# **COVID-19: A Housing and Community Development Response**

# Prepared by the COVID-19 Working Group of the Vacant and Abandoned Property Action Council (VAPAC) May 11, 2020

# **Introduction**

Since the early to mid-2000s, housing and community development advocates have been working to support solutions to the collapse of housing markets and the destabilization of communities that resulted from the mortgage foreclosure crisis in Cuyahoga County.

More than a decade after the foreclosure crisis began, Cuyahoga County residents have still not fully recovered. Housing prices have been increasing, with some communities faring far better than others. Yet many in the county are still experiencing a housing recovery that lags behind the national trend. Further, the County's eastern communities with high percentages of African American homeowners were among the first to experience the devastating effects of unsustainable mortgages and are still among the last to see an end to the crisis.

Suddenly and unexpectedly, Cuyahoga County – along with the whole of the world – has found itself thrown into another economic crisis, at a time when a significant portion of the county has still not recovered from the prior crisis<sup>1</sup>. Unemployment from COVID-19 threatens a new wave of housing instability: tenants will be unable to pay their rent and will be faced with eviction, property owners will be unable to pay their property taxes and their mortgages and will face foreclosure; owners and tenants will be unable to pay their utilities and will be subject to shut-offs; homeowners will be unable to pay for urgent repairs, leaving them living in unsafe and unhealthy conditions.

Economists from the World Bank, Federal Reserve, and International Monetary Fund say this will likely be the worst recession since the 1930s,<sup>2</sup> and evidence is already surfacing that suggests the crisis is having a disproportionate impact on people of color and other at-risk populations.<sup>3</sup> Locally, if unemployed persons are unable to keep up on rental obligations, we could see arrearages totaling \$7M per month in the City of Cleveland, and \$218M per month statewide.

While it is impossible to yet know the full impact of COVID-19 (and therefore the full set of resources and tools that will be necessary to combat it), we have identified a set of needs and

<sup>&</sup>lt;sup>1</sup> <u>https://www.cleveland.com/opinion/2020/04/facing-deepening-coronavirus-harm-clevelands-resilience-will-be-</u> tested-brent-larkin.html

<sup>&</sup>lt;sup>2</sup> <u>https://www.cnn.com/2020/04/14/business/imf-world-economic-outlook/index.html</u>

<sup>&</sup>lt;sup>3</sup> <u>https://www.hrc.org/blog/hrc-president-on-the-disproportionate-impact-of-covid-19-on-marginalized-po</u>

responses that can be deployed in the near future to address some of the already apparent *housing* challenges. We recognize that COVID-19's impact is not limited to housing, and resources and programs to address other important sectors of life such as education, employment, transportation and healthcare will also be necessary but are not addressed in this response.

# **Guiding Principles**

The recommendations proposed in this response draw upon the collective experience of dozens of organizations that were on the front lines of the mortgage foreclosure crisis. That experience suggests a number of principles that should guide a response to the COVID-19 crisis:

- 1. Ohio residents should remain in their homes, free from eviction, foreclosure and utility shut offs related to income disruption caused by sheltering in place.
- 2. Community resources should be allocated to those most at risk of losing their housing and most in need of assistance; residents should have access to the tools to address their property tax, mortgage, or rent payments during the crisis.
- 3. Eviction moratoria should protect those experiencing a financial hardship resulting directly or indirectly from COVID-19, but they do not negate the obligation to pay rent, and should not be used to shield tenants engaging in unlawful activity, nuisance activity, property damage or domestic violence.
- 4. Foreclosure moratoria should protect those experiencing a financial hardship resulting directly or indirectly from COVID-19, and both mortgage lenders/servicers and public officials enforcing tax delinquency should have additional flexibility with residents in repayment.
- 5. It is incumbent upon public officials to aggressively educate the public and publicize the availability of the unique resources, programs, tools and moratoria being made available in this time of crisis.
- 6. Public officials should take full advantage of data resources to track and monitor the impact and recovery from COVID-19, such as the Northeast Ohio Community and Neighborhood Data for Organizing (NEO CANDO) data system at the Center for Urban Poverty and Community Development at Case Western Reserve University and the Northern Ohio Data and Information Service (NODIS) at Cleveland State University.
- 7. Urgent action is required: prompt action now and into the future will mitigate the housing and economic consequences that are predicted to result from this crisis.

# **Recommendations**

The recommendations below are organized by section according to whom they are primarily addressed: U.S. Congress, State of Ohio, Cuyahoga County, municipalities, private industry, etc. We have endeavored to address recommendations to parties and agencies that have authority to implement them. However, we recognize that in some cases there could be an overlap of

authority and/or a question of authority to act. The timing, phasing, and coordination of these interventions is critical. People unable to pay rent face a more immediate threat to housing security than a homeowner facing mortgage or property tax delinquency. This does not diminish the urgency of any these recommendations. Ensuring all of these programs and strategies are implemented will result in the greatest likelihood of housing stability throughout Ohio. Nevertheless, as stated in the Guiding Principles above, we urge public officials to assume any short term, emergency, authority they may have to take swift action to protect families and their homes in this health and economic crisis.

#### 1. What Members of Congress Can Do:

#### Who

A. The Ohio Congressional Delegation: Senators Rob Portman and Sherrod Brown; Representatives Marcia Fudge, Marcy Kaptur, Tim Ryan, David Joyce, Jim Jordan, Joyce Beatty, Bill Johnson, Mike Turner, Anthony Gonzalez, Bob Gibbs, Steve Chabot, Brad Wenstrup, Steve Stivers, Troy Balderson, Bob Latta, and Warren Davidson

#### What

1) Emergency Solutions Grants (ESG) - Support a proposal for \$100 Billion of funding to provide time-limited emergency rental assistance in the next coronavirus relief bill. Under this proposal, low-income tenants impacted by COVID-19 and the economic crisis would apply for financial assistance to be paid directly to their landlords. This proposal would allow some arrearages to be covered, as well as rent payments going forward, until reemployment is possible. This will keep tenants stably housed while ensuring property owners can continue operating responsibly.

2) Additional federal resources will be needed to fund eviction prevention counseling for the limited number of residents who will need deeper support beyond rental assistance.

3) HOME\_— Support a proposal for \$10 Billion in additional allocation with a focus on flexibility to respond to the crisis immediately, to help stabilize low and moderate-income families, to cover increased operating costs associated with addressing COVID-19 related expenses, and to stimulate the preservation and production of affordable homes.

4) Support the expansion of income eligibility for COVID-19 related rental assistance for CDBG and HOME resources up to 120% AMI.

5) Use oversight authority to encourage the FHFA, FNMA, FHLMC, and VA to establish and maintain up-to-date and searchable databases of owned or insured mortgages, accessible to the public, so that mortgagees can readily ascertain whether they have a mortgage entitled to relief

#### 2. What the State of Ohio Can Do:

#### Who

A. Governor DeWine

#### What

1) Encourage Ohio Courts to consider measures to reduce the number of eviction filings and eviction judgments, including supporting a uniform, statewide approach to the use of the courts' equity jurisdiction to ameliorate COVID-related hardships, including using equitable principles to (1) refuse judgment in eviction cases that would be resolved if the landlord was amenable to and the tenant was approved for payment via state, local, federal, or private philanthropic COVID response programs; (2) supporting pre-filing mediation or extended timeline requirements imposed by municipal courts to assist in managing their dockets as we recover from the crisis; (3) using equitable principles in the apportioning of costs and fees between plaintiff and defendant, with an emphasis on waiver of any COVID-related late fees and costs; and (4) encouraging courts to refuse to consider increased clean-up or sanitation costs associated with a tenant's COVIDrelated illness to be anything other than normal wear and tear on the unit.

2) Consider joining with other states that have issued Executive Orders staying enforcement of residential and commercial evictions related to COVID-19 hardship. As noted in the "Guiding Principles" above, exceptions should be made for tenants engaging in unlawful activity, domestic violence, and nuisance activity, etc. The order should state that the staying of eviction does not remove the obligation to pay rent, and a tenant must provide documentation of a hardship resulting from COVID-19.

See Executive Orders in Arizona, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, New Hampshire, New Jersey, New York, Oregon, Washington, and Wisconsin.

https://www.fool.com/millionacres/real-estatemarket/articles/cities-and-states-that-have-paused-evictionsdue-to-covid-19/

3) Eviction moratoria are a critically important step, but even when eviction is on hold, rent is not. Both renters and property owners need support. The need for **emergency**  **rental assistance** due to the crisis will be unprecedented. An insufficient response will result in wide scale displacement among low income households and dramatic increases in homelessness. Utilize additional COVID-19 related federal resources to fund an of-scale rental assistance pool for residents impacted by COVID-19.

- CDBG Rental assistance for residents up to 80% of AMI. Utilized as an immediate emergency payment for up to three months' rent (maximum federally permitted limit).
- Allocate any unused Coronavirus Relief Fund dollars that are not needed for health care workers and first responders to rental assistance.
- Create a broad-based rental assistance program to prevent the tsunami of evictions anticipated in the coming months; convene a group of stakeholders to create a plan for the program.
- Continue to support the Ohio Department of Health's Minority Health Strikeforce examining the disproportionate impact of COVID-19 on communities of color, and meaningfully incorporate their findings into future responses and programs.
- ESG Rental assistance for residents up to 50% (with HUD waiver) of AMI. Utilized as a shallow subsidy, payment of delinquent obligations or for a security deposit for residents, up to the federally permitted limits.

4) Rental Assistance – Future Federal Allocation of Housing Resources in a Phase 4 Stimulus. CDBG and ESG – See above rental assistance recommendations.

 Rental assistance for residents up to 60% of AMI (request waiver up to 120%). Reserved as a resource to be utilized as a shallow rent subsidy to address lingering effects of COVID-19 related issues in the medium term, up to the federally permitted limits.\*

\*Please note that VAPAC is not suggesting a reallocation of current HOME funds

• Utilize to address the needs of local affordable housing portfolios experiencing instability/additional expenses due to the crisis.

5) Allocate \$35 million of Temporary Assistance for Needy
Families (TANF) dollars to create the Homeless Family
Assistance Program to support evidence-based rapid
rehousing and homeless prevention strategies.

6) Seek necessary waivers to ensure future Federal allocation of housing resources in a Phase 4 stimulus can be used in a flexible manner. CDBG and ESG – See above rental assistance recommendations. Additionally, support utilizing additionally allocated HOME dollars as:

- Rental assistance for residents up to 60% of AMI (request waiver up to 120%). Reserved as a resource to be utilized as a shallow rent subsidy to address lingering effects of COVID-19 related issues in the medium term, up to the federally permitted limits. \*
- Utilize to address the needs of local affordable housing portfolios experiencing instability/additional expenses due to the crisis.

\*Please note that VAPAC is not suggesting a reallocation of current HOME funds

7) Allocate additional TANF dollars to the Prevention, Retention, and Contingency (PRC) program.

8) Encourage landlords to agree, as a condition of receipt of relief funds, to not use the existence of a previous paid COVID-related arrearage as grounds for non-renewal of a lease.

9) Support municipal governments' financial ability to maintain strong code enforcement capacity. This is a critical first line resource in protecting its housing stock, one of the most valuable assets of local communities.

B. Supreme Court of Ohio	1) Extend the current stay of all foreclosures and sheriff sales
	of occupied properties for an additional 60 days until July
	15th.

	2) Encourage, to the full extent of the court's lawful powers, a uniform approach to forcible entry actions and evictions arising from hardships related to the Stay-at-Home orders. These efforts would include a statewide approach to the use of the courts' equity jurisdiction to ameliorate COVID-related hardships, including using equitable principles to (1) refuse judgment in eviction cases that would be resolved if the landlord was amenable to and the tenant was approved for payment via state, local, federal, or private philanthropic COVID response programs; (2) supporting pre-filing mediation or extended timeline requirements imposed by municipal courts to assist in managing their dockets as we recover from the crisis; (3) using equitable principles in the apportioning of costs and fees between plaintiff and defendant, with an emphasis on waiver of any COVID-related late fees and costs; and (4) encouraging courts to refuse to consider increased clean-up or sanitation costs associated with a tenant's COVID- related illness to be anything other than normal wear and tear on the unit. (See recommendations to the Cleveland Housing Court, below.)
	3) Fund and implement informational programs for municipal court judges and employees to ensure that available tenant and landlord relief programs can be known and accessed statewide.
C. Ohio General Assembly	1) Amend state law to give Treasurers the flexibility to increase the maximum delinquent tax payment plan contract from 5 to up to 10 years.
	2) Amend state law to provide for a one year Poverty Exemption for property tax delinquency, with provision for additional exemption upon demonstration of need.
	3) Amend state law to prevent landlords from placing the full costs of COVID-related sanitation measures on tenants by amending ORC to provide that cleanup of a unit necessitated by an event precipitating a local or state emergency declaration cannot be considered damages payable from the tenant's security deposit.
	4) Amend O.R.C. 1901.14 to clearly grant municipal courts the ability to impose appropriate moratoria on civil actions during a period of crisis, including, but not limited to evictions,

foreclosure, and debt collection actions during periods of a federal, state, or local, state of emergency declaration.

5) Amend state law to prevent discrimination by residential and commercial landlords in accepting timely payment in the form of federal, state, local, or private philanthropic disaster or hardship response sources for payment of rent or rent arrearages. These types of sources would include Veterans' relief warrants issued by county governments, payment from an OHFA-sponsored COVID relief fund, certified checks or wire transfers from private 501(c)(3) organizations such as Catholic Charities, etc.

6) Explore tax credits for landlords who do not evict their tenants, as noted as a recommendation from <u>Hawaii Working</u> <u>Families Coalition</u> memo to the state on the use of federal funding for Hawaii State COVID-19 response.

7) Amend state law to allow the Treasurer to waive interest on delinquent tax payments in cases of documented hardship related to COVID-19.

8) Amend state law to allow late filings for individuals eligible for a Homestead Exemption to be retroactive for three years instead of one year with adequate documentation.

#### 3. What Cuyahoga County Can Do:

#### Who

#### What

A. Executive Budish

1) Education:

a. Take the lead on an aggressive publicity campaign to educate county residents on all resources and programs the county has, or will, initiate in response to this crisis, including implementing any of the recommendations below. In addition, educate county residents on all resources, programs and moratoria they may benefit from at the <u>state</u> and <u>federal</u> level, including eligibility for rent, mortgage and tax delinquency relief. The campaign should include TV, radio ads, PSAs, and bus ads. b. Continue full funding for housing counseling agencies, at the level of funding for contracts that expired on 3/31/20 and provide increased funding as demand for counseling increases.

### 2) Emergency Housing and Rental Assistance:

a. Allocate a significant portion of the \$215,523,501 the county will receive from CARES Act funding to be used for rental assistance.

b. Allocate additional TANF dollars to the Prevention, Retention, and Contingency (PRC) program.

c. Temporarily issue direct grants to agencies that administer county funds to clients, i.e. temporarily suspend the county's practice of disbursing funds on a reimbursement basis. Due to the urgency and magnitude of the COVID-19 problem, nonprofit agencies that serve clients will not have sufficient cash on hand to meet projected needs on a reimbursement basis.

d. Advocate at the state and federal level for the inclusion of additional funds for **emergency rental assistance** in all disaster response legislation (see state and federal recommendations above).

e. Continue providing hotel rooms for people experiencing homelessness. The congregate living environment provided by homeless shelters is not safe per CDC social distancing guidelines. The population at shelters needs to be reduced to comply with guidelines.

f. Develop a plan that prioritizes testing among people experiencing homelessness. The CDC finds: "Given the high proportion of positive tests in the shelters with identified clusters and evidence for presymptomatic and asymptomatic transmission of SARS-CoV-2 (5), testing of all residents and staff members regardless of symptoms at shelters where clusters have been detected should be considered. If testing is easily accessible, regular testing in shelters before identifying clusters should also be considered. Testing all persons can facilitate isolation of those who are infected to minimize ongoing transmission in these settings."<sup>4</sup>

g. Continue taking the lead on a coordinated response among participating jurisdictions receiving extra CDBG funding to respond to the crisis in order to maximize efficiency and effectiveness.

### 3) Property Tax Delinquency:

a. Waive late penalties for those who miss a property tax deadline due to a COVID-19 related hardship.

b. In cases of COVID-related hardship, extend existing payment plan contract terms to the maximum allowed by state law.

c. Extend the number of payment plan contracts offered for homeowners from 3 to 5 contracts and for investors from 2 to 4 contracts.

d. Work with housing advocates to urge the Ohio General Assembly to give Treasurers the flexibity to increase the maximum repayment plan contract period for delinquent real estate taxes from 5 to up to 10 years.

e. Restore the collection of housing counseling data so the data can inform strategic response to the COVID-19 crisis.

f. Continue supporting the County's Delinquent Tax Outreach Department ("Fishbowl").

#### 4) Foreclosure:

a. Revisit past Cuyahoga County Foreclosure Prevention Program efforts that played a critical role when foreclosure levels were high, for example, the use of DTAC funds to provide forgivable loans to homeowners at risk of foreclosure.

b. Re-Establish a Foreclosure Prevention Program through the Department of Development, to include the following specific

<sup>&</sup>lt;sup>4</sup> <u>https://www.cdc.gov/mmwr/volumes/69/wr/mm6917e1.htm?s\_cid=mm6917e1\_e&deliveryName=USCDC\_921-DM26442</u>

	<ul> <li>measures to increase efficiency and evaluate the operation of the County's efforts: (1) Re-Establish the County Foreclosure Prevention Coalition with county staff, counseling agencies, 211 and others; (2) Engage Cleveland State University to host and staff the coalition meetings; (3) Engage the CSU convener to collect housing counseling data and use that data to inform strategic medium-term response to the COVID-19 crisis and any ensuing economic recession; and (4) Assign relevant County personnel to attend the coalition meetings.</li> <li>c. Support the Court of Common Pleas in budgetary requests for the operation of the Magistrates Department and the ADR Department. Both play pivotal roles in assisting homeowners and lenders in resolving cases prior to judgment and in minimizing the impact that large numbers of foreclosure and other debt collection filings present to court resources and the efficient administration of justice in other areas.</li> <li>d. Advocate at the state and federal level for increased support to homeowners, funding of foreclosure rescue, foreclosure assistance programs, real estate tax relief, and the restoration of guidelines and requirements imposed on banks for loan workouts and modifications with homeowners.</li> </ul>
B. Common Pleas Court	<ol> <li>Amend the current Court Administrative Order to extend stays of foreclosure and suspension of Sheriff Sales on occupied property for an additional 60 days until July 15.</li> <li>Re-start the foreclosure mediation program.</li> </ol>
	<ul><li>3) Insure that the foreclosure mediation program is represented at Foreclosure Counseling Coalition meetings.</li></ul>
4. What the City of Cleveland	d Can Do:
Who	What
A. Mayor Jackson	1) Allocate a significant portion of the \$19M the City will

1ayor Jackson	<ol> <li>Allocate a significant portion of the \$19M the City will receive from CARES Act funding to be used for rental assistance.</li> </ol>
	2) Develop a plan that prioritizes testing among people experiencing homelessness. The CDC finds: " <i>Given the high proportion of positive tests in the shelters with identified clusters</i>

	and evidence for presymptomatic and asymptomatic transmission of SARS-CoV-2 (5), testing of all residents and staff members regardless of symptoms at shelters where clusters have been detected should be considered. If testing is easily accessible, regular testing in shelters before identifying clusters should also be considered. Testing all persons can facilitate isolation of those who are infected to minimize ongoing transmission in these settings." <sup>5</sup>
	3) Advocate at the county, state, and federal level for the inclusion of additional funds for <b>emergency rental assistance</b> in all disaster response legislation (see state and federal recommendations above).
	4) Provide hotel rooms for people experiencing homelessness. The congregate living environment provided by homeless shelters is not safe per CDC social distancing guidelines. The population at shelters needs to be reduced to comply with guidelines.
	5) Explore programs to support households that are experiencing fluctuating income as a result of COVID-19 and any anticipated breakout in the future, including shallow rent subsidies, such as the District of Columbia Flexible Rent Subsidy Pilot Program.
B. Cleveland Housing Court	1) The Court has been proactive in imposing two eviction moratoria, through 6/15/20. We suggest the Court consider a further step and apply the CARES Act timeline for all evictions (including non-federally supported units) - until 7/25/20. The CARES Act also requires a 30 day notice which cannot be served until after 7/25/20, effectively preventing eviction proceedings until after 8/25/20. Exceptions should be made for unlawful activity, nuisance activity, evictions to protect victims of domestic violence, and non-COVID related non-payment or damage complaints.
	2) In the case of federally supported units covered by the CARES Act, since tenants being evicted may not know whether their unit is protected, require all landlords to disclose federally backed mortgages or other federal support, if known.

<sup>&</sup>lt;sup>5</sup> Ibid.

3) Establish a court rule requiring pre-filing mediation in eviction cases.

4) Use the court's inherent equity powers to prevent a landlord from being granted an eviction while refusing to accept payment in full from a government or non-profit entity.

5) In an eviction for non-payment of rent, use the court's inherent equity powers to prevent a landlord from recovering additional late fees/penalties/interest when the lateness is due to a documented COVID-19 hardship.

6) Make standard the expectation that mediated settlement agreements will include provisions providing that any previous paid arrearages arising from COVID-related hardship will not constitute grounds for non-renewal of an oral or written lease.

7) Use the Court's equity jurisdiction to ensure that landlords a) do not discriminate against tenants without arrearages due to a change in the tenants' source of income, and b) do not use source of income to deny the renewal of a lease.

### 5. What Suburbs Can Do:

Who	What
A. Suburban Mayors	1) Encourage suburban municipal courts to use their equity jurisdiction in eviction actions in a substantially similar manner to the recommendations to the Cleveland Municipal Court (4. B. above) to ensure uniform standards across the region, and to facilitate the provision of clear information and expectations to both tenants and landlords
	2) Advocate at the county, state, and federal level for emergency rental assistance (see state and federal recommendations above).
	3) Utilize municipal staff to reach out to residents suffering a COVID-19 hardship to inform them of available resources.
	<ol> <li>Work with the County's Delinquent Tax Outreach</li> <li>Department to help provide early intervention to residents</li> </ol>

with delinquent property taxes.

B. Suburban Courts
 1) Use their equity jurisdiction in eviction actions in a manner substantially similar to the recommendations to the Cleveland Municipal Court (4. B. above) to ensure uniform standards across the region, and to facilitate the provision of clear information and expectations to both tenants and landlords.

### 6. What Private Industry & Philanthropy Can Do:

Who	What
A. Banks, Mortgage Lenders and Mortgage Servicers	1) Fannie Mae and Freddie Mac are offering moratoria on foreclosure for 60 days with a 12-month loan forbearance on loans that are federally-backed. Banks, mortgage lenders and mortgage servicers should match this offer on <u>non</u> -federally backed mortgage loans.
	2) If a bank, mortgage lender or mortgage servicer is offering a deferral of payments or forbearance for a period of time, the term of the loan should be extended for an equal period of time to avoid a balloon payment coming due at the end of the deferral or forbearance.
	3) Fannie Mae and Freddie Mac are offering up to four 12- month forbearance periods on federally-backed loans. Banks, mortgage lenders and mortgage servicers should provide the same offer on <u>non</u> -federally backed loans.
B. Philanthropy	1) Utilize existing eviction prevention infrastructure to fund a rental assistance pool for County residents who are 80%-120% AMI. Utilized as a shallow rent subsidy by residents impacted by COVID-19 that caused unemployment or reduction in household income after March 1, 2020.
7. All Levels:	
Who	What
A. All elected and appointed officials, government staff at all levels.	<ol> <li>Maintain a high level of awareness about the availability of resources for Ohioans and commit to support additional funding and timely distribution of those resources.</li> </ol>
	2) Develop a public advertising campaign to: (1) disseminate

accurate information regarding Ohioans' financial obligations

during and after the crisis; and (2) point Ohioans in the direction of crisis-response resources.

## **Conclusion**

This situation is evolving at a rapid rate with new data informing decision-making at all times. It will be important to continue to collect and analyze crucial information around housing trends that will directly impact people unable to pay rent or a mortgage due to unemployment. Every emergency requires a nuanced response and the impacts of this pandemic (both short-term and long-term) are difficult to anticipate with certainty at this time. However, history demonstrates time and again that those most vulnerable in times of economic and social stability generally suffer the greatest in times of turmoil. To prevent vacancy, loss of generational wealth and neighborhood destabilization, intervention is needed immediately. The economic and health consequences will be staggering if residents and businesses do not receive needed resources and relief.

The Vacant and Abandoned Property Action Council (VAPAC) is a monthly forum for discussing issues and solutions related to housing vacancy and community de-stabilization in Cuyahoga County. VAPAC has been meeting regularly since 2005.

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