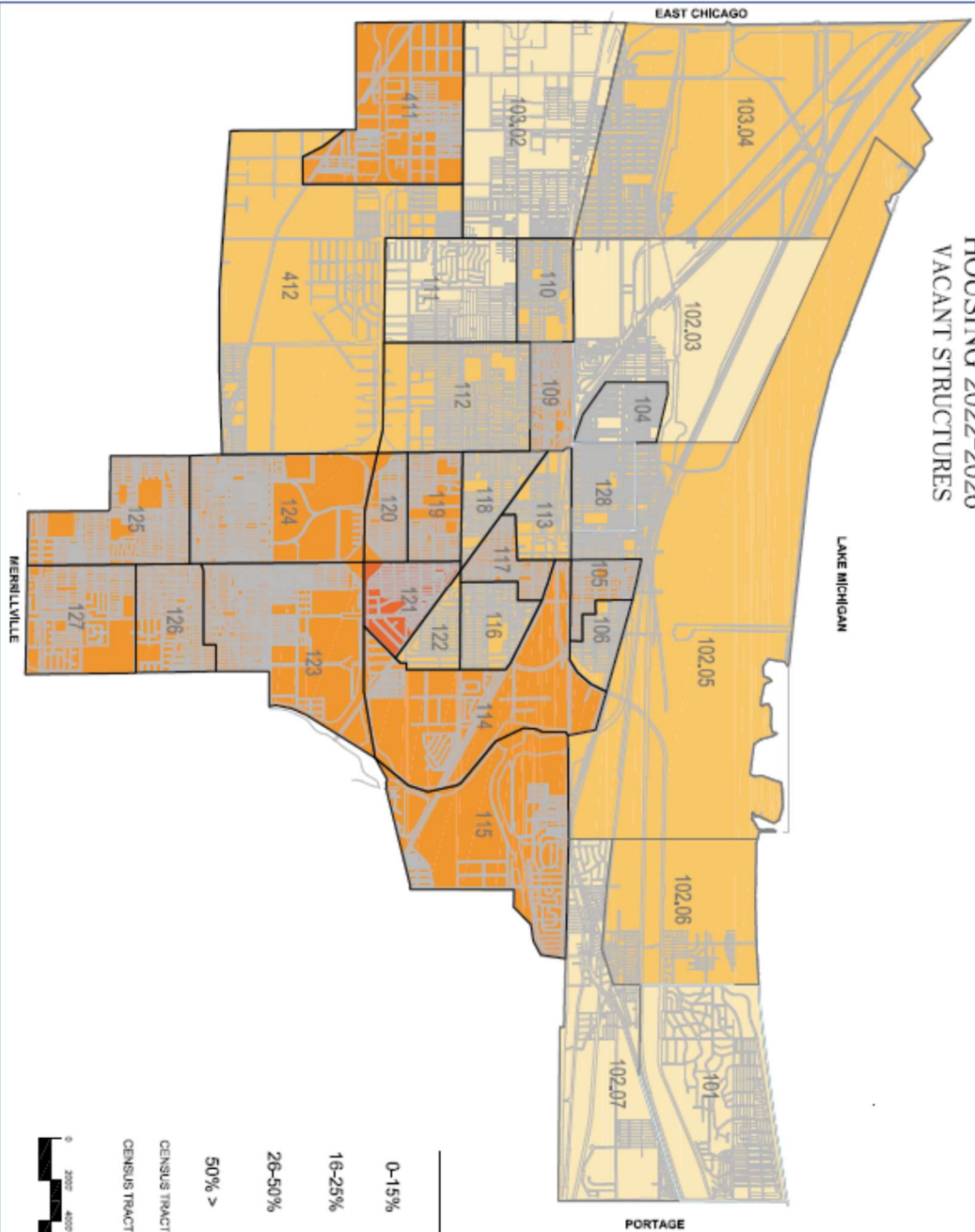
**Table 23 - Tenure By Year Built - 2020**

Year Built	Owner Occupied		Renter Occupied		Total	
2014 >	9	20.0%	36	80.0%	45	0.1%
2010 to 2013	34	26.0%	97	74.0%	131	0.4%
2000 to 2009	320	32.3%	671	67.7%	991	3.2%
1980 to 1999	650	24.0%	2,059	76.0%	2,709	8.7%
1960 to 1979	4,591	47.1%	5,162	52.9%	9,753	31.3%
1940 to 1959	6,779	59.6%	4,586	40.4%	11,365	36.4%
< 1939	3,310	53.3%	2,903	46.7%	6,213	19.9%
<b>Totals</b>	<b>15,693</b>		<b>15,514</b>		<b>31,207</b>	

Source: U.S. Census Bureau, 2020 ACS 5-Year Estimates

A conversation with the Gary Building Department indicates that very few new housing units have been constructed in recent years. The estimated number of new units is reported by the Building Department to be less than 30-40 for the last decade. Census information indicates that about 45 housing units have been constructed since 2014 in the City of Gary. In contrast, this number could add up to several thousand in suburban areas of Gary.

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 VACANT STRUCTURES





**Table 24 – Housing Age/Year Built**

Year	Number	%
2014 or later	45	0.1%
2010 - 2013	180	0.4%
2000 - 2009	1,204	2.9%
1990 - 1999	1,246	3.0%
1980 - 1989	1,939	4.6%
1970 - 1979	5,195	12.3%
1960 - 1969	6,809	16.2%
1950 - 1959	9,713	23.1%
1940 - 1949	6,273	14.9%
1939 or earlier	9,520	22.6%
<b>Total housing units</b>	<b>42,124</b>	<b>100.0%</b>

Source: U.S. Census Bureau, 2020 ACS 5-Year Estimates

With respect to foreclosure, available information from the County Sherriff sales data indicates that the number of foreclosures in the City has drastically declined in recent years. Although to a large degree this may be due to COVID, as many financial institutions limited their foreclosure activities, it may also be due to strength of the market due to the shortage of available homes.

**Table 25 – Sherriff Tax Sale of Residential Properties**

Month	No.
July	4
August	12
September (anticipated)	6
<b>Average/month</b>	<b>7</b>

Source: Lake County Sherriff Department., 2021

## **2. Rent**

A comparison of median gross rents for the area reports Gary's rate is the second lowest in the metropolitan area. The City of East Chicago has the lowest rents in the area. According to the 2020 Census report, Gary's median gross rent for a two-bedroom home is \$792. Across the state line in Illinois, the average cost of a two-bedroom apartment is reported to be above \$1,100. The difference in comparable rents in Indiana versus Illinois is more than \$300. Lower cost of rent in Indiana is one factor that appears to be attracting many residents into the region. Affordable rents are contributing to the concentration of lower income households. Proximity to the Illinois state line and other economic factors has also made the City more attractive.



**Table 26 - Comparable Rent**

Area	Median Gross Rent/Month	
	2020	2010
Gary	792	667
Hammond	883	736
East Chicago	\$658	\$655
Lake County	\$885	\$748
Chicago	\$1,154	\$885
Lansing	\$1,036	\$846
Cook County	\$1,160	\$900

Source: U.S. Census Bureau, 2020 ACS 5-Year Estimates

In some cases, Illinois residents seeking lower rental rates in the City of Gary contribute to the establishment of a permanent transient population. This transient population may place additional demand on limited resources used to meet social needs of long-term residents.

**Table 27 - Cost Burden**

Description	Renters		Owners*	
	Number	%	Number	%
Less than 20.0 percent	3,130	23.5%	2,855	43.40%
20.0 to 24.9 percent	1,322	9.9%	727	11.10%
25.0 to 29.9 percent	1,446	10.8%	608	9.30%
30.0 to 34.9 percent	1,050	7.9%	192	2.90%
35.0 percent or more	6,390	47.9%	2,190	33.30%
Not computed	2,176	(X)	6	(X)
<b>Total</b>	<b>13,338</b>	<b>100%</b>	<b>13,339</b>	<b>100%</b>

Source: U.S. Census Bureau, 2020 ACS 5-Year Estimates

\* Owners represents only those with a mortgage

Despite the low rents and price of a typical home, a significant amount of the family budget is used for rent or mortgage. Over 55% of all renters pay more than 30% of their income for rent. The high percentage of resources allocated towards rent impacts a household's ability to transition from renter to homeowner. For owners, a smaller percentage of family are cost burdened by their mortgage, but these homeowners probably face considerable amount of maintenance that is reported.

### 3. Homeownership

Stability in a neighborhood is rooted in homeownership. Outmigration has impacted both owner and renter occupied units. According to the 2020 Census, renters accounted for 49.7% of the total households. In contrast, homeowners represent about 50.3% of total households. Homeownership declined between 2010 and 2020, from 55.6% to 50.3% a loss of about 2,247 units. As a whole, the City lost more about 1,049 housing units. Most of the units are most likely abandoned or demolished due to their structural conditions.

**Table 28 - Homeownership**

Tenure	2020	%	2010	%	Change	%
Owner Occupied	15,693	37.3%	17,940	42.4%	-2,247	-12.5%
Renter Occupied	15,514	36.8%	14,316	33.8%	1,198	8.4%
Vacant	10,917	25.9%	10,070	23.8%	847	8.4%
Total	42,124	100.0%	42,326	100.0%	-202	-0.5%

Source: U.S. Census Bureau, ACS 5-Year Estimates

During the same period, when renter and owner-occupied housing was declining, the number of vacant structures continued to increase. The number of foreclosures, increasing unemployment, and population outmigration are contributing factors to the significant number of vacant structures.

#### 4. Home Mortgage

A large number of homeowners in Gary own their home without a mortgage. Only about 41% of homeowners have a mortgage.

**Table 29 - Mortgage Status**

Description	Number	%
Housing units with a mortgage	6,578	41.9%
Housing units without a mortgage	9,115	58.1%
Owner-occupied units	15,693	100.0%

Source: U.S. Census Bureau, 2020 ACS 5-Year Estimates

A review of the Home Mortgage Disclosure Action (HMDA) data for 2021 indicates that a total of 391 loans were originated to purchase a home in Gary. The average home loan was about \$122,689. The home loans amounts were generally higher for those with FHA financing rather than conventional.

**Table 30- Disposition of Type of Loans and Amounts**

Action Taken	No.	Average Loan
Home Purchase Loans Originated	391	\$ 122,698
Home Refinancing	324	\$ 125,833
Home Improvement Loan	47	\$ 42,234
Average amount of FHA loan	\$130,540	
Average Amount of Conventional Loan	\$118,373	
Average Amount of Refinancing	\$125,833	
Percent of FHA loan purchase	36%	

Source: FFIEC, Home Mortgage Disclosure Act

The mortgage loans originated by FHA, about 36% of the total loans, were generally slightly higher than conventional loans. This is most likely due to flexibility and lower downpayment requirements for FHA loans. While the number of home refinancing is relatively high, the number of home improvement loans are very limited in the City. Most homes in Gary do require and could benefit from improvements. Availability of home improvement loan is important to the sustainability of most neighborhoods and should be a priority for the City of Gary.

The amount of loan issued, reflects that value of most homes in the City. A review of Zillow Home Value Index, indicates that the price of a typical home listed in Gary is about 79,924. This is less than what was reported earlier, but it is also indicative of the suppressed values of most homes.

**Table 31- Typical Home Value**

Single-Family Homes - Times Series						
Area	% Change 2022-2021	5/31/2022	5/31/2021	% Change 2015-2020	5/31/2020	5/31/2015
Gary	41.9%	\$ 79,924	\$ 56,323	34.7%	\$ 48,029	\$ 35,658
Valparaiso	15.9%	\$ 326,779	\$ 281,930	22.8%	\$ 247,413	\$ 201,488
Hammond	18.3%	\$ 164,862	\$ 139,378	51.6%	\$ 119,154	\$ 78,592
Crown Point	16.7%	\$ 330,580	\$ 283,281	26.1%	\$ 257,533	\$ 204,234
Anderson	23.3%	\$ 109,531	\$ 88,824	47.5%	\$ 73,667	\$ 49,955
La Porte	19.2%	\$ 233,850	\$ 196,198	22.2%	\$ 171,860	\$ 140,682
Merrillville	19.6%	\$ 231,216	\$ 193,359	36.5%	\$ 173,691	\$ 127,292
East Chicago	36.6%	\$ 126,804	\$ 92,803	42.5%	\$ 80,124	\$ 56,208

Source: ZHVI, Zillow Home Value Index ([www.zillow.com/research/data](http://www.zillow.com/research/data))

**5. Housing Needs**

Housing needs in each community are influenced by economic conditions. As each community is unique, the impact of economic conditions will vary for each circumstance. To measure the impact of these conditions, HUD gathers and analyses data to develop the Comprehensive Housing Affordability Strategy (CHAS). Information in the CHAS categorizes income levels into groups that are used to determine housing affordability. Data used in this report is now a component of the Consolidated Plan.

According to the CHAS data identified in Table 32, the total number of households in the City of Gary is 33,750. Among the renters, the extremely low-income families show, the highest needs in all categories. Similar conditions exist for this income group in the homeowner households. The very low-income group (30-50% AMI) also show needs in all categories for renters in the City. Both homeowners and renters show cost burden in all income group. This indicate of affordability issue for all income group for both rental and ownership market.

**Table 32 - Housing Needs**

Housing Problems (Households with one of the listed needs)	Renter					Owner				
	0-30%	>30-50%	>50-80%	>80-100%	Total	0-30%	>30-50%	>50-80%	>80-100%	Total
	AMI	AMI	AMI	AMI		AMI	AMI	AMI	AMI	
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing Lacking complete plumbing or kitchen facilities	120	10			155	95				145
Severely Overcrowded With >1.51 people per room (and complete kitchen and plumbing)	10	15			35	4				28
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	400	110			615	55				140
Housing cost burden greater than 50% of income (and none of the above problems)	3,630	710			4,344	1,375				22,058
Housing cost burden greater than 30% of income (and none of the above problems)	840	1,159	710	105	2,850	445	675	765	70	1,955
Zero/negative Income (and none of the above problem)	1,170	0			1,170	255				255
<b>Total</b>	<b>6,170</b>				<b>9,169</b>	<b>2,229</b>				<b>24,581</b>

Source: HUD Housing Affordability Strategy (CHAS) Data, 2020

## 6. Vacancy Rates

According to the Census report data in Table 19, the City of Gary had a housing inventory of 42,124 units in 2020. The same report shows an increase in the number of vacant units from 10,070 in 2010 to 10,917 by 2020. It appears most of the loss was observed as the total number of owner-occupied homes declined by about 2,247 units. The vacant units in the City constitute about 25% of total housing units in the City.

### C. PUBLIC AND ASSISTED HOUSING PROFILE

The Gary Housing Authority (GHA) manages ten developments with a total of 647 units. The Authority has reduced its inventory in recent years due to a transformation plan approved by HUD about five years ago. As this transformation continues, additional units are expected to be demolished and replaced with mix unit developments as well new development in other sites planned to be acquired by GHA.

Tables 33 and 34 identifies public housing developments and units for different population groups. Designated elderly housing is provided by two facilities and account for 267 units. Families have the greatest access to assisted housing units in the City with nearly 379 of the allocation.

The Gary Housing Authority (GHA) participates in the tenant-based rental assistance program. The Housing Choice Voucher Program (HCVP) provides rental assistance to low-income individuals and families. A significant number of GHA's subsidized housing allocation is in the form of the HCVP. As the transformation continues, GHA is issuing voucher as a replacement for the units that are taken out of inventory. As such, the Authority today manages 1,833 housing vouchers. The elderly population currently has access to over 9.3% of available housing units. Turnover rate is generally low and available vouchers for the program maintain a waiting list. An open solicitation process is used to fill openings in the program based on a number of criteria outlined in the Authority's procedures.

**Table 33 - Public Housing Facilities 2022**

Facility	Elderly	Family	ADA Unit	Total Units
Genesis Towers	139	0	0	139
Carolyn Mosby Hi-Rise	0	0	0	0
Al Thomas Hi-Rise	0	24	0	24
Glen Park Hi-Rise	128	0	0	128
Concord Village		143	0	143
Delaney East Community		0	0	0
Hope VI Home Ownership		1	0	1
Dorie Miller		118	0	118
Duneland Village		49	0	49
Horace Mann Hope VI		45	0	45
<b>Total</b>	<b>267</b>	<b>379</b>	<b>16</b>	<b>647</b>

Source: Gary Housing Authority, 2022

**Table 34 - Subsidized Housing Units**

Population	# Units	%
Elderly	221	9.34%
Family	305	12.90%
Disabled	205	8.67%
Housing Choice Voucher	1,822	70.07%
<b>Total</b>	<b>2,364</b>	

Source: Gary Housing Authority, 2022

Accessible units that meet ADA accessibility requirements account for less than 1% of subsidized units in the jurisdiction. The Housing Authority will consider converting units as they become available for rehabilitation as a means to increase its accessible unit inventory.

An increase in new facilities to accommodate the disabled is sorely needed. Available elderly and disabled housing do not meet today's quality standards. The Authority has a large number of older housing units, and major improvements and rehabilitation is underway to upgrade these units. This will include improvements to meet handicap accessibility requirements and code.



## 7. Accessible Housing

Section 504 of the Rehabilitation Act of 1973 requires that all recipients of federal funds provide for persons with disabilities to have access to housing that accommodates their physical limitations. Any significant construction modifications or alterations of dwelling units must adapt a percentage of those units for people with disabilities.

Disabled population is identified by a number of characteristics by the 2020 U.S. Census. Information collected about people with a variety of disabilities includes:

- Sensory disabilities involving sight or hearing;
- Conditions that limit basic physical activities;
- Disabilities that cause difficulty in learning, remembering, or concentrating;
- Conditions that cause difficulty in dressing, bathing, or getting around inside the home;
- Disabilities that make it difficult to go outside the home; and
- Disabilities that inhibited a person=s ability to work.

**Table 35 - Population With Disability**

Disability	Eldery	< 5 to 65	Total
With a hearing difficulty	1,452	879	2,331
With a vision difficulty	946	1,458	2,404
With a cognitive difficulty	1,566	3,802	5,368
With an ambulatory difficulty	3,728	3,782	7,510
With a self-care difficulty	1,371	1,474	2,845
With an independent living difficulty	2,390	2,865	5,255
<b>Total</b>	<b>11,453</b>	<b>14,260</b>	<b>25,713</b>

Source: U.S. Census Bureau, 2020 ACS 5-Year Estimates

### 8.1 Availability of Accessible Housing

The 2020 Census estimates, provides the number of persons with some type of limitations in Gary as being about 14,260 persons. According to this report, about 11,453 of the City's elderly population have a disability. The City's disabled population represents 34% of the total population. Not all of those with disabilities require living assistance. About 18% have physical disability while, about 11% or 2,845 persons, have a self care difficulty.

**Table 36 - Population With Physical Disability**

Category	5 to 64	%	65 >	%
Physical Disability	7,639	10.93%	5,403	7.73%
No Physical Disability	47,868	68.52%	8,953	12.82%
Population 5>	69,863			

Source: U.S. Census Bureau, 2020 ACS 5-Year Estimates

The most recent data available describing the conditions of those with physical disabilities is listed in Table 37. Census 2020 reports nearly 81% of the population over 5 years of age did not have a physical disability. The City of Gary's population age 5 to 64, with a physical disability comprised 18,7% of the population. Of this total, the elderly population accounted for about 7.7%.

**Table 37 - Comparison of Population With Physical Disability**

Category	2020		2010	
	5 to 64	65 >	5 to 64	65 >
Physical Disability	7,639	5,403	15,568	5,046
No Physical Disability	47,868	8,953	59,127	6,764
Population 5>	69,863		74,695	

Source: U.S. Census Bureau, 2020 ACS 5-Year Estimates



# Chapter III

## Evaluation of Jurisdiction’s Current Fair Housing Status

### A. INFORMATION GATHERING

Information used in this study was collected using several different methods. Participants provided data related to each agency's area of expertise that involved Fair Housing issues. Agencies that were involved or attended meetings, completed a questionnaire, and participated in focus group discussions. The interview process involved several agencies that included public, civic, and governmental organizations. These participants responded to questions relating to fair housing, housing choice, available amenities, and quality of life. The collected information was evaluated to assess current Fair Housing conditions in the City of Gary.

### B. ASSESSMENT OF CURRENT FAIR HOUSING LEGAL STATUS

Complaints of discrimination in housing can be filed with the City of Gary, which has its own fair housing ordinance, the U.S. Department of Housing and Urban Development, and the Indiana Civil Rights Commission (ICRC). The authorized agency responsible for Fair Housing related issues and discrimination complaints is the City of Gary's Human Relations Commission (GHRC). The agency is involved extensively with community outreach and education related to Fair Housing Laws. GHRC staff receives ongoing training and provides educational information to the public regularly. A number of activities that Gary Human Relations Commissions actively engages includes, but is not limited to the following:

- Fair Housing counseling provided to the general public;
- Outreach and training for landlords on Fair Housing and Accessibility;
- Working with the Mayor's Council on Disabilities in community outreach;
- Community education with regards to rights of employment and the disabled;
- Fair Housing and Employment Assistance Program and Enforcement;
- Annual Northwest Indiana Housing Summit.

The Commission also works closely with the Department of Community Development Entitlement Programs. Programs administered by the Department are required to comply with the Fair Housing Act. The following Table shows overall activities of the GHRC for the last five years.

**Table 38 - Gary Human Relations Commission 2017-2021**

Activities	2017	2018	2019	2020	2021	Total
Legal Matters Recognized	0	0	0	0	0	0
Employment Case:	190	172	168	72	54	656
Housing Cases	5	9	8	5	0	27
<b>Total</b>	<b>195</b>	<b>181</b>	<b>176</b>	<b>79</b>	<b>54</b>	<b>737</b>

Source: Gary Human Relations Commission

### C. INVESTIGATION PROCESS

Procedures established for processing Fair Housing and other discriminatory practice cases are determined by State and Federal guidelines. These guidelines are outlined under the Fair Housing Assistance Program (FHAP). The FHAP outlines the minimum actions that must be taken to identify fair housing issues and the type of documentation that must be submitted to HUD. The process used to investigate cases include, but are not limited to, the following:

1. Investigation
2. Probable Cause or No Probable Cause Determination
3. Withdrawal with Resolution
4. Conciliation/Settlement
5. Judicial Dismissals

The status and basis of complaints are listed in Table 37 by year of occurrence. A total of 36 cases were processed over a period of five years. Thirty-three cases have been closed and three cases are pending at the time of this writing.

**Table 39 - Discriminatory Cases and Disposition**

#	Date Filed	Basis	Description	Status
1	1/5/2017	Sex, Disability	Complainant failed to cooperate	Closed
2	4/21/2017	Sex, Disability	Conciliation/settlement successful	Closed
3	8/4/2017	Sex, Disability	Conciliation/settlement successful	Closed
4	10/25/2017	Sex, Disability	No cause determination	Closed
5	11/20/2017	Sex, Disability	Conciliation/settlement successful	Closed
6	1/9/2018	Disability	Conciliation/settlement successful	Closed
7	2/12/2018	Sex, Disability	No cause determination	Closed
8	6/29/2018	Sex, Disability	Complaint withdrawn by complainant without	Closed
9	8/22/2018	Sex, Disability	Complainant failed to cooperate	Closed
10	8/28/2018	Race, Disability	No cause determination	Closed
11	10/4/2018	Sex, Disability	Complaint withdrawn by complainant after	Closed
12	10/18/2018	Sex, Disability	Complaint withdrawn by complainant without	Closed
13	11/5/2018	Sex, Disability	No cause determination	Closed
14	7/12/2019	Disability	Unable to locate respondent	Closed
15	7/31/2019	Disability	Conciliation/settlement successful	Closed
16	8/26/2019	Disability	Conciliation/settlement successful	Closed
17	11/12/2019	Sex, Disability	No cause determination	Closed
18	11/25/2019	Disability	Cause determination/conciliation successful	Closed
19	12/30/2019	Disability	Complaint withdrawn by complainant after	Closed

Source: Gary Human Relations Commission

#	Date Filed	Basis	Description	Status
20	1/24/2020	Disability	No cause determination	Closed
21	2/18/2020	Disability	No cause determination	Closed
22	4/15/2020	Race	No cause determination	Closed
23	6/4/2020	Race	No cause determination	Closed
24	11/18/2020	Disability	Complaint withdrawn by complainant after	Closed
25	12/1/2020	Sex	No cause determination	Closed
26	12/1/2020	Familial Status	No cause determination	Closed
27	6/8/2021	Familial Status	Complaint withdrawn by complainant without	Closed
28	4/6/2021	Sex	No cause determination	Closed
29	5/19/2021	Sex	No cause determination	Closed
30	9/14/2021	Disability	Conciliation/settlement successful	Closed
31	1/4/2022	Sex, Familial Status, Disability	Conciliation/settlement successful	Closed
32	1/7/2022	Sex	No Cause Determination	Closed
33	2/4/2022	Sex, Disability	Conciliation/settlement successful	Closed
34	3/18/2022	Familial Status/Sex	Pending	Open
35	4/27/2022	Race	Pending	Open
36	5/10/2022	Familial Status	Pending	Open

Source: Gary Human Relations Commission

Case information was provided beginning in 2017 up to the December, 2021. During 2017–2021, 36 charges of housing discrimination in Gary were filed with GHRC. Disability accounted for more than 53% of all cases, with Sex being the second highest number of cases with 39%. Race accounted for only one case.

**Table 40 – Gary Fair Housing Cases filed with GHRC 2017-2021**

Bases of Complaint	Year					Total
	2021	2020	2019	2018	2017	
Race	0	1	0	0	0	1
Sex	2	1	1	7	5	16
National Origin	0	0	0	0	0	0
Disability	1	3	6	7	5	22
Familial Status	1	1	0	0	0	2
<b>Total Complaints</b>	<b>4</b>	<b>6</b>	<b>7</b>	<b>14</b>	<b>10</b>	<b>41</b>

Source: Gary Human Relations Commission

According to information provided by GHRC, reconciliation or settlement were approved in ten cases, while four cases were withdrawn with resolution. The most common cases filed over the five-year period reviewed were disability related. Other cases involved discriminatory practices relating to race, sex, and familial status.

**Table 41 - Case Legal Status**

Status	# of Cases
No Probable Cause Finding	14
Withdrawal with Resolution	4
Conciliation/Settlements	10
Judicial Dismissals	0
Withdrawals	4
Complainants Failure to Cooperate	1
Lack of Jurisdiction	0
Unable to Locate Complainant	1
<b>Total Cases</b>	<b>35</b>

Source: Gary Human Relations Commission

**1. Fair Housing complaints or compliance reviews where the Secretary has issued a charge of, or made a finding of discrimination.**

There are no current charges or findings of discrimination in the City of Gary at the time of this reporting.

**2. Fair Housing discrimination suit filed by the Department of Justice or private plaintiffs.**

In 2016, the National Fair Housing Alliance initiated a lawsuit against financial institutions who purposefully neglected to maintain foreclosed properties in minority neighborhoods in 30 metropolitan areas throughout the United States, including in Gary, Indiana. The National Fair Housing Alliance (NFHA) and 20 fair housing organizations throughout the country reached a landmark \$53 million agreement with the Federal National Mortgage Association, commonly known as Fannie Mae (2022). The settlement resolves the groups' claims that Fannie Mae treated homes it owned in majority-Black and Latino communities unfavorably.

**3. Fair Housing Marketing Procedures**

As a recipient of federal funds through the Department of Housing and Urban Development (HUD), Home Investment Partnership (HOME), and Community Development Block Grant (CDBG) Programs, the City is required to market and promote Fair Housing. To this end, the Department of Community Development makes extra effort to affirmatively market all properties advertised for housing in its marketing procedures. The Department's Home Ownership Opportunity Network (HON) office actively participates in financial literacy, credit counseling, anti-redlining mortgage loans and refinancing assistance, and home maintenance training.

Under the federally funded HOME Program, all housing assisted with HOME funds must be marketed in accordance with Affirmative Fair Marketing Procedures adopted by the City and approved by HUD's Fair Housing and Equal Opportunity division. In practice, these procedures

are required by the City and the Redevelopment Commission on all assisted projects, regardless of the source of funds for the project.

Each year, the Annual Northwest Indiana Housing Summit, with the exception of last three years due to COVID, is held to promote fair housing in Northwest Indiana. A host of organizations sponsor this fair housing conference. The conference not only targets the real estate, lending, landlords, and insurance organizations, it is also open to residents, neighborhood groups, and other interested agencies. The participants in the conference can obtain a variety of information about the fair housing requirements, open housing policies of the City, and housing programs which assist members of the minority and low-income community.

#### **D. LENDING PRACTICES**

For decades, one of the barriers to fair housing choice throughout the country has been discrimination by private sector lenders based largely on race. These practices have led to minorities, especially African Americans and, usually to a lesser extent, Hispanics, being denied conventional home loans significantly more frequently than Caucasians, and being approved at substantially lower rates.

The federal government authorizes several agencies to collect data and document lending practices. The Home Mortgage Disclosure Act (HMDA) was formed by Congress in 1975 and implemented by the Federal Reserve to require lending institutions to report public loan information. This agency is under the direction and oversight of a council that is comprised of eight federal agencies including the most commonly known, the Federal Deposit Insurance Corporation (FDIC). The Federal Financial Institutions Examination Council (FFIEC) is the formal interagency body which oversees the collection of data.

A review of the information in the HMDA report for 2021 for the City of Gary shows more than one quarter (26.7) of mortgages in 2021 were not owner-occupied mortgages. This reflects the existence of a large number of multifamily housing units in the City that meets the needs of the residents. But in order to meet the broader housing needs of low-moderate income families, investment in single family rental property may provide other options in lieu of homeownership. Single family rental property investment could be used to offset the foreclosure homes in the City as well as homes that are not sellable due market to conditions.

**Table 42 - Non-Owner-Occupied Loans**

<b>Unit Type</b>	<b>2021</b>
Pct. purchase loans for 1 to 4 fam. units that are not owner-occ.	26.71%

Source: FFIEC, Home Mortgage Disclosure Act, 2021

#### **FHA/VA and Conventional Loans**

Review of the HMDA data indicates that in 2021 there was about 391 loans originated for homes in the City of Gary. The average cost of the originated loans was about \$122,698. The

total number of loans issued for refinancing amounted to 324 loans. The number of home improvement loan was only 47, for an average home improvement loan being about \$42,234.

**Table 43- Disposition of Type of Loans and Amounts**

Action Taken	No.	Average Loan
Home Purchase Loans Originated	391	\$ 122,698
Home Refinancing	324	\$ 125,833
Home Improvement Loan	47	\$ 42,234
Average amount of FHA loan	\$130,540	
Average Amount of Conventional Loan	\$118,373	
Average Amount of Refinancing	\$125,833	
Percent of FHA loan purchase	36%	

Source: FFIEC, Home Mortgage Disclosure Act, 2021

The average loan originated by FHA loan was about \$130,540. The amount of loans by conventional providers was smaller at about \$118,373. Of all loans originated about 36% were issued by FHA and the remaining were issued conventionally. The largest denial rate is observed for home improvement loans. Of the total number of applications, only about 22% were originated. The home improvements loans typically show about 63% denial.

**Table 44 - Disposition of Loan Applications, and Type of Loan, 2021**

Action Taken	Home Purchase Loans		Refinancing	Home Improvement
	FHA, FSA/RHS & amp; VA	Conventional		
Loans Originated	139	252	324	47
Applications Approved but not Accepted	7	16	27	7
Applications Denied by Financial Institution	<b>28</b>	<b>62</b>	<b>209</b>	<b>136</b>
Applications Withdrawn by Applicant	34	61	133	12
File Closed for Incompleteness	9	13	82	13
Applications Received	217	404	775	215
% Loan Originated to Applying Ratio	64%	62%	42%	22%
Loan Denial Rate (Gary)	13%	15%	27%	63%

Source: FFIEC, Home Mortgage Disclosure Act, 2021

The limited number of home improvement loans will require further assessment as with the housing stock being old, the need for home improvements is significantly higher in Gary. The HMDA report does not breakdown the home improvements however, it is important that the additional investigations is carried out to ensure availability of home improvement loan in the City .

The City of Gary denial rates for conventional home mortgage applications were slightly at a higher rate than government secured (FHA/VA) loans. One explanation for the disparity between Conventional and FHA/VA mortgage loans may be the qualification requirements. Typically, a minimum of 10%-20% down payment and a six-month financial savings reserve is required for conventional loans. Credit scores and history may also impact approval for conventional loans. In conversations with local lenders, they indicated that often qualifications

are a major factor in denying most loans. Such qualifications can often be easily improved with financial education, and credit improvements by borrowers.

**Table 45 - Comparison of Gary and Lake County for Housing Loans**

Action Taken	Gary	Lake County
Loans Originated	63.0%	57.9%
Applications Approved but not Accepted	3.7%	2.0%
Applications Denied by Financial Institution	14.5%	11.7%
Applications Withdrawn by Applicant	15.3%	11.4%
File Closed for Incompleteness	3.5%	5.6%

Source: FFIEC, Home Mortgage Disclosure Act, 2021

HMDA data for the City of Gary were further analyzed and compared with the Lake County as a whole. The analysis indicates that slightly better originated rates for the City of Gary in comparison with the County as whole. The data further indicates that slightly higher rate of denial rate for the Gary applications in comparison with the County. The review of HMDA data further shows the disparity that exist for the total number of loans originated between Gary and the rest of County. According to the HMDA data, the total number of loans originated for Gary is about 5.6 loans per 1000 population. This ratio for the County is about 45 loans per 1000 populations, about seven times higher than Gary. It is important that the City work regionally to address this disparity.

The analysis of the HMDA data based on different census tracts in the City indicates that Miller Neighborhood was the most active community in the City with about 70 loans originated. The average loan for this neighborhood was also the highest among all communities at \$239,714. The second most active community was Glen Park west (CT 125) with forty (40) loans originated. The average amount of loans for this neighborhood was about \$100,500. The third most active area in the City was the neighborhood around the Small Farms with about 29 loans. As noted earlier, the number of home loans in the City is far behind the Lake County as a whole. The same condition exists for the amount of loan per home, which is substantially lower than the County as a whole.

**1. REO Properties**

Over the last two decades, City of Gary, similar to many other communities, particularly those with high percentage of minorities, have seen many foreclosed properties to decline and eventually totally abandoned without any recourse. In 2016, the National Fair Housing Alliance (NFHA) and twenty other fair housing organizations across the country, filed a fair housing discrimination lawsuit against the Federal National Mortgage Association ,Fannie Mae, alleging that Fannie Mae purposely fails to maintain its foreclosures (also known as real estate owned or "REO" properties) in middle and working class African American and Latino neighborhoods to the same level of quality it does for foreclosures it owns in White middle- and working-class neighborhoods. City of Gary is one of the 30 metropolitan areas that has been identified in this law suit. Maintenance of foreclosed properties is important in overall neighborhood vitality and upkeep. Last year, the National Fair Housing Alliance and other involved organizations, reached



an agreement totaling \$53 million with Fannie Mae. While the final settlement is still in the works, the settlement is expected to benefit the affected communities, including Gary.

**Table 46 - Home Purchase Loans for 1-to-4 Family and Manufactured Homes, 2021**

Census Tract	FHA, FSA/RHS & VA		Conventional		Ave. Loans Amount
	Number	\$Amount	Number	\$Amount	
101	14	\$2,620,000	56	\$14,160,000	\$239,714
102.06	16	\$2,110,000	17	\$2,145,000	\$128,939
102.07	0	\$ -	0	\$ -	\$ -
102.03	1	\$125,000	1	\$75,000	\$100,000
102.05	0	\$ -	1	\$135,000	\$ -
103.02	7	\$1,005,000	2	\$170,000	\$130,556
103.04	6	\$530,000	11	\$655,000	\$69,706
104	11	\$1,505,000	8	\$350,000	\$97,632
105	0	\$ -	0	\$ -	\$ -
106	1	\$135,000	0	\$ -	\$ -
109	0	\$ -	1	\$35,000	\$ -
110	6	\$740,000	5	\$315,000	\$95,909
111	15	\$1,955,000	14	\$1,280,000	\$111,552
112	13	\$1,795,000	12	\$1,080,000	\$115,000
113	0	\$ -	1	\$55,000	\$ -
114	0	\$ -	2	\$130,000	\$65,000
115	3	\$325,000	14	\$820,000	\$67,353
116	1	\$125,000	4	\$290,000	\$ -
117	0	\$ -	0	\$ -	\$ -
118	6	\$680,000	11	\$1,045,000	\$101,471
119	1	\$125,000	3	\$175,000	\$75,000
120	1	\$125,000	1	\$105,000	\$ -
121	0	\$ -	1	\$25,000	\$ -
122	0	\$ -	1	\$25,000	\$ -
123	3	\$325,000	6	\$530,000	\$95,000
124	9	\$815,000	14	\$960,000	\$77,174
125	16	\$2,040,000	24	\$1,980,000	\$100,500
126	3	\$345,000	15	\$1,005,000	\$75,000
127	5	\$585,000	16	\$1,250,000	\$87,381
128	0	\$ -	5	\$385,000	\$ -
411	0	\$ -	1	\$95,000	\$ -
412	1	\$135,000	5	\$555,000	\$ -
<b>Total</b>	<b>139</b>	<b>\$18,145,000</b>	<b>252</b>	<b>\$29,830,000</b>	<b>\$122,698</b>

Source: FFIEC, Home Mortgage Disclosure Act (HMDA)

## 2. Foreclosure

High numbers of tax sale property in a community significantly impacts home values of owner-occupied property. Many factors have contributed to the rise in properties listed for tax sale over the past several years. Job loss, long term unemployment, and risky mortgage products are primary causes for the rise in number of foreclosure property.



The Lake County Sherriff Department reports only a limited number of foreclosures for the City of Gary for the last two months. This number of foreclosures does not correctly reflect the number of homes under risk as due to COVID Pandemic, most financial institutions have suspended their foreclosure activities. Similarly, the Federal assistance to homeowners has positively impacted the number of foreclosures nationally.

**Table 47 - Foreclosure**

Month	No.
July	4
August	12
September (anticipated)	6
<b>Average/month</b>	<b>7</b>

Source: Lake County Sheriff's Sale

**E. EXPLANATION OF ANY TRENDS**

Recent economic conditions, in addition to trends that have been occurring in the City of Gary over a period of years, continue to impact the quality of life in the City. The diminished quality of life and low-income levels have challenged the community's ability to attract sustainable development.

The loss of population over the past forty years has lowered the total population of the City to 69,070, according to the 2020 Census Decennial. This population change represents about 13% decline in the past 10 years. Vacant and abandoned properties have reached a high of over 10,917 structures. Other economic factors that impact the City's wellbeing are long-term job losses, above average unemployment and gap in income growth.

In April 2022, the unemployment rate was 6.4%, twice the local and national rate. Levels of poverty also contribute to economic conditions in the community. Census 2020 ACS reports the City of Gary has a median family income of \$36,885, with a poverty rate of 30%. The HUD income data for the City, reports the City's low-moderate income population at 70.24%.

The City of Gary's population is 80% African Americans with a homeownership rate of slightly above 50%. A review of the Home Mortgage Disclosure Act (HMDA) report for 2021, illustrates a sever lack of housing activities in the City in comparison with the County as whole. The City's housing activities is about one seventh of the County on the basis of population. Collectively there are several factors that are responsible for impediments to fair housing and housing choice in the City of Gary. The most challenging barrier identified is the lag in income growth for households in the City.

The City of Gary has few amenities to attract a diversified group of new residents. There are few retail options, parks and recreation facilities are not maintained, and other general services are not timely. An abundance of vacant and abandoned structures, vacant schools, and the lack of a strong education system has diminished the sense of community. These conditions impact the overall quality of life in the City and impede efforts to attract middle income home buyers.

## **F. DISCUSSION OF OTHER FAIR HOUSING CONCERNS OR PROBLEMS**

A significant amount of affordable housing choices is available in the City of Gary for low- and moderate-income families both in the rental and owner inventory. The most significant issue in housing is lack of adequate income to even afford very affordable prices. Availability of housing choices for middle income families, particularly for those that are interested in living in modern homes with amenities is also a major issue.

Other factors that hinder the ability of the City to attract middle income families is the perception of low performing schools, public safety, and other quality of life issues. Population loss, the lack of community stability, open spaces, and parks that are not maintained makes the area less attractive to middle income families. Participants in group discussions and comments gathered from surveys distributed stressed an urgent need for affordable housing as well as a diversified quality housing.

### **1. Municipal Services**

The availability of municipal services in areas with low-and moderate-income families is another measure of fair housing choice provisions. Institutional services are available throughout the community. The City of Gary has a multitude of departments and agencies that offer a myriad of services. Population loss and the economic downturn and COVID 19 Pandemic, however have all had an impact on the delivery of service.

Other social services, educational facilities, parks and recreation, infrastructure, and police protection are evenly located throughout the city to accommodate the needs of all residents. There is no evidence of discriminatory distribution of services in low- and moderate-income areas as the City, with the exception two census tracts, is majority low- and moderate-income community.

### **2. Section 504 of the Rehabilitation act of 1973**

The City of Gary currently has a ADA Transition Plan that was prepared in 2012. The City is planning to update this plan to ensure compliance with ADA requirements for the City's facilities and programs. Outside updating the current plan, no issues were identified.

### **3. Gary Public Transportation Corporation**

The Americans with Disabilities Act of 1990 (ADA) requires communities to address the needs of the "disabled", as defined by federal rules, and assure equal opportunity to all citizens. All facilities designed and constructed after 1992 must be accessible and physical barriers in existing public facilities must be removed if "reasonably" achievable.

All bus vehicles are equipped with an electrical lift to support wheelchair access. Existing bus shelters are generally accessible, but some shelters show worn and may need to be updated in the future.

#### **4. Home Appraisal Practices**

No studies were conducted or published during the time period covered by this study related to this subject.

# Chapter IV

## Identification of Impediments to Fair Housing Choice

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### Determining Factors

The City's policies related to land use control, zoning, and building codes are perhaps less of a contributing factor in creation of a barrier or lack of residential investment in the City of Gary. In recent years it appears that growth in income, living wages, employment and ability to pay are more important contributing factors preventing access to affordable housing. In Gary, housing cost is the primary barrier to affordable housing, despite relatively low prices for owner-occupied homes.

The neighborhood conditions often prevent development of new and modern housing in the City. In practice, this condition forces many to seek out housing outside the City, continuing the flight out of the City. Neighborhood conditions further make housing values depressed and in affect more difficult to finance a home.

Another barrier in the City is the shortage of affordable and accessible housing for persons with disabilities. The limited supply of accessible housing for persons with physical disabilities is due in large part to the age of existing housing stock, most of which was built before the Americans with Disabilities Act was enacted. Many of the City's older homes are difficult to retrofit for accessibility because of their external or internal architectural design. Some newer rental properties provide accessible units; however, stakeholder conversations and GHA waiting list data suggest that there is an unmet need for accessible housing.

The Housing Market Analysis and Needs sections of the Gary Consolidated Plan identified several segments of the population that require housing assistance, i.e., small families and households with low or very low income. These needs are further intensified by the fact that income growth has not kept up with the rest of the region. The City's current Analysis of Impediments to Fair Housing identifies six (6) impediments to fair housing in the City of Gary. Three of these directly relate to affordable housing.

The analysis of data, discussions with the stakeholders and review of survey questionnaire, have resulted in identification of seven most critical barriers and impediments to fair housing in the City of Gary in the public and private sectors. These are:

1. Insufficient Income Growth.
2. Neighborhood Obsolescence.
3. Dual Housing Market.
4. Shortage of Affordable Housing Units.
5. Lending Practices.
6. Accessing to Fair Housing Information.
7. ADA Compliance.

## A. PUBLIC SECTOR

### 1. Zoning and Site Selection

The Arsh Group's analysis of the City's Zoning Code did not find any zoning regulations that effectively exclude housing affordable to any income range. The requirements for set back or side yards or other bulk regulations would not inherently have exclusionary effect as the code allows for larger land coverage and floor area ratios. The City's Zoning Ordinance further does not restrict the location of Group Homes in any manner that conflicts with the Fair Housing Act or other Department of Justice or HUD regulations. Similarly, the Public Housing Developments in Gary are subject to the same procedures and requirements as other private developments of four units or more.

Gary's permit fees and development review processes are also some of the least burdensome in the region. The City does not charge development impact fees or technical review fees that other local communities typically require. The City further does not place any special permitting reviews on affordable housing projects that would not be required of all developments. To reduce the cost of construction (and presumably the dwelling units), Gary may want to consider reducing the off-street parking requirements for new multi-family dwellings close to a South Shore Line transit stations since such housing tends to generate fewer automobiles than housing far from transit lines.

With ample land available in the City as a result of demolition and vacated schools or commercial uses, in the residential neighborhoods, additional modern residential construction can be planned through redevelopment and conversion of former commercial or institutional uses. Multifamily housing is typically allowed in most commercially zone districts. Residential uses are also permitted as a part of mixed-use development above first floor. Mixed use developments are a cost-effective way to produce additional housing affordable for households with modest incomes.

Housing affordability in Gary is largely an economic issue, not a regulatory one, and the City's public policies relative to housing are not restrictive or discriminatory. The City's tax policies generally affecting land and other property, land use controls, zoning ordinances, building codes, code enforcement, fees and charges, and policies that affect the return on residential investment are not major impediments to the development of affordable housing opportunities in Gary. There are neither Court orders nor HUD sanctions in effect in Gary.

#### **Comprehensive Plan**

The City of Gary prepared and adopted a new Comprehensive Plan in 2019. This plan established several major land uses policies to support diversity in housing and inclusion of higher density housing in major corridors. The Plan further supports development of affordable housing particularly in the vicinity of transit stations and in close proximity of South Shore stations. The development of mixed-use housing, particularly in the central part of the City, is also supported.

### **Building Codes**

The Gary Building Department currently has five inspectors which enforce existing codes. The Department has adopted the Architectural Accessibility Barrier Standard as required by the State of Indiana. These guidelines are typically stricter than those required by the Americans with Disabilities Act requirements. The regulations apply to new construction and any major rehabilitation of any residential property.

#### **Actions To Be Taken:**

- As the City develop a new zoning code, elements of fair housing consideration should be incorporated in the new code. These include provisions for mixed income units as well as integration of smaller homes in new subdivisions.
- Identify specific steps that will strengthen the fair housing aspect of community revitalization activities through equalizing services, initiating or strengthening agreements with financial institutions subject to Community Reinvestment Act (CRA), creating job-housing and education-housing linkages.
- The Gary Housing Authority is in the process of the major transformation. While such efforts should be fully supported, it is important that location and mix of new housing should be diligently reviewed and ensure such developments do not create concentration or have negative impact on surrounding neighborhoods.
- Encourage Gary Housing Authority to utilize scattered-site, low-density housing acquisition as a means to de-concentrate and address needs of larger families.

## **2. Neighborhood Revitalization, Municipal and Other Services Employment-Housing-Transportation Linkage**

The City of Gary has several redevelopment and revitalization areas that it plans to continue to implement a variety of projects over the next 10 to 20 years. Most of these sites are located in neighborhoods with high concentrations of both low-income population and significant loss of neighborhood character, thus making them suitable for revitalization. The existing revitalization strategies for these sites somewhat vary among different sites, but all have housing and/or economic development/urban revitalization goals. Proposed projects for these sites have multiple financial partners that include non-profit and for-profit developers, neighborhood organizations, private lending institutions, and federal, state, and local resources. CDBG and HOME Program funds will continue to be expended for initial planning expenses, predevelopment, demolition, and capital expenses for several of these sites as proposed in the Consolidated Plan as Target Areas. These Target Areas include Downtown, University Park and Midtown.

### **Municipal and Other Services**

Municipal services such as code enforcement, community policing, street and sidewalk improvements, and neighborhood services are funded with a combination of local tax

revenues, state aid, and CDBG funds. CDBG funds are used to supplement these services in neighborhoods, such as code enforcement, that are located within census tracts or block groups where at least 51% of the population is low- to moderate-income. A review of the municipal services does not indicate any discriminatory practices for different neighborhoods. The services are undertaken to insure that all neighborhoods benefit equally.

### **Employment-Housing-Transportation Linkage**

The City of Gary is relatively well connected to major employment centers, shopping and regional service providers in the region via Gary Public Transportation Corporation (GPTC) transit service. The Northern Indiana Commuter Transportation District (NICTD), also known as South Shore Line, provides public transit connecting Gary residents to the major employers in Chicago and other destinations in the northern part of the region. GPTC operates bus routes locally and to a limited extent regionally, originating at the Downtown Metro Center. One of the routes, Broadway Metro Express, provides access to sorely needed available jobs in Merrillville, Hobart and Schererville and other locations.

The limited regional transit (Gary, Merrillville and Hammond) provided by the GPTC, while important but does not fulfill the need for a true regional transit system. Lack of vehicle ownership for those with limited income further limits the ability of Gary residents to access jobs, goods, and services within Northwest Indiana.

The elderly and disabled are served by the GPTC's Access219 Paratransit Service. The service is a complementary "ride-share" service for residents who are unable to use the fixed route buses due to a disability. The service is available daily and costs \$2.50 each way and \$4.00 for out-of-town service locations.

### **Action to be Taken:**

- Support transportation investment in Gary to create a true regional approach to transportation development and regional access.
- Prioritize Connectivity to Employment Center  
Gary's public transit should be supported to continue to foster connectivity to job centers; bike routes should be expanded to facilitate alternative methods to access employment centers for those without access to automobile.

## **3. Planning and Zoning Boards**

Diversity in representation of citizens in the community, including lower income racial and ethnic groups, gender categories, persons with disabilities, and families with children should be a basic element of the City's efforts to further fair housing. The Planning Commission is made up of nine members, and Board of Zoning Appeals (BZA) is made up of five members.



The existing composition of Plan Commission reflect the City’s population as a whole and is considered to be diversified.

## B. PRIVATE SECTOR

Discrimination in mortgage lending against minorities in Lake County and the entire Gary Metropolitan Statistical Area, continues to pose an obstacle to fair housing choice. Controlling for all variables, it is clear that racial minorities continue to have less of an access to home mortgage loans than the rest of the population in the County. While we are sure that many local lenders do not embrace discriminatory practices and mortgage financing approval is a much more complicated process, Home Mortgage Disclosure Act (HMDA) data suggest that access to mortgage loan remains to be a major concern in Gary. The Home Mortgage Disclosure Act requires lending institutions to make annual public disclosures of their home mortgage and home improvement lending activities.

To determine if there are “banking and insurance policies pertaining to the financing, sale, purchase, rehabilitation, and rental of housing that may affect the achievement of fair housing choice within the City of Gary, an analysis of 2021 HMDA data was performed for the City of Gary. The review of the HMDA data, identified as set of issues that may represent conditions that are not desirable or may create impediments.

### 1. Regional Analysis

A total of 3,152 home loan applications were processed in Lake County in 2021. Of this total, 2,328 loans were originated. The number of originated loans, for both FHA and Conventional loans, represent 76% of the total loans originated for home purchases in the County. The denial rates for home loan purchases for FHA loan was about 9% while for conventional loans it was about 6%. This rate for Home Improvement loans was 36%.

**Table 48 - Comparison of Loans for Lake County and Gary**

	Home Purchase Loans							
	A		B		C		D	
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans	
Lake County on 1- to 4-Family	Number	\$Amount	Number	\$Amount	Number	\$Amount	Number	\$Amount
Loans Originated	2,328	\$ 508,970,000	5,790	\$ 1,341,970,000	12,332	\$ 2,246,510,000	808	\$ 56,550,000
Applications Approved but not Accepted	57	\$ 11,715,000	131	\$ 28,495,000	485	\$ 85,235,000	55	\$ 2,915,000
Applications Denied by Financial Institution	270	\$ 58,630,000	459	\$ 82,165,000	2,492	\$ 390,270,000	674	\$ 41,770,000
Applications Withdrawn by Applicant	440	\$ 97,470,000	947	\$ 218,055,000	2,703	\$ 485,565,000	96	\$ 7,760,000
File Closed for Incompleteness	57	\$ 12,755,000	160	\$ 33,550,000	1,745	\$ 299,055,000	85	\$ 7,405,000
Applications Received	3,152	\$ 689,540,000	7,487	\$ 1,704,235,000	19,757	\$ 3,506,635,000	1,718	\$ 116,400,000
% Loan Originated to Applying Ratio	74%		77%		62%		47%	
Loan Denial Rate (Gary)	9%		6%		13%		39%	
Gary Loans on 1- to 4-Family and Manufactured Home Dwellings								
Loans Originated	139	\$ 18,145,000	252	\$ 29,830,000	324	\$ 40,770,000	47	\$ 1,985,000
Applications Approved but not Accepted	7	\$ 955,000	16	\$ 2,150,000	27	\$ 2,555,000	7	\$ 385,000
Applications Denied by Financial Institution	28	\$ 3,130,000	62	\$ 7,070,000	209	\$ 18,575,000	136	\$ 5,930,000
Applications Withdrawn by Applicant	34	\$ 4,310,000	61	\$ 6,065,000	133	\$ 14,695,000	12	\$ 730,000
File Closed for Incompleteness	9	\$ 1,265,000	13	\$ 1,445,000	82	\$ 10,210,000	13	\$ 775,000
Applications Received	217	\$ 27,805,000	404	\$ 46,560,000	775	\$ 86,805,000	215	\$ 9,805,000
% Loan Originated to Applying Ratio	64%		62%		42%		22%	
Loan Denial Rate (Gary)	13%		15%		27%		63%	

Source: FFIEC, Home Mortgage Disclosure Act



In 2021, Gary had 139 or 6% of the total FHA, FSA and VA loans made in the County. These loans typically target people of lower income. 6% approval rate does not represent an equitable distribution of home loans in the County for Gary residents. For conventional loan, similar disparity may exist. The total number of conventional loans issued to Gary residents (252) represents about 4% of the total loans issued for the County as whole.

**Table 49 - Comparison of Loans for Lake County and Gary**

Action Taken	Average Loan	
	Gary	Lake County
Home Purchase Loans Originated	\$ 122,698	\$ 228,004
Home Refinancing	\$ 125,833	\$ 182,169
Home Improvement Loan	\$ 42,234	\$ 69,988

**Comparison of Lake County/Gary Loan Originations and Denial Rates**

The Lake County origination rate is 74% and the Gary origination rate is 64%. The denial rate is 9% for the County and 13% for Gary. The differences do not represent a significant disparity. The difference may be explained by the relative affluence of suburban communities in the County. Loan activity in this category shows that Gary loans appear to be subject to the same standards as the County.

For Home Improvement Loans, however, it appears a larger number of loans are denied from Gary residents as a whole. For the home improvement loans the number of loans that are originated for Gary is substantially less than the County and represent about 6% of total home improvement loans in the County. With the City of Gary, having a large number of older homes, home improvement loan can play a significant impact in revitalization of the City. As such it appears disparity may exist for home improvement loans in the City of Gary.

**Local Loan Analysis by Census Tract**

The analysis of lending practices by census tract is based on total loan originations and denials for FHA, VA and Conventional loans. The analysis shows that the Census Tract 101 has the highest number of loans with most being conventional. This tract also has the highest average loan amount of about \$239,714. The second highest loans were originated for Census Tract 125. The average loan amount for this tract was about \$100,500. Several tracts in the City did not report any loans. Table 45 in Chapter III, lists the relevant HMDA and loan amount data for each of the Gary’s census tracts.

**Action to be Taken:**

- Expand On-going Predatory Lending Awareness Efforts
- Review lending, foreclosure and appraisal practices through formal surveys, testing or informal means to examine their policies, procedures, and practices for possible differential treatment of home mortgage loans, REO properties, home insurance, or home improvement loans based on race, ethnicity, gender, disability status, and familial status.

- The ongoing disparities in loan approval and denial rates, suggests a substantial need to provide Gary residents with financial counseling to better prepare applicants before they submit a mortgage loan application. Such counseling should include educating potential home buyers to recognize what they can actually afford to purchase, budgeting monthly ownership costs, building a reserve fund for normal and emergency repairs, and encouraging consideration of the full range of housing choices available.
- City of Gary and Gary Human Relations Commission (GHRC) could provide resources to contract with an organization that provides such counseling and arrange with real estate firms and lenders serving the City to identify applicants who are likely to benefit from such counseling?
- Identify specific action steps that could be taken to strengthen the fair housing aspect of Gary’s revitalization activities through equalizing services, revising displacement policies and procedures, initiating or strengthening agreements with banks and other lending institutions subject to CRA, creating job-housing and education-housing linkages in and outside neighborhoods.
- With the regulation of lenders falling within the purview of federal and state regulators, Gary is limited in what it can do to alter the behavior of those lenders that engage in discriminatory practices. A powerful option available to Gary, which has been used in the past, is to join other organizations and seek more proactive engagement by local and regional lending institution to proactively improve lending practices in the City of Gary.
- Anecdotal evidence suggests some reluctance on the part of some rental agencies, to accept certificate or vouchers. Additional testing is recommended to ensure full access to housing for individuals holding vouchers or certificate.

## **2. Real Estate Transactions, Appraisals, Insurance**

During the preparation of this document, no information was collected that indicated any adverse impact of appraisals, any adverse trends in the insurance industry, or availability of insurance in different neighborhoods that may impact Fair Housing or Fair Housing Choice.

### **Action to be Taken:**

- No impediments.

## **C. PUBLIC AND PRIVATE SECTOR**

Discussion in Chapter III, showed that, outside cases related to disability, the City of Gary Human Relations Commission has received relatively limited number of fair housing complaints from Gary residents in the past five years. The limited number of grievances on file may be due to the fact that complaints must be filed in person at GHRC’s office in locations

that have not been in the City Hall. In addition, a very small percent of discrimination is generally reported as most protected classes do not know that they have been discriminated against or do not know what constitutes discrimination. Because of these circumstances, it is important that a more robust system for monitoring and enforcing fair housing activity in Gary is established.

## **1. Accessing Fair Housing Information and Filing Complaints**

The process of engaging in a legal challenge by itself is a terrifying task for a family or person that is in need of immediate housing. With this backdrop, anybody who feels he or she has been discriminated will often run into a maze of processes that is unfamiliar to most and often difficult to file a complaint. The process is inherently a substantial barrier to fair housing choice when an impacted person, feels the institutional process cannot quickly and easily address the situation. In addition, information is often difficult to obtain about how to file a fair housing complaint.

Review of the City's procedure, indicates that despite efforts by the Gary Human Rights Commission, a potential victim will be required to go through an assessment process to justify filing a complaint for discrimination. This process requires time and perhaps delay in finding a suitable housing solution for a person with immediate need for housing. In the last couple of years, contact with the City has also been hampered due to COVID 19.

Conversations with several agencies and organizations, further indicate that an expanded outreach may be desirable as lack of general knowledge about the fair housing may be an impediment to housing choice in the City of Gary. Education and improving financial literacy were widely reported as possible solutions for improving housing choice in the City of Gary.

### **Actions to be Taken:**

- GHRC should train its phone operator or receptionist to refer all calls about housing discrimination to the City's Fair Housing Officer. Any outgoing recording that callers to GHRC hear when the lines are busy or the office is closed, should include how to reach the Fair Housing Officer if you believe you are a victim of housing discrimination.
- GHRC should add a page to its website that provides clear information on behaviors and practices that constitute a fair housing violation, an online and/or downloadable form to file a housing discrimination complaint, contact information from other agencies, such as HUD or Indiana Civil Rights Commission (ICRC), that can assist the victims with their fair housing complaint.
- GHRC must establish a robust outreach and awareness efforts to inform local and regional agencies and citizens of its mission and services offered. GHRC must also

lead efforts in regional fair housing promotion events to ensure compliance at a regional level and particularly establishing a unified housing market.

- Support a robust credit counseling and education program for establishing good credit and publicize availability of government guaranteed loans to potential borrowers.
- Convene regular focus group meetings, consisting of health providers, landlords, homebuilders, banks and financial institutions, neighborhood organizations, and service providers to share information, gather feedback on current barriers and to discuss strategies to eliminate such barriers.
- Gary should review lending and appraisal practices through formal surveys or informal means to examine their policies, procedures, and practices for possible differential treatment of home mortgage loans, home insurance, REO property maintenance, or home improvement loans based on race, ethnicity, gender, disability status, and familial status.

## 2. Visitability in Housing

US Department of Housing and Urban Development (HUD) endorses the “visitability” concept, which is a voluntary standard promoted by the Department in 2 and 3 family new construction and existing structures. Visitability means that:

1. At least one entrance is at grade (no step), approached by an accessible route, such as a sidewalk and;
2. The entrance door and all interior doors on the first floor are at least 34 inches wide, offering 32 inches of clear passage space.

Visitability allows mobility-impaired residents to visit families and friends where this would not otherwise be possible. A visitable home also serves persons without disabilities (for example, a mother pushing a stroller, a person delivering large appliances, a person using a walker, etc.). One difference between “visitability” and “accessibility” is that accessibility requires that all features of a dwelling unit be made accessible for mobility-impaired persons. A visitable home provides less accessibility than an accessible home, and is meant to be those units not required to be accessible.”

The City currently lacks guidelines regarding visitability/accessibility that go beyond what is required by the basic “handicapped accessibility” laws for CDBG and HOME funded residential development of more than four units. This guideline would affect new construction of private residential developments and rehabs of 3 or fewer units.

**Actions to be Taken:**

The City of Gary is in the process of developing a new ADA transition plan. As a part of development, if possible, it is recommended that the City also include policy and standards for visitability of housing units with less than three housing units where it is practical.

- Develop written visitability policy and standards to make new and rehabilitated housing units visitable where practical.

# Chapter V

## Conclusions and Recommendations

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### A. IMPEDIMENTS AND PLAN OF ACTION

#### 1. Summary

The intent of this report is to identify and provide corrective actions for any fair housing, or barriers to housing related issues as defined by the Department of Housing and Urban Development (HUD). Part of the process is to conduct a thorough examination of conditions that impact fair housing access and housing choice. To this end, The Arsh Group Inc. developed a systematic process to gather information by conversations with a diverse group of agencies, and evaluating local and economic conditions, housing trends, and other information.

National economic conditions, COVID Pandemic, joined with events that have taken place regionally and, in the State, have created an environment that has produced difficult challenges for the City of Gary. These events have contributed in the last decade to conditions consisting of loss of industrial jobs, inflated housing market values, a decline of household income, and a surplus of vacant and abandoned structures.

Several factors are responsible for impediments to fair housing and housing choice in the City of Gary. The most challenging barrier identified is the lack of income growth which is placing pressure on housing affordability despite relatively low cost of typical home in the City. An abundance of vacant and abandoned structures, vacant schools, overgrown parks are all contributing to the neighborhood conditions that often negatively influence the viability of the neighborhood. This condition augmented by lack of new modern housing in the City, often force homebuyers to seek housing outside the City despite affordability of existing housing stock. The weak education system is further influencing the overall sense of community. Lastly duality of housing market in the region, distorts the free housing market choice in the City and the region often forcing segregation.

The analysis contained in this study, identified seven impediments to fair housing choice. The impediments are accompanied by the Fair Housing Action Plan (FHAP) identified in this Chapter, outlines a plan of action to specifically address each impediment identified.

- Impediment 1: Insufficient Income Growth
- Impediment 2: Neighborhood Obsolescence
- Impediment 3: Dual Housing Market
- Impediment 4: Shortage of Affordable Housing Units
- Impediment 5: Lending Practices
- Impediment 6: Access to Fair Housing Information
- Impediment 7: ADA Compliance

The City's Consolidated Plan includes as one of its priority goals the promotion of fair housing. Toward that end, the following actions are recommended to address impediments and affirmatively further fair housing in the City of Gary:

## **2. Impediments**

The impediments and recommendations that follow address private sector and public sector impediments to fair housing choice in the City of Gary. The recommendations offer guidance and specific tools to incorporate fair housing into Gary's planning and revitalization process for the next five years and beyond. The recommendations offered in the following sections also include several recommendations for zoning and land use practices. While we did not identify impediments connected to land use practices, the suggested recommendations could prevent creation of future impediments if left unaltered.

### **Impediment 1: Insufficient Income Growth**

The median household income of Gary is reported to be about \$ \$31,400. Such an income allows about \$782 for housing cost for a family not to be cost burdened. Such amount is substantially lower than the average of cost of a home mortgage or rent in the City. Among homeowners about 36.2% are cost burdened while 55.8% of renters in the City are paying more than 30% of their income for housing.

For a typical house, in 2021, the average FHA loan amount was \$127,963 for purchase of a home. While this price is relatively low and should make housing affordable for low-income households, most families are not able to finance such a home as a typical household can only afford a mortgage of about \$720. This amount is much less than what is typically required to purchase and maintain a typical home (\$850-\$1000).

The fair market rent for Gary, requires substantially larger income for most to afford market rate housing. For a typically family, to afford to rent a three-bedroom home requires an income of more than \$ 42,400. This is therefore is higher than what most Gary families can earn to afford a typical three-bedroom home.

The Census reports for 2020 indicate that the average income deficit for a Gary family is about \$14,002. Such a large income deficiency makes most homes unaffordable for the average family to rent or to buy.

#### **Actions to be Taken:**

1. Strengthen City's economic base to create more job opportunities for residents.
2. Promote business development and entrepreneurship to create opportunities in the City and expand neighborhood livability.
3. Support education and training programs to expand opportunity for employment

4. Provide social services support to enable residents to seek and access employment outside the City of Gary.

## **Impediment 2: Neighborhood Obsolescence**

Loss of population in the City, has affected many neighborhoods' characters in the City. The Census report for 2020, shows the City has a total of 10,917 vacant housing units. According to 2020 the City has lost more than 13% of its population for the last decade. The Gary School District has several of its schools vacant and some are demolished in recent years making some neighborhoods more isolated. The Department of Parks and Recreation has 57 parks in its inventory, many of which are not used or adequately maintained. The Department is in the process of reviewing its priorities for park improvements. It is expected that some of the parks will be designated as surplus properties.

Overgrown parks, vacant schools, vacant lots, abandoned homes and closed businesses impact the overall fabric and character of the neighborhoods. The impact of deteriorating neighborhoods is not limited to the appearance alone. The conditions discourage investment and reduce sense of community

### **Actions to be Taken:**

1. Concentrate development efforts to provide housing opportunities in target areas.
2. Focus on the target areas to demolish dilapidated property and return vacant lots to public green spaces, i.e., natural and community gardens.
3. Work with developers to build new infill housing and subdivisions, particularly in those areas that are within established neighborhoods such as former school sites and in target areas.
4. Expand code enforcement and zoning compliance to ensure viability of neighborhoods.
5. Develop plans for adaptive reuse of the vacant school sites and other larger site for redevelopment.
6. Expand lead removal efforts in rehabilitation of homes to make them available for families.
7. Develop strategies to promote the City's affordable housing and attract buyers.
8. Encourage mixed-use development to ensure adequate neighborhood facilities such as grocery stores and other essential services.

## **Impediment 3: Dual Housing Market**

The dual housing market that dominates the Gary metropolitan area may be the most substantial impediment to fair housing choice that the City of Gary faces today. A review of the regional development landscape indicates the existence of divergent housing market in the region. Existence of a market duality severely distorts the free housing market in the



region. Such dual market trend is largely responsible for the intense level of racial segregation throughout the Gary metro region. The total number of new single-family housing constructed in the City of Gary is typically amount to less than a handful housing units while housing construction in adjoining communities, exceeds several hundred units annually. Despite unprecedented strength of the regional housing market, City of Gary appears to be very much isolated with little benefits from the prevailing shortage of housing.

While it is possible for Gary to achieve stable housing diversity by building a larger number of diverse modern housing units, establishing a unitary regional housing market would require transformational steps where all segments of regional housing market can partner and collaborate to change the trends and create an integrated housing market for Northwest Indiana. Such integration will require strong partnership among all units of government and regional housing providers for the next 20-30 years.

### **Actions to be Taken:**

1. Institute a regional approach to fair housing

The housing, racial, and socio-economic data from the 2020 U.S. Census as well as the amount of assisted and subsidized housing for the City of Gary, shows that there is a concentration of low- and moderate-income persons living in the City of Gary. The strategy to reverse this trend must include promoting construction of modern housing in the City, encouragement of rehabilitation of existing housing units as well as outreach to maintain demand for housing throughout the City with the goal of creating a unitary regional housing market.

Gary's political and business leaders and staff need to work closely with leaders of the real estate industry - both rental and for sale - as well as the leaders and staff of other communities, and the Lake and Porter Counties to implement actions which foster transforming the dual housing market into a unitary free market throughout the metropolitan area. This transformation will inherently have to be incremental and will take many years to achieve. But this change is essential for Gary and other heavily populated minority communities in northwest Indiana to maintain their stability over the long run and enjoy a free unitary housing market in which all residents participate and compete for the housing they can afford.

2. Expand opportunity for housing choice in Gary

Perhaps the most essential action Gary can take is to establish a program that encourages residents and potential residents to expand where they look for housing. The City has long had a Housing Opportunity Network (HON) program which promotes homeownership. This program can be expanded, as a housing service center, to robustly promote housing opportunities in the City. Strategies for such goal could include outreach, counseling, regular meetings with builders, realtors and financial institutions. In addition, an ongoing publicity campaign to expand housing

choice, can be introduced which can target potential tenants and home buyers, specific groups such as younger families, those that already work in Gary, as well as professional groups. The idea is to expand housing choices and remove self-imposed restrictions.

3. Promote Fair Housing Regionally

The GHRC must establish a robust outreach and awareness effort to inform local and regional agencies and citizens of its mission and service it offers. GHRC must also lead efforts in regional fair housing promotion events to ensure compliance at a regional level and particularly establishing a unified housing market.

#### **Impediment 4: Shortage of Affordable Housing Units**

A limited number of housing units are available that can be afforded by most families particularly those of larger families with children. Renters from outside the City that can pay higher rents, often compete for available units. New mixed-use developments are typically designed to capitalize on the market potentials of the development in the City, while serving affordable housing needs for the whole market rather than a targeted population. As such, while affordable housing developers continue to build housing units with more bedrooms, a lack of policies or incentives to encourage construction of larger homes continues to limit the number of units available for families.

##### **Actions to be Taken:**

1. Collaborate with GHA in development of diverse housing units
2. Expand supply of large family housing unit  
The City often work with local CDCs to rehabilitate existing housing units. The City regularly encourage such rehab efforts by providing financial support. The City should consider establishing a tiered approach with additional incentives for housing renovations with larger number of bedrooms.
3. Collaborate with local developers and CDCs to construct new housing units.
4. Prevent deterioration of rental properties.  
It is important to maintain the existing supply of affordable rental properties in the City. Some of the existing rental properties will have expiring contract that will be removed in the next five years. The City should take actions to not only to protect these as affordable housing but also support other privately held rental properties.

#### **Impediment 5: Lending Practices**

Access to mortgage in the City of Gary continues to pose a serious obstacle to fair housing choice. Controlling for all variables, it can be argued that mortgage availability for Gary

residents is a harder task than for the remaining residents of the Lake County. While it is clear that many local lenders do not embrace discriminatory practices, Home Mortgage Disclosure Act (HMDA) data suggests that inequity exist for access to loan for purchasing a home in Gary or obtaining home improvement loans. It does not appear that there is a strong preemptive program to educate the residents about financial literacy and predatory lending. Public awareness and preemptive education are vital to consumers who may fall prey to unfavorable lending practices or become the victim of unfamiliarity with lending processes.

### **Actions to be Taken:**

#### 1. Promote Financial Counseling and Education

The ongoing disparities in loan approval and denial rates, suggests a substantial need to provide Gary residents with financial counseling to better prepare applicants before they submit a mortgage loan application. Such counseling should include educating potential home buyers to recognize what they can actually afford to purchase, budgeting monthly ownership costs, building a reserve fund for normal and emergency repairs, and encouraging consideration of the full range of housing choices available.

#### 2. Expand Partnership with Financial Institutions

While local lenders and institutions have relatively open and transparent process for lending, they are often limited in their activities for business reasons. The City and the Gary Human Relations Commission must expand direct engagement of lending institutions with residents in a proactive manner to improve magnitude of lending and particularly home improvement loans in the City of Gary.

#### 3. Expand homeownership incentives programs

The prevalence of low-income population, often impedes opportunities for homeownership for many families either for lack of downpayment or inadequate loan to value ratio for a mortgage. To address this impediment, the City must consider providing a range of assistance such as downpayment or forgivable loan to encourage homeownership.

### **Impediment 6: Access to Fair Housing Information**

The process of engaging in a legal challenge by itself is terrifying task for a family or person that is in need of housing. Conversations with several organizations, also indicate that an expanded outreach may be desirable as lack of general knowledge about the fair housing may be an impediment to housing choice in the City of Gary. To improve access to information and fair housing, several strategies must be applied to remove this barrier.

## **Actions to be Taken:**

1. Expand local capacity to promote fair housing, outreach and education

The local capacity expansion must be comprehensive to cover all aspect of outreach, training and enforcement. These may include training of phone operator, establishment of expanded web site that provides clear information, counseling and leading efforts in regional fair housing promotion.

2. Convene regular focus group meetings and conversation

Facilitate meetings with the health providers, landlords, homebuilders, banks and financial institutions, neighborhood organizations, and other service providers to gather feedback on current barriers and to discuss strategies to eliminate such barriers.

3. Expand testing of financial and other housing services providers

Gary should continuously review lending and appraisal practices through formal surveys or informal means to examine their policies, procedures, and practices for possible differential treatment of home mortgage loans, home insurance, or home improvement loans based on race, ethnicity, gender, disability status, and familial status.

## **Impediment 7: ADA Compliance**

In 2012, the City of Gary prepared its last ADA Transition Plan. Since the adoption of this plan, the City has been implementing different aspects and recommendations of the plan. The City currently does not have any legal cases or complaint from any resident or organizations. The urban conditions of the City have changed since the adoption of the plan more than a decade ago. It is appropriate to update the current ADA compliance for the City by developing a new plan.

The City also lacks recommended guidelines regarding visitability/accessibility that go beyond what is required by the basic "handicapped accessibility" laws for CDBG and HOME funded residential development of more than four units. It is important that the visitability issue is considered as a part of a new ADA plan. To ensure full compliance, the following recommendations are identified.

## **Actions to be Taken:**

1. Update current ADA transition plan for the City of Gary while incorporating visibility guideline as a strong element of the Plan.
2. Develop a priority plan to modify a number of facilities annually to ensure compliance.
3. Coordinate and provide resource information to connect agencies offering transportation service with the disabled.

4. Support programs which expand the supply of accessible housing units for residents, particularly those for the elderly.

### **3. Additional Recommendations**

#### **Recommendation 1: Zoning and Code Enforcement**

In recent years, a substantial increase in the number of vacant structures and related violations have placed extraordinary demand on limited zoning and code enforcement resources. The overwhelming number of cases is beyond the capacity of current City staff to process. In most cases, the violations are not identified. In few cases, where the City has initiated enforcement action, the legal process is often lengthy and inconclusive. Vacant properties are not limited to the private sector but also include public sector properties. There is a strong need for streamlining the process of enforcing and issuing zoning and code violation citations.

##### **Actions to be Taken:**

1. Expand capacity to enforce zoning and code violations and legal processing.
2. Work with neighborhood groups, block clubs, urban League and others to promote neighborhood conservation.

#### **Recommendation 2: Land Use Practices**

Incorporating fair housing into planning process allows early intervention and prevention of fair housing issues. Such practice not only will address inequities that is often inherent with the zoning process, but also remove potential zoning barriers which is often used as a guide to land use decision. In practice Gary's Comprehensive Plan and Zoning Code do not exclude housing affordable to households of modest means. However, existing land use conditions and age of housing often are barriers to access to modern housing as the greater majority of the City's housing stock consist of medium and small-sized single-family homes, "duplexes and multifamily homes. About one half of all housing units are rental.

##### **Actions to be Taken:**

1. Bring fair housing into land use decisions  
Identify specific steps that will strengthen the fair housing aspect of community revitalization activities through equalizing services, initiating or strengthening agreements with financial institutions subject to CRA, creating job-housing and education-housing linkages.
2. Ensure availability and development of diverse housing

Partner with other developers, to encourage use of existing land, particularly those of former school sites, for low-density housing development and construction as a means to modernize housing stock in the City and rebuild the sense of neighborhood.

Further, the Gary Housing Authority is in the process of the major transformation. While such efforts must be supported, it is important that location and mix of new housing should be diligently reviewed and ensure proposed developments do not create concentration or have negative impact on surrounding neighborhoods.

3. Update Gary Zoning Code with full consideration for housing equity

The City of Gary has experienced significant change since its last zoning code update several decades ago. Although there has been a number of modifications, revisions and amendments, these do not address current land use, economic, environmental issues, and other concerns. A comprehensive approach to the development of a new zoning code would provide the necessary tools to allow the City to make needed adjustments based on current conditions. In addition, as the City develop a new zoning code, elements of fair housing consideration should be incorporated in its provisions. These include provisions for mixed income units as well as integration of smaller homes in new subdivisions.

## **B. MONITORING AND IMPLEMENTATION**

This Analysis of Impediments to Fair Housing Choice identifies barriers that could limit housing choice for residents of Gary. Impediments to fair housing can be complex in nature and often are embedded in the fabric of the community through different layers such as social, cultural and economic levels. These barriers often can prevent residents to recognize their right to fair treatment. Therefore, education becomes the essential ingredient to fight discrimination and a powerful tool to increase awareness.

According to the Final Rule on AFFH issued by HUD in 2015, AFFH is defined as “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.” (80 FR 42353). The following matrix provides a listing of all identified impediments and associated actions steps to implement them. A five-year timeline is proposed to ensure an orderly progress for implementation and to achieve City’s goals for fair housing.

## Implementation Matrix

RECOMMENDED ACTION		RESPONSIBLE AGENCY		IMPLEMENTATION TIMELINE (Yr.)				
		LEAD	SUPPORT	1	2	3	4	5
<b>1. Insufficient Income Growth</b>								
1	Strengthen City's economic base to create more job opportunities for residents.	C, ED	CD	Ongoing process for several departments.				
2	Promote business development and entrepreneurship	ED	CD	5	5	5	5	5
3	Support education and training programs to expand opportunity for employment	CD	ED,	Ongoing process for several departments.				
				25	25	25	25	25
				Education and related counseling to benefit persons at a rate/ per year, listed above. A total of \$100,000 will be planned by CD towards these efforts.				
4	Provide social services support to enable residents to seek and access employment outside the City of Gary.	CD	CTT, GPTC	5	5	5	5	5
				Support to families to at a rate/ per year, listed above. A total of \$50,000 has been identified by CD towards these efforts.				
<b>2. Neighborhood Obsolescence</b>								
1	Concentrate development efforts in target areas.	CD	C, RD	5	5	5	5	5
				Rehabilitation of existing housing units in target areas, at a rate/ per year, listed above. CD has an ongoing commitment through several Programs.				
2	Focus on the target areas to demolish dilapidated property and return vacant lots to public green spaces	RD	C, CD	5	5	5	5	5
				Acquisition/demolition at a rate/ per year, listed above.				
3	Work with developers to build new infill housing and subdivisions	CD	C, RD, BLDG	5	5	5	5	5
				Construction of new housing at a rate anticipated above.				
4	Expand code enforcement and zoning compliance	BLD	Z, L, C	On going process for several departments				
5	Work with financial institutions to ensure REO properties are maintained.	GHRC	L,BLDG	On going process for GHRC				
6	Develop plans for adaptive reuse of the vacant school sites and other larger sites for redevelopment.	P	C, RD, CD, GHA, GCSC	Ongoing process for several departments.				
7	Expand lead removal efforts in rehabilitation of homes	CD	BLDG	5	5	5	5	5
				On going process				
8	Develop strategies to promote the City's affordable housing and attract buyers.	CD	C, RD, BLDG	3	3	3	3	3
				Acquisition/demolition at a rate/ per year,				
9	Encourage mixed-use development to ensure adequate neighborhood facilities	RD	GHA, RD, CD	20	20	20	20	20
				Construction of new housing by both public and private				
<b>3. Dual Housing Market</b>								
1	Institute a regional approach to fair housing	C, GHRC	CD, NIRPC	Ongoing process by the City and several responsive departments.				
2	Expand opportunity for housing choice in Gary	CD	EC, GHRC	30	30	30	30	30
				On going efforts by City agencies. A \$150,000 commitment has been made by CD.				
3	Promote Fair Housing Regionally	GHRC	CD, ED, C	On going efforts by GHRC. A \$100,000 commitment has been made by CD.				
<b>4. Shortage of Affordable Housing Units</b>								
1	Collaborate with GHA in development of diverse housing units	GHA	CD, RD	10	10	10	10	10
				On going efforts by the City and GHA.				
2	Expand supply of large family housing unit	CD	RD, GHA	2	2	2	2	2
				On going efforts by the City to rehab housing for families.				
3	Collaborate with local developers and CDCs to construct new housing units.	CD	ED	5	5	5	5	5
				On going efforts by the City and local organizations to construct new housing				
4	Prevent deterioration of existing rental properties.	CD	BLDG	On going efforts by the City to maintain the supply of rental housing in the City.				



RECOMMEND ACTION		RESPONSIBLE AGENCY		IMPLEMENTATION TIMELINE (Yr.)				
		LEAD	SUPPORT	1	2	3	4	5
<b>5. Lending Practices</b>								
1	Financial Counseling and Education	CD	GHRC	10	10	10	10	10
				On going efforts by the City to provide education and financial counseling.				
2	Expand Partnership with Financial Institutions	GHRC, ED	CD	30	30	30	30	30
				On going efforts by the City and other agencies to expand availability of home and improvement loans.				
3	Expand homeownership incentives programs	CD	EC, RD	3	3	3	3	3
				On going efforts by the City and other				
<b>6. Accessing Fair Housing Information</b>								
1	Expand local capacity to promote fair housing, outreach and education	GHRC	CD	2	2	2	2	2
				On going efforts by the City to promote fair housing and outreach. 2 semi-annual fair housing campaigns are anticipated.				
2	Convene regular focus group meetings and conversation	GHRC	CD, ED	2	2	2	2	2
				On going efforts by the City to foster communications with other agencies and				
3	Expand testing of financial and other housing services providers	GHRC	CD					
				On going efforts to enforce fair housing in the				
<b>7. ADA Compliance</b>								
1	Update current ADA Transition Plan	C	CD		1			
				On going efforts by the City. Update plan is anticipated to be completed next year.				
2	Develop a priority plan to modify a number of facilities annually to ensure compliance.	CD	RD					
				On going efforts by the City to comply with ADA requirements.				
3	Support programs which expand the supply of accessible housing units	CD	ED	2	2	2	2	2
				On going process. The City will provide for ADA				
<b>8. Zoning and Code Enforcement</b>								
1	Expand capacity to enforce zoning and code violations	BLDG, Z	CD					
				On going efforts by the City to enforce codes.				
3	Work with neighborhood groups, block clubs, urban League and others to promote neighborhood conservation.	CD	GHRC					
				On going process. Several neighborhood meetings are planned annually.				
<b>9. Land use Practices</b>								
1	Bring fair housing into land use decisions	P	RD, Z					
				On going efforts by the City to encourage fair housing in review of zoning petitions.				
2	Ensure availability and development of diverse housing	CD	RD					
				On going efforts by the City to encourage diversity in housing development petitions.				
3	Update Gary Zoning Code with full consideration for housing equity.	P	C, Z, RD			1		
				Development of a new updated zoning				

**Responsible Agency Legend**

- BLDG** Building Department
- C** City
- CD** Community Development
- CTT** Calumet Township Trustee
- ED** Economic Development
- GHA** Gary Housing Authority
- GHRC** Human Relations Commission
- GCSC** Gary Community School Corporation
- GPTC** Gary Public Transportation Corp
- L** Law Department
- NIRPC** Northwestern Indiana Regional Planning Commission
- RD** Redevelopment
- P** Gary Planning Department
- Z** Zoning Department



# Certification

The City of Gary has completed this Analysis of Impediments to Fair Housing as part of its overall dedication to fair housing planning, as affirmed in the 2021 City of Gary Consolidated Plan.

Certified by the City of Gary on August 12, 2022

Arlene D. Colvin, Esq., Director  
**Department of Community Development**

*Arlene Colvin*

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Date: 08-12-2022

**VII. Appendix**

**1. Public Participation**

**A. Agenda, Meeting Minutes, Public Notice**

**B. Community Questionnaire Tabulations**

# **AGENDA**

## **2022-2026 Analysis of Impediments to Fair Housing**

### **PUBLIC HEARING**

**Monday, July 11, 2022  
5:00 p.m.**

**Gary Main Library**

- |                                |   |
|--------------------------------|---|
| <b>1. Welcome Remarks</b>      | <b>Evelyn Aponte<br/>Compliance Manager</b>             |
| <b>2. Fair Housing Process</b> | <b>Taghi Arshami, Principal<br/>The Arsh Group Inc.</b> |
| <b>3. Public Comments</b>      |   |
| <b>4. Adjournment</b>          | <b>Evelyn Aponte</b>                                    |

City of Gary Community Development Department  
 2022-2026 Analysis of Impediments to Fair Housing  
 Public Hearing Attendance Sheet  
 July 11, 2022 - 5:00 P.M.

No.	Name	Organization and Address	Phone Number	Email Address
1	Mary Lewis	1851 Martin Luther King Dr. #105	219-200-7794	doublem12967@gmail.com
2	Wanda Pettigrew	401 Broadway Community Dev Gary, IN 46400	219-881-5075	wpettigrew@gary.gov
3	Ashley McClam	5043 Madison St 401 Broadway Comm. Dev.	219-881-5075	kneeland.gary.gov
4	Erlyz Gonte	Comm. Dev. Dept. 401 Broadway	219-881-5075	egonte@gary.gov
5	Shirley Jones	Community Dev. Dept 401 Broadway, 300	219-881-5075	fjones@gary.gov
6	Judson Salmon	Lydia House REBUILDING THE BREACH	219 629 0238	Judson.Salmon@gmail.com
7	Ahija Muhammad	COG Youth Services Bureau	219 885 278	amuhamed@aogary.gov
8	Terran' Porsiani	The Fresh Group	219-921-9100	TPRS.HG.REVP.@Ashygroup.com

**PUBLIC NOTICE**

**City of Gary  
Analysis of Impediment to Fair Housing**

Date: July 11, 2022, 5:00 PM

**TO ALL INTERESTED AGENCIES, GROUPS, AND PERSONS:**

The City of Gary has prepared a new Analysis of Impediments to Fair Housing for the City. The City is soliciting community input for the pending analysis of fair housing from residents and interested public. As a part of this analysis, the Department of Community Development is conducting a public meeting to solicit input about fair housing issues, impediments to housing choice and availability of affordable housing in the City of Gary. The public meeting will be held at the Gary Public Library & Cultural Center's Community Room, 220 W. 5<sup>th</sup> Ave., on Monday, July 11, 2022 at 5:00 p.m. All residents, interested agencies and organizations are invited to participate in this meeting.

The City of Gary intends to use the collected information to formulate recommendations to expand fair housing and eliminate impediments that may exist in the City. For further information, please contact Ms. Kimberley McClam at the City of Gary Community Development Department, 401 Broadway, Suite 300, Gary, IN 46402 at 219-881-5075 or by email at [kmccclam@gary.gov](mailto:kmccclam@gary.gov). The City of Gary prohibits any discrimination on the basis of any individual's physical ability. Anyone requiring reasonable accommodation for this meeting, as provided by law should contact the Community Development Department at least five (5) days before the meeting.

# CHICAGO TRIBUNE

media group

Sold To:  
CITY OF GARY COMMUNITY DEV - CU00410928  
401 Broadway, Ste 300  
Gary, IN 46402-1253

Bill To:  
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401 Broadway, Ste 300  
Gary, IN 46402-1253

## Proof of Publication

Order Number: 7238998  
Purchase Order: PUBLIC NOTICE\_Fair Housing

State of Illinois

) ss:

County of Cook

I, Jeremy Gates, a principal clerk of Post Tribune newspaper of general circulation printed and published in the English language in the city of Crown Point, in the State of Indiana and County of Lake, and that the printed matter attached hereto is a true copy, which was duly published in said paper for 1 time(s), the date(s) of publication being as follows:

Jun 27, 2022.

The undersigned further states that the Post Tribune newspaper(s) maintains an Internet website, which is located at [http://classifieds.chicagotribune.com/classifieds?category=public\\_notice](http://classifieds.chicagotribune.com/classifieds?category=public_notice) website and that a copy of the above referenced printed matter was posted on such website on the date(s) of publication set forth above.

Dated at Chicago, Illinois on this 28 day of June, 2022.



Jeremy Gates

# **CHICAGO TRIBUNE**

media group

## **PUBLIC NOTICE**

### **City of Gary Analysis of Impediment to Fair Housing**

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PM

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# CHICAGO TRIBUNE

media group

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Community Development  
Department at least five  
(5) days before the meet-  
ing.

6/27/2022 7238998

HSPAXLP

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Gary Dept of Community  
(Governmental Unit)  
Development  
Lake County, Indiana

To: The Times Media Company

601-45th Avenue, Munster, IN 46321

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Pursuant to the provisions and penalties of IC 5-11-10-1, I hereby certify that the foregoing account is just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same has been paid.

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June 27, 2012

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Date June 29, 2012

Nicole L. Muscari  
Title: Legal Clerk



By: Austina Palmer

## **B- Community Questionnaire**

# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

## CITY OF GARY

### DEPARTMENT OF COMMUNITY DEVELOPMENT

Please review the following questions and respond to the best of your knowledge. Thank you.

Questions	Agree	Disagree/ Other
1. Are the numbers of lower and/or moderate-income housing units adequate in the City of Gary?		
2. Housing issues are adequately addressed at the metropolitan or regional level?		
3. Are municipal and other services (transportation, social services, schools, health services, hospitals, banks, grocery stores and other businesses equally distributed throughout the geographic area of Gary.		
4. There is a pattern of discrimination for rental housing exists in the City of Gary.		
5. Incidence of racial steering or blockbusting by real estate brokers exists in the City of Gary.		
6. There is adequate diversity in housing for both renters and owners in the City of Gary.		
<b>7. Fair Housing Practice</b>		
▪ Fair Housing laws are enforced in Gary?		
▪ Landlords can limit number of children?		
▪ Housing discrimination happens in my neighborhood?		
<b>8. Barriers to Housing Choice</b>		
▪ Cost of housing		
▪ Access to public transportation		
▪ Housing discrimination		
▪ Lack of Access		
▪ Distance to employment		
<b>9. Are any of the following a Discrimination Issue in the City of Gary?</b>		
▪ Race		
▪ Age		
▪ Family size		
▪ Gender		
▪ Religion		
▪ Language		
▪ Disability		
<b>10. Banking Practices</b>		
▪ Easy to obtain loans from financial institutions and mortgage companies in Gary		
▪ Insurance companies offer policies within 100% replacement value to lower-income & first-time homebuyers at reasonable rates		
▪ Lower-income families are able to refinance their homes at competitive interest rates		
<b>11. What do you think would be the most effective actions in addressing the issues you have <u>agreed</u> above?</b>		
<b>12. What is the one thing you believe would have the greatest positive affect in promoting fair housing in City of Gary?</b>		
Any other comments you would like to make related to fair housing in the City of Gary.		

13 PARTICIPANTS  
RESPONDED

**ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE**

CITY OF GARY

DEPARTMENT OF COMMUNITY DEVELOPMENT

Please review the following questions and respond to the best of your knowledge. Thank you.

MAYE  
N/A

Questions	Agree	Disagree/ Other	
1. Are the numbers of lower and/or moderate-income housing units adequate in the City of Gary?	1	10	2
2. Housing issues are adequately addressed at the metropolitan or regional level?		12	1
3. Are municipal and other services (transportation, social services, schools, health services, hospitals, banks, grocery stores and other businesses equally distributed throughout the geographic area of Gary.	1	11	1
4. There is a pattern of discrimination for rental housing exists in the City of Gary.	6	4	3
5. Incidence of racial steering or blockbusting by real estate brokers exists in the City of Gary.	5	4	3
6. There is adequate diversity in housing for both renters and owners in the City of Gary.	1	11	
<b>7. Fair Housing Practice</b>			
• Fair Housing laws are enforced in Gary?	3	1	6
• Landlords can limit number of children?	1	1	4
• Housing discrimination happens in my neighborhood?	4	3	6
<b>8. Barriers to Housing Choice</b>			
• Cost of housing	9	2	2
• Access to public transportation	11	1	1
• Housing discrimination	6	4	3
• Lack of Access	12		1
• Distance to employment	9	2	1
<b>9. Are any of the following a Discrimination Issue in the City of Gary?</b>			
• Race	6	2	6
• Age	3	5	6
• Family size	6	2	5
• Gender	2	6	5
• Religion	1	5	5
• Language	3	4	4
• Disability	7	2	2
<b>10. Banking Practices</b>			
• Easy to obtain loans from financial institutions and mortgage companies in Gary	2	8	3
• Insurance companies offer policies within 100% replacement value to lower-income & first-time homebuyers at reasonable rates	1	8	4
• Lower-income families are able to refinance their homes at competitive interest rates	1	7	5
11. What do you think would be the most effective actions in addressing the issues you have <u>agreed</u> above?			
12. What is the one thing you believe would have the greatest positive affect in promoting fair housing in City of Gary?			
Any other comments you would like to make related to fair housing in the City of Gay.			

## **2022-2026 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE PARTICIPANT LIST**

### **CITY DEPARTMENTS ATTENDEES**

#### **Meeting July 6, 2022**

1. Eric Boria- Administrator/Zoning Department
2. Taryl Bonds- Executive Director/Gary Housing Authority-
3. Gregory H. Jenkins- Director/Planning Department

#### **Meeting July 5, 2022**

### **SPECIAL NEEDS/HEALTH AGENCIES ATTENDEES**

1. Edward Williams- Chairman/Mayor's Organization on Disabilities
2. Jackie Bennett- Administrator/Secretary Mayor's Organization on Disabilities
3. Chris Carroll- Chief of Clinical/Edgewater Systems for Balance Living

#### **Meeting July 7, 2022**

### **HOMELESS SERVICES**

1. Angela Curtis- Executive Director/Sojourner Truth House
2. Pamela Key- Client Services Director/Sojourner Truth House
3. Arlandra Gilbert - Staff Sojourner Truth House
4. Felicia Evans- Program Manager/Crisis Center

### **SOCIAL SERVICES PROVIDERS ATTENDEES**

1. Sandra Noe- Executive Director/Meals on Wheels
2. Laura Wynn- Chief Operating Officer /Indiana Parenting Institute

### **BUSINESS & BANKING**

#### **Meeting July 8, 2022**

1. Charles Hughes- Executive Director/Chamber of Commerce
2. Kenneth Whisenton- Chief Community Development Officer/Horizon Bank
3. Yolanda Davis- Vice President/Community Reinvestment Officer/Centier Bank

**Meeting July 8, 2022**

**HEALTH AND HUMAN SERVICES/CITY OF GARY**

1. **Veronica Collins- Executive Director/Health & Human Services**
2. **Haneefah Khaliq- Executive Director/Human Relations Commission**

**Meeting July 8, 2022**

**REALTORS**

1. **Candice Wright- Realtor/ Wright Realty**
2. **LaVonne Hoskins- Realtor/Blessed Realty**

**HOUSING SERVICES ORGANIZATIONS**

**Meeting July 15, 2022**

1. **Vernita Leslie- Executive Director/Broadway Area CDC**
2. **Sandra Dafiaghor- Executive Director/CR Works CDC**
3. **Wende Burbridge- Development Director/Habitat for Humanity NWI**

## QUESTIONS FROM SURVEY

### **11. What do you think would be the most effective actions in addressing the issues you have agreed above?**

1. To take a regional approach to addressing discrimination: resulting segregation.  
Invest in equity-oriented infrastructure with input from community engagement.
2. Just surveying and seeing the needs
3. Build more affordable homes to purchase
4. More information available to the public as to what constitutes fair housing discrimination
5. Funds, Policies, legal legislative actions, stronger system engagement
6. Access to more affordable decent housing in Gary
7. Providing more support on the City, State and County level for families to have better choices.
8. State and City needs to allocate more money in developing communities with rehab dollars and for construction. "Build and Businesses will follow".
9. Marketing and Outreach
10. N/A

### **12. What is the one thing you believe would have the greatest positive affect in promoting fair housing in the City of Gary?**

1. Zoning & Development code requiring developers/owners to provide  
ADA accessibility, access to public transportation (instead of parking), mixed income tied to financing.
2. Open doors to all walks of life
3. Having Homes available
4. More availability of housing in non-blighted areas with access to essential services
5. Appropriate corrective actions when discrimination occurs
6. Service providers working together with assistance of the City.
7. Availability of housing, voucher support, and an incentive for landlords to people with criminal history.
8. Money to be spent on affordable single family dwellings.
9. Outreach
10. Education (The only question answered)
11. Eliminating the barriers to housing would be the most effective.



## 12. Creating incentives for builders

### **Any other comments you would like to make related to fair housing in the City of Gary?**

1. More funds, stronger policy adherence, better reporting of issues, stronger supportive system for all housing issues.
2. Who is monitoring the investors (slum landlords) housing?  
Suggestion: Fund your community development partners so they can do housing development continuously!!
3. The issue of fair housing in Gary is regional so should play its part in a regional solution.
4. Support of organizations that promote and impact fair housing with programs and advocacy.