
HUNTINGTON, WEST VIRGINIA

800 Fifth Avenue, P.O. Box 1659, Huntington, WV 25717

FY 2011 Update to the Analysis of Impediments to Fair Housing Choice

*For Submission to HUD for the
Community Development Block Grant and
HOME Investment Partnership Programs*

Kim Wolfe,
Honorable Mayor

City Council:
James Ritter
Teresa Loudermilk
Frances Jackson
Nate Randolph
Sandra Clements
Mark Bates
Scott Caserta
Russell Houck
Jim Insko
Steve Williams
Rebecca Thacker



212 East Seventh Avenue
Homestead, PA 15120





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Executive Summary

The City of Huntington, West Virginia is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG), the HOME Investment Partnerships Program (HOME), and the Emergency Shelter Grant Program (ESG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to "affirmatively further fair housing," each entitlement community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice. The HUD Fair Housing and Equal Opportunity (FHEO) Office is now advising federal entitlement communities to update their Analysis of Impediments to Fair Housing Choice when the Five Year Consolidated Plans are completed, and then every five (5) years thereafter.

The City of Huntington prepared an Analysis of Impediments to Fair Housing Choice in 1996 and updates in 2004 and 2008. The City has prepared this 2011 Update to the Analysis of Impediments to Fair Housing Choice to bring the City into sequence with its FY 2010-2014 Five Year Consolidated Plan. This analysis focuses on the status and interaction of six (6) fundamental conditions within the City of Huntington:

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

The Fair Housing Act prohibits discrimination against persons based on their **race, color, religion, sex, national origin, disability, or familial status** in the sale, rental, and financing of housing. This Analysis of Impediments seeks to identify any discrimination that may occur in the City of Huntington which consequently could limit housing choice.

The methodology employed to undertake this Analysis of Impediments included:

- **Research**
 - A review of the City's Zoning Ordinance, Comprehensive Plan, land use policies and procedures was undertaken, including the FY 2010-2014 Five Year Consolidated Plan, FY 2010 Annual Action Plan, FY 2011 Annual Action Plan, FY 2008 Analysis of Impediments to Fair Housing Choice, and FY 2009 Consolidated Annual Performance Evaluation Report.
 - A review of the Huntington Housing Authority's Admission Requirements Summary for Public Housing Program and Section 8 Rental Assistance Program, Equal Housing Opportunity Policy Statement, Fair Housing Policies, Admissions and Continued Occupancy Policy, Section 8 Rental Assistance Program – Landlord Packet, and Reasonable Accommodations Policy.
 - Demographic data for the City was analyzed from the U.S. Census, the HUD-CHAS data and tables, and HMDA data.
 - A review of the real estate and mortgage practices was undertaken.

- **Interviews & Meetings**
 - Meetings and/or interviews were conducted with the Huntington Housing Authority (HHA) and Housing Development Corporation (HDC), Mountain State Center for Independent Living (MTSTCIL), community and social service/advocacy agencies for the disabled, housing providers, the Huntington Human Relations Commission (HHRC), the West Virginia Human Relations Commission, and city staff members.
 - Surveys were sent to the Huntington Housing Authority, community and social service agencies, banks, and the Huntington Board of Realtors. Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.
 - Resident surveys were distributed to over 35,000 households in the City of Huntington as an insert in a weekly newspaper. This newspaper is distributed to every household free of charge.

- **Analysis of Data**
 - Low- and moderate-income areas were identified.
 - Concentrations of minority populations were identified.
 - Fair housing awareness in the community was evaluated.
 - Distribution of public and assisted housing units was analyzed.
 - The location of CDBG expenditures throughout the City was analyzed.



- The location of HOME expenditures throughout the City was analyzed.
- **Potential Impediments**
 - Public sector policies that may be viewed as impediments were analyzed.
 - Private sector policies that may be viewed as impediments were analyzed.
 - The status of previous impediments were analyzed.
- **Citizen Participation**
 - The draft 2011 Update to the Analysis of Impediments to Fair Housing Choice was placed on the City's website and at several locations throughout the City to gather public input on the Plan.

The City of Huntington's 2011 Update to the City's Analysis of Impediments to Fair Housing Choice has identified the following impediments, as well as defined specific goals and strategies to address each impediment.

- **Impediment 1: Housing Affordability** – There is a lack of affordable housing, outside areas of low/mod concentration, that is decent, safe, and sound, which limits the choices of neighborhoods that a low/mod income household can afford, which makes it a fair housing concern.

Goal: Increase the supply of decent, safe, and sound housing that is affordable to lower income households, both renters and owner occupants, outside areas of low/mod concentration.

The strategies to meet this goal include:

- **1-A:** Provide funds for new rental housing and increase the availability of affordable housing units to reduce the number of LMI households waiting for public housing and rental assistance.
- **1-B:** Increase the supply of available decent, safe, sound, and affordable housing through rehabilitation assistance, new construction, and the transfer of surplus city-owned properties for LMI housing initiatives.
- **1-C:** Increase homeownership opportunities for LMI households by providing housing counseling, credit counseling, and downpayment assistance.
- **1-D:** Maintain an effective property maintenance inspection and enforcement program to prevent deterioration of the City's housing stock.

- **Impediment 2: Fair Housing, Education, Advocacy, Monitoring, and Enforcement** – There is a lack of knowledge and awareness on the part of tenants and landlords of their rights and responsibilities under the Fair Housing Act and a need to continually monitor and enforce the Fair Housing Act.

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

The strategies to meet this goal include:

- **2-A:** Provide funds and strengthen the delivery of public education and targeted training and programs concerning the rights and responsibilities ensured by the Fair Housing Act.
 - **2-B:** Support the designation and funding of an independent FHIP organization to replace the Huntington Human Relations Commission.
 - **2-C:** Fund and strengthen the delivery of financial literacy counseling for LMI and minority households to combat predatory and subprime lending practices.
 - **2-D:** Fund and support the delivery of fair housing services to at-risk groups and victims of housing discrimination.
- **Impediment 3: Housing Accessibility** – There is a lack of accessible and visitable housing units that are affordable to low/mod income households which are physically challenged, creating a fair housing concern.

Goal: Increase the supply of decent, safe, and sound housing that is affordable and accessible to lower income households who are handicapped, for both renters and owner occupants.

The strategies to meet this goal include:

- **3-A:** Study the issues regarding accessibility to affordable housing by conducting an inventory of accessible units, determine needs for specific accessibility features in units, and develop recommendations to increase marketing of accessible units to the disabled and frail elderly renters.
- **3-B:** Assist by increasing the supply of housing that is accessible to persons with disabilities and the frail elderly by providing targeted rehabilitation assistance and ensuring that new multi-family construction meets accessibility provisions of the Fair Housing Act.



- **3-C:** Improve the accessibility to emergency shelters and transitional housing units to accommodate handicapped persons.
 - **3-D:** Increase the supply of accessible units for emergency shelters and transitional housing locations.
- **Impediment 4: Homeownership for Minorities** – There is a disproportionate number of minority homeowners compared to the high percentage of minority renter households, as compared to the high percentage of non-minority homeowners.

Goal: Increase the number of minority homeowners and thus reduce the percentage of minority households which are renters.

The strategies to meet this goal include:

- **4-A:** Develop homeownership opportunities for minorities by providing financial incentives, housing counseling and credit counseling programs.
 - **4-B:** Undertake an outreach and marketing program to inform minorities and low- and moderate-income households about homeownership opportunities in the City.
- **Impediment 5: Cost Overburden** – There is a high percentage of both owner-occupied and renter-occupied households whose housing costs exceed 30% of their total household income.

Goal: Reduce the number of families whose housing costs exceed 30% or more of their total household income.

The strategies to meet this goal include:

- **5-A:** Provide housing rehab financial assistance to homeowners to improve their property and to install energy cost saving measures to reduce their housing costs.
- **5-B:** Promote the development of more affordable housing for the very-low income.
- **5-C:** Provide homebuyer assistance for the purchase of existing housing by low-income homebuyers.



- **Impediment 6: Housing Complaints** – There has been an increase in the number of complaints filed with HUD-FHEO on housing discrimination based on race.

Goal: Through education, advocacy and monitoring eliminate, discrimination in the rental of housing to minorities.

The strategies to meet this goal include:

- **6-A:** Educate landlords, real estate agents, renters, and homeowners on their rights and responsibilities under the Fair Housing Act.
 - **6-B:** Assist outside independent organizations to sample and monitor patterns of discrimination.
- **Impediment 7: Age of Housing Stock** – Almost 33.6% of the existing housing units in the City were built prior to 1939 and 17.0% of the City's population is over 65 years of age, which means that many housing units are not easily made accessible and therefore, there is a lack of units that can be made accessible.

Goal: Develop new housing opportunities for persons who are elderly and physically challenged as an alternative to existing housing units to increase the supply of accessible housing.

The strategies to meet this goal include:

- **7-A:** Encourage the construction of new accessible housing units that meet the needs of the elderly and physically challenged.
- **Impediment 8: Reasonable Accommodations/Modifications** – There is a lack of responsibility on the part of landlords to make reasonable accommodations and modifications for persons who are physically challenged which is a violation of the Fair Housing Act.

Goal: Increase awareness of landlord's responsibility to make reasonable accommodations and increase the supply of accessible rental housing.

The strategies to meet this goal include:

- **8-A:** Strengthen the delivery of public education and training programs concerning the rights and responsibilities ensured by the Fair Housing Act.
- **8-B:** Provide funds and incentives to assist landlords in making reasonable accommodation/modifications which are necessary to make their properties accessible.



- **Impediment 9: Public Policies** – The City of Huntington regulates land use through its Zoning Ordinance and Building Codes. Some of these policies are outdated and may be too restrictive as they are currently written.

Goal: Update the City's Zoning Ordinance, and the City's policies and procedures to comply with the Fair Housing Act.

The strategies to meet this goal include:

- **9-A:** The City will review the City's Zoning Ordinance and codes for compliance with the Fair Housing Act, as amended.
- **9-B:** The City will amend its Zoning Ordinance in accordance with, and makes reference to, the Fair Housing Act, the Americans with Disabilities Act, and other Federal and State laws.
- **9-C:** The City will review its policies and procedures in regard to land use regulation in order to bring them into compliance with Federal and State laws.



I. Introduction

The City of Huntington is an entitlement community under the U.S. Department of Housing and Urban Development's Community Development Block Grant Program (CDBG), the HOME Investment Partnerships Program (HOME), and the Emergency Shelter Grant Program (ESG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to "affirmatively further fair housing" the community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice. The HUD Fair Housing and Equal Opportunity (FHEO) Office is now advising federal entitlement communities to update their Analysis of Impediments to Fair Housing Choice when the Five Year Consolidated Plans are completed, and then every five (5) years thereafter.

HUD defines "fair housing choice" as:

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

The Fair Housing Analysis consists of the following six (6) conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
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The City of Huntington prepared an Analysis of Impediments to Fair Housing Choice in February 1996, and updates in 2004 and 2008. This 2011 Update to the Analysis of Impediments to Fair Housing Choice will outline progress that has been made since the previous Analysis of Impediments in June 2008, explore the continuation of these impediments where necessary, and identify any new impediments to fair housing



choice. Furthermore, this Analysis of Impediments will bring the City into the same time sequence as the City's FY 2010-2014 Five Year Consolidated Plan. The document is designed to act as a planning tool, providing the City of Huntington with the necessary framework to strategically reduce the identified impediments to fair housing choice over the next five (5) years.

II. Background Data

In order to perform an analysis of fair housing in the City of Huntington, the demographic and socio-economic characteristics of the City were evaluated as a basis for determining and identifying any existing impediments to fair housing choice.

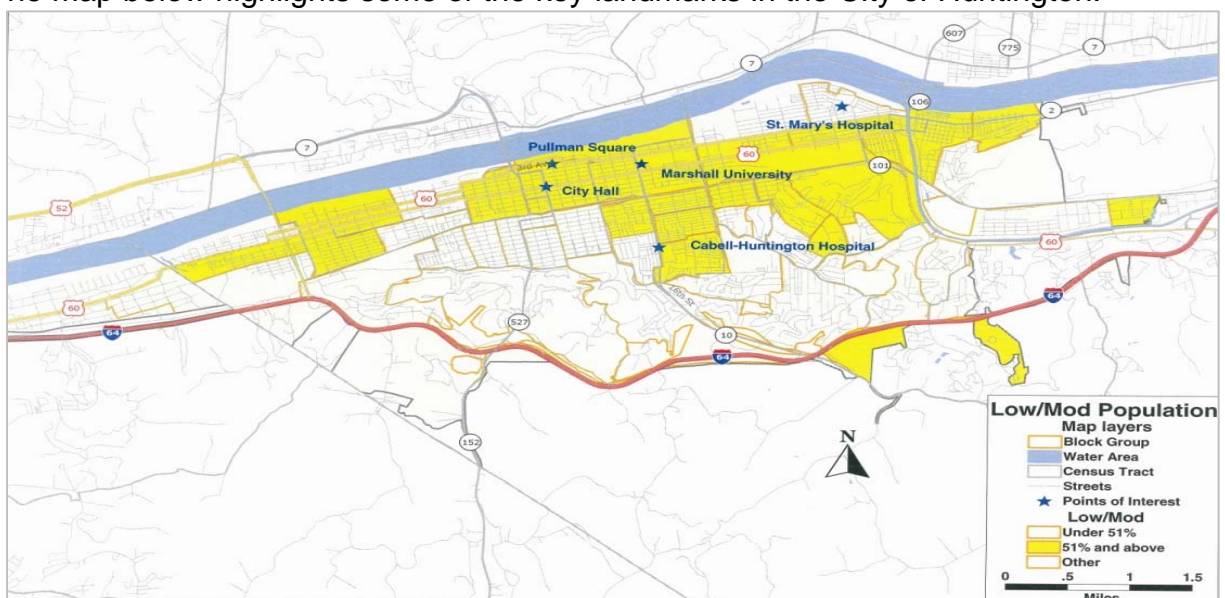


The City of Huntington is located in Cabell and Wayne Counties, West Virginia. The majority of the City is in Cabell County and serves as the County seat. It is the home of Marshall University. Huntington is the second largest city in the State of West Virginia, with slightly less population than the state capital of Charleston.

The City of Huntington was founded in 1870 and incorporated in 1871. The strength of the coal industry and manufacturing in the City led it to its population peak of approximately 100,000 residents in the 1950s.

The 2000 U.S. Census is the most recently complete set of data available by census tract and block group. However, as a result of the 2010 Census, the 2005-2009 American Community Survey offers the most recent estimates of general the demographics of the City of Huntington. This Census data, along with other databases such as the CHAS Data, have been used to evaluate the City of Huntington’s demographic and socio-economic characteristics, as well as other conditions affecting fair housing choice.

The map below highlights some of the key landmarks in the City of Huntington.



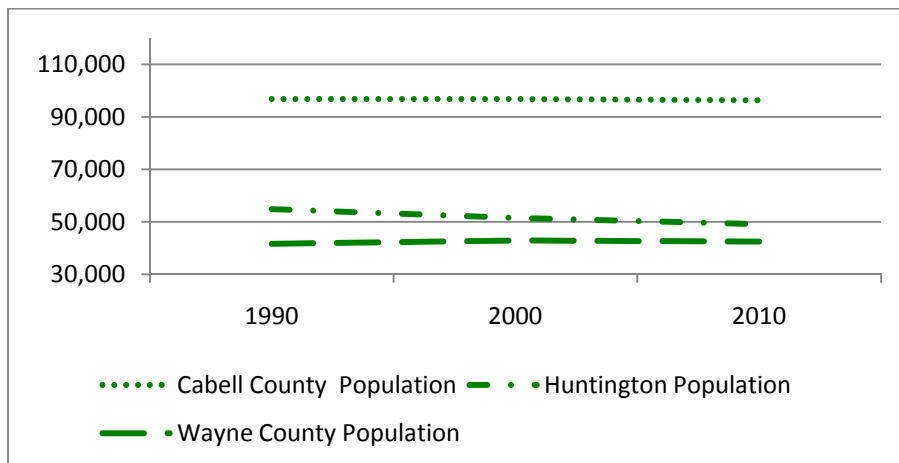


Appendix A of this report contains extensive demographic data that is summarized and/or illustrated in the following sections. Appendix B of this report includes maps of the presented data.

A. Population, Race, and Ethnicity:

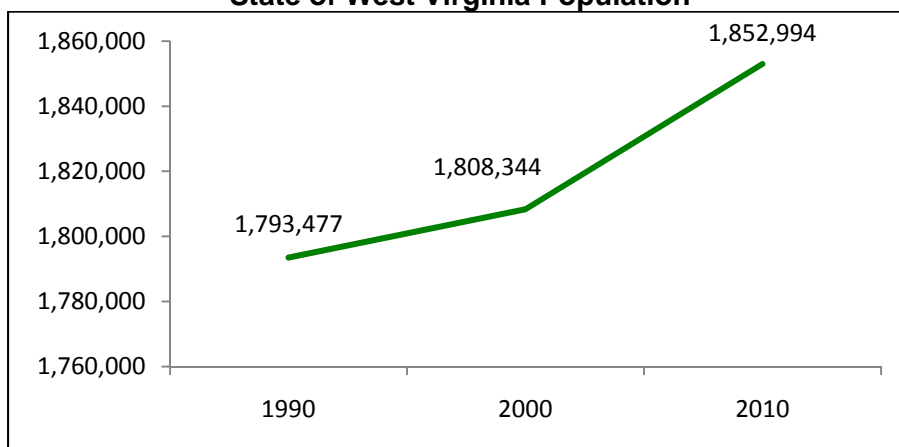
The City of Huntington has experienced an overall decrease in population in recent years. The charts below illustrate the change in population in the City of Huntington, Cabell County, Wayne County, and the State of West Virginia since 1990.

Huntington, Cabell County, and Wayne County Populations



Source: 1990, 2000, 2010 U.S. Census

State of West Virginia Population



Source: 1990, 2000, 2010 U.S. Census

While the City of Huntington has seen a decrease in population over the last two decades, Cabell County has maintained a fairly steady population, and Wayne County actually saw a slight influx of residents between 1990 and 2000. The State of West Virginia has had steady population growth since 1990.



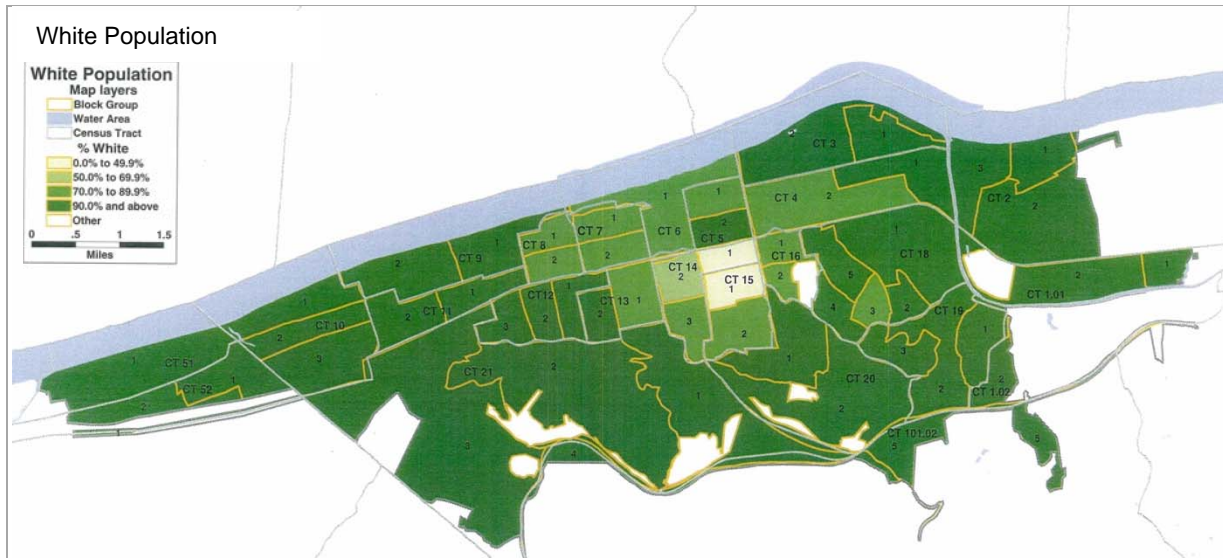
The City of Huntington’s population is comprised largely of white individuals (88.0%). The second most common racial group in the City is black or African American individuals (8.1%). The table below outlines the estimated racial composition of residents of the City of Huntington, Cabell County, Wayne County, and West Virginia at the time of the 2000 and 2010 U.S. Census.

Race Statistics

Race	City of Huntington		Cabell County		Wayne County		State of West Virginia	
	2000	2010	2000	2010	2000	2010	2000	2010
Total	100%	100%	100%	100%	100%	100%	100%	100%
One Race	98.5%	97.3%	98.9%	98.0%	99.4%	99.2%	99.1%	98.5%
White	89.6%	86.9%	93.4%	91.6%	98.8%	98.6%	95.0%	93.9%
Black or African American	7.5%	8.6%	4.3%	5.0%	0.1%	0.2%	3.2%	3.4%
American Indian and Alaska Native	0.2%	0.3%	0.2%	0.2%	0.2%	0.3%	0.2%	0.2%
Asian	0.8%	1.1%	0.8%	1.0%	0.2%	0.2%	0.5%	0.7%
Native Hawaiian and Other Pacific Islander	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Some other Race	0.3%	0.4%	0.2%	0.3%	0.1%	0.1%	0.2%	0.3%
Two or More Races	1.5%	2.7%	1.1%	2.0%	0.6%	0.8%	0.9%	1.5%

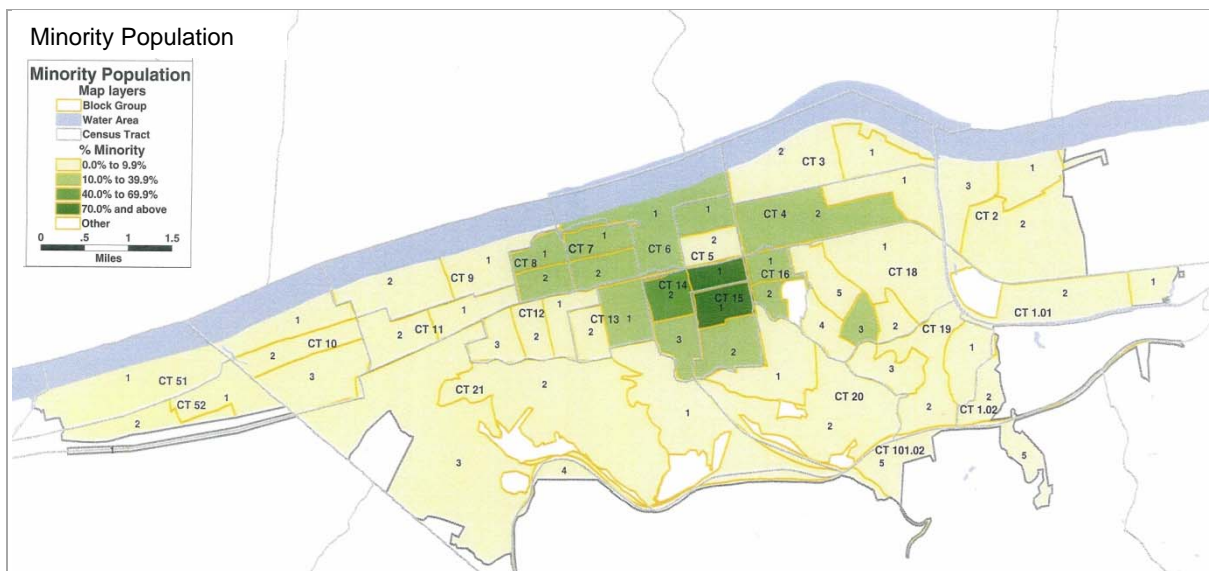
Source: 2000, 2010 U.S. Census

The maps below highlight the distribution of racial groups in the City by block group at the time of the 2000 U.S. Census. The darker the shade of green in each block group, the higher the concentration of the population group. Full sized maps can be found in Appendix B. The City of Huntington has seen a slight increase in minority population and decrease in the white population since the 2000 U.S. Census. In the maps below, the highest concentrations are illustrated with the darkest shade of green. The lowest concentrations are represented by the light yellow. The City has a large white population that is fairly evenly distributed across the City. The lowest percentages of white population are in the central part of the City.



Source: 2000 U.S. Census

The City of Huntington does not have a very large minority population (10.4%). For the most part, the minority population in the City of Huntington is concentrated in the central part of the City as illustrated by the darkly shaded block groups on the map below.



Source: 2000 U.S. Census

The racial demographics are likely compounded by the presence of the Carter G. Woodson Apartments, Washington Square Apartments, Northcott Court Apartments, and Fairfield Tower Apartments constructed by the Housing Authority between 1940 and 1995. In fact, the two block groups in the City that have the highest concentration of minority residents contain two of the largest public housing developments, increasing the concentration of minorities. More recently, the Huntington Housing Authority has made efforts to reduce the concentration of the minority population by supporting efforts to develop affordable housing outside of the areas of minority concentration.



The table below highlights the ethnicities of Huntington residents at the time of the 2000 U.S. Census and the estimation from the 2005-2009 American Community Survey.

Ethnicity and Ancestry

Ancestry	2000 U.S. Census		2005-2009 American Community Survey	
	Number	Percent	Number	Percent
Total Population	51,529	100%	49,285	--
Total Ancestries Reported	41,016	79.6%	--	--
American	7,194	14.0%	4,696	9.5%
Arab	245	0.5%	293	0.6%
Czech	81	0.2%	67	0.1%
Danish	60	0.1%	52	0.1%
Dutch	950	1.8%	754	1.5%
English	5,628	10.9%	7,676	15.6%
French (except Basque)	825	1.6%	752	1.5%
French Canadian	70	0.1%	56	0.1%
German	5,670	11.0%	7,320	14.9%
Greek	270	0.5%	196	0.4%
Hungarian	229	0.4%	162	0.3%
Irish	6,063	11.8%	8,505	17.3%
Italian	1,238	2.4%	2,041	4.1%
Lithuanian	12	0.0%	31	0.1%
Norwegian	258	0.5%	139	0.3%
Polish	530	1.0%	487	1.0%
Portuguese	0	0.0%	22	0.0%
Russian	139	0.3%	318	0.6%
Scotch-Irish	1,543	3.0%	1,728	3.5%
Scottish	1,190	2.3%	1,014	2.1%
Slovak	8	0.0%	23	0.0%
Sub-Saharan African	70	0.1%	139	0.3%
Swedish	123	0.2%	209	0.4%
Swiss	70	0.1%	27	0.1%
Ukrainian	19	0.0%	71	0.1%
Welsh	402	0.8%	451	0.9%
West Indian (excluding Hispanic groups)	54	0.1%	56	0.1%
Other ancestries	8,075	15.7%	--	--

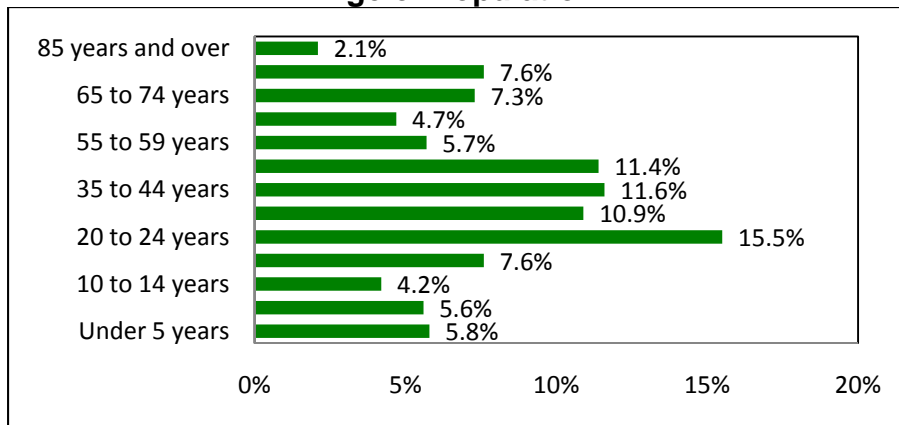
Source: 2000 U.S. Census, 2005-2009 American Community Survey



There has been relatively little change in the presumed ethnic composition of the City of Huntington. The most common ethnicities remain, for the most part, at the same proportion during the 2005-2009 American Community Survey as at the time of the 2000 U.S. Census. American, English, German, and Irish are the most common ethnicities in the City.

The following chart highlights the age range of residents in the City of Huntington according to the 2005-2009 American Community Survey. The median age in the City according to the 2005-2009 American Community Survey is 35.4 years old. This is a decrease from the 2000 median age of 36.7 years old. The U.S. Census estimates that seventeen percent (17.0%) of the City’s population is 65 or older, which is illustrated on the following map showing the distribution of the aging population across the City.

Age of Population

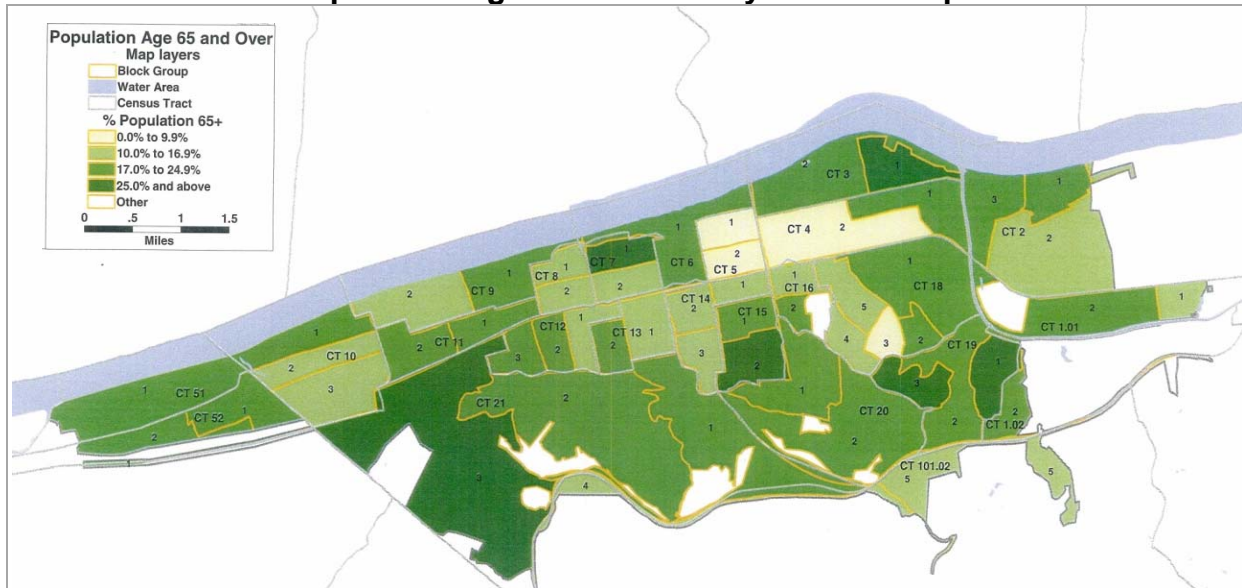


Source: 2005-2009 American Community Survey

The median age of the population in the City of Huntington is lower than the median age for Cabell County (37.7 years), Wayne County (39.9 years), and the State of West Virginia (40.4 years). However, a considerable portion of the City’s population is over the age of 65, and other recent reports indicate that the median age of the City will increase as the “Baby Boomer’s” age. There is an anticipated need for housing and supportive services for the aging population.

The map below shows the distribution of the population age 65 and over throughout the City. Again, the darkest shade of green shows the highest concentration of persons age 65 and over. Overall, the elderly population is fairly evenly distributed across the City, with the exception of a few block groups near the northeast portion of the City that have a very low percentage of elderly persons. A full size copy of this map can be found in Appendix B.

Population Age 65 and Over by Block Group



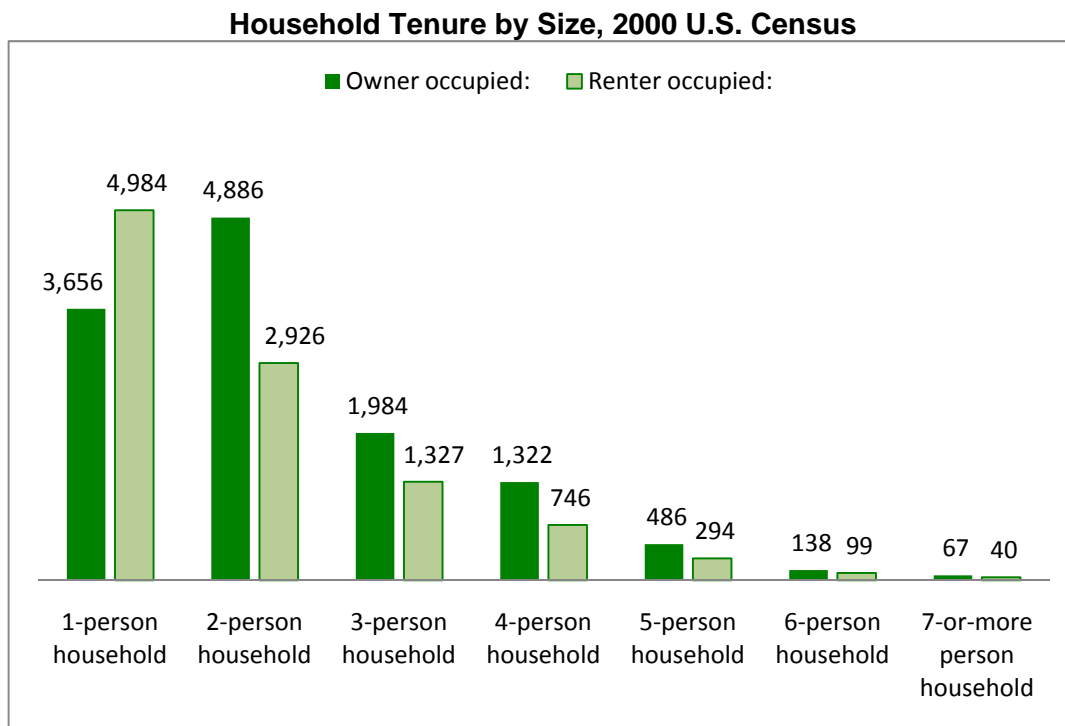
Source: 2000 U.S. Census

B. Households:

Household Tenure

According to the 2000 U.S. Census, there were 22,955 households in the City of Huntington. Of these households, 54.6% were owner occupied and 45.4% were renter occupied. The 2005-2009 American Community Survey estimates that number of households decreased to 21,847, the percentage of owner-occupied units had decreased to 53.7% and the percentage of renter-occupied units had increased to 46.3%.

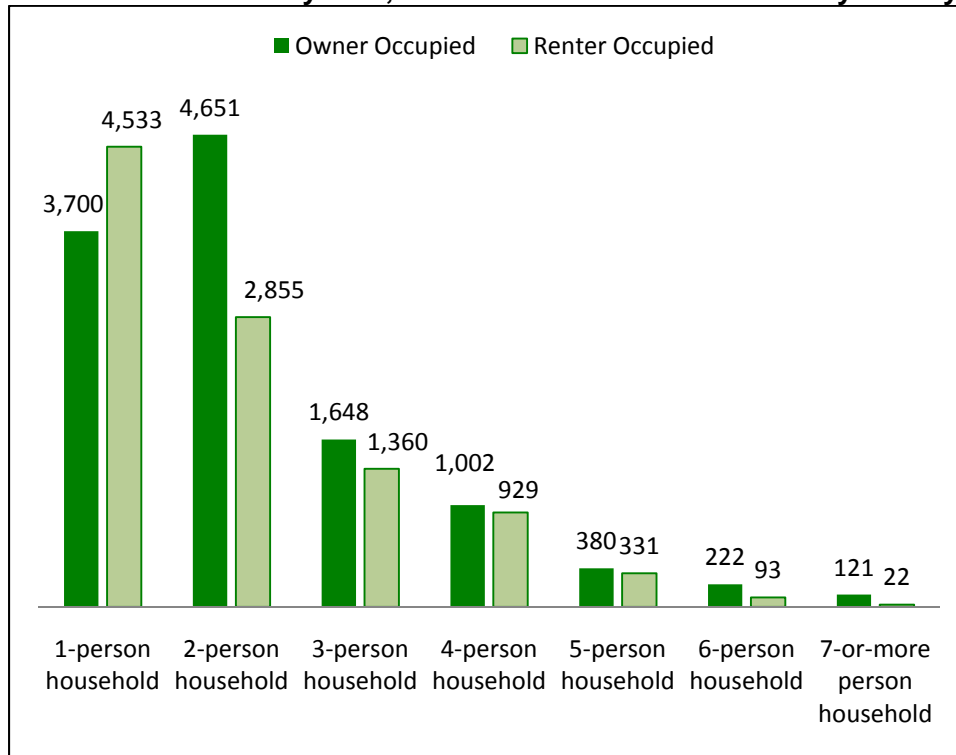
The following charts show the housing tenure by size as determined by the 2000 U.S. Census and the 2005-2009 American Community Survey.



Source: 2005-2009 American Community Survey

At the time of the 2000 U.S. Census, the number of owner occupied households exceeded the number of renter occupied households in every size category except for single person households. The number of owner-occupied households increases from one- to two-person households, and then decreases drastically. The number of renter occupied households experiences a sharp decline in the first three size categories. There is a slight difference between the number of renter- and owner-occupied households that have seven or more people.

Household Tenure by Size, 2005-2009 American Community Survey



Source: 2005-2009 American Community Survey

Many of the same trends existed during the 2005-2009 American Community Survey as at the time of the 2000 U.S. Census. The number of single-person renter-occupied households exceeds the number of owner-occupied households. The number of renter-occupied households decreased between single and double occupancy, while the number of two-person owner-occupied units exceeds the number of single-person units.

For the most part, housing units are spread across the City, with a few areas of concentration. The southern portion of the City has a low percentage of renter-occupied housing units and a high percentage of owner-occupied units. The northern portion of the City has a high percentage of renter-occupied housing units and a low percentage of owner-occupied units. The northern portion of the City, along the river, is the oldest developed portion of the City. The newer developments in the City, comprising of mostly single family detached houses were built in the southern portion of the City after 1950. Appendix B includes maps of the total number of housing units by block group in the City of Huntington. Additionally, maps showing household tenure by block group are also included in Appendix B.

The table below compares household tenure by race in 2000 and at the time of the 2005-2009 American Community Survey. White households comprise 88.3% of all households, but represent 93.5% of homeowner occupied households and only 82.3% of renter households. On the other hand, Black or African American households comprise only 5.1% of the total homeowners and 13.1% of the renter households.



Household Tenure by Race

Cohort	2000 U.S. Census		2005-2009 American Community Survey	
	Owner (54.6%)	Renter (45.4%)	Owner (53.7%)	Renter (46.3%)
Householder who is White alone	11,742	9,082	10,959	8,333
Householder who is Black or African American alone	635	964	596	1,329
Householder who is American Indian and Alaska Native alone	21	24	7	39
Householder who is Asian alone	51	141	74	183
Householder who is Native Hawaiian and Other Pacific Islander alone	0	3	0	0
Householder who is some other race alone	14	36	23	45
Householder who is two or more races	76	166	65	194

Source: 2000 U.S. Census, 2005-2009 American Community Survey

The chart illustrates the breakdown of household tenure by race at the time of the 2000 U.S. Census and according to the estimates of the 2005-2009 American Community Survey.

HUD Assisted Housing

Low Income Housing Tax Credit (LIHTC) projects and other HUD assisted housing developments are spread across the middle of the City. Most are located in areas that are low-income or have higher minority populations, but several are located outside of these areas, as well. Section 8 Voucher use is distributed across the City in areas of all income ranges, racial compositions, and housing tenure. Maps highlighting the LIHTC locations, HUD Assisted Housing locations, and Section 8 Voucher use across the City can be found below and in Appendix B. Cabell County Community Services Organization, Inc. (CCCSO) is preparing a Section 202 Supportive Housing for the Elderly for a project located in the City of Huntington. In addition, Wayne County Community Services Organization, Inc. (WCCSO) is preparing a Section 202 Supportive Housing for the Elderly in Wayne County. At this time there are no known proposed Section 811 Applications for Supportive Housing for the Disabled in the City. Below is a listing of the HUD Assisted Housing developments in the City of Huntington.

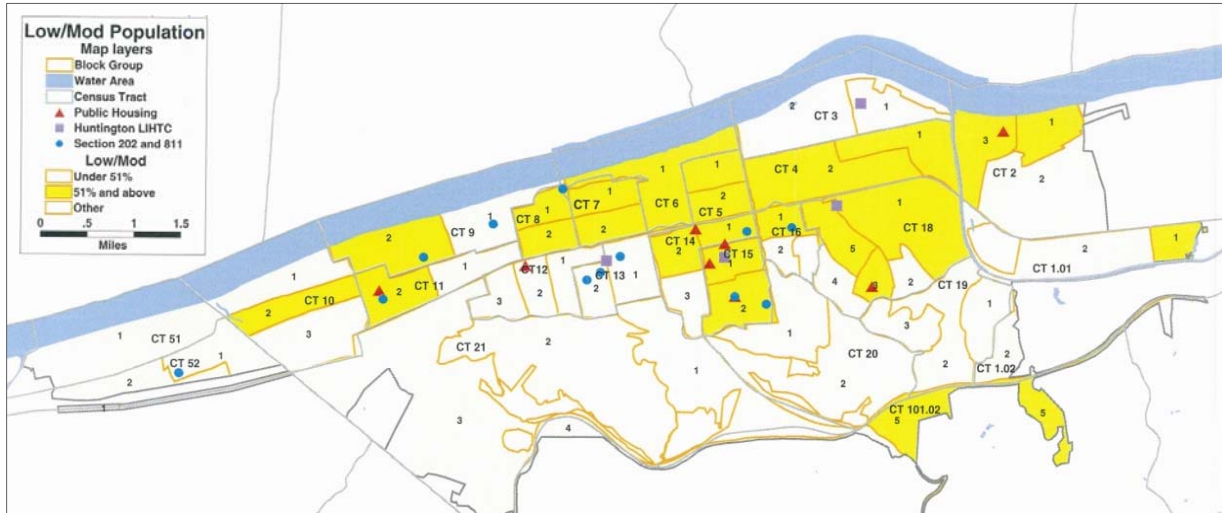
HUD Assisted Housing Units

Development	Housing Type	Total Number of Units:	Total Low-Income Units:
The Fairfield Apartments	Section 202 Supportive Housing	17	17
Eden Park Apartments	Section 202 Supportive Housing	20	20



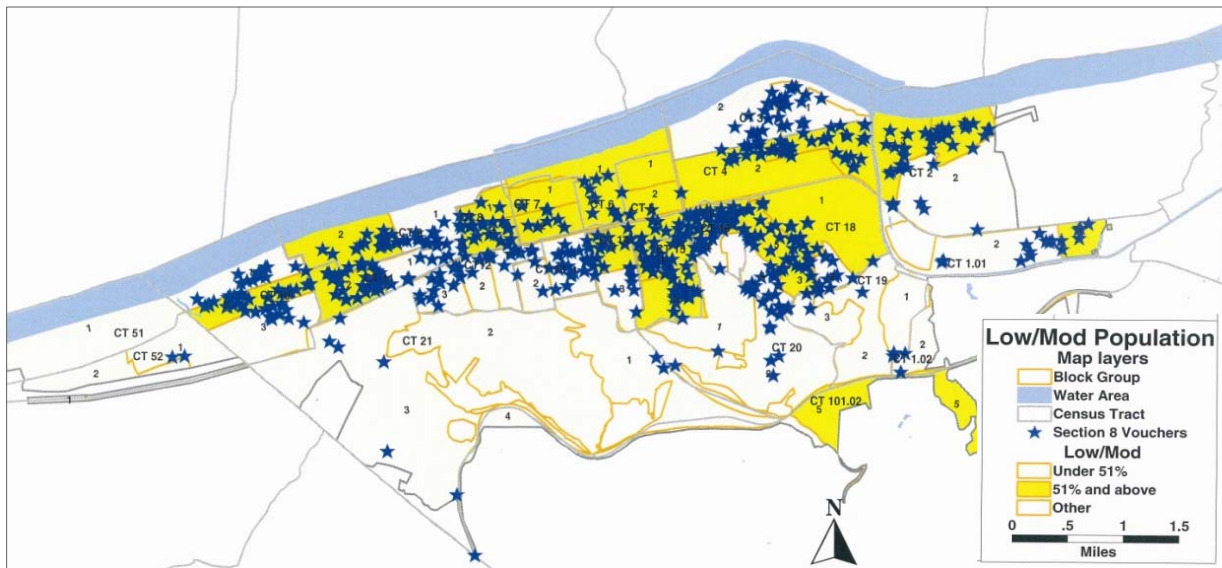
Our Place/Westmoreland Apartments	Section 202 Supportive Housing	20	20
Westview Manor	Section 202 Supportive Housing	100	100
Evergreen	Section 202/811 Supportive Housing	19	19
GR Vale	Section 811 Supportive Housing	5	5
Washington Avenue	Section 811 Supportive Housing	10	10
Oak Tree	Section 811 Supportive Housing	12	12
Mary Woelfel	Section 811 Supportive Housing	6	6
Green Gables of Huntington	Section 811 Supportive Housing	4	4
Green Gables of Huntington	Section 811 Supportive Housing	4	4
Green Gables of Huntington	Section 811 Supportive Housing	4	4
Ashley Place	Low-Income Housing Tax Credit	1	1
Simms School Apartments	Low-Income Housing Tax Credit	20	20
Pine Valley Apartments	Low-Income Housing Tax Credit	18	18
Dunhill Apartments	Low-Income Housing Tax Credit	32	32
Huntington High Renaissance	Low-Income Housing Tax Credit	42	42
The Hamlets	Low-Income Housing Tax Credit	50	50
The Parks	Low-Income Housing Tax Credit	50	50
Glenbrier Apartments	Low-Income Housing Tax Credit	81	80
Artisan Heights	Low-Income Housing Tax Credit	22	22
Washington Square	Public Housing - Family	79	79
Northcott Court	Public Housing - Family	126	126
Marcum Terrace	Public Housing - Family	280	280
Fairfield Tower	Public Housing - Senior	84	84
Riverview East	Public Housing - Senior	60	60
Madison Manor	Public Housing - Senior	75	75
WK Elliott Apartments	Public Housing - Family	66	66
Trowbridge Manor	Public Housing - Senior	85	85
Dotson Courtyard	Public Housing - Family	13	13
Carter G. Woodson	Public Housing - Family	20	20
Huntington Housing Authority Family Townhouses	Public Housing	2	2
TOTAL		1,427	1,426

Locations of Low-Income Housing Tax Credit & HUD Assisted Housing



Source: 2000 U.S. Census

Locations of Section 8 Vouchers

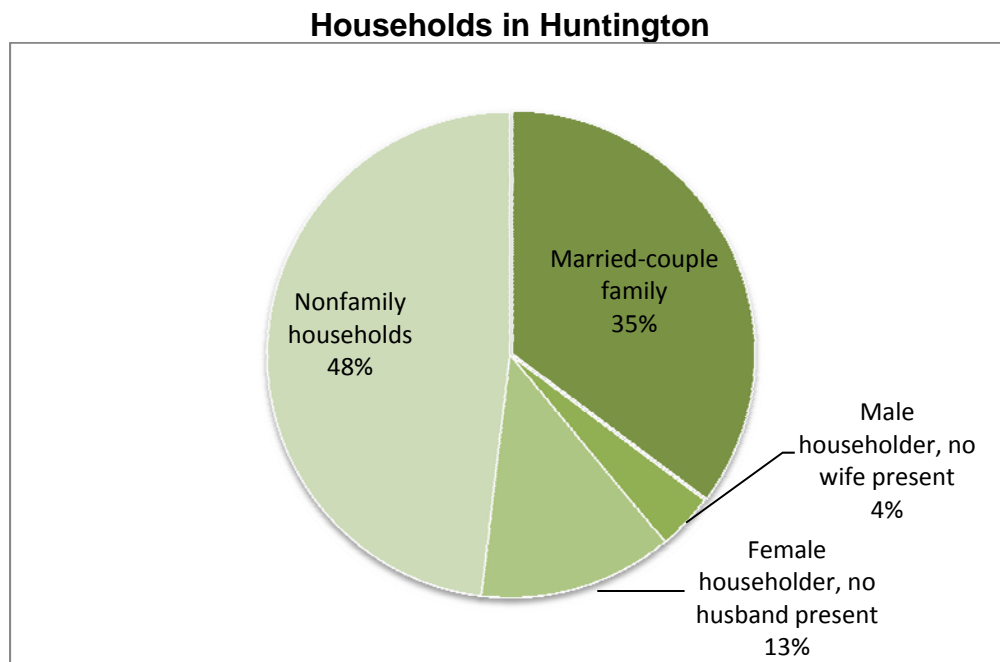


Source: 2000 U.S. Census

Families

In 2000, families comprised 53.3% of all households in the City; 20.6% of which had children under 18 years of age. At the time of the 2005-2009 American Community Survey, it was estimated that the percentage of families decreased to 51.9% of all households in the City, with 21.2% having children under the age of eighteen. This illustrates the aging in place of the households in the City. Thirteen percent (13.1%) of families were female-headed households at the time of the 2000 U.S. Census and 12.9% of families are currently female-headed households according to the 2005-2009

American Community Survey. The chart below illustrates the breakdown of households by type in the City of Huntington at the time of the 2005-2009 American Community Survey.



Source: 2005-2009 American Community Survey

Of the female-headed households in the City of Huntington at the time of the 2000 U.S. Census, 6.6% of the 3,005 female-headed households had related children under the age of 18. At the time of the 2005-2009 American Community Survey, 6.5% of the 2,809 female-headed households had related children under the age of 18. The U.S. Census Bureau has estimated that the number of female-headed households in the City of Huntington has decreased by 196 households, or 6.5%.



C. Income and Poverty:

The 2005-2009 American Community Survey reported that the median household income for the City of Huntington was \$27,181, compared to \$33,062 for Cabell County, \$34,814 for Wayne County, and \$37,356 for the State of West Virginia. The table below highlights an overview of household income at the time of the 2000 U.S. Census and the 2005-2009 American Community Survey.

Household Income

Income	2000 U.S. Census		2005-2009 American Community Survey	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	23,067	--	21,847	--
Less than \$10,000	5,276	22.9%	4,047	18.5%
\$10,000 to \$14,999	2,783	12.1%	2,153	9.9%
\$15,000 to \$24,999	3,995	17.3%	4,022	18.4%
\$25,000 to \$34,999	2,995	13.0%	3,089	14.1%
\$35,000 to \$49,999	3,051	13.2%	2,679	12.3%
\$50,000 to \$74,999	2,848	12.3%	2,797	12.8%
\$75,000 to \$99,999	1,065	4.6%	1,401	6.4%
\$100,000 to \$149,999	576	2.5%	974	4.5%
\$150,000 to \$199,999	182	0.8%	204	0.9%
\$200,000 or more	296	1.3%	481	2.2%
Median Household Income	\$23,234		\$27,181	

Source: 2000 U.S. Census, 2005-2009 American Community Survey

According to the 2005-2009 American Community Survey, the Median Household Income increased from \$23,234 in 2000 to \$27,181, meaning that 50% of households earn less than \$27,181 each year. Cabell County, Wayne County, and the State of West Virginia saw increases in Median Household Income from \$28,479 to \$33,062, \$27,352 to \$34,814, and \$29,696 to \$37,356 respectively.

The table below identifies the Section 8 Income Limits in the Huntington-Ashland, WV-KY-OH HUD Metro Fair Market Rent Area based on household size for FY 2010.



**Section 8 Income Limits for 2010,
Huntington-Ashland, WV-KY-OH MSA**

Persons	Income Category		
	Extremely Low (30%) Income Limits	Very Low (50%) Income Limits	Low (80%) Income Limits
1 Person	\$10,200	\$17,000	\$27,200
2 Persons	\$11,650	\$19,400	\$31,050
3 Persons	\$13,100	\$21,850	\$34,950
4 Persons	\$14,550	\$24,250	\$38,800
5 Persons	\$15,750	\$26,200	\$41,950
6 Persons	\$16,900	\$28,150	\$45,050
7 Persons	\$18,050	\$30,100	\$48,150
8 Persons	\$19,250	\$32,050	\$51,250

Source: HUD

The Median Family Household Income for a family of four (4) living in the Huntington-Ashland Metro Area is \$48,500 compared to a median family income of \$39,444 for the City of Huntington. This difference in median income highlights the income disparities that exist between the Metro Area and the City.

The table below highlights the current low- and moderate-income population in the City of Huntington. The block groups that have a population of 51% or more low- and moderate-income are indicated in **bold**. A full-sized map of the low- and moderate-income block groups in the City can be found in Appendix B.

Low- and Moderate-Income Population

CDBGNAME	TRACT	BLKGRP	POP100	HU100	LOWMOD	LOWMODUNIV	LOWMODPCT
City of Huntington	000101	1	326	145	225	408	55.1%
City of Huntington	000101	2	993	462	328	1,024	32.0%
City of Huntington	000102	2	505	234	67	478	14.0%
City of Huntington	000200	1	902	424	520	857	60.7%
City of Huntington	000200	2	721	340	366	730	50.1%
City of Huntington	000200	3	991	526	753	1,043	72.2%
City of Huntington	000300	1	1,406	727	569	1,422	40.0%
City of Huntington	000300	2	1,197	621	405	1,041	38.9%
City of Huntington	000400	1	1,509	807	804	1,457	55.2%
City of Huntington	000400	2	1,157	529	875	1,250	70.0%
City of Huntington	000500	1	1,540	39	28	48	58.3%
City of Huntington	000500	2	1,107	578	960	1,077	89.1%
City of Huntington	000600	1	1,756	988	1,077	1,244	86.6%
City of Huntington	000700	1	701	452	400	433	92.4%
City of Huntington	000700	2	333	273	275	424	64.9%



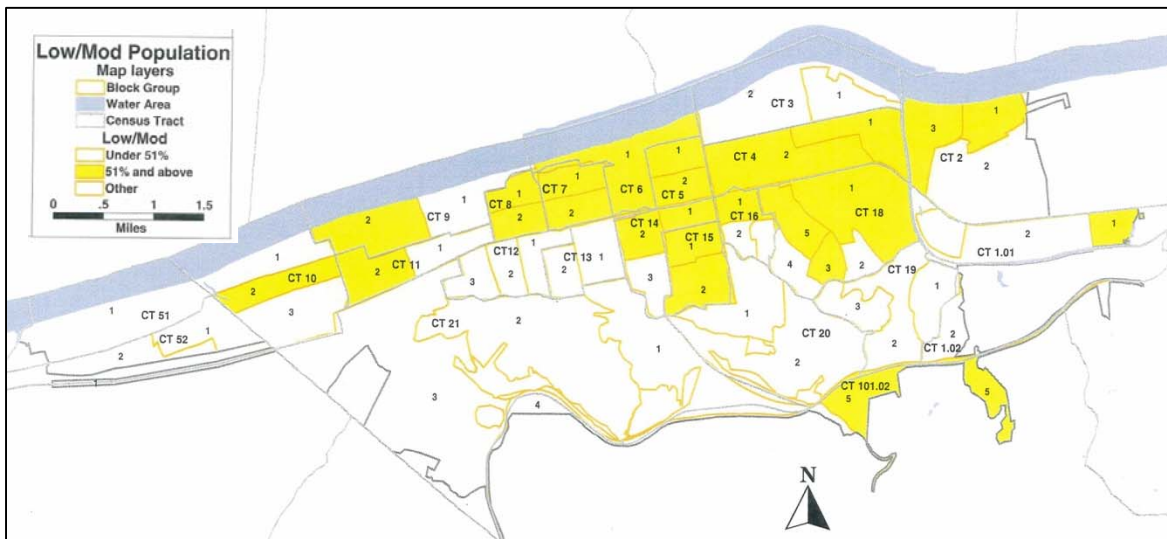
City of Huntington	000800	1	375	255	256	382	67.0%
City of Huntington	000800	2	799	526	488	753	64.8%
City of Huntington	000900	1	799	394	351	724	48.5%
City of Huntington	000900	2	1,041	582	723	1,029	70.3%
City of Huntington	001000	1	916	449	457	912	50.1%
City of Huntington	001000	2	976	501	688	966	71.2%
City of Huntington	001000	3	570	272	246	548	44.9%
City of Huntington	001100	1	759	413	380	774	49.1%
City of Huntington	001100	2	1,301	739	774	1,293	59.9%
City of Huntington	001200	1	873	423	306	982	31.2%
City of Huntington	001200	2	801	413	193	727	26.5%
City of Huntington	001200	3	1,156	602	409	1,121	36.5%
City of Huntington	001300	1	1,829	1,193	895	1,898	47.2%
City of Huntington	001300	2	926	533	278	850	32.7%
City of Huntington	001400	1	722	391	451	655	68.9%
City of Huntington	001400	2	852	511	420	811	51.8%
City of Huntington	001400	3	1,012	545	308	992	31.0%
City of Huntington	001500	1	1,123	654	748	1,203	62.2%
City of Huntington	001500	2	1,501	741	734	1,340	54.8%
City of Huntington	001600	1	808	424	483	778	62.1%
City of Huntington	001600	2	447	230	204	438	46.6%
City of Huntington	001800	1	616	300	390	623	62.6%
City of Huntington	001800	2	561	275	251	523	48.0%
City of Huntington	001800	3	932	451	717	995	72.1%
City of Huntington	001800	4	909	411	402	816	49.3%
City of Huntington	001800	5	1,109	554	729	1,081	67.4%
City of Huntington	001900	1	623	297	222	624	35.6%
City of Huntington	001900	2	919	431	189	919	20.6%
City of Huntington	001900	3	605	298	168	542	31.0%
City of Huntington	002000	1	923	424	127	938	13.5%
City of Huntington	002000	2	2,496	1,110	583	2,529	23.1%
City of Huntington	002100	1	640	306	93	635	14.6%
City of Huntington	002100	2	1,113	522	94	1,076	8.7%
City of Huntington	002100	3	1,110	526	375	1,080	34.7%
City of Huntington	005100	1	3,199	1,566	1,245	3,155	39.5%
City of Huntington	005200	2	932	454	366	954	38.4%
City of Huntington	010102	4	40	19	11	40	27.5%
City of Huntington	010102	5	15	7	17	17	100.0%
CITY OF HUNTINGTON TOTALS:			51,472	25,887	23,423	48,659	48.1%

Source: HUD

Approximately forty-eight percent of residents of the City of Huntington are considered low- and moderate-income.

The low- and moderate-income map for the City of Huntington is included in Appendix B. There are two (2) block groups in the southern portion of the City in which more than 51% of the population is low- or moderate-income, however, most of the low- and moderate-income population can be found in the northern part of the City, along the river (22 block groups). A smaller version of this map is included below.

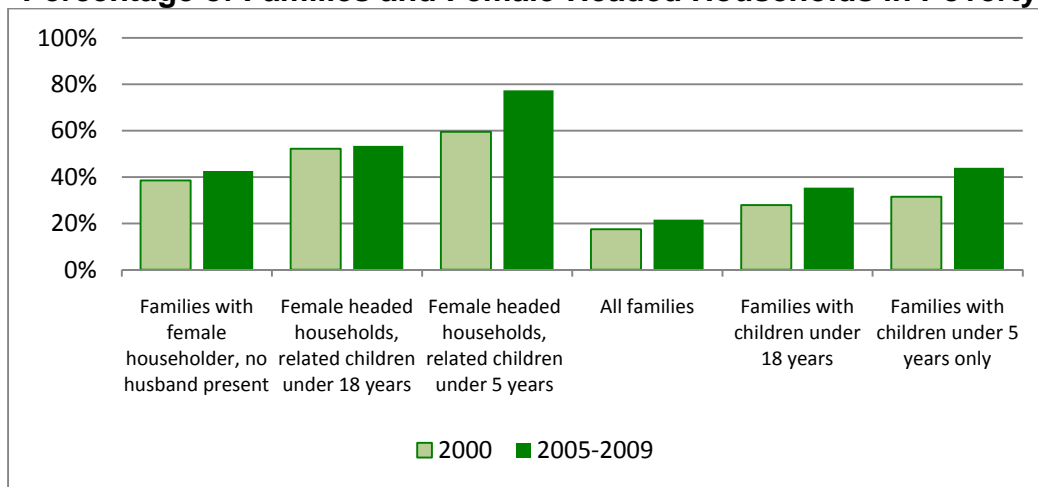
Low- and Moderate-Income Population by Block Group



Source: 2000 U.S. Census

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

Percentage of Families and Female-Headed Households in Poverty



Source: 2000 U.S. Census, 2005-2009 American Community Survey

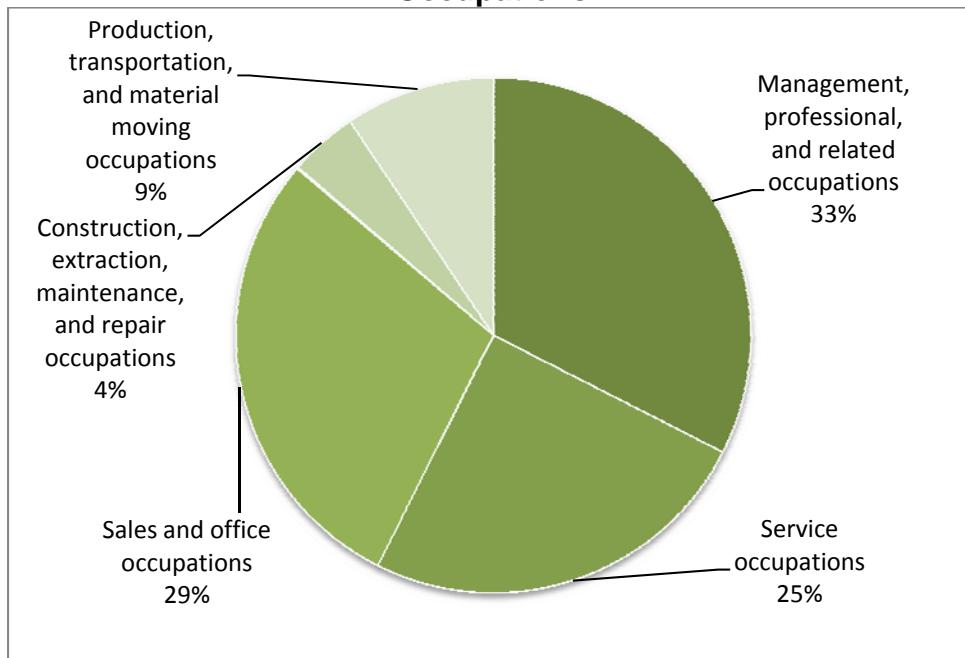


The results of the American Community Survey indicated that the City of Huntington has seen an increase in the percentage of families with children of all ages who are living in poverty. It is also estimated that the portion of female-headed households with children under the age of five who are living in poverty has also increased since the 2000 U.S. Census. Between the 2000 U.S. Census and the 2005-2009 American Community Survey, there was an increase in the percentage of households living below the poverty level. Female headed households living below the poverty level with related children under the age of five (5) saw the greatest increase.

D. Employment:

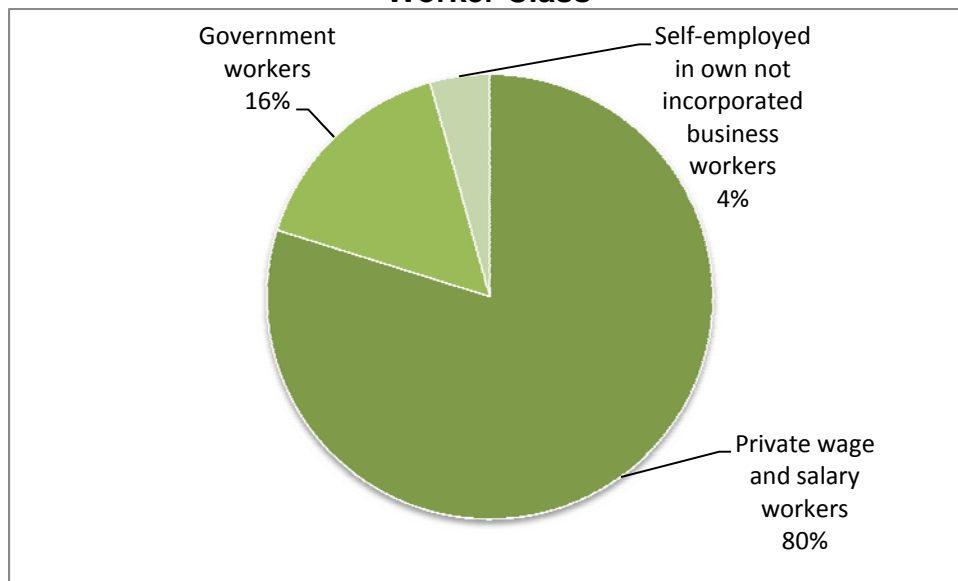
According to the 2005-2009 American Community Survey, 54.9% of the City's population age 16 and over are part of the labor force. The charts below illustrate the occupations and classes of workers in the City of Huntington. The majority of workers (88%) are in management or professional, service, or sales and office occupations.

Occupations



Source: 2005-2009 American Community Survey

Worker Class

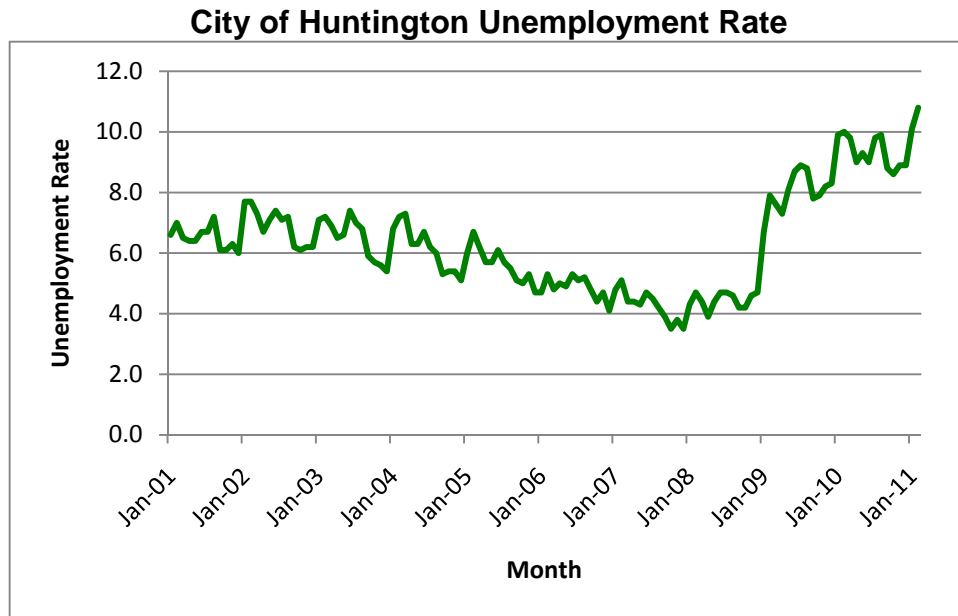


Source: 2005-2009 American Community Survey



Eighty percent (80%) of people employed in the City of Huntington are privately employed. The next most common class of workers is those employed by the government, making up sixteen percent (16%) of the employed population.

The chart below illustrates the unemployment rate trend for the City of Huntington from January 2000 to February 2011.



Source: <http://data.bls.gov>

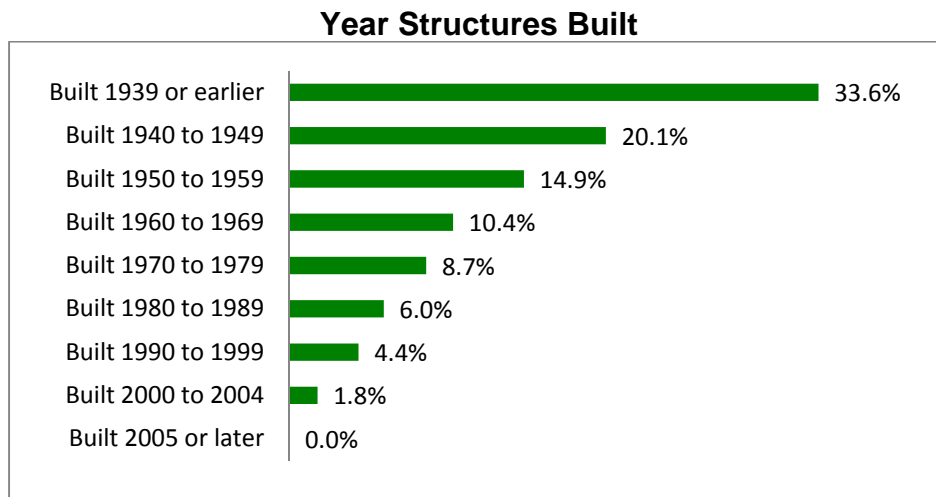
The unemployment rate in the City of Huntington was decreasing between 2005 and 2009. However, in January 2009 the City experienced an increase in the unemployment rate from 4.7% in December 2008, to 6.7% in January 2009. In February 2011, the City of Huntington had an unemployment rate of 10.8%. During this same time, the Cabell County and Wayne County had unemployment rates of 9.2% and 11.1% respectively. The State of West Virginia had an unemployment rate of 10.3%. Overall, the national unemployment trends mirror those of Huntington, with unemployment increasing sharply in January 2009.



E. Housing Profile:

Based on the 2005-2009 American Community Survey data, the City of Huntington’s housing stock can be considered “older” because 33.6% of all housing units were constructed prior to 1940, and another 35% were built between 1940 and 1959. Approximately two-thirds (68.6%) of the City’s housing stock was built prior to 1960, which is now fifty (50) years old.

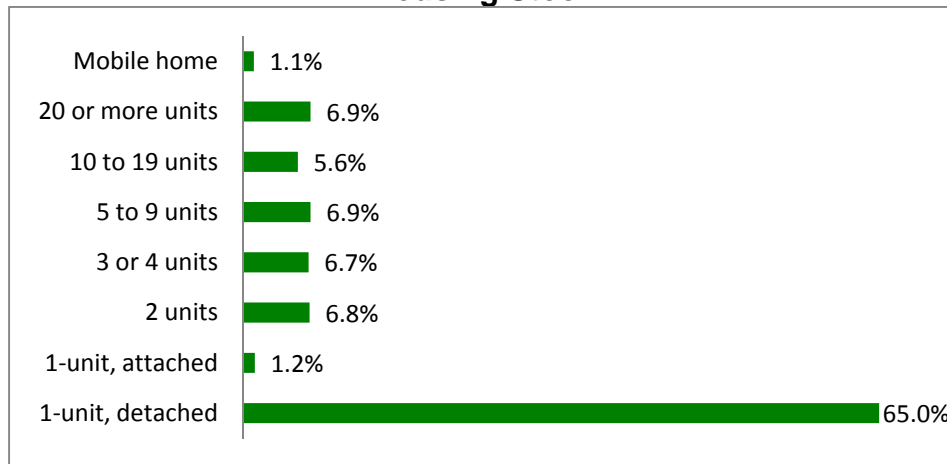
The 2005-2009 American Community Survey provides only an estimate of housing units constructed since the 2000 U.S. Census. As a result, there is some error in the percentage of housing units that have been constructed since 2000. The 2005-2009 American Community Survey estimates that 6 housing units were constructed in the City between 2005 and 2009, but there is some error in this data as it is an estimation. The chart above shows 0.0% percent of housing units constructed because the estimated number is so small relative to the total number of housing structures in the City. The City of Huntington Inspections and Compliance Department reports an average of ten (10) to fifteen (15) single and multi-family housing starts each year. In 2010, there were fifteen (15) permits to build new homes or multi-family housing developments. The chart below illustrates the year that housing structures were built in the City of Huntington.



Source: 2005-2009 American Community Survey

The following chart outlines the composition of the housing stock in the City of Huntington at the time of the 2005-2009 American Community Survey.

Housing Stock



Source: 2005-2009 American Community Survey

Approximately two-thirds (66.2%) of all housing units are single family housing units, either attached or detached. Mobile homes comprise approximately 1.1% of all of the housing units. The remaining housing units are fairly evenly divided among housing that is 2 units, 3-4 units, 5-9 units, 10-19 units, and 20 or more units. These percentages are estimates based on the 2005-2009 American Community Survey and therefore some error exists.

The Huntington-Ashland Metro Area saw an increase in housing starts from 2003 to 2006, but housing starts from 2006 forward decreased; however, in 2008, there was a spike in the construction of multi-family and units of 5 or more, but those starts fell again in 2009.

Annual Housing Starts in the Huntington-Ashland, WV-KY-OH Metro Area

	Total	Single Family	Multi-Family	5+ Units
2003	179	163	16	0
2004	352	197	155	141
2005	616	272	344	316
2006	633	336	297	265
2007	372	258	114	96
2008	343	145	198	145
2009	193	110	89	49

Source: <http://socds.huduser.org/permits/summary.odt>

The median value of an owner-occupied house in the City of Huntington in 2000 was \$65,000. The 2005-2009 American Community Survey estimates that the current median value of an owner-occupied house in the City has increased to \$81,100. The American Community Survey also estimates that the current median value for owner-occupied homes is \$94,400 in Cabell County, \$83,400 in Wayne County, and \$91,400 in the State of West Virginia.



F. Financing:

Owner Costs

The median monthly owner-occupied housing costs for households with a mortgage in the City of Huntington according to the 2005-2009 American Community Survey was \$683. The table illustrates mortgage status and selected monthly owner-occupied housing costs. Almost half (48.8%) of all owner-occupied houses in Huntington do not have mortgages. The chart below outlines the monthly housing costs of owner-occupied housing units in the City of Huntington at the time of the 2005-2009 American Community Survey.

Mortgage Status and Selected Monthly Owner Costs

Monthly Owner Cost	2000 U.S. Census		2005-2009 American Community Survey	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Houses with a mortgage	6,046	51.7%	6,004	---
Less than \$300	105	0.9%	44	0.7%
\$300 to \$499	1,162	9.9%	318	5.3%
\$500 to \$699	1,930	16.5%	1,166	19.4%
\$700 to \$999	1,657	14.2%	2,119	35.3%
\$1,000 to \$1,499	786	6.7%	1,594	26.5%
\$1,500 to \$1,999	217	1.9%	465	7.7%
\$2,000 or more	189	1.6%	298	5.0%
Median	\$683	---	\$897	---
Houses without a mortgage	5,659	48.3%	5,720	---
Median	\$221	---	\$298	---

Source: 2000 U.S. Census and 2005-2009 American Community Survey

Monthly housing costs for 18.4% of all owner-occupied households exceeded 30% of their monthly income, indicating a relatively high percentage of owners whose housing is not considered “affordable.” The 2005-2009 American Community Survey estimates that this value has increased to approximately 26.6% for all owner-occupied households whose housing costs exceed 30% of their monthly income. This is a significant increase in housing costs and illustrates the need for more affordable housing in the City. The following table illustrates housing costs for owner-households.



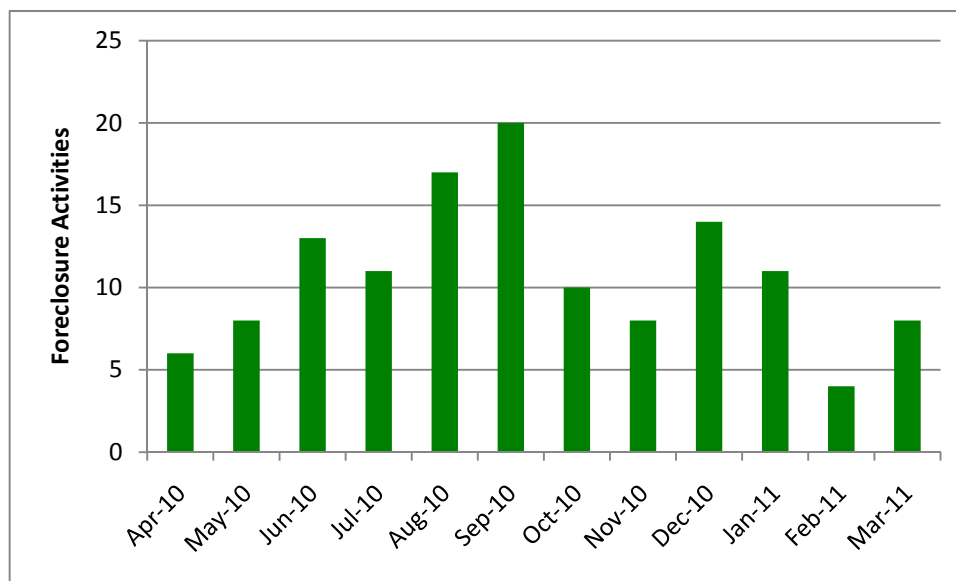
Selected Monthly Owner Costs as a Percentage of Household Income (1999)

Owner Costs as a % of Income	2000 U.S. Census		2005-2009 American Community Survey – Housing Units with a Mortgage		2005-2009 American Community Survey – Housing Units without a Mortgage	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Less than 15 percent	5,571	47.6%	2,656	44.5%	3,949	69.3%
15 to 19 percent	1,854	15.8%			645	11.3%
20 to 24 percent	1,191	10.2%	1,019	17.1%	402	7.1%
25 to 29 percent	771	6.6%	706	11.8%	123	2.2%
30 to 34 percent	574	4.9%	305	5.1%	137	2.4%
35 percent or more	1,580	13.5%	1,280	21.5%	440	7.7%
Not computed	164	1.4%	38	---	24	---

Source: 2000 U.S. Census and 2005-2009 American Community Survey

According to RealtyTrac, the City of Huntington had eighty-eight (88) homes in foreclosure. In March 2011 (the most recent month for which this data is available), 1 in every 5,073 housing units in the City received a foreclosure filing. In May 2011, 1 in every 8,052 housing units in the State of West Virginia and 1 in every 605 households nationwide received a foreclosure filing. The chart below illustrates the foreclosures in the City of Huntington since April 2010.

Number of Foreclosures



Source: www.realtytrac.com



Renter Costs

The median monthly rent in the City for 2000 was \$414; and it increased to \$570 according to the 2005-2009 American Community Survey. The table below illustrates rental rates within the City at the time of the 2000 U.S. Census and the 2005-2009 American Community Survey.

Gross Monthly Rent

Rental Rates	2000 U.S. Census		2005-2009 American Community Survey	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Less than \$200	1,179	11.4%	445	4.8%
\$200 to \$299	1,058	10.2%	689	7.4%
\$300 to \$499	4,547	43.8%	2,489	26.8%
\$500 to \$749	2,366	22.8%	3,220	34.7%
\$750 to \$999	300	2.9%	1,577	17.0%
\$1,000 to \$1,499	207	2.0%	720	7.8%
\$1,500 or more	60	0.6%	131	1.4%
No cash rent	663	6.4%	825	---
Median	\$414	---	\$570	---

Source: 2000 U.S. Census Data and 2005-2009 American Community Survey

The monthly housing costs for 47.1% of all renter-occupied households exceeded 30% of monthly income in 2000, indicating an even higher percentage of renters than owners whose housing is not considered “affordable.” The Census Bureau predicts that the percentage of households for which rent exceeds 30% of their income has grown to an estimated 60.8%. The table below illustrates the housing cost for renter-households in 1999 and at the time of the 2005-2009 American Community Survey.

Gross Rent as a Percentage of Household Income in Huntington

Rental Cost as a % of Income	2000 U.S. Census		2005-2009 American Community Survey	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Less than 15 percent	1637	15.8%	648	7.3%
15 to 19 percent	1017	9.8%	740	8.3%
20 to 24 percent	1055	10.2%	1019	11.5%
25 to 29 percent	710	6.8%	1071	12.1%
30 to 34 percent	580	5.6%	794	8.9%
35 percent or more	4307	41.5%	4612	51.9%
Not computed	1074	10.3%		---

Source: 2000 U.S. Census Data and 2005-2009 American Community Survey



The table above shows an increase of 10.4% from the 2000 Census to the 2005-2009 American Community Survey in the number of households spending 35% or more of their income on rent. The table below highlights the percentage of the households in Cabell County, Wayne County, and the State of West Virginia spending over 30% of their monthly income on rent.

Gross Rent as a Percentage of Household Income

	Cabell County				Wayne County				State of West Virginia			
	2000		2005-2009		2000		2005-2009		2000		2005-2009	
	Estimate	%	Estimate	%	Estimate	%	Estimate	%	Estimate	%	Estimate	%
Less than 15.0%	2,466	17.1%	1,146	8.9%	630	17.6%	355	12.6%	33,374	18.9%	26,407	16.8%
15.0 to 19.9%	1,534	10.7%	1,376	10.7%	393	11.0%	333	11.8%	20,118	11.4%	20,607	13.1%
20.0 to 24.9%	1,551	10.8%	1,739	13.5%	260	7.3%	191	6.8%	17,400	9.9%	17,928	11.4%
25.0 to 29.9%	1,128	7.8%	1,632	12.7%	385	10.7%	431	15.3%	14,823	8.4%	18,505	11.8%
30.0 to 34.9%	814	5.7%	1,274	9.9%	171	4.8%	285	10.1%	10,963	6.2%	13,067	8.3%
35.0% or more	5,214	36.2%	5,697	44.3%	992	27.7%	1,223	43.4%	49,917	28.3%	60,956	38.7%
Not Computed	1,684	11.7%	-	-	755	21.1%	-	-	29,798	16.9%	-	-

Source: 2000 U.S. Census, 2005-2009 American Community Survey

Cabell County, Wayne County, and the State of West Virginia each saw dramatic increases in the percentage of renter households whose gross rent exceeds 30% of the monthly household income. In Cabell County, 54.2% of renter households are estimated to spend more than 30% of their income on rent as compared to 41.9% in 2000. Similarly, the percentage of households whose housing is unaffordable increased from 32.5% to 53.5% in Wayne County and 34.5% to 47.0% in the State of West Virginia. Relative to the surrounding communities and the State, with 60.8% of its renter households paying more than 30% of their monthly income for rent, the affordability of rental housing in Huntington is a problem for many of its residents.

The 2011 Fair Market Rents for the Huntington-Ashland, WV-KY-OH, HUD Metro Fair Market Rent Area are shown in the table below.

FY 2011 FMRs by Unit Bedrooms

	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2011 FMR	\$420	\$496	\$596	\$735	\$759

Source: HUD



G. Household Types:

Based on the HUD – Comprehensive Housing Affordability Strategy (CHAS) data in Appendix C, the following statistics were found based on Low/Mod Income (LMI) housing types:

- Total number of renter households with incomes less than 30% of median family income is 3,317.
 - 14.0% are elderly (1 & 2 persons), 466 households
 - 25.4% are small families (2 to 4 persons), 844 households
 - 2.5% are large families (5 or more persons), 83 households
 - 58.0% are other renter households, 1,924 households
- Total number of renter households with incomes greater than 30% but less than 50% of median family income is 2,068.
 - 26.6% are elderly (1 & 2 persons), 551 households
 - 32.7% are small families (2 to 4 persons), 677 households
 - 3.3% are large families (5 or more persons), 69 households
 - 37.3% are other renter households, 771 households
- Total number of renter households with incomes greater than 50% but less than 80% of median family income is 1,917.
 - 20.4% are elderly (1 & 2 persons), 392 households
 - 33.0% are small families (2 to 4 persons), 632 households
 - 3.0% are large families (5 or more persons), 57 households
 - 43.6% are other renter households, 836 households
- Total number of owner households with incomes less than 30% of median family income is 979.
 - 50.5% are elderly (1 & 2 persons), 494 households
 - 21.4% are small families (2 to 4 persons), 209 households
 - 4.0% are large families (5 or more persons), 39 households
 - 24.2% are other owner households, 237 households
- Total number of owner households with incomes greater than 30% but less than 50% of median family income is 1,179.
 - 61.1% are elderly (1 & 2 persons), 721 households
 - 18.2% are small families (2 to 4 persons), 214 households



- 5.3% are large families (5 or more persons), 62 households
- 15.4% are other owner households, 182 households
- Total number of owner households with incomes greater than 50% but less than 80% of median family income is 1,938.
 - 54.2% are elderly (1 & 2 persons), 1,051 households
 - 30.1% are small families (2 to 4 persons), 584 households
 - 6.2% are large families (5 or more persons), 120 households
 - 9.4% are other owner households, 183 households

Small families and other renter households comprise a large portion of renter-occupied households, while elderly households make up the greatest portion of owner-occupied households. The elderly and the small families seem to have the greatest need of financial support for housing in the City of Huntington.



H. Cost Overburden:

Based on the HUD – Comprehensive Housing Affordability Strategy (CHAS) data found in Appendix C the following statistics were identified for Low/Mod Income (LMI) households that are cost overburdened:

- Total percentage of all renter households with incomes less than 30% of median family income that are cost overburdened by greater than 30% of income is 73.7%. Below is the percentage of renter households in each household type category that are cost overburdened in this income category.
 - 59.7% of elderly (1 & 2 persons), 278 households
 - 75.8% of small families (2 to 4 persons), 640 households
 - 88.0% of large families (5 or more persons), 73 households
 - 75.6% of other renter households, 1,455 households
- Total percentage of all renter households with incomes less than 30% of median family income that are cost overburdened by greater than 50% of income is 64.0%. Below is the percentage of renter households in each household type category that are cost overburdened in this income category.
 - 34.1% of elderly (1 & 2 persons), 159 households
 - 68.1% of small families (2 to 4 persons), 575 households
 - 75.9% of large families (5 or more persons), 63 households
 - 68.9% of other renter households, 1,326 households
- Total percentage of all renter households with incomes greater than 30% but less than 50% of median family income that are cost overburdened by greater than 30% is 74.8%. Below is the percentage of renter households in each household type category that are cost overburdened in this income category.
 - 51.2% of elderly (1 & 2 persons), 282 households
 - 77.3% of small families (2 to 4 persons), 523 households
 - 58.0% of large families (5 or more persons), 40 households
 - 91.1% of other renter households, 702 households
- Total percentage of all renter households with incomes greater than 30% but less than 50% of median family income that are cost overburdened by greater than 50% is 29.8%. Below is the percentage of renter households in each household type category that are cost overburdened in this income category.
 - 26.9% of elderly (1 & 2 persons), 148 households
 - 27.2% of small families (2 to 4 persons), 184 households
 - 0.0% of large families (5 or more persons), 0 households



- 36.8% of other renter households, 284 households
- Total percentage of all owner households with incomes less than 30% of median family income that are cost overburdened by greater than 30% of income is 70.0%. Below is the percentage of owner households in each household type category that are cost overburdened in this income category.
 - 64.6% of elderly (1 & 2 persons), 319 households
 - 81.3% of small families (2 to 4 persons), 170 households
 - 100.0% of large families (5 or more persons), 39 households
 - 66.2% of other owner households, 157 households
- Total percentage of all owner households with incomes less than 30% of median family income that are cost overburdened by greater than 50% of income is 47.4%. Below is the percentage of owner households in each household type category that are cost overburdened.
 - 44.9% of elderly (1 & 2 persons), 222 households
 - 62.2% of small families (2 to 4 persons), 130 households
 - 74.4% of large families (5 or more persons), 29 households
 - 35.0% of other owner households, 83 households
- Total percentage of all owner households with incomes greater than 30% but less than or equal to 50% of median family income that are cost overburdened by greater than 30% is 42.1%. Below is the percentage of owner households in each household type category that are cost overburdened.
 - 31.3% of elderly (1 & 2 persons), 226 households
 - 67.3% of small families (2 to 4 persons), 144 households
 - 53.2% of large families (5 or more persons), 33 households
 - 51.1% of other owner households, 93 households
- Total percentage of all owner households with incomes greater than 30% but less than or equal to 50% of median family income that are cost overburdened by greater than 50% of income is 23.3%. Below is the percentage of owner households in each household type category that are cost overburdened.
 - 20.5% of elderly (1 & 2 persons), 148 households
 - 29.9% of small families (2 to 4 persons), 64 households
 - 6.5% of large families (5 or more persons), 4 households
 - 32.4% of other owner households, 59 households



Almost seventy-four percent (73.7%) of renter households with income less than 30% of median family income are cost overburdened by more than 30% of their income. Similarly, 74.8% renter households with income between 30% and 50% of median family income are cost overburdened by more than 30%. This indicates a need for financial assistance for very low-income households for rental units.

A high percentage of owner-occupied households with income less than 30% and between 30% and 50% of median family income are also cost overburdened by more than 30% (70% and 42.1% of households respectively). This also indicates the need for affordable owner-occupied housing for very low-income households.

Elderly households, and large and small families, both owners and renters, are the most cost-overburdened households.

I. Housing Problems:

Based on the HUD – Comprehensive Housing Affordability Strategy (CHAS) data found in Appendix C, the following statistics were based on Low/Mod Income (LMI) housing types:

- Total percentage of renter households with incomes less than 30% of median family income that have a housing problem is 76.1%. Below is the percentage of renter households in each household type category that have a housing problem in this income category.
 - 60.5% of elderly (1 & 2 persons), 282 households
 - 76.3% of small families (2 to 4 persons), 644 households
 - 88.0% of large families (5 or more persons), 73 households
 - 76.1% of other renter households, 1,464 households
- Total percentage of renter households with incomes greater than 30% but less than 50% of median family income that have a housing problem is 75.0%. Below is the percentage of renter households in each household type category that have a housing problem in this income category.
 - 51.2% of elderly (1 & 2 persons), 282 households
 - 77.3% of small families (2 to 4 persons), 523 households
 - 63.8% of large families (5 or more persons), 44 households
 - 91.1% of other renter households, 702 households
- Total percentage of renter households with incomes greater than 50% but less than 80% of median family income that have a housing problem is 34.1%. Below is the percentage of renter households in each household type category that have a housing problem in this income category.
 - 30.1% of elderly (1 & 2 persons), 118 households
 - 22.5% of small families (2 to 4 persons), 142 households
 - 47.4% of large families (5 or more persons), 27 households
 - 43.9% of other renter households, 367 households
- Total percentage of owner households with incomes less than 30% of median family income that have a housing problem is 70.0%. Below is the percentage of owner households in each household type category that have a housing problem in this income category.
 - 64.6% of elderly (1 & 2 persons), 319 households
 - 81.3% of small families (2 to 4 persons), 170 households



- 100.0% of large families (5 or more persons), 39 households
- 66.2% of other owner households, 157 households
- Total percentage of owner households with incomes greater than 30% but less than 50% of median family income that have a housing problem is 42.1%. Below is the percentage of owner households in each household type category that have a housing problem in this income category.
 - 31.3% of elderly (1 & 2 persons), 226 households
 - 67.3% of small families (2 to 4 persons), 144 households
 - 53.2% of large families (5 or more persons), 33 households
 - 51.1% of other owner households, 93 households
- Total percentage of owner households with incomes greater than 50% but less than 80% of median family income that have a housing problem is 29.7%. Below is the percentage of owner households in each household type category that have a housing problem in this income category.
 - 17.4% of elderly (1 & 2 persons), 183 households
 - 41.8% of small families (2 to 4 persons), 244 households
 - 58.3% of large families (5 or more persons), 70 households
 - 43.2% of other owner households, 79 households

Both renter and owner households with income less than 50% of median family income have high instances of housing problems (75.0% to 76.1% of renters, 42.1% to 70.0% of owners). Renter households with income less than 50% of median family income show the greatest instances of housing problems. All household categories demonstrate a need for assistance to address housing problems.

The website www.dataplace.org provides an overview of data for communities across the country. The table below highlights important data to further illustrate the housing problem in the City of Huntington. The affordability of housing in the City of Huntington is a serious problem.

Housing Hardship

Categories of Housing Hardships	Percentage
Percentage of Households with income 0-80% of area median with housing cost burden	55.9%
Percentage of Households with income 0-80% of area median with severe housing cost burden	32.5%
Percentage housing units that are overcrowded	0.7%
Percentage housing units without complete kitchen facilities	0.4%
Percentage occupied housing units without complete plumbing facilities	0.3%

Source: www.dataplace.org



J. Disabled Households:

The table includes the 2000 Census Data that shows the number of disabled individuals in the City of Huntington. The total population five (5) years and over is 47,971 and the disabled population is 12,227 people, or 25.5%. This is an indicator of the need for housing for the disabled which are mainly low- and moderate-income, and do not have housing resources that are accessible and/or affordable.

Disability Data

Disability status of the civilian noninstitutional population	Both sexes	Male	Female
Population 5 years and over	47,971	22,290	25,681
With a disability	12,227	5,495	6,732
Percent with a disability	25.5	24.7	26.2
Population 5 to 15 years	5,507	2,736	2,771
With a disability	639	359	280
Percent with a disability	11.6	13.1	10.1
Sensory	151	46	105
Physical	103	53	50
Mental	514	311	203
Self-care	60	36	24
Population 16 to 64 years	33,697	16,385	17,312
With a disability	7,239	3,721	3,518
Percent with a disability	21.5	22.7	20.3
Sensory	1,209	670	539
Physical	3,495	1,667	1,828
Mental	2,650	1,485	1,165
Self-care	893	425	468
Going outside the home	2,286	1,182	1,104
Employment disability	4,207	2,218	1,989
Population 65 years and over	8,767	3,169	5,598
With a disability	4,349	1,415	2,934
Percent with a disability	49.6	44.7	52.4
Sensory	1,327	480	847
Physical	3,272	1,005	2,267
Mental	1,063	348	715
Self-care	1,072	309	763
Going outside the home	2,209	679	1,530
Population 18 to 34 years	15,198	7,605	7,593
With a disability	1,995	1,055	940
Percent enrolled in college or graduate school	23.8	29.2	17.7
Percent not enrolled and with a bachelor's degree or higher	5.2	4.7	5.7
No disability	13,203	6,550	6,653
Percent enrolled in college or graduate school	46.8	45	48.6
Percent not enrolled and with a bachelor's degree or higher	11	10.5	11.5



Population 21 to 64 years	28,138	13,587	14,551
With a disability	6,652	3,359	3,293
Percent employed	39.5	40.4	38.7
No disability	21,486	10,228	11,258
Percent employed	72	76.4	68

Source: 2000 U.S. Census

Of the population age 65 and older, 49.6% have a disability, with women having a higher rate of disabilities than men (52.4% and 44.7% respectively). Educational rates for individuals with disabilities ages 18 to 34 years old are lower than for individuals who are not disabled in this same age category. Of disabled individuals ages 18 to 34, 23.8% are enrolled in college or graduate school, and 5.2% have at least a bachelor’s degree but are not currently enrolled. In this same age range, 16.8% of individuals who are not disabled are enrolled in college or graduate school, and 11.0% have at least a bachelor’s degree but are not enrolled in school.

The disparities between individuals who “are” and “are not” disabled can also be seen in the employment statistics. Less than half (39.5%) of disabled persons ages 21 to 64 years old are employed, whereas 72.0% of non-disabled persons ages 21 to 64 are employed.

The CHAS Data also reports households with disabilities and mobility issues. The CHAS Data can be found in Appendix C. The most recent CHAS Data identifies the following prevalence of housing problems for households with mobility and self-care limitations:

- 31.6% of Total Households reported “any housing problems” with Renters reported at 43.3% and Owners at 23.7%.
- 66.3% of the <=30% MFI Total Households reported “any housing problems” with the highest reported as “Elderly” Owners at 71.1%.
- 50.7% of the >30% to <=50% MFI Total Households reported “any housing problems” with the highest reported as “All Other” Renters at 73.3%.
- 28.7% of the >50% to <=80% MFI Total Households reported “any housing problems” with the highest reported as “All Other” Owners at 43.1%.

III. Review/Update to Original Plan

The previous “Analysis of Impediments to Fair Housing Choice” was prepared in June 2008. The following paragraphs restate the identified impediments within that document and summarize the progress made on each.

A. Summary of Impediments – June 2008:

- **Impediment No. 1: Housing Affordability** – There is a lack of affordable housing that is decent, safe, and sound, which limits the choices of neighborhoods and makes it a fair housing concern.

Goal: Increase the supply of decent, safe, and sound housing that is affordable to lower-income households, both renters and owner occupants.

- **Actions – FY 2008:** In FY 2008, the City provided funds to the Housing Development Corporation to construct new duplex housing units and apartments in the Fairfield West Neighborhood. The City has also redeveloped Artisan Avenue, including acquiring vacant properties and clearing vacant buildings that cannot be rehabilitated to assemble into sites to develop new affordable units. The City has also continued to rehabilitate owner-occupied housing units. In FY 2008, ten (10) people were served by fair housing programs and fifteen (15) households received homebuyer training. The City continued its code enforcement and inspections in low- and moderate-income areas of the City.
- **Actions – FY 2009:** In FY 2009, the City did not provide funds to assist new affordable rental units but it did assist the rehabilitation of fourteen (14) owner-occupied units and four (4) renter-occupied units. Additionally, the City assisted twenty-eight (28) households through homebuyer training and also twenty-eight (28) first time homebuyers to purchase a home. During that fiscal year, the City hired an additional code enforcement officer to maintain an effective property maintenance inspection and enforcement program. Of the 1,221 code inspections completed during FY 2009, 1,082 inspections were in eligible low- and moderate-income block groups.
- **Actions – FY 2010:** In FY 2010, the City provided funds to assist with the development of seven (7) units of affordable housing in the Fairfield West Neighborhood, as well as provided assistance to rehabilitate twenty-eight (28) owner-occupied units and four (4)



rental units. The City also assisted fifty-five (55) households that completed the homebuyer training course and are now eligible to purchase a home. Eight (8) first time homebuyers purchased a home in FY 2010. During the fiscal year, the City provided 1,010 code enforcement inspections, 779 of which were in eligible low- and moderate-income block groups.

The City of Huntington will continue to address this impediment in the 2011 Update to the Analysis of Impediments to Fair Housing Choice through Impediment 1 – Housing Affordability.

- **Impediment No. 2: Fair Housing Education, Advocacy, Monitoring, and Enforcement** – There is a lack of awareness of the rights and responsibilities under the Fair Housing Act and a need to continually monitor and enforce the Fair Housing Act.

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

- **Actions – FY 2008:** The Huntington Human Relations Commission (HHRC) received funding from the City to provide public education and outreach through training sessions and educational seminars for landlords and realtors. HHRC and Information and Referral Services each provided outreach and education to the public. HHRC also received funding from the City to monitor and investigate fair housing complaints.
- **Actions – FY 2009:** The Huntington Human Relations Commission (HHRC) was decertified in FY 2009 and did not provide public education or outreach during that fiscal year. The City, using CDBG funds, supported a staff person through the HHRC to answer calls and direct people to the West Virginia Human Rights Commission (WVHRC). During that year, the HHRC directed five (5) persons to the WVHRC. To help assist with fair housing education, the West Virginia office of FHEO held a training session for the City of Huntington's Engineering and Inspection staff on Design & Construction Requirements under the Fair Housing Act Amendments. In addition, the City hosted a Housing Fair to promote Fair Housing Month at the Huntington Housing Authority in April 2010. This was open to the public and the public housing residents. Information and Referral Services (I&RS) administers the Homeless Prevention and Rapid Re-housing Program (HPRP)



for the City of Huntington and offered a budget class that met twice a week.

- **Actions – FY 2010:** In FY 2010, the Huntington Human Relations Commission was contacted a total of 218 times, 204 by phone and 14 walk-ins. Twenty-nine (29) of the persons contacting the HHRC had complaints that were directed to the West Virginia Human Relations Commission. In June 2011, the City hosted a Housing Fair at the Huntington Housing Authority to promote Fair Housing. At this time, the City passed out educational materials and key chains advertising the phone number at the City where residents can file fair housing complaints. Additionally, Information and Referral Services (I&R) continues to administer the Homeless Prevention and Rapid Rehousing Program (HPRP) and offers weekly budget classes.

The City of Huntington will continue to address this impediment in the 2011 Update to the Analysis of Impediments to Fair Housing Choice through Impediment 2 – Fair Housing, Education, Advocacy, Monitoring and Enforcement.

- **Impediment No. 3: Discrimination and Rental Housing** – There is discrimination in rental housing by renting bedrooms for individuals instead of the entire apartment to families since landlords can charge more per person/room versus per family/apartment.

Goal: Prevent landlords from renting rooms based on individuals and instead, apartments should be rented on the whole housing unit basis.

- **Actions – FY 2008:** In FY 2008, the Huntington Human Relations Commission closely monitored this issue and distributed informational materials to perspective renters, but did not receive any complaints on this.
- **Actions – FY 2009:** In FY 2009, HUD decertified the Huntington Human Relations Commission, meaning that the commission did not receive funds directly from HUD to complete fair housing investigations. The City continued to recognize the HHRC as a commission of the City and a contact for residents to begin the process of fair housing complaints. This impediment was not addressed in FY 2009.
- **Actions – FY 2010:** Interviews and outreach conducted in FY 2010 as part of the research for the Analysis of Impediments to Fair Housing Choice suggested that this impediment is not affecting family households. Rentals made by the room are limited to a



specific building for college student housing and does not affect any of the protected classes as was once thought. The City's Human Relations Commission referred this concern to the West Virginia Human Rights Commission for additional follow-up and monitoring. The City considers this impediment to be resolved.

The City of Huntington is not continuing this as an impediment under its FY 2011 Analysis of Impediment to Fair Housing Choice.

- **Impediment No. 4: Housing Accessibility** – There is a lack of accessible affordable housing that is decent, safe, and sound, which limits housing choice for handicapped persons and makes it a fair housing concern.

Goal: Increase the supply of decent, safe, and sound housing that is affordable and accessible to lower income households, for both renters and owner occupants.

- **Actions – FY 2008:** As of FY 2008, the City had not yet completed its inventory of affordable and accessible housing stock. In FY 2008, the City provided funds to developers to construct new affordable and accessible housing and to rehabilitate existing housing units. The City worked with shelter providers to address accessibility issues of shelter facilities and to develop additional emergency shelter and transitional housing units.
- **Actions – FY 2009:** The Huntington Housing Authority maintained its Section 504 Compliance and upgraded units to provide additional handicapped accessible housing for low-income persons. The City also provided funds for developers to construct new affordable and accessible housing and also to rehabilitate existing units. Four (4) rental units were completed during FY 2009. The City continues to support emergency shelters and transitional housing agencies.
- **Actions – FY 2010:** The Huntington Housing Authority continued to maintain its Section 504 Compliance to ensure that at least five percent of its housing is handicapped accessible. In FY 2010 the City provided funds to assist the construction and completion of eleven (11) handicap accessible housing units for low-income persons. The City also provided funding to Habitat for Humanity for the construction of one (1) handicap accessible single family home. The new St. Agnes development also has one (1) accessible unit for a renter household. Two (2) of the units at the new Artisan Heights development are accessible. The City continued to provide funds to support emergency shelters and transitional housing units.



The City of Huntington will continue to address this impediment in the 2011 Update to the Analysis of Impediments to Fair Housing Choice through Impediment 3 – Housing Accessibility.

- **Impediment No. 5: Economic Opportunities** – There is a lack of economic opportunities which prevents low-income households from improving their income and their ability to move outside of low-income areas, which reduces fair housing choice.

Goal: Increase the number of job opportunities for low-income persons to allow them to find affordable housing outside low-income areas.

- **Actions – FY 2008:** In FY 2008, the City worked with the Huntington-Ironton Empowerment Zone – BID, the Section 108 Loan to the Douglass Center, Unlimited Futures Microenterprise Assistance, the WIA Program, and CBD Improvements. In 2008, the City also received an EPA “Brownfield” Grant to prepare environmental studies and redevelop brownfield sites for new economic development opportunities to create new jobs.
- **Actions – FY 2009:** In FY 2009, the City worked with the Huntington-Ironton Empowerment Zone - A Downtown BID Project, the Section 108 Loans, Unlimited Futures - Microenterprise Assistance, the WIA Program, and made improvements to the Commercial Business District. During FY 2009, the City created and/or retained 79 jobs. The City also continued the preparation of the environmental study, funded through the EPA “Brownfield” Grant received in FY 2008.
- **Actions – FY 2010:** In FY 2010, the City provided Section 108 loan payment assistance and funding support to Unlimited Futures for microenterprise assistance. The City also continued with the revitalization of the Downtown Central Business District. The City has also identified three (3) additional sites for environmental studies through the FY 2008 EPA Brownfield Grant.

The City of Huntington is not continuing this as an impediment under its FY 2011 Analysis of Impediment to Fair Housing Choice.

- **Impediment No. 6: Minority Homeowners** – There is a disproportionate number of minority homeowners compared to the high percentage of minority renter households, as compared to the high percentage of non-minority homeowners.



Goal: Increase the number of minority homeowners and thus reduce the percentage of minority households which are renters.

- **Actions – FY 2008:** In FY 2008, the City worked with the Housing Authority, local social service provider agencies, and the Human Relations Commission to survey minority renter households in an effort to determine barriers to homeownership. During that year, the City continued to develop homeownership opportunities and incentives. The City Department of Development and Planning and the HURA worked together to assist local developers and non-profit housing agencies acquire properties and develop affordable housing. The City, HRC, and Housing Authority continued to advertise, market, and conduct outreach to inform minority households of the homeownership opportunities in the City.
- **Actions – FY 2009:** In FY 2009, the City continued to offer homeownership opportunities for minority and low-income households through the First Time Homebuyer Program. During that year, twenty-eight (28) households received homebuyer training and twenty-eight (28) households were assisted through the First Time Homebuyer Program. Of the households assisted through the First Time Homebuyer Program, 78.6% were white and 21.4% were minority. Over sixty percent (60.7%) of buyers had household incomes between 50% and 60% of Area Median Income (AMI); 21.4% of households had income between 30% and 50% of AMI; and 3.6% of households had income between 0% and 30% of AMI. The City and HURA worked with Habitat for Humanity and the Housing Development Corporation to develop affordable housing on Artisan Avenue. The City continued to undertake marketing and outreach efforts through the HOME Program.
- **Actions – FY 2010:** In FY 2010, eight (8) homebuyers were assisted by the City through the First Time Homebuyer Program and Habitat for Humanity. Of the households assisted through the First Time Homebuyer Program, 75% were white and 25% were minority. All of the homes constructed by Habitat for Humanity were sold to minority households. The City continues to collaborate with HURA and Habitat for Humanity to develop affordable housing and continues to undertake marketing and outreach through the HOME Program.

The City of Huntington will continue to address this impediment in the 2011 Update to the Analysis of Impediments to Fair Housing Choice through Impediment 4 – Homeownership for Minorities.



- **Impediment No. 7: Cost Overburden** – There is a high percentage of both owner-occupied and renter-occupied households whose housing costs exceeds 30% of their total household income.

Goal: Reduce the number of families whose housing costs exceed 30% or more of their total household income.

- **Actions – FY 2008:** In FY 2008, the City provided three (3) rehabilitation loans, assisted nine (9) first time homebuyers, provided funds to develop new rental housing for low- and very low-income households, and continued to work with local developers to support the construction of new affordable housing. Additional funds were not available from HUD to provide more Section 8 Housing Choice Vouchers.
- **Actions – FY 2009:** In FY 2009, the City provided eighteen (18) rehabilitation loans, assisted twenty-eight (28) first time homebuyers, and funded three (3) new affordable housing developments expected to be completed in 2011. The Housing Authority continued to work to provide rental assistance and housing for very low- and low-income families.
- **Actions – FY 2010:** In FY 2010, the City completed three (3) affordably housing developments, assisted eight (8) first time homebuyers, and funded five (5) loans to rehabilitate single family owner-occupied homes. The Huntington Housing Authority continues to provide Section 8 Housing Choice Vouchers.

The City of Huntington will continue to address this impediment in the 2011 Update to the Analysis of Impediments to Fair Housing Choice through Impediment 5 – Cost Overburden.



IV. Impediments to Fair Housing 2011

In order to determine if any impediments to fair housing choice exist, interviews and meetings were conducted, surveys were distributed, and an analysis of the fair housing complaints in the City of Huntington was undertaken.

A. Fair Housing Complaints:

1. Human Relations Commission of the City of Huntington:

The Huntington Human Relations Commission (HHRC) has one staff member to engage the community in education and outreach. HHRC no longer has the authority to complete testing in response to fair housing complaints.

**City of Huntington
Human Relations Commission**
800 Fifth Avenue
Huntington, WV 25701
304-696-5592/Voice 304-696-4465/Fax

The Huntington Human Relations Commission accepts phone calls and walk-in reports of fair housing discrimination. The HHRC determines the nature of the complaint and will provide educational materials, or refers the complainant to the appropriate agency to address their complaint. The table below highlights the complaints that the HHRC received from May 2010 through January 2011.

Complaints Filed with the Huntington Human Relations Commission

Month	Total Complaints	Contact Type		Complaint Type		Referral		
		Phone	Walk-In	Educational	Non-Jurisdictional	State	Other	Attorney General
May 2010	21	19	2	13	8	4	17	0
June 2010	20	20	0	17	3	0	20	0
July 2010	16	16	0	11	5	5	11	0
August 2010	22	19	3	19	3	2	19	1
September 2010	25	23	2	24	1	2	23	0
October 2010	12	11	1	10	2	1	11	0
November 2010	13	13	0	13	0	2	11	0
December 2010	13	13	0	13	0	2	11	0
January 2011	11	11	0	11	0	0	11	0

Source: HUD, FHEO

Most of the complaints received by the HHRC result in the distribution of educational information. Out of the 153 complaints received, the most common complaint was related to landlord/tenant problems. There were sixty-five (65) landlord/tenant complaints, or 42.5% of all of the complaints received by the HHRC between May 2010 and January 2011.



2. West Virginia Human Relations Commission

The West Virginia Human Rights Commission (WVHRC) is a subdivision of the West Virginia Department of Health & Human Resources.

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

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

In addition to its staff members, the WVHRC has nine (9) Commissioners. While the WVHRC’s primary office is located in Charleston, WV, it is the role of the Commissioners to be active in their regions and promote awareness of the Commission. The WVHRC employs two (2) investigators to investigate fair housing complaints across the state. Because Huntington does not have a fair housing investigator on staff, all complaints fall under the jurisdiction of the WVHRC.

The WVHRC had an office in Huntington until it was closed last year as a result of budgetary cut backs. All Huntington complaints are now handled out of the Charleston office, which is only 45 minutes away from Huntington. The WVHRC does not conduct active outreach and education in the City of Huntington so as not to duplicate the services offered by the HHRC. The WVHRC does sponsor a day-long training in the Charleston area each year.

The WVHRC publishes an annual summary of docketed cases filed during the State’s annual fiscal year (July 1st – June 30th).

3. Fair Housing & Equal Opportunity (HUD)

The U.S. Department of Housing and Urban Development’s (HUD) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. From January 1, 2005 to December 31, 2010, fifty-two (52) fair housing complaints originated in Cabell and Wayne Counties, forty-seven (47) of which originated within the City of Huntington.

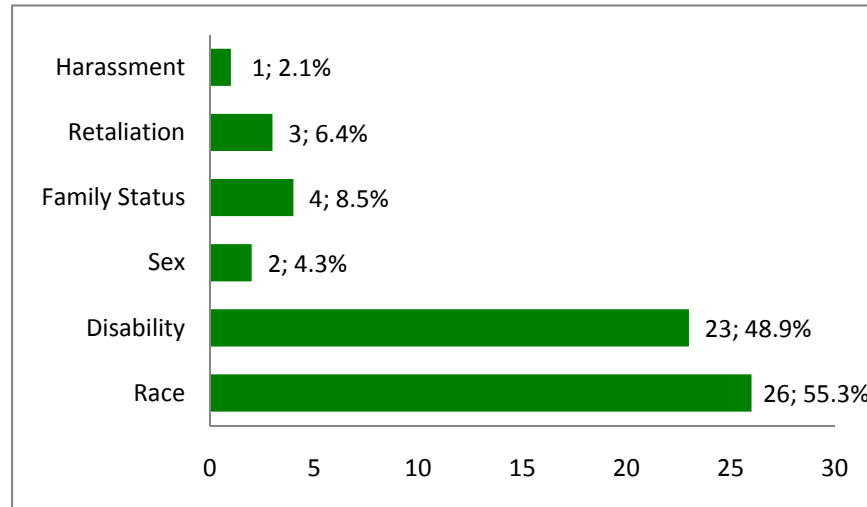
Philadelphia HUD Field Office
The Wanamaker Building
100 Penn Square East
Philadelphia, PA 19107-3380
(215) 861-7620 (Voice)

The complaints received for the City of Huntington are disaggregated in the chart below to illustrate the most common basis for complaints. In the City of Huntington, race was the most common basis for complaints between January 1, 2005 and December 23,



2010, disability was the second most common cause for complaint. It is important to note that some ten (10) complaints had multiple bases.

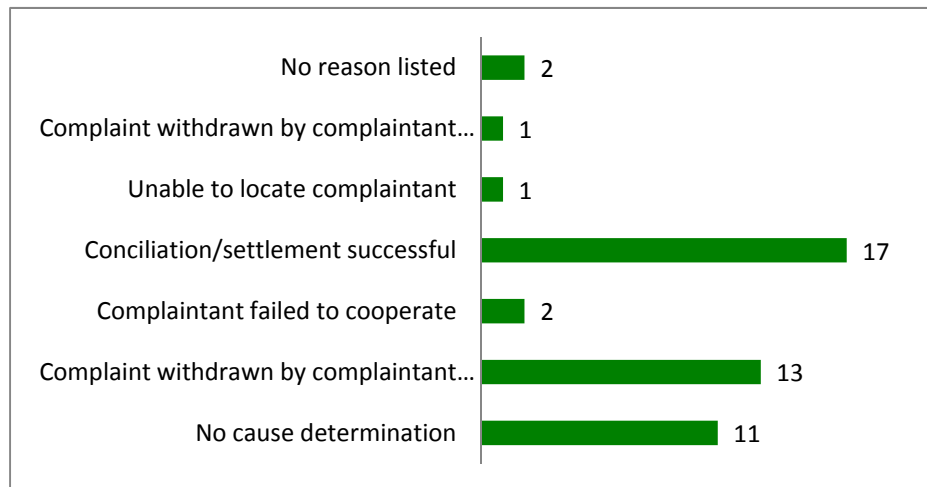
Basis for Complaints



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

Forty-one (41) of the forty-seven (47) complaint cases from the City of Huntington have been closed. The chart below shows how the cases have been settled. Note, only two (2) out of the forty-seven (47) cases did not identify a resolution as a result of the complainant failing to cooperate with the WVHRC.

Complaint Resolution



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

The table “HUD-FHEO Complaints,” summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity between January 1, 2005 and December 31, 2010 in the City of Huntington. For the last reporting period of January 1, 2010 through December 31, 2010 there were three (3) Fair Housing Complaints received by HUD-FHEO for the City of Huntington.



HUD-FHEO Complaints							
HUD File Number	HUD Date Filed	Issue Code Description	Basis	City	How Closed	Date Closed	Cause Date
030501988	1/3/2005	310 Discriminatory refusal to rent	Race	Huntington	No cause determination	11/16/2005	
030505158	6/30/2005	310 Discriminatory refusal to rent	Family Status	Huntington	No cause determination	3/10/2006	
		320 Discriminatory advertising, statements and notices					
030505738	5/24/2005	310 Discriminatory refusal to rent	Disability	Huntington	No cause determination	4/26/2006	
030506018	7/11/2005	300 Discriminatory refusal to sell	Race	Huntington	No cause determination	3/10/2006	
030601688	1/11/2006	310 Discriminatory refusal to rent	Race	Huntington	No cause determination		
030605158	5/26/2006	382 Discrimination in terms/conditions/privileges relating to rental	Race	Huntington	Complaint withdrawn by complainant after resolution	9/18/2009	
030700528	11/9/2006	382 Discrimination in terms/conditions/privileges relating to rental	Race	Huntington	Complainant failed to cooperate	3/26/2007	
030701076	12/12/2006	310 Discriminatory refusal to rent	Sex	Huntington			8/22/2007
030702866	3/6/2007	382 Discrimination in terms/conditions/privileges relating to rental	Disability	Huntington	Conciliation/settlement successful	5/2/2007	
030702875	3/6/2007	380 Discriminatory terms, conditions, privileges, or services and facilities	Disability	Huntington	Conciliation/settlement successful	5/2/2007	



030705338	8/15/2007	382 Discrimination in terms/conditions/privileges relating to rental	Race	Huntington	No cause determination	11/26/2007	
030706288	9/17/2007	380 Discriminatory terms, conditions, privileges, or services and facilities	Race, Disability	Huntington	No cause determination	11/28/2007	
030706506	9/27/2007	382 Discrimination in terms/conditions/privileges relating to rental	Disability	Huntington	Conciliation/settlement successful	1/7/2008	
030706518	9/28/2007	384 Discrimination in services and facilities relating to rental	Race, Disability	Huntington	Conciliation/settlement successful	6/30/2008	
03085528	9/28/2007	382 Discrimination in terms/conditions/privileges relating to rental	Race	Huntington	Conciliation/settlement successful	6/30/2008	
030706588	9/20/2007	382 Discrimination in terms/conditions/privileges relating to rental	Race	Huntington	Complaint withdrawn by complainant after resolution	1/7/2008	
030800768	10/30/2007	382 Discrimination in terms/conditions/privileges relating to rental	Race, Disability	Huntington	Conciliation/settlement successful	2/6/2008	
030800798	10/30/2007	384 Discrimination in services and facilities relating to rental	Race	Huntington	Complaint withdrawn by complainant after resolution	3/5/2008	
030600808	10/30/2007	384 Discrimination in services and facilities relating to rental	Race, Disability	Huntington	Conciliation/settlement successful	6/30/2008	
		510 Failure to make reasonable accommodation					
030800818	10/30/2007	382 Discrimination in terms/conditions/privileges relating to rental	Race, Disability	Huntington	Conciliation/settlement successful	6/30/2008	



		444 Use of discriminatory indicators					
030800528	10/30/2007	382 Discrimination in terms/conditions/privileges relating to rental	Race, Disability	Huntington	Conciliation/settlement successful	6/30/2008	
030501015	11/6/2007	382 Discrimination in terms/conditions/privileges relating to rental	Race, Disability	Huntington	Complaint withdrawn by complainant after resolution	4/25/2008	
		310 Discriminatory refusal to rent					
030801028	11/8/2007	382 Discrimination in terms/conditions/privileges relating to rental	Race, Disability	Huntington	Complainant failed to cooperate	6/30/2008	
030802948	3/3/2008	380 Discriminatory terms, conditions, privileges, or services and facilities	Disability	Huntington	Conciliation/settlement successful	6/17/2008	
030802958	3/7/2008	382 Discrimination in terms/conditions/privileges relating to rental	Disability	Huntington	Unable to locate complainant	11/19/2008	
030804088	3/10/2008	382 Discrimination in terms/conditions/privileges relating to rental	Disability	Huntington	Conciliation/settlement successful	8/16/2008	
030804098	5/5/2008	510 Failure to make reasonable accommodation	Race	Huntington	Complaint withdrawn by complainant after resolution	11/5/2008	
030804378	5/30/2008	380 Discriminatory terms, conditions, privileges, or services and facilities	Race, Disability	Huntington	Conciliation/settlement successful	11/5/2008	
030804468	5/16/2008	384 Discrimination in services and facilities relating to rental	Disability	Huntington	Complaint withdrawn by complainant after resolution		



030806438	9/30/2008	382 Discrimination in terms/conditions/privileges relating to rental	Disability	Huntington	Complaint withdrawn by complainant after resolution	3/23/2009	
030900058	10/1/2008	382 Discrimination in terms/conditions/privileges relating to rental	Disability	Huntington	No cause determination	1/25/2010	
030900208	10/14/2008	380 Discriminatory terms, conditions, privileges, or services and facilities	Race	Huntington	Complaint withdrawn by complainant after resolution	12/31/2008	
030902028	2/2/2009	382 Discrimination in terms/conditions/privileges relating to rental	Retaliation	Huntington	No cause determination	5/5/2010	
030902038	2/3/2009	382 Discrimination in terms/conditions/privileges relating to rental	Race	Huntington	Complaint withdrawn by complainant after resolution	10/14/2009	
030902048	2/3/2009	380 Discriminatory terms, conditions, privileges, or services and facilities	Race	Huntington	Complaint withdrawn by complainant after resolution	10/14/2009	
030902198	2/3/2009	440 Other discriminatory acts	Retaliation	Huntington	Conciliation/settlement successful	2/5/2010	
030902208	2/19/2009	382 Discrimination in terms/conditions/privileges relating to rental	Race	Huntington			
030902298	2/19/2009	382 Discrimination in terms/conditions/privileges relating to rental	Race	Huntington	Complaint withdrawn by complainant after resolution	10/14/2009	
030902308	2/19/2009	382 Discrimination in terms/conditions/privileges relating to rental	Race	Huntington	Complaint withdrawn by complainant after resolution	2/8/2010	



030902318	2/23/2009	500 Failure to permit reasonable modification	Disability	Huntington	Complaint withdrawn by complainant after resolution	2/18/2010	
030902528	3/20/2009	320 Discriminatory advertising, statements and notices	Family Status	Huntington	Complaint withdrawn by complainant without resolution	6/29/2010	
030902818	3/23/2009	382 Discrimination in terms/conditions/privileges relating to rental	Disability	Huntington	Conciliation/settlement successful	10/14/2009	
030903465	5/4/2009	310 Discriminatory refusal to rent	Family Status	Huntington	No cause determination	12/16/2009	
030905748	9/2/2009	382 Discrimination in terms/conditions/privileges relating to rental	Family Status	Huntington	No cause determination	1/25/2010	
031002028	3/2/2010	302 Discriminatory refusal to sell and negotiate for sale	Race	Huntington	Conciliation/settlement successful	6/28/2010	
031004428	7/14/2010	510 Failure to make reasonable accommodation	Sex, Harassment, Disability, Retaliation	Huntington	Conciliation/settlement successful		
031100158	10/6/2010	510 Failure to make reasonable accommodation	Disability	Huntington	Conciliation/settlement successful		

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



4. Housing and Human Services Agencies

The City of Huntington interviewed agencies offering housing and human services within the City in order to obtain their input and gain insight into potential impediments to fair housing. The following agencies were engaged in roundtable discussions, individual meetings, or through surveys:

- Wayne County Habitat for Humanity
- Prester Center for Mental Health Services
- Huntington Area Habitat for Humanity
- Cabell-Huntington Coalition for the Homeless
- Huntington Housing Authority (HHA)
- Housing Development Corporation (HDC)
- Cabell County Community Services Organization (CCCSO)
- Mountain State Center for Independent Living (MTSTCIL)
- United Way of the River Cities
- West Virginia Advocates
- Information and Referral Services (I&R)
- Cabell County Office of the West Virginia Department of Health and Human Resources (DHHR)

Each of these agencies provided feedback on their perception of housing-related issues in the City of Huntington. Complete meeting notes can be found in Part VI, Appendix D.



B. Public Sector:

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The local government controls land use and development through the comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in a community. Local officials determine the community’s commitment to housing goals and objectives. The local policies therefore determine if fair housing is to be promoted or passively tolerated.

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

1. CDBG Program

The City of Huntington receives CDBG funds from HUD as an entitlement city under the program. The City annually receives approximately \$1,875,983 in CDBG funds. The City allocates its funds to public facility improvements, public services, senior services, youth services, and housing activities. Of the CDBG funds for project activities, 85.3% directly benefit low- and moderate-income persons and all of the CDBG funds allocated to public services directly benefit low- and moderate-income persons.

In particular, the City in its FY 2011 CDBG Program allocated the CDBG funds as follows in the table:

Partial FY 2011 CDBG Allocation

Community Development Block Grant Funds		
Number	Activity	Amount
Program Administration –		
CDBG-11-01	General Administration	\$ 361,188.80
CDBG-11-02	Mountain State Centers for Independent Living – Fair Housing Education	\$ 30,000.00
Public Service –		
CDBG-11-03	Information & Referral Services	\$ 5,000.00
CDBG-11-04	Coalition for the Homeless (Harmony House)	\$ 5,000.00
CDBG-11-05	Community Centers	\$ 283,391.60
Public Facility & Improvements –		
CDBG-11-06	West 5 th Avenue Park	\$ 40,000.00
CDBG-11-07	CBD Improvements	\$ 6,666.00



CDBG-11-08	Children's Place	\$ 16,535.00
CDBG-11-09	Sidewalks and Handicap Ramps	\$ 150,000.00
CDBG-11-10	Huntington City Mission	\$ 75,000.00
CDBG-11-11	Huntington Fire Dept. – Aerial Truck	\$ 100,000.00
CDBG-11-12	Old Central City	\$ 20,419.66
CDBG-11-13	Healing Place	\$ 50,000.00
CDBG-11-14	Community Centers	\$ 36,547.49
CDBG-11-15	Guyandotte Slip-Hilltop	\$ 130,000.00
Housing Rehabilitation –		
CDBG-11-16	Volunteer Rehabilitation Program – World Changers	\$ 75,000.00
CDBG-11-17	Housing Rehabilitation – Administration/Delivery Costs	\$ 89,000.00
Clearance and Demolition –		
CDBG-11-18	Demolition of vacant dilapidated structures citywide	\$ 200,039.00
CDBG-11-19	Land Bank	\$ 30,000.00
Economic Development –		
CDBG-11-20	Unlimited Futures, Inc. – Microenterprise Assistance	\$ 30,000.00
Section 108 Loans –		
CDBG-11-21	Douglass Centre	\$ 102,000.00
CDBG-11-22	Huntington Renaissance Housing	\$ 120,195.45

All activities listed above will occur in low/mod areas of the city which have a high priority of the City. Additionally, each activity meets the National Objectives of serving a low/mod area, low/mod people, job creation, or reducing slum/blight. Activities shaded in gray serve to reduce barriers to affordable housing within the City.

In its FY 2010-2014 Five Year Consolidated Plan, the City of Huntington identified the following goals to prioritize funding needs during this five year period, as outlined below in the table below.

Five Year Strategies and Objectives

Housing Strategy – HS	
<i>Objective</i>	<i>Priority</i>
HS-1. Provide assistance for homeownership.	High
HS-2. Assist in the development of new affordable housing.	High



HS-3.	Provide rehabilitation assistance for owner and renter occupied units.	High
HS-4.	Promote an emergency repair program.	Medium
HS-5.	Promote a weatherization assistance program.	Low
HS-6.	Promote accessibility improvements to housing.	Low
HS-7.	Promote revitalization efforts in residential neighborhoods.	Medium
HS-8.	Remove blighting and deteriorating conditions of housing.	High
HS-9.	Provide code enforcement and inspections.	High
HS-10.	Promote Fair Housing Choice and eliminate concentration of low-income housing.	High
HS-11.	Promote housing support services and counseling to target income population.	Medium
HS-12.	Provide tenant based rental assistance.	Low
Homeless Strategy – HA		
<i>Objective</i>		<i>Priority</i>
HA-1.	Promote housing opportunities for the homeless.	Medium
HA-2.	Promote supportive services for the homeless.	High
HA-3.	Promote the development of permanent housing opportunities for the homeless.	Medium
HA-4.	Assist people who are at risk of becoming homeless.	Medium
Other Special Needs Strategy – SN		
<i>Objective</i>		<i>Priority</i>
SN-1.	Promote special needs housing opportunities.	Medium
SN-2.	Promote special needs support services.	Medium
Community Development Strategy – CD		
<i>Objective</i>		<i>Priority</i>
CD-1.	Improve the City's infrastructure. (streets, walks, curbs, sewers, etc.)	High
CD-2.	Provide assistance to target income persons.	Medium
CD-3.	Provide assistance for youth and youth programs.	High
CD-4.	Provide assistance to the elderly and frail elderly support programs.	High
CD-5.	Improve the City's community facilities.	Medium
CD-6.	Remove architectural barriers and make public facilities accessible.	Medium
CD-7.	Remove slum and blighting conditions.	High
CD-8.	Promote community policing and crime prevention programs.	High



CD-9.	Improve public safety facilities and equipment.	Medium
Economic Development Strategy – ED		
<i>Objective</i>		<i>Priority</i>
ED-1.	Promote new commercial/industrial development in the City.	Medium
ED-2.	Create new job opportunities in the City.	Medium
ED-3.	Assist in the redevelopment of “brownfield” sites.	High
ED-4.	Provide assistance for small business development.	Low
ED-5.	Assist in revitalization efforts of business districts.	High
Anti-Poverty Strategy – AP		
<i>Objective</i>		<i>Priority</i>
AP-1.	Promote workforce development programs.	Medium
AP-2.	Provide assistance for food and shelter programs.	High
AP-3.	Promote job training programs in the City.	Medium
AP-4.	Create job opportunities for the unemployed and the underemployed.	Medium
Administration & Management – AM		
<i>Objective</i>		<i>Priority</i>
AM-1.	Provide program administration and oversight.	High
AM-2.	Provide planning and management services.	Medium

2. HOME Program

Annually, the City of Huntington receives approximately \$963,199 in HOME Funds to assist low- and moderate-income households. These funds are often used to develop new affordable housing, or to provide homeownership assistance. The table below outlines the proposed use of FY 2011 HOME Funds.

The City of Huntington is the Participating Jurisdiction (PJ) for the Cabell-Huntington-Wayne HOME Consortium. In FY 2011, the City of Huntington anticipates that it will receive \$96,319.90 in Administrative funds, \$59,569.01 in CHDO project funds, and \$113,281.75 for non-CHDO activities. The Consortium is basing these figures on the FY 2011 funding amount of \$963,199 and program income in the amount of \$50,000. The HOME Funds are used for activities that reduce barriers to affordable housing.



FY 2011 HOME Allocation

HOME Investment Partnerships Funds		
Number	Activity	Amount
Program Administration -		
HOME-11-23	Administration	\$ 96,319.90
CHDO Set-Aside -		
HOME-11-24	City of Huntington – HDC Project	\$ 59,569.01
HOME-11-25	Cabell County – CCCSO – West Middle School Project	\$ 38,648.55
HOME-11-26	Wayne County – WCCSO – 900 Norfolk Avenue Project	\$ 46,262.29
Non-CHDO Projects -		
HOME-11-27	City of Huntington – Homebuyer Assistance	\$ 113,281.75
HOME-11-28	City of Huntington – Habitat for Humanity – Downpayment Assistance	\$ 40,000.00
HOME-11-29	City of Huntington – Habitat for Humanity – Material Cost	\$ 58,000.00
HOME-11-30	City of Huntington – Housing for Low Income Vets	\$ 66,707.00
HOME-11-31	Cabell County – CCCSO	\$ 7,183.46
HOME-11-32	Cabell County – Homebuyer Assistance	\$ 76,176.46
HOME-11-33	Cabell County – Habitat for Humanity	\$ 87,000.00
HOME-11-34	Cabell County – Habitat for Humanity – Downpayment Assistance	\$ 10,000.00
HOME-11-35	Wayne County – Homebuyer Assistance	\$ 100,000.00
HOME-11-36	Wayne County – Uncommitted	\$ 115,890.69
CHDO Operating -		
HOME-11-37	City of Huntington – HDC	\$ 2,267.59
HOME-11-38	Cabell-Huntington Coalition for the Homeless	\$ 17,588.73
HOME-11-39	Cabell County – HDC	\$ 12,882.77
HOME-11-40	Wayne County – HDC	\$ 15,420.80
Program Income -		
HOME-11-41	Program Income – Homebuyer Assistance	\$ 50,000.00

3. ESG Funds

The City of Huntington also receives an annual allocation of Emergency Shelter Grant (ESG) Funds to assist the homeless or to support homeless prevention activities. The



table below outlines the City's proposed use of the \$90,964 of ESG Funds that it received for FY 2011.

FY 2011 ESG Allocation

Emergency Shelter Grant Funds		
Number	Activity	Amount
ESG-11-42	ESG General Administration	\$ 4,548.20
ESG-11-43	Branches, Inc.	\$ 21,603.95
ESG-11-44	Huntington City Mission	\$ 21,603.95
ESG-11-45	Prestera Mental Health Center	\$ 21,603.95
ESG-11-46	Cabell-Huntington Coalition for the Homeless	\$ 21,603.95

4. Other Funds

In addition to the CDBG funds, the City of Huntington received the following federal, state, and county allocations for FY 2011 as outlined in the table below. The State of West Virginia under its Community Partnership Funds Program has allocated grants to the following projects and activities in the City of Huntington:

Other FY 2011 Funds

Item	Amount
Healing Place of Huntington - Windows & Furnishings	\$ 5,000
Paul Ambrose Trail for Health (PATH)	\$ 15,000
Huntington City Mission - Beds & Furnishings	\$ 3,000
Huntington Outdoor Theater	\$ 5,000
Women's Club - Ritter Tree Plant	\$ 1,500
John Hereford B & G Club - Repairs & Equipment	\$ 1,500
Publisher's Place - Spirit of WV Calendar	\$ 1,500
Healing Place of Huntington - Windows & Furnishings	\$ 23,000
Huntington Little League 3 - Phase II Construction	\$ 16,500
Huntington YMCA	\$ 3,000
Mt. State Center for Ind. Living - Façade & HVAC	\$ 1,500
Huntington City Mission - Furnishings & Beds	\$ 1,000
Jr. League - "Kids in the Kitchen" - Equipment	\$ 2,500
Huntington Litter Getters	\$ 4,500



Huntington Museum of Art - Accessible Trail	\$ 8,000
HPD "Weed & Seed" - Equipment & Supplies	\$ 3,500
Museum of Radio & Technology - Renovations & Insulation	\$ 3,000
Ronald McDonald House – Generator	\$ 3,000
Scottish Rite - MU Speech & Hearing Center	\$ 1,500
A.D. Lewis Community Center - Dishwasher, Roof & Repairs	\$ 5,000
Jeff George Hospitality House - Renovations & Equipment	\$ 1,500
Total:	\$ 110,000

5. Low Income Housing Tax Credits

The Low Income Housing Tax Credit (LIHTC) Program was created under the Tax Reform Act of 1986 and is intended to attract private investment to develop affordable rental housing for low- and moderate-income households.

The City of Huntington is supportive of the use of Low Income Housing Tax Credit (LIHTC) projects to provide housing that is affordable to low income households. There are seventeen (17) LIHTC projects with 608 LIHTC units in the City of Huntington. The most recent LIHTC development is a 22 unit development called Artisan Heights. This LIHTC project was completed in 2010 and offers modern three-bedroom and four-bedroom units in the Fairfield East Neighborhood of Huntington.

A map of the Low Income Housing Tax Credit projects in the City of Huntington can be found in Part II, Section K.

The table below provides a list of LIHTC projects which were built in the City of Huntington from 1987 through 2010. A total of 316 units were built, 315 of which are low-income.

Low-Income Housing Tax Credit Projects

Project Name:	Project Address:	Project City:	Project State:	Project ZIP Code:	Total Number of Units:	Total Low-Income Units:
Ashley Place	2744 Guyan Avenue	Huntington	WV	25702	1	1
Simms School Apartments	1680 11 th Avenue	Huntington	WV	25701	20	20
Pine Valley Apartments	2373 Spring Valley Drive	Huntington	WV	25704	18	18
Dunhill Apartments	6032 Hubbards Branch Road	Huntington	WV	25704	32	32
Huntington High Renaissance	900 8th Street	Huntington	WV	25701	42	42
The Hamlets	112 Hamlet Lane	Huntington	WV	25702	50	50



Project Name:	Project Address:	Project City:	Project State:	Project ZIP Code:	Total Number of Units:	Total Low-Income Units:
The Parks	100 Park Circle	Huntington	WV	25704	50	50
Glenbrier Apartments	60 Martil Jo Drive	Huntington	WV	25702	81	80
Artisan Heights	834 28 th Street	Huntington	WV	25705	22	22

Source: <http://ihhc.huduser.org/> and <http://www.wvhdf.com>

None of these housing units are expected to be lost from the assisted housing inventory in City of Huntington.

6. Planning, Zoning, and Building Codes

The City of Huntington continues to monitor and update its zoning codes. Most recently, the City updated the regulations overseeing the development of townhouses in the City. The City is currently working to update the following outdated definitions in its zoning ordinance:

- Family
- Group Residential Facility
- Personal Care Home

Additionally, the City is currently in the process of updating its zoning ordinance to include the following definitions:

- Accessibility
- American Disabilities Act
- Fair Housing Act
- Visitability

7. Taxes

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

The City's tax assessments are set by the County; therefore the City does not have any control over the assessed value.

- County – Owner-Occupied 1.7175 mills
- County – Non Owner-Occupied 3.4350 mills
- Municipal Fee..... \$120/year
- Refuse Fee \$180/year

The Municipal Fee is a minimum of \$120 per year, and an additional 7.35¢ per square foot of the home per year. Additionally, the refuse fee is reduced (\$60 per year) for



families with annual income less than \$14,000. The median value of the taxable residential properties within the City of Huntington is \$81,100 (Source: 2005-2009 American Community Survey). Properties are taxed based on their assessed value, which is 60% of the appraised value. Therefore, the taxable value of the median value of a house in the City is \$48,660.

The table below illustrates the taxes assessed for 1,000 square foot owner-occupied and renter-occupied properties valued at \$81,100 and assessed at \$48,660.

Property Taxes

Taxes for Owner-Occupied Property Assessed at \$48,660 in the City of Huntington	
County – Owner-Occupied	\$ 835.74
Municipal Fee	\$ 193.50
Refuse Fee	\$ 180.00
Total Taxes	\$ 1,209.24
Taxes for Renter-Occupied Property Assessed at \$48,660 in the City of Huntington	
County – Renter-Occupied	\$ 1,671.47
Municipal Fee	\$ 193.50
Refuse Fee	\$ 180.00
Total Taxes	\$ 2,044.97

As shown in the chart above, the property taxes for a rental property exceed those for an owner-occupied property. It can be expected that these elevated property tax expenses are passed down to the renter in the form of higher rents.

8. Public Housing

The Huntington Housing Authority has funding to support the administration of 1,207 Section 8 Housing Choice Vouchers, although HUD has authorized 1,331 Vouchers for the Huntington Housing Authority. As of January 2011, 2,227 families were on the Section 8 Voucher waiting list. The waiting list was closed on December 15, 2010 and has not reopened.

The Huntington Housing Authority also owns and operates 891 public housing units in the City that include senior communities, handicapped accessible housing, and neighborhood sites consisting of townhomes and single family homes. In December 2010, HHA had 884 of these units leased, for a vacancy rate of less than 1%. As of January 12, 2011, the Huntington Housing Authority had 961 families on the waiting list



for public housing units, and the waiting list remained open. Part II, Section K includes a map highlighting the locations of HUD assisted housing units and the Block Groups where Section 8 Vouchers are most commonly used.

The table below outlines the total number of public housing units available in the City of Huntington, and how many are currently accessible. The Huntington Housing Authority recognized the need for accessible units many years ago. As a result, 5% of their existing units have been modified for accessibility, and at least 5% of all new units are handicapped accessible. The chart below includes public housing units managed by both the Huntington Housing Authority and the Huntington Development Corporation (including Section 202, Section 811, and LIHTC Projects).

Public Housing Developments

Public Housing Developments	Number of Units	Accessible Units	Type of Development
Washington Square	79	5	Family
Northcott Court	126	6	Family
Marcum Terrace	280	12	Family
Fairfield Towers	67	0	Senior
Riverview East	60	5	Senior
Madison Manor	75	1	Senior
W.K. Elliott Garden Apartments	66	6	Family
Trowbridge Manor	85	9	Senior
Carter G. Woodson	20	2	Family
HHA Family Townhouses	2	0	Family
Housing Development Corporation	391	37	Family

The table below highlights the HUD assisted housing developments in the City of Huntington that are intended to serve low-income, disabled, and elderly households. The table below outlines the existing HUD assisted developments in the City.

HUD Assisted Housing

Development Name	Development Type
The Fairfield Apartments	Section 202 Elderly Supportive Housing
Eden Park Apartments	Section 202 Elderly Supportive Housing
Our Place/Westmoreland Apartments	Section 202 Elderly Supportive Housing
Westview Manor	Section 202 Elderly Supportive Housing
Evergreen Apartments	Section 202 Elderly Supportive Housing/ Section 811 Disabled Supportive Housing
GR Vale Apartments	Section 811 Disabled Supportive Housing
Washington Avenue Apartments	Section 811 Disabled Supportive Housing
Oak Tree Apartments	Section 811 Disabled Supportive Housing



Mary Woelfel Apartments	Section 811 Disabled Supportive Housing
Green Gables of Huntington	Section 811 Disabled Supportive Housing

HUD Assisted units and Low-Income Housing Tax Credit units are located across the City in areas of varying income, demographics, and housing tenure. The maps in Appendix B illustrate the locations of HUD assisted housing and Low-Income Housing Tax Credit developments as compared to income and race.

The table below presents data on multi-family and Section 8 assisted housing facilities in the City of Huntington. Ninety-five percent (95.1%) of the assisted units have contracts set to expire by 2013.

Multi-family and Section 8 Project Based Assisted Housing Facilities

Multi-family assisted units with active contracts status	610
Percentage of Multi-family assisted units with contracts expiring in 2004	36.1%
Percentage of Multi-family assisted units with contracts expiring in 2005	24.6%
Percentage of Multi-family assisted units with contracts expiring in 2006	10.8%
Percentage of Multi-family assisted units with contracts expiring in 2007	0.0%
Percentage of Multi-family assisted units with contracts expiring in 2008	19.5%
Percentage of Multi-family assisted units with contracts expiring in 2009-2013	4.1%
Percentage of Multi-family assisted units with contracts expiring in 2014 or later	4.9%

Source: www.dataplace.org

As part of this analysis, the City of Huntington reviewed several of the Huntington Housing Authority’s documents and policies to ensure compliance with the Fair Housing Act, as amended, and the Americans with Disabilities Act. Specifically, the City reviewed the Housing Authority’s Admission Requirements Summary for Public Housing Program and Section 8 Rental Assistance Program; the Equal Housing Opportunity Policy Statement; Fair Housing Policies; Admissions and Continued Occupancy Policy; Section 8 Rental Assistance Program – Landlord Packet; and the Reasonable Accommodations Policy.

9. Mountain State Centers for Independent Living

Mountain State Centers for Independent Living (MTSTCIL) is a community-based organization providing numerous social services and other resources to individuals with disabilities and their families. Beginning in FY 2011, the City will grant MTSTCIL CDBG funding to carry out a fair housing advocacy, outreach and education program. Through this program, MTSTCIL will strive to strengthen the delivery of fair housing education to at risk groups, victims of housing discrimination, landlords, and the general population in the City of Huntington. MTSTCIL will work closely with available services and media outlets to ensure a comprehensive marketing and education effort throughout the City.

C. Private Sector:

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

1. Real Estate Practices

The Huntington Board of Realtors, a member of the National Association of Realtors, is the local organization of real estate brokers operating in the City of Huntington. The Huntington Board of Realtors has an open membership policy and does not discriminate. Members are bound by the Code of Ethics of the National Association of Realtors (NAR). This Code of Ethics is available on the Huntington Board of Realtors website (<http://huntingtonboardofrealtors.com/>) and it obligates its members to maintain professional standards including efforts to affirmatively furthering fair housing.



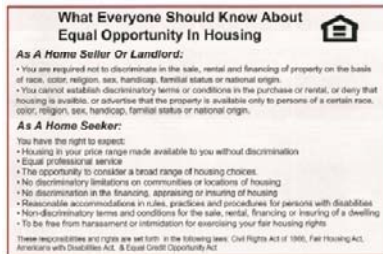
The Huntington Board of Realtors and the West Virginia Association of Realtors offer continuing education courses on a variety of topics including a 3.5 hour course on Fair Housing as well as a course on ethics and professional standards to ensure that its members are up to date on policies, practices, and procedures. The West Virginia Association of Realtors also offers several other continuing education opportunities, webinars, and other training opportunities to educate members and promote April as Fair Housing Month. The Huntington Board of Realtors has the necessary policies in place to handle fair housing discrimination complaints.

2. Newspaper/Magazine Advertising

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

Real estate advertisements were reviewed for several real estate publications, including the *Homes of the Tri-State Area*, *Rental Guide of the Tri-State Area*, and the Real Estate Section of the *Herald-Dispatch*. Each of these publications contained HUD's publisher's notice indicating that all





advertisements were subject to the Federal Fair Housing Act and that all advertised housing is available on an equal opportunity basis. The real estate and lender’s advertisements in each of these publications include the equal housing opportunity logo on each page. The *Homes of the Tri-State Area* publication also included a half-page ad entitled “What Everyone Should Know About Equal Opportunity Housing” and included key facts for sellers,

landlords, and home seekers. None of the advertisements contained language that prohibited occupancy by any group.

3. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at www.ffiec.gov/hmda/ and is included in the Appendix B of this Analysis of Impediments. The available data does not indicate any discriminatory lending patterns. The following tables provide an analysis of the HMDA data. Data for the City of Huntington, Cabell County, and Wayne County is highlighted where possible. All other data is that of the entire Huntington-Ashland Metropolitan Statistical Area (MSA).

The table below compares lending in the City of Huntington to Cabell County, Wayne County, and the Huntington-Ashland Metro Area. Lending in the City of Huntington comprised over half of the lending in Cabell County and more than twenty-one percent (21.76%) of the lending in the metro area in 2009.

HMDA Data Analysis for 2009

	Home Purchase Loans							
	FHA, FSA/RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	Amount	#	Amount	#	Amount	#	Amount
Huntington	262	\$26,080	427	\$43,930	1157	\$125,666	225	\$11,092
Cabell County	457	\$50,827	754	\$85,523	2,275	\$289,466	396	\$20,834
Wayne County	178	\$17,835	203	\$17,219	811	\$86,256	190	\$10,157
MSA/MD	1,204	\$129,665	2,064	\$214,625	7,717	\$899,658	1383	\$60,422
% of Cabell County lending in Huntington	57.33%	51.31%	56.63%	51.37%	50.86%	43.41%	56.82%	53.24%
% of metro area lending in Cabell County	37.96%	39.20%	36.53%	39.85%	29.48%	32.18%	28.63%	34.48%
% of metro area lending in Wayne County	14.78%	13.75%	9.84%	8.02%	10.51%	9.59%	13.74%	16.81%



% of metro area lending in Huntington	21.76%	20.11%	20.69%	20.47%	14.99%	13.97%	16.27%	18.36%
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**Note: Amounts in thousands.*

The table below shows the conventional loan applications in the City of Huntington. Almost two-thirds (62.49%) of the loan applications in the City were approved.

Disposition of Conventional Loans

	City of Huntington		
	Count	% of Huntington Applications	% of Total MSA Applications
Loans Originated	1216	58.72%	9.83%
Approved, Not Accepted	78	3.77%	0.63%
Applications Denied	507	24.48%	4.10%
Applications Withdrawn	216	10.43%	1.75%
File Closed for Incompleteness	54	2.61%	0.44%

The table below outlines the disposition of conventional loans in the Huntington-Ashland MSA by income level. Loan applications from low-income households have the highest denial rates, and upper-income households have the highest origination rates.

Disposition of Conventional Loans by Income Level

Income Level	Applications Received		Loans Originated		Applications Approved, Not Accepted		Applications Denied		Applications Withdrawn or Closed for Incompleteness	
	Count	% of Total	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level
Low	538	26.07%	275	51.1%	37	6.9%	178	33.1%	48	8.9%
Moderate	246	11.92%	160	65.0%	13	5.3%	59	24.0%	14	5.7%
Middle	224	10.85%	144	64.3%	8	3.6%	52	23.2%	20	8.9%
Upper	973	47.14%	699	71.8%	68	7.0%	125	12.8%	81	8.3%
Income Not Available	83	4.02%	63	75.9%	1	1.2%	4	4.8%	15	18.1%
Total	2,064	100.00%	1,341	65.0%	127	6.2%	418	20.3%	178	8.6%

The tables below show the dispositions of conventional loans disaggregated by minority status and income level for the Huntington-Ashland MSA. The number of applications for conventional loans submitted by White, Non-Hispanic applicants significantly outnumbers Minority applicants in each income level analyzed. In each income category, the percentage of loans originated by White households exceeds the percentage of loans originated by Minority households, based on the number of



applicants in each minority status category. Conversely, low- and moderate-income Minority applicants experience a higher rate of denial than white, non-Hispanic.

Conventional Loan Disposition Rates by Minority Status, Low Income

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non-Hispanic	405	95.7%	263	64.9%	26	6.4%	70	17.3%	39	9.6%	7	1.7%
Minority, Including Hispanic	18	4.3%	8	44.4%	0	0.0%	5	27.8%	4	22.2%	1	5.6%
Total	423	--	271	--	26	--	75	--	43	--	8	--

The number of white, non-Hispanic low-income applicants significantly outnumbers the number of minority applicants; however, minority applicants have a higher rate of denial than white applicants.

Conventional Loan Disposition Rates by Minority Status, Moderate Income

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non-Hispanic	186	98.4%	137	73.7%	4	2.2%	32	17.2%	12	6.5%	1	0.5%
Minority, Including Hispanic	3	1.6%	2	66.7%	0	0.0%	0	0.0%	0	0.0%	1	33.3%
Total	189	--	139	--	4	--	32	--	12	--	2	--

The number of white, non-Hispanic moderate-income applicants significantly outnumbers the number of minority applicants. With so few minority applicants in the moderate income category, it is difficult to make direct comparisons. However, the loan origination rates for white and minority applicants are similar.



Conventional Loan Disposition Rates by Minority Status, Middle Income

Minority Status	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
White, Non-Hispanic	172	96.6%	122	70.9%	12	7.0%	16	9.3%	22	12.8%	0	0.0%
Minority, Including Hispanic	6	3.4%	3	50.0%	1	16.7%	1	16.7%	0	0.0%	1	16.7%
Total	178	--	125	--	13	--	17	--	22	--	1	--

The number of white, non-Hispanic moderate-income applicants significantly outnumbers the number of minority applicants. Compared to white applicants, minority applicants have a lower origination rate and a higher denial rate.

The table below offers a closer look at the denial rates of conventional loans by denial reason and income level. For low-, moderate-, and middle-income applicants, the most common denial reasons include debt-to-income ratio, credit history, and collateral. The most common denial reasons for upper-income applicants include collateral and credit history. Overall, the most common reason for denial is credit history. Collateral are the second most common reasons for the denial of conventional loans in the Huntington-Ashland MSA.

Conventional Loan Denial Rates by Denial Reason and Income Level

	Low Income		Moderate Income		Middle Income		Upper Income		Income Not Available		Total Denials	
	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Total
Debt to Income Ratio	286	22.3%	59	17.5%	63	14.4%	126	11.2%	10	16.4%	544	16.8%
Employment History	31	2.4%	7	2.1%	4	0.9%	13	1.2%	2	3.3%	57	1.8%
Credit History	641	50.0%	146	43.3%	206	46.9%	410	36.5%	19	31.1%	1422	43.9%
Collateral	140	10.9%	64	19.0%	89	20.3%	360	32.0%	9	14.8%	662	20.4%
Insufficient Cash	26	2.0%	8	2.4%	7	1.6%	17	1.5%	3	4.9%	61	1.9%
Unverifiable Information	16	1.2%	9	2.7%	6	1.4%	27	2.4%	2	3.3%	60	1.9%
Credit Application Incomplete	45	3.5%	24	7.1%	31	7.1%	85	7.6%	11	18.0%	196	6.0%
Mortgage Insurance Denied	3	0.2%	0	0.0%	0	0.0%	4	0.4%	0	0.0%	7	0.2%
Other	93	7.3%	20	5.9%	33	7.5%	82	7.3%	5	8.2%	233	7.2%
Total Denials/ % of Total	1281	--	337	--	439	--	1124	--	61	--	3242	--



An additional analysis of loans granted by race in Huntington West Virginia, Cabell County, Wayne County, and across the country is beneficial to further illustrate the financial trends in the City of Huntington. The following tables present data gathered from www.dataplace.org. The table below presents loans for the purchase of single-family homes by race. The City of Huntington has a high proportion of home loans made to minority households relative to Cabell and Wayne Counties and the state.

Home Purchase Loans by Race

Loans by Race	City of Huntington	Cabell County	Wayne County	West Virginia	United States
Percentage of owner-occupied home purchase loans to Whites (2007)	93.8%	95.2%	97.5%	94.2%	72.7%
Percentage of owner-occupied home purchase loans to Blacks (2007)	2.3%	1.6%	0.0%	2.0%	7.9%
Percentage of owner-occupied home purchase loans to Asian/Pacific Islanders (2007)	1.4%	0.9%	0.0%	0.8%	5.2%
Percentage of owner-occupied home purchase loans to Native Americans (2007)	0.2%	0.2%	0.4%	0.1%	0.3%
Percentage of owner-occupied home purchase loans to Hispanics (2007)	1.0%	0.9%	0.7%	1.2%	10.8%
Percentage of owner-occupied home purchase loans to mixed race pairs (2007)	0.8%	0.9%	1.4%	1.6%	2.9%
Percentage of owner-occupied home purchase loans to minorities (2007)	6.2%	4.8%	2.5%	5.8%	27.3%
Percentage of owner-occupied home purchase loans made to multiracial applicants (2007)	0.4%	0.3%	0.0%	0.1%	0.2%

Source: www.dataplace.org

The table below highlights home loans made in the City of Huntington, Cabell County, Wayne County, West Virginia, and the United States. The median income in the City of Huntington is lower than the median income of Cabell County, the state, and the country. The City of Huntington has the highest percentage of loans made to very low- and low-income households.



Home Purchase Loans by Income

Income	City of Huntington	Cabell County	Wayne County	West Virginia	United States
Median borrower income for owner-occupied purchase 1 to 4 family (2007)	\$48,000	\$54,000	\$46,000	\$58,000	\$74,000
Median income of purchase borrowers (1 to 4 families)/median owner income (2007)	\$43,000	\$39,000	\$41,000	\$40,000	\$42,000
Percentage of owner-occupied home purchase loans to very low-income borrowers (2007)	9.4%	6.9%	8.3%	6.9%	5.7%
Percentage of owner-occupied home purchase loans to low-income borrowers (2007)	19.7%	16.5%	20.0%	18.5%	19.2%
Percentage of owner-occupied home purchase loans to middle-income borrowers (2007)	27.9%	27.2%	33.4%	27.4%	25.8%
Percentage of owner-occupied home purchase loans to high-income borrowers (2007)	43.0%	49.5%	38.3%	47.2%	49.3%

Source: www.dataplace.org

The table below considers the percentage of conventional and refinancing mortgages made by subprime lenders. The prevalence of these loans in the City of Huntington in 2005 (the most recent data available) exceeds the rates for Cabell County, but not Wayne County, the State of West Virginia, or the nation.

Loans from Subprime Lenders by Purpose and Loan Type

Type	City of Huntington	Cabell County	Wayne County	West Virginia	United States
Percentage of conventional home purchase mortgage loans by subprime lenders (2005)	3.8%	3.3%	3.8%	4.3%	17.7%
Percentage of conventional refinancing mortgage loans by subprime lenders (2005)	11.4%	8.7%	9.4%	11.6%	20.4%

Source: www.dataplace.org



D. Citizen Participation:

The City of Huntington’s 2011 Update to its Analysis of Impediments to Fair Housing Choice was available for public comment on the City’s website (www.cityofhuntington.com), at the City’s Department of Development and Planning, located at 800 Fifth Avenue, and at the Guyandotte and West Huntington Branches of the Cabell County Public Library. The document was available for fifteen (15) days beginning on August 5, 2011. Citizens wishing to provide feedback on the Analysis of Impediments were encouraged to submit their comments in writing to the City’s Department of Development and Planning by August 19, 2011.

In order to garner community input on the barriers to fair housing in the City of Huntington, the City distributed surveys by including them in the weekly newspaper that is sent to all residents. In all, approximately 35,000 citizen surveys were distributed. The City received ninety-one (91) completed questionnaires. Respondents were first asked to consider a list of categories and identify which were protected classes. Disability and Race were the most commonly identified protected classes, with 72.5% of all respondents correctly identifying each of these categories. The table below shows the percentage of survey participants who identified each category as a protected class.

Category	Percent Selecting Category as Protected Class
Age	61.5%
Color	62.6%
Disability	72.5%
Ethnicity	56.0%
Family Status	51.6%
Gender/Sex	50.5%
Income	48.4%
National Origin	54.9%
Race	72.5%
Religion	48.4%

The survey participants were then asked to identify the greatest barriers to fair housing in the City. The most commonly identified barriers included a lack of knowledge among residents regarding fair housing, a lack of affordable housing in some areas of the City, lack of fair housing education, a lack of knowledge among landlords and property managers regarding fair housing, and a lack of accessible housing for persons with disabilities.

Only a quarter of the respondents (25.3%) believe that residents know how to report a fair housing concern or violation and almost eighty percent (79.1%) believe that some fair housing complaints in the City are never reported. Lack of knowledge of the reporting process and fear of retaliation were the most common reasons identified for why fair housing violations might not be reported.



E. Potential Impediments and Recommendations:

The following impediments to fair housing choice and recommendations are presented to assist the City of Huntington to affirmatively further fair housing in the community. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment. New and carried over impediments to Fair Housing Choice are presented in chart format on the pages that follow.

Several of the previously identified impediments are still present in the City of Huntington, despite the City's best efforts. Below is a list of impediments that were developed as part of Huntington's 2011 Analysis of Impediments.

- **Impediment 1: Housing Affordability** – There is a lack of affordable housing, outside areas of low/mod concentration, that is decent, safe, and sound, which limits the choices of neighborhoods that a low/mod income household can afford, which makes it a fair housing concern.
- **Impediment 2: Fair Housing, Education, Advocacy, Monitoring, and Enforcement** – There is a lack of knowledge and awareness on the part of tenants and landlords of their rights and responsibilities under the Fair Housing Act and a need to continually monitor and enforce the Fair Housing Act.
- **Impediment 3: Housing Accessibility** – There is a lack of accessible and visitable housing units that are affordable to low/mod income households which are physically challenged, creating a fair housing concern.
- **Impediment 4: Homeownership for Minorities** – There is a disproportionate number of minority homeowners compared to the high percentage of minority renter households, as compared to the high percentage of non-minority homeowners.
- **Impediment 5: Cost Overburden** – There is a high percentage of both owner-occupied and renter-occupied households whose housing costs exceed 30% of their total household income.
- **Impediment 6: Housing Complaints** – There has been an increase in the number of complaints filed with HUD-FHEO on housing discrimination based on race.
- **Impediment 7: Age of Housing Stock** – Almost 33.6% of the existing housing units in the City were built prior to 1939 and 17.0% of the City's population is over 65 years of age, which means that many housing units are not easily made accessible and therefore, there is a lack of units that can be made accessible.
- **Impediment 8: Reasonable Accommodations/Modifications** – There is a lack of responsibility on the part of landlords to make reasonable accommodations



and modifications for persons who are physically challenged which is a violation of the Fair Housing Act.

- **Impediment 9: Public Policies** – The City of Huntington regulates land use through its Zoning Ordinance and Building Codes. Some of these policies are outdated and may be too restrictive as they are currently written.

CITY OF HUNTINGTON'S FAIR HOUSING GOALS AND STRATEGIES - FY 2011 to FY 2016

IMPEDIMENTS TO BE ADDRESSED	GOAL	STRATEGIES TO MEET THE GOALS	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS	BENCHMARK	PROPOSED FIVE YEAR INVESTMENT	YEAR TO BE COMPLETED
IMPEDIMENT 1: HOUSING AFFORDABILITY – There is a lack of affordable housing, outside areas of low/mod concentration, that is decent, safe, and sound, which limits the choices of neighborhoods that a low/mod income household can afford, which makes it a fair housing concern.	GOAL – Increase the supply of decent, safe, and sound housing that is affordable to lower income households, both renters and owner occupants, outside areas of low/mod concentration.	1-A: Provide funds for new rental housing, and increase the availability of affordable housing units to reduce the number of LMI households waiting for public housing and rental assistance.	- Huntington Housing Authority - CHDO's - Housing Developers - City of Huntington	Develop forty (40) affordable housing units for renters	\$1,000,000	2016
		1-B: Increase the supply of available decent, safe, sound, and affordable housing through rehabilitation assistance, new construction, and the transfer of surplus city-owned properties for LMI housing initiatives.	- City of Huntington - Huntington Housing Authority - CHDO's - Housing Developers	Construct or rehabilitate forty (40) affordable housing units	\$375,000	2016
		1-C: Increase homeownership opportunities for LMI households by providing housing counseling, credit counseling, and downpayment assistance.	- City of Huntington - Huntington Housing Authority - CHDO's - Housing Developers	Fifty (50) low/moderate income families in program	\$1,000,000	2016
		1-D: Maintain an effective property maintenance inspection and enforcement program to prevent deterioration of the City's housing stock.	- City of Huntington	Complete one hundred (100) inspections per year	\$200,000	On-going
IMPEDIMENT 2: FAIR HOUSING, EDUCATION, ADVOCACY, MONITORING, AND ENFORCEMENT – There is a lack of knowledge and awareness on the part of tenants and landlords of their rights and responsibilities under the Fair Housing Act and a need to continually monitor and enforce the Fair Housing Act.	GOAL – Increase the knowledge and awareness of the rights of individuals and the responsibilities of building owners in regard to the Fair Housing Act through education, advocacy, monitoring, and enforcement to eliminate discrimination in housing and to provide fair housing choices for all individuals and families.	2-A: Provide funds and strengthen the delivery of public education and targeted training and programs concerning the rights and responsibilities ensured by the Fair Housing Act.	- Mountain State Center for Independent Living - City of Huntington - Board of Realtors - WV Human Rights Commission	Conduct one training program each year	\$100,000	2016
		2-B: Support the designation and funding of an independent FHIP organization to replace the Huntington Human Relations Commission.	- Mountain State Center for Independent Living - HUD FHEO Office - City of Huntington	One (1) organization to become a FHIP		2014
		2-C: Fund and strengthen the delivery of financial literacy counseling for LMI and minority households to combat predatory and subprime lending practices.	- Mountain State Center for Independent Living - Social Service Agencies - WV Human Rights Commission	Conduct programs every other year		2016
		2-D: Fund and support the delivery of fair housing services to at-risk groups and victims of housing discrimination.	- Mountain State Center for Independent Living - Social Service Agencies - WV Human Rights Commission	Conduct programs each year		2016
IMPEDIMENT 3: HOUSING ACCESSIBILITY – There is a lack of accessible and visitable housing units that are affordable to low/mod income households which are physically challenged, creating a fair housing concern.	GOAL – Increase the supply of decent, safe, and sound housing that is affordable and accessible to lower income households, who are handicapped, for both renters and owner occupants.	3-A: Study the issues regarding accessibility to affordable housing by conducting an inventory of accessible units, determine needs for specific accessibility features in units, and develop recommendations to increase marketing of accessible units to the disabled and frail elderly renters.	- City of Huntington - Social Service Agencies	Create an inventory of accessible units and market units	\$15,000	2014
		3-B: Assist by increasing the supply of housing that is accessible to persons with disabilities and the frail elderly by providing targeted rehabilitation assistance and ensuring that new multi-family construction meets accessibility provisions of the Fair Housing Act.	- City of Huntington - CHDO's - Housing Developers	Rehabilitation of ten (10) accessible housing units	\$150,000	2016
		3-C: Improve the accessibility to emergency shelters and transitional housing units to accommodate handicapped persons.	- City of Huntington - Shelter Providers	Modify one (1) shelter/transitional facility	\$50,000	2013
		3-D: Increase the supply of accessible units for emergency shelters and transitional housing locations.	- City of Huntington - Shelter Providers	Develop ten (10) accessible beds		
IMPEDIMENT 4: HOMEOWNERSHIP FOR MINORITIES – There is a disproportionate number of minority homeowners in relation to the high percentage of minority renter households, as compared to the high percentage of non-minority homeowners.	GOAL – Increase the number of minority homeowners and thus reduce the percentage of minority households which are renters.	4-A: Develop homeownership opportunities for minorities by providing financial incentives, housing counseling and credit counseling programs.	- City of Huntington - WV Housing Development Fund - Social Service Agencies	Ten (10) minority families become homeowners	\$150,000	2016
		4-B: Undertake an outreach and marketing program to inform minorities and low- and moderate-income households about homeownership opportunities in the City.	- City of Huntington - Mountain State Center for Independent Living - Social Service Agencies	Develop a marketing program and implement plan	\$10,000	2016

CITY OF HUNTINGTON'S FAIR HOUSING GOALS AND STRATEGIES - FY 2011 to FY 2016

IMPEDIMENTS TO BE ADDRESSED	GOAL	STRATEGIES TO MEET THE GOALS	RESPONSIBLE ENTITIES ASSIGNED TO MEET GOALS	BENCHMARK	PROPOSED FIVE YEAR INVESTMENT	YEAR TO BE COMPLETED
IMPEDIMENT 5: COST OVERBURDEN – There is a high percentage of both owner-occupied and renter-occupied households whose housing costs exceed 30% of their total household income.	GOAL – Reduce the number of families whose housing costs exceed 30% or more of their total household income.	5-A: Provide housing rehab financial assistance to homeowners to improve their property and to install energy cost saving measures to reduce their housing costs.	- City of Huntington - Social Service Agencies	Rehabilitate twenty-five (25) homes	\$250,000	2016
		5-B: Promote the development of more affordable housing for the very-low income.	- City of Huntington - WV Housing Development Fund - Social Service Agencies	Construction of twenty-five (25) housing units	\$500,000	2016
		5-C: Provide homebuyer assistance for the purchase of existing housing by low-income homebuyers.	- City of Huntington - WV Housing Development Fund - Social Service Agencies	Provide ten (10) households per year with downpayment assistance	\$150,000	2016
IMPEDIMENT 6: HOUSING COMPLAINTS – There has been an increase in the number of complaints filed with HUD-FHEO on housing discrimination based on race.	GOAL – Through education, advocacy and monitoring, eliminate discrimination in the rental of housing for minorities.	6-A: Educate landlords, real estate agents, renters, and homeowners on their rights and responsibilities under the Fair Housing Act.	- City of Huntington - Mountain State Center for Independent Living - Board of Realtors	Conduct one (1) training and educational program every year	\$25,000	On-going
		6-B: Assist outside independent organizations to sample and monitor patterns of discrimination.	- WV Human Rights Commission - Mountain State Center for Independent Living	Reduction in the number of complaints filed with HUD-FHEO		
IMPEDIMENT 7: AGE OF HOUSING STOCK – Almost 33.6% of the existing housing units in the City were built prior to 1939 and 17.0% of the City's population is over 65 years of age, which means that many housing units are not easily made accessible and therefore, there is a lack of units that can be made accessible.	GOAL – Develop new housing opportunities for persons who are elderly and physically challenged as an alternative to existing housing units to increase the supply of accessible housing.	7-A: Encourage the construction of new accessible housing units that meet the needs of the elderly and physically challenged.	- City of Huntington - Social Service Agencies - Housing Developers	Construction of five (5) new accessible housing units	\$250,000	2016
IMPEDIMENT 8: REASONABLE ACCOMMODATIONS/ MODIFICATIONS – There is a lack of willingness on the part of landlords to make reasonable accommodations and modifications for persons who are physically challenged which is a violation of the Fair Housing Act.	GOAL – Increase awareness of landlords responsibility to make reasonable accommodations and increase the supply of accessible rental housing.	8-A: Strengthen the delivery of public education and training programs concerning the rights and responsibilities ensured by the Fair Housing Act.	- City of Huntington - Mountain State Center for Independent Living - Social Service Agencies	Conduct outreach and training	\$15,000	On-going
		8-B: Provide funds and incentives to assist landlords in making reasonable accommodation/modifications necessary to make their properties accessible.	- City of Huntington - Mountain State Center for Independent Living - Landlords	Ten (10) housing units made accessible	\$150,000	2016
IMPEDIMENT 9: PUBLIC POLICIES – The City of Huntington regulates land use through its Zoning Ordinance and Building Codes. Some of these policies are outdated and may be too restrictive as they are currently written.	GOAL – Update the City's Zoning Ordinance and, City policies and procedures to comply with the Fair Housing Act.	9-A: The City will review the City's Zoning Ordinance and codes for compliance with the Fair Housing Act, as amended.	- City of Huntington Department of Development and Planning - City of Huntington Planning Commission - City of Huntington Zoning Board	Revise City Zoning Ordinance	Staff time	2012
		9-B: The City will amend its Zoning Ordinance in accordance with, and makes reference to, the Fair Housing Act, the Americans with Disabilities Act, and other Federal and State laws.	- City of Huntington Department of Development and Planning - City of Huntington Planning Commission - City of Huntington Zoning Board	Revise City Zoning Ordinance	Staff time	2012
		9-C: The City will review its policies and procedures in regard to land use regulation in order to bring them into compliance with Federal and State Laws.	- City of Huntington Department of Development and Planning - City of Huntington Planning Commission - City of Huntington Zoning Board	Revise City Policies and Procedures	Staff time	2012



V. Certification and Resolution

Signature Page:

I hereby certify that this *Fair Housing Analysis Update – 2011* is in compliance with the intent and directives of the Community Development Block Grant Program regulations.

Kim Wolfe, Mayor, City of Huntington, WV

Date



VI. Appendix

The following items are in the appendix:

- **Appendix A – Demographic Data**
- **Appendix B – Maps**
- **Appendix C – HUD-CHAS Data**
- **Appendix D – Home Mortgage Disclosure Act Data**
- **Appendix E – Meeting Summaries**



A. Appendix A – Demographic Data

Attached is the 2005-2009 American Community Survey Data for the City of Huntington, Cabell County, Wayne County, and the State of West Virginia.



B. Appendix B – Maps

- LIHTC and HUD Assisted Housing and Low- and Moderate-Income Population
- LIHTC and HUD Assisted Housing and White Population
- LIHTC and HUD Assisted Housing and Minority Population
- LIHTC and HUD Assisted Housing and Owner-Occupied Housing Units
- LIHTC and HUD Assisted Housing and Renter-Occupied Housing Units
- Section 8 Vouchers and Low- and Moderate-Income Population
- Section 8 Vouchers and White Population
- Section 8 Vouchers and Minority Population
- Section 8 Vouchers and Owner-Occupied Housing Units
- Section 8 Vouchers and Renter-Occupied Housing Units
- City of Huntington Points of Interest



C. Appendix C – HUD-CHAS Data

Attached are the HUD-CHAS Data tables for the City of Huntington.



D. Appendix D – Home Mortgage Disclosure Act Data

Attached are the CRA Reports for the Huntington-Ashland, WV-KY-OH MSA, date May 24, 2010. These reports were downloaded from www.ffiec.org/hmda/.



E. Appendix E – Meeting Summaries

Attached are summaries of the following meetings:

- Huntington Housing Authority and the Huntington Development Corporation
 - February 7, 2011, 1:00 PM
- Housing Providers
 - February 7, 2011, 2:30 PM
- City of Huntington Department of Planning and Development
 - February 8, 2011, 8:00 AM
- City of Huntington Zoning Department
 - February 8, 2011, 9:30 AM
- Mountain State Center for Independent Living
 - February 8, 2011, 10:00 AM
- West Virginia Advocates and the United Way of the River Cities
 - February 8, 2010, 11:00 AM
- Huntington Human Relations Commission
 - February 8, 2011, 1:00 PM
- Social Service Providers
 - February 8, 2011, 1:30 PM