

CITY OF HUNTINGTON ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (A.I.) FY 2020 - 2024



City of Huntington, 800 5th Avenue,
Huntington, West Virginia 25701



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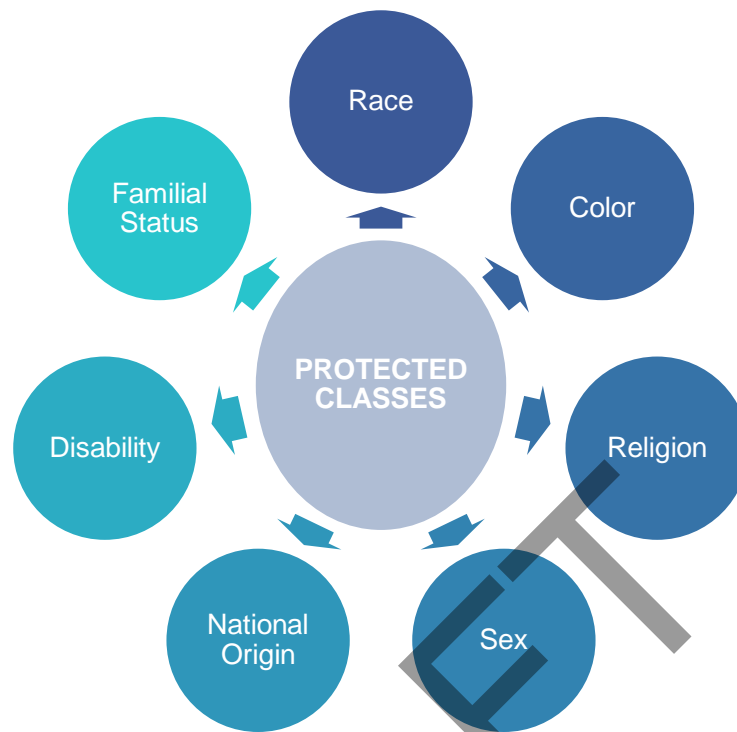
Executive Summary

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 (CDBG) Program. In addition, the City of Huntington is a member of the Cabell-Huntington-Wayne HOME Consortium, which is administered by the City. 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 an Analysis of Impediments which identifies any barriers to fair housing choice.

The City of Huntington last prepared an Analysis of Impediments to Fair Housing Choice in 2015. The City has now prepared this 2020 Analysis of Impediments to Fair Housing Choice to coincide with the City's FY 2020-2024 Five Year Consolidated Plan. The analysis focuses on the status and interaction of six (6) fundamental conditions within the community:

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

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



The methodology employed to undertake this Analysis of Impediments included:

- **Research**
 - Review of the 2015 Analysis of Impediments to Fair Housing Choice, the City's Zoning Ordinance, Comprehensive Plan, Five Year Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance Evaluation Reports.
 - Review of the Housing Authority's Five Year and Annual PHA Plans.
 - Review of the most recent demographic data for the area from the U.S. Census, which included general, demographic, housing, economic, social, and disability characteristics.
 - Review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data.
 - Review of financial lending through the Home Mortgage Disclosure Act (HMDA) database.
 - A review of local real estate and mortgage practices.
 - Home mortgage foreclosure data.



- **Interviews & Meetings**
 - Meetings and interviews were conducted with various City and County Departments; Housing Authorities; community, social service, and advocacy agencies, as well as public meetings.
 - Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.
- **Analysis of Data**
 - Low- and moderate-income areas were identified and mapped.
 - Concentrations of minority populations were identified and mapped.
 - Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
 - Fair housing awareness in the community was evaluated.
 - Distribution by location of public and assisted housing units were analyzed and mapped.
 - The location of CDBG expenditures throughout the area were analyzed.
 - CDBG/HOME Five Year Goals and Objectives were reviewed.
- **Potential Impediments**
 - Public sector policies that may be viewed as impediments were analyzed.
 - Private sector policies that may be viewed as impediments were analyzed.
 - The status of previously identified impediments was analyzed.
- **Citizen Participation**
 - A public survey was publicized by the various participating jurisdictions, public meetings were held, and copies of the draft AI were placed on public display to encourage citizen input.
 - The public survey was available at the following link <https://surveymonkey.com/s/HUNTCDBG> from January 1, 2019 until March 16, 2020.

The City of Huntington held one (1) Public hearing to engage the public and local organizations/agencies and help identify issues impacting Fair



Housing Choice. The Public Hearing was held on Wednesday, January 22, 2019 in City Council Chambers.

- Notices for the public hearing were published in the “The Herald Dispatch,” the local newspaper of general circulation in the area.
- The City of Huntington met with representatives from local housing, community development, and social service organizations through a series of small group discussions. These were held with the following types of organizations:
 - Huntington Housing Authority
 - Community Organizations
 - Economic Development Organizations
 - Education Providers
 - Fair Housing Organizations
 - Housing Providers
 - Health Care Organizations
 - Homeless Service Providers
 - Public Safety
 - Social Service Providers

The document was on public display for a period of thirty (30) days. Residents were encouraged to submit written or oral feedback on the Analysis of Impediments. A virtual public meeting was held to replace a second in-person public hearing.

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

- **Housing Opportunities:**
 - There is a shortage of affordable housing in the City of Huntington that is decent, safe, and sanitary.
 - Much of the City’s housing stock is in need of major rehab.
 - The population and the housing supply of the City of Huntington have been decreasing.
 - The number of renter-occupied and owner-occupied units have been decreasing in the City of Huntington.
 - Due to large amounts of student debt, individuals are struggling to find housing loans.
- **Cost Overburden:**
 - Lower household incomes create cost overburdened housing conditions; According to the 2013-2017 ACS approximately 18.3% of



homeowners and 60.8% of renters in the City are cost overburdened by 30% or more.

- Individuals and families in the lowest-income areas struggle to find higher paying jobs.
- The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs.

- **Disability/Accessibility:**

- There is a lack of housing in the City that is accessible and affordable for the elderly, the disabled, and persons with special needs.
- The denial by some landlords to make reasonable modifications and accommodations limits the amount of accessible units in the City that are for rent for persons with special needs.
- The limited public transportation network in the City is not convenient for lower income households to go to: work, health care, shopping, etc., which limits the choices where a low-income household can live.
- The City of Huntington is not designed for walkability, and there is a need for sidewalks in many portions of the City.
- Some landlords will refuse to make reasonable modifications and accommodations, and they discriminate against elderly tenants.

- **Fair Housing:**

- Tenants and homebuyers do not always file housing discrimination complaints when they have been discriminated against, either because they do not know about the Fair Housing Act or they do not know where to report complaints.
- There is a lack of awareness of tenants' rights and landlords' responsibilities, including what reasonable modifications and accommodations are.
- Some tenants will not report discriminatory practices for fear of retaliation.

The City of Huntington placed the “draft” 2020 Analysis of Impediments on its public website and held a virtual public hearing on-line.



The following impediments to Fair Housing Choice were identified:

- **Impediment 1: Fair Housing Education and Outreach**

There is a need to educate members of the community concerning their rights and responsibilities under the Fair Housing Act and to raise awareness, especially for low-income households, that all residents of the City have a right under federal law to fair housing choice.

Goal: Improve the public's knowledge and awareness of the Federal Fair Housing Act, and related laws, regulations, and requirements to affirmatively further fair housing in the City.

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

1-A: Continue to promote Fair Housing awareness through the media and with assistance from local/regional social service agencies, by providing educational awareness/opportunities for all persons to learn more about their rights and requirements under the Fair Housing Act and Americans with Disabilities Act.

1-B: Continue to make available and distribute literature and informational material concerning fair housing issues and an individual's rights.

1-C: Educate landlords on their responsibilities to make reasonable accommodations for disabled tenants.

1-D: Update the information on the City's website about whom to contact and how to file a fair housing complaint, as well as general Fair Housing information for homeowners and renters.

1-E: Strive for better intergovernmental cooperation between Federal, State, County, and local partners, as well as community groups and developers, to effectively identify and address potential barriers to affordable housing choice.

- **Impediment 2: Public Policies and Regulations**

The City's Zoning Code needs additional definitions, provisions, and revisions to be compliant with the Federal Fair Housing Act, Section 504, and the Americans with Disabilities Act, to affirmatively further fair housing.

Goal: The City's Zoning Code and land development policies will promote and affirmatively further fair housing.



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

2-A: The City should review the City's Zoning Ordinance and Building Codes for compliance with the Fair Housing Act, as amended.

2-B: Continue to revise and update definitions and add new definitions for the words: "Family," "Handicap (Disabled)," "Fair Housing Act," "Accessibility," "Visitability," etc.

2-C: Annually review the City's zoning ordinance and land development controls to be consistent with the City's goal to affirmatively further fair housing.

- **Impediment 3: Continuing Need for Affordable and Accessible Housing Units**

There is a lack of affordable and accessible housing units in the City of Huntington as the supply of affordable and accessible housing has not kept pace with the demand of individuals desiring to live independently.

Goal: Construction rehabilitation, and development of additional affordable rental and owner occupied housing units in the area, especially for households whose income is less than 80% of the median income will increase annually to meet the demand for housing.

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

3-A: Support and encourage both private and non-profit housing developers to undertake plans for the construction of new affordable and accessible renter and owner occupied housing that would be located in areas that provide access to employment opportunities, transportation, amenities, and services throughout the City.

3-B: Support and encourage the rehabilitation of existing housing units in the City to become decent, safe, and sound renter and owner occupied housing that is affordable and accessible to lower income households.

3-C: Continue to enforce the ADA and Fair Housing requirements for landlords to make "reasonable accommodations" to their rental properties so units become accessible to tenants who are disabled, as well as educating the disabled how to request special accommodations.



- **Impediment 4: Private Lending and Insurance Practices**

The Home Mortgage Disclosure Act (HMDA) data suggests that there is a disparity between the approval rates of home mortgage loans originated from White and those originated from Minority applicants.

Goal: Approval rates for all originated home mortgage loans and insurance coverage should be fair, risk based, unbiased, and impartial, regardless of race, familial status and location.

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

4-A: Federal, state, local, and private funding should be used to provide a higher rate of public financial assistance to potential homebuyers in lower income neighborhoods to improve loan to value ratios, so that private lenders will increase the number of loans made in these areas.

4-B: Monitoring of the HMDA data should be accomplished periodically for compliance with the Fair Housing Act by an outside independent agency.

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I. Introduction

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”

A 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
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient’s jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

HUD-FHEO suggests that communities conducting a fair housing analysis consider the policies surrounding “visitability,” the Section 504 Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act. Housing that is “visitable” has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” housing has at least one accessible means of ingress/egress, and all interior and bathroom doorways have as a minimum a 32-inch clear opening. Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “Section 504” prohibits discrimination against persons with disabilities in any program receiving Federal funds. The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. The Fair Housing Act requires property owners to make reasonable modifications to units and/or public areas in order to allow a disabled tenant to have full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. In regard to local zoning ordinances, the Fair Housing Act prohibits local government from



making zoning or land use decisions or implementing land use policies that exclude or discriminate against persons of a protected class.

The City of Huntington previously prepared an Analysis of Impediments to Fair Housing Choice in 2015. This 2020 Analysis of Impediments to Fair Housing Choice will outline the progress that has been made since the previous Analysis of Impediments, 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 of Huntington into sequence with their FY 2020-2024 Five Year Consolidated Plans. The document is designed to act as a planning tool, providing the participating entitlement communities with the necessary framework to strategically reduce any identified impediments to fair housing choice over the next five (5) years, and continue to make modifications based on events and activities in the community during this time period.

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II. Background Data

In 1775, “Holderby’s Landing” was founded on the land along the Ohio River where modern-day Huntington sits. In 1871, this land was purchased by the railroad tycoon Collis P. Huntington to become the western hub for the Chesapeake and Ohio Railway. The proximity to the Ohio and Guyandotte Rivers made Holderby’s Landing an ideal location for a railroad hub. Collis Huntington, with the help of Rufus Cook – a civil engineer – designed a town based on a geometric grid pattern with street intersections and consecutively numbered addresses. On February 27, 1871, the West Virginia legislature approved an act that granted the incorporation of the City of Huntington. The City quickly grew to a population greater than 10,000 residents and replaced Barboursville as the Cabell County Seat.

In the early 1900s, the City of Huntington thrived as an innovative and growing commercial hub. Huntington was the second American City (after San Francisco, California) to have fully electric streetcars. Additionally, the City benefitted from growing educational opportunities. What was once only used as a teacher training facility, the State Normal School of Marshall College (now Marshall University) began to expand as an institution and offered a variety of post-secondary programs, and by 1920 started offering four-year degrees.

Throughout Huntington’s young history, flooding had always been a problem, but in 1937, the City had a flood that damaged much of the City, killed five people, and left tens of thousands of people homeless. Today there is a series of walls and gates that have been built to prevent future flooding.

The City saw another spurt of growth in the 1950s when the Tri-State Airport, Huntington Museum of Art, Cabell Huntington Hospital, and Veterans Memorial Field House were all built. The additions of these important amenities helped to foster the City of Huntington as a truly modern and cultured West Virginian City.

From the 1950s to the beginning of the 21st Century, the City lost population due to urban sprawl, and loss of manufacturing which changed the economy. To address this and to modernize, the City shifted its economic focus towards education, tourism, and healthcare services. In fact, with the help of Marshall University, Cabell-Huntington Hospital, and other healthcare providers, today, the City has become a premier City of medical research.

In the 21st Century, the City has seen abundant economic growth. The City successfully turned a vacant redevelopment site into Pullman Square Town Center. Pullman Square is a downtown area with a variety of shops and restaurants, many of which are local. Additionally, the City has continued improvements throughout by putting in bike lanes, pedestrian-friendly design concepts, and lighting upgrades. The City’s local tourism saw a boon with the airing of the movie “*We Are Marshall*” starring Matthew McConaughey. The film



is about the University of Marshall football team's 1970 plane crash and was a tremendous boon for local growth.

The City of Huntington may not be the industrial power that it once was, its culture, rich history, and strong sense of community make it an attractive 21st-century home for many.

A. Population, Race, Ethnicity, and Religion:

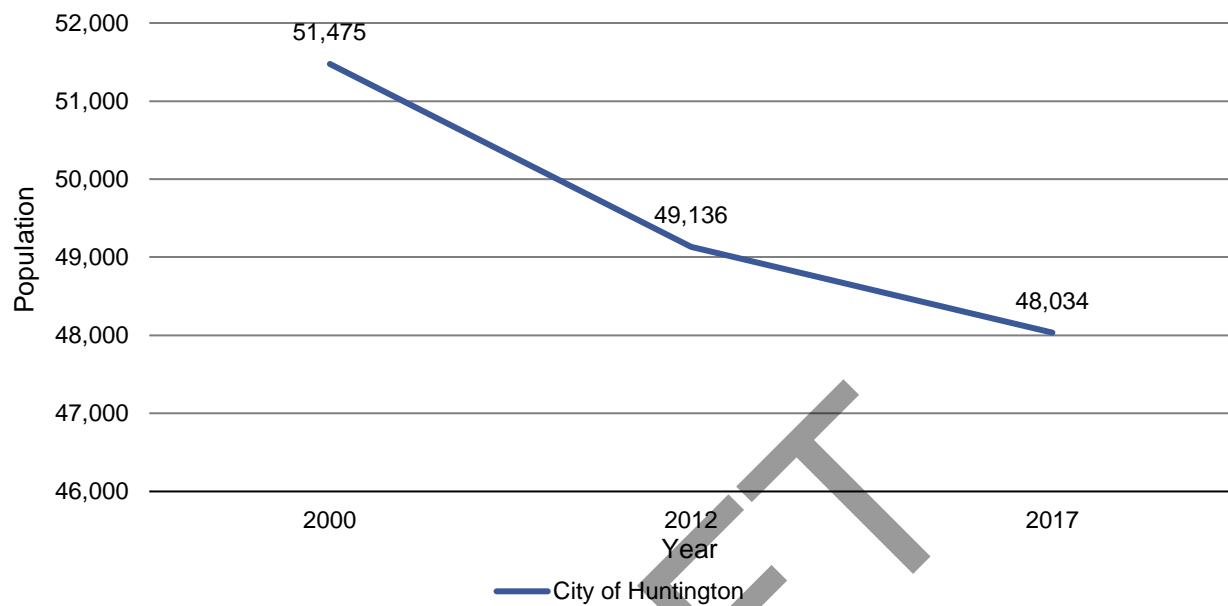
Population

According to the 2013-2017 American Community Survey, the total population for the City of Huntington was 48,034 in 2017. At the time of the 2010 Census, the population was 49,138, and at the time of the 2000 Census, the City of Huntington had a population of 51,475. These numbers illustrate a steadily declining population.

The U.S. Census Bureau has used the population at the time of the 2010 Census to make annual estimates as to the change in population. The City's population decreased by an estimated 3,441 people between 2000 and 2016, or 6.7%. In 2017, there were 24,906 females (51.9%) and 23,128 males (48.1%) living in the City of Huntington.



Chart II-1 Population Change for the City of Huntington



Source: 2000 U.S. Census, 2008-2012 ACS, and 2013-2017 ACS

Race

The following table highlights the racial composition of Huntington residents as of 2012 and 2017.

Table II-1 – Race and Hispanic or Latino Population
In the City of Huntington, IL

Race and Hispanic or Latino	2008-2012 American Community Survey		2013-2017 American Community Survey	
	#	%	#	%
Total	49,136	100%	48,034	100%
White Alone	42,999	87.5%	41,122	85.6%
Black or African American	4,050	8.2%	4,189	8.7%
American Indian and Alaska Native	141	0.3%	102	0.2%
Asian	338	0.7%	746	1.6%
Native Hawaiian and Other Pacific Islander	22	0%	40	0.1%



Some other race	75	0.2%	258	0.5%
Two or More Races	1,511	3.1%	1,577	3.3%
Hispanic or Latino	582	1.2%	941	2%

Source: 2008-2012 and 2013-2017 ACS

The most common race identified in Huntington in 2012 was White alone with 42,999 residents comprising 87.5% percent of the total population. The second most common race identified in Huntington in 2012 was Black or African American alone, with 4,050 residents comprising 8.2% percent of the population.

There was not any change in racial proportions in Huntington from 2012 to 2017, which was larger than 5.0 percentage points.

Ethnicity

The following table highlights the ancestries of Huntington residents as of 2012 and 2017.

Table II-2 – Ancestry in the City of Huntington

Ancestry	2008-2012 American Community Survey		2013-2017 American Community Survey	
	#	%	#	%
Total population	49,136	100%	48,034	100%
American	4,043	8.2%	4,039	8.4%
Arab	429	0.9%	242	0.5%
Czech	44	0.1%	26	0.1%
Danish	30	0.1%	20	0%
Dutch	725	1.5%	596	1.2%
English	7,518	15.3%	4,548	9.5%



French Basque) (except	791	1.6%	850	1.8%
French Canadian	62	0.1%	126	0.3%
German	6,952	14.1%	6,855	14.3%
Greek	229	0.5%	173	0.4%
Hungarian	152	0.3%	159	0.3%
Irish	8,106	16.5%	6,689	13.9%
Italian	1,759	3.6%	1,690	3.5%
Lithuanian	27	0.1%	35	0.1%
Norwegian	171	0.3%	113	0.2%
Polish	747	1.5%	428	0.9%
Portuguese	10	0%	24	0%
Russian	113	0.2%	191	0.4%
Scotch-Irish	972	2%	1,127	2.3%
Scottish	1,320	2.7%	923	1.9%
Slovak	24	0%	8	0%
Subsaharan African	162	0.3%	213	0.4%
Swedish	185	0.4%	104	0.2%
Swiss	70	0.1%	26	0.1%
Ukrainian	42	0.1%	11	0%
Welsh	466	0.9%	448	0.9%



West Indian (excluding Hispanic origin groups)	30	0.1%	89	0.2%
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Source: 2008-2012 and 2013-2017 ACS

The most common ancestral group identified in the City of Huntington in 2012 was Irish, with 8,106 residents comprising 16.5 percent of the population. The second most common ancestral group identified in Huntington in 2012 was English with 7,518 residents comprising 15.3 percent of the population.

By 2017, the most common ancestral group identified in the City of Huntington in 2017 was German, with 6,855 residents comprising 14.3 percent of the population. The second most common ancestral group identified in Huntington in 2017 was Irish with 6,689 residents comprising 13.9 percent of the population.

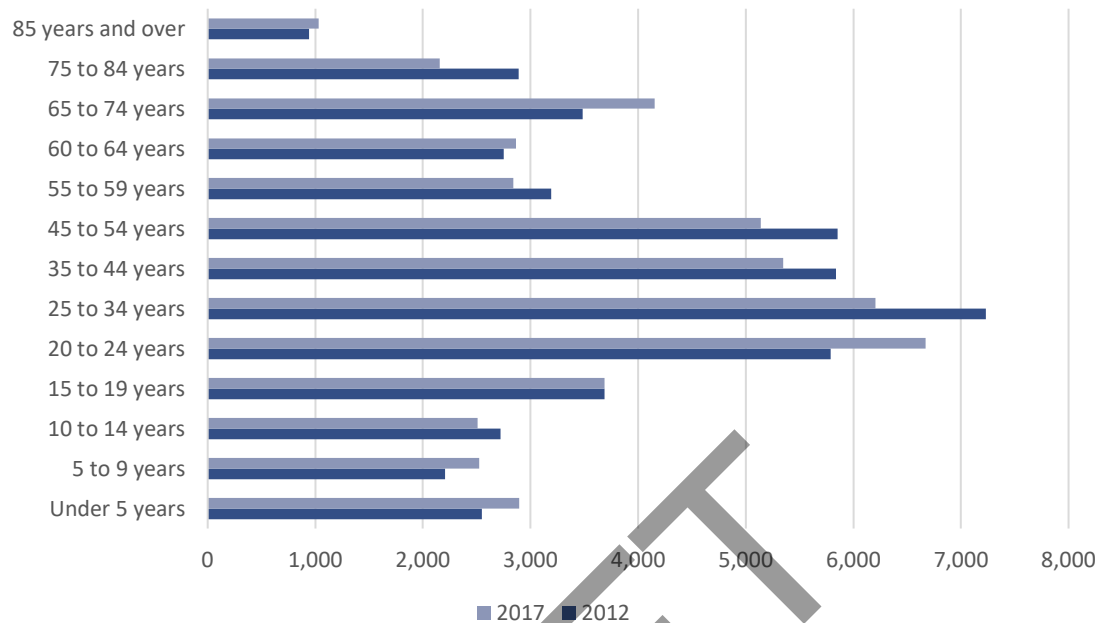
There was one change in proportional representation in the City of Huntington from 2012 to 2017, which was larger than 5.0 percentage points. The total number of residents identifying as English decreased from 15.3 to 9.5 percent of the population.

Age

The following Chart II-2 illustrates age distribution in the City of Huntington at the time of the 2008-2012 ACS and 2013-2017 ACS. The data shows that currently, children under 20 years of age represent 24.2 percent of the population; 37.9 percent of the population is between 20 and 45 years of age; 22.6 percent of the population is 45 to 65; and 15.3 percent of the population is 65 years of age and older. The median age is 34.3 years of age.



Chart II-2 Breakdown by Age



Source: 2008-2012 and 2013-2017 ACS

Religion -

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

Table II-3 below shows the distribution of residents of Cabell County across various denominational groups as a percentage of the population that reported an affiliation with a church.



Table II-3 – Religious Affiliation in Huntington

	1980		1990		2000		2010	
	#	%	#	%	#	%	#	%
Evangelical Protestant	6,963	6.5%	13,633	14.1%	12,431	12.8%	13,824	14.4%
Black Protestant	-	-	-	-	-	-	415	0.4%
Mainline Protestant	34,570	32.4%	26,498	27.4%	21,936	22.7%	18,454	19.1%
Catholic	5,006	4.7%	5,970	6.2%	5,117	5.3%	3,052	3.2%
Orthodox	-	-	-	-	350	0.4%	255	0.3%
Other	1,108	1%	798	0.8%	1,459	1.5%	1,771	1.8%
Total Adherents:	47,647	44.6%	46,899	48.4%	41,293	42.7%	37,771	39.2%
Unclaimed (% of total population)	55.4%	-	51.6%	-	57.3%	-	60.8%	-
Total Population	106,835	-	96,827	-	96,784	-	96,319	-

Source: The Association of Religion Data

Between 1980 and 2010, Cabell County experienced an overall decrease in people identifying themselves as “Mainline Protestants,” while there was an overall increase in the portion of the religious population identifying itself as “Evangelical Protestants.” The number identifying as Catholic fluctuated between decades. Between 1980 and 2010, Cabell County saw an overall decrease in the number of people identifying with religious traditions. The percentage of total adherents declined since 1990, while the percentage of the population unclaimed to any religion increased substantially.

B. Households:

Table II-4 highlights the changes in the number of households and population in the area from the Year 2012 to the Year 2017.



Table II-4 – Households & Population

Year	HOUSEHOLDS		POPULATION	
	#	Change	#	Change
2012	21,582	-	49,136	-
2017	20,309	-6.3%	48,034	-2.3%

Source: 2008-2012 and 2013-2017 ACS

Household Tenure

According to the 2008-2012 American Community Survey, there were 25,158 housing units in Huntington. Of these housing units, 21,582 (85.8%) were occupied, and 3,576 (14.2%) were vacant. Of the occupied housing units, 11,199 (51.9%) were owner-occupied, and 10,383 (48.1%) were renter-occupied.

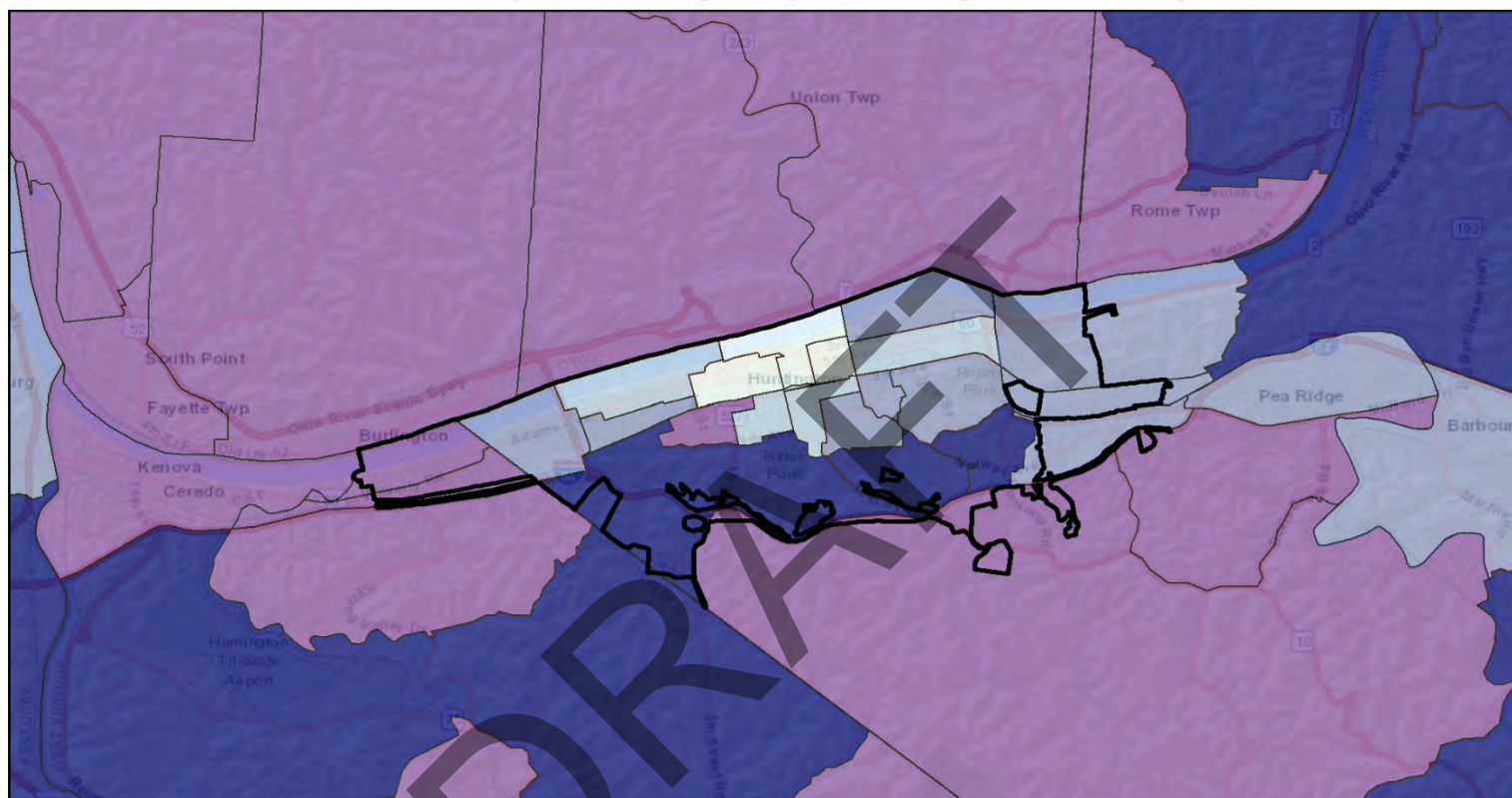
In the 2013-2017 American Community Survey, there were 24,533 housing units in Huntington. Of these housing units, 20,309 (82.8 percent) were occupied, and 4,224 (17.2 percent) were vacant. Of the occupied housing units, 10,182 (50.1%) were owner-occupied, and 10,127 (49.9%) were renter-occupied.

From 2012 to 2017, there was a 625 unit decrease in the total number of housing units, a 1,273 unit decrease (6.3 percentage point decrease) in the number of occupied units, and a 648 unit increase (15.3 percentage point increase) in the number of vacant units. The number of owner-occupied units decreased by 1,017 units (10.0 percentage point decrease), and the number of renter-occupied units decreased by 56 units (2.5 percentage point decrease).

The following maps illustrate the concentrations of owner-occupied and renter-occupied housing units. Higher concentrations of a particular housing type are accentuated by a darker color. In Huntington, owner-occupied units are most abundant in the southern portion of the city, and renter-occupied units are most abundant along the riverfront.



% Owner Occupied Housing - City of Huntington, West Virginia



March 13, 2020

Override 1 **OwnerOccupiedHousing**

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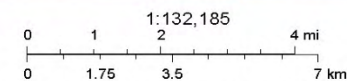
0-26.16% Owner Occupied

26.16-45.84% Owner Occupied

45.84-62.90% Owner Occupied

62.90-78.23% Owner Occupied

>78.23% Owner Occupied

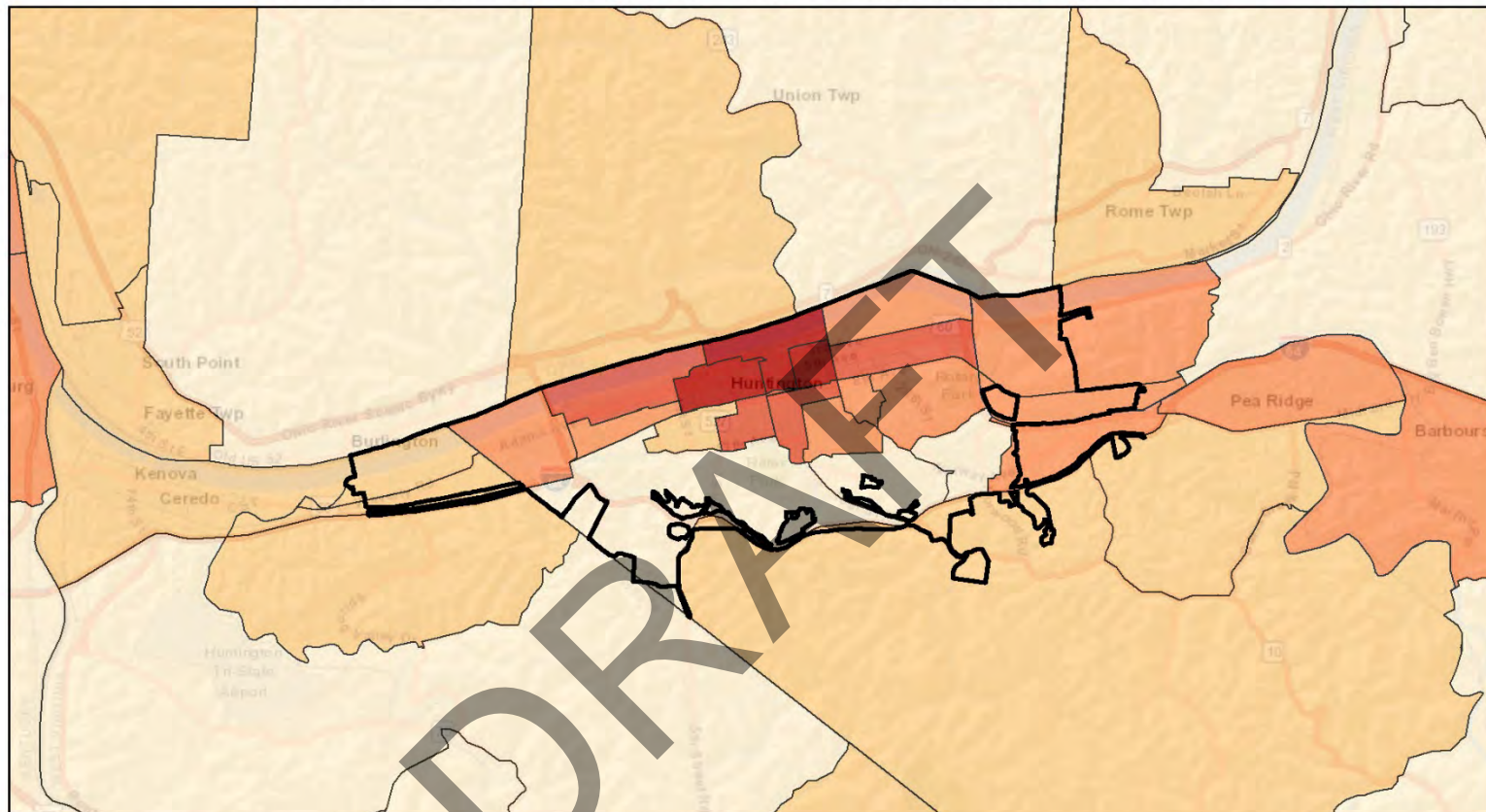


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Source: HUD CPD Maps



% Renter Occupied Housing - City of Huntington, West Virginia



March 13, 2020

Override 1 PercentRenterOccupiedHousing

B25009EST10_PCT

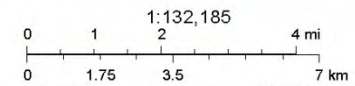
0-22.40%

22.40-38.35%

38.35-55.86%

55.86-75.72%

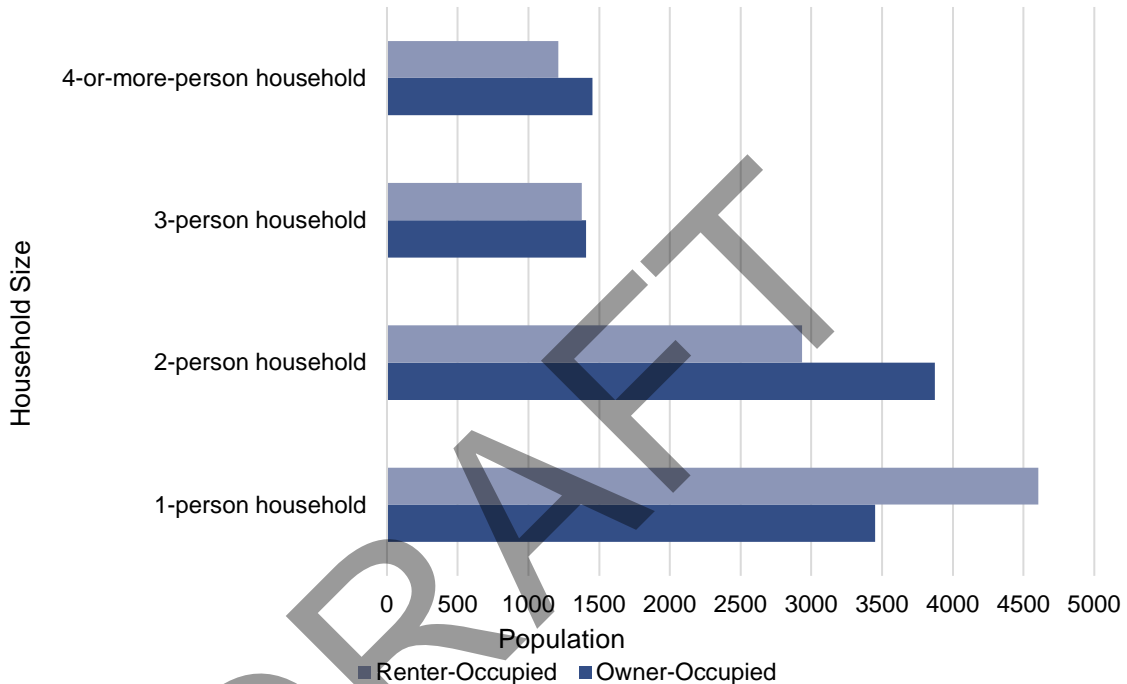
Source: HUD CPD Maps



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

In 2012, the average household size was 2.15 persons, and the average family size was 2.88 persons. In 2017, the average household size was 2.21 persons, and the average family size was 3.04 persons.

Chart II-3 - Household Tenure by Size in Huntington



Source: 2012-2017 ACS

Family and household sizes have remained relatively constant since 2012. While owner-occupancy rates are declining, for an urban city, there still is a healthy balance between owner-occupied and renter-occupied housing units. The number of households has been decreasing, increasing from 2012 to 2017 at the same time as the population has also decreased. The decrease in households and decreases in population has lightened the housing supply pressure on the renter-occupied housing market.

Household Tenure by Race and Ethnicity

Table II-5 compares homeowners and renters by race and ethnicity in Huntington. White households represent 87.6% of all households, 46.3% of homeowners, and 41.3% of renters. Black or African American households represent 8.5% of all households, 2.3% of homeowners, and 6.1% of renters. Hispanic or Latino households represent 1.2% of all households, 0.5% of homeowners, and 0.7% of renters.



Table II-5 – Household Tenure by Race and Ethnicity

Cohort	2008-2012 ACS		2013-2017 ACS	
	Owner	Renter	Owner	Renter
Householder who is White alone	48.5%	40.1%	46.3%	41.3%
Householder who is Black or African American alone	2.4%	6.1%	2.3%	6.1%
Householder who is American Indian and Alaska Native alone	0.1%	0.3%	0.1%	0.3%
Householder who is Asian alone	0.2%	3.3%	4.2%	0.7%
Householder who is Native Hawaiian and Other Pacific Islander alone	0.1%	0.6%	0.0%	0.1%
Householder who is some other race alone	0.0%	0.1%	0.1%	0.2%
Householder who is two or more races	0.6%	0.9%	0.7%	0.8%
Householder who is Hispanic or Latino	0.4%	0.5%	0.5%	0.7%

Source: 2008-2012 and 2013-2017 ACS

Homeownership rates are slowly declining in the City. Homeowners represented 51.9 percent (11,199 households) of all households in 2012, and 50.1 percent (10,182 households) of all households in 2017. In response, rental rates increased in the City. Renters represented 48.1 percent (10,383 households) of all households in 2012 and 49.9 percent (10,127 households) of all households in 2017.



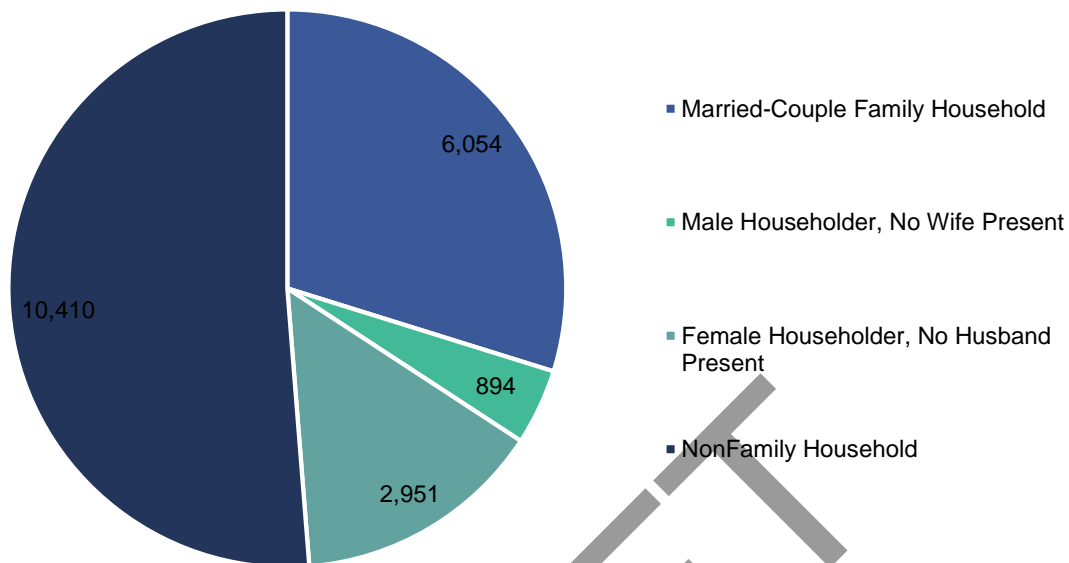
Significant household shifts in the City of Huntington included the 1,273 unit decrease in total occupied units, the 648 increase in unoccupied units, and the 1,017 unit decrease in owner-occupied units from 2012 to 2017. Additionally, there was a 1,063 unit (11.3 percentage point) decrease in the number of White owner-occupied units, a 49 unit (10.3 percentage point) decrease in the number of Black or African American owner-occupied units, and a 79 unit (6.3 percentage point) decrease in the number of Black or African American renter-occupied units.

Families

In 2012, there were a total of 21,582 households in the City of Huntington. Non-family households comprised 48.5% (10,461 households) of all households. In 2017, there were a total of 20,309 households, of which 10,410 (48.5% households) comprised non-family households. The total number of households in the City of Huntington decreased by -1,273 units from 2012 to 2017, whereas the total number of non-family households decreased by -51 units (-0.5 percentage point). A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 51.3 percent of all households, married-couple family households comprised 29.8 percent of all households, female householders with no husband present comprised 14.5 percent of all households, and male householders with no wife present comprised 4.4 percent of all households in the City. Chart II-4 illustrates the breakdown of households by type in Huntington as of 2017, using data from the 2013-2017 ACS.

Chart II-4 - Households in Huntington



Source: 2013-2017 ACS

C. Income and Poverty:

Household Income

The median household income for the City of Huntington increased by 4.0 percent over the time period of 2012 to 2017 from \$29,149 in 2012 to \$30,359 in 2017.

The median household income for Cabell County increased by 1.5 percent over the same time period from \$37,238 in 2012 to \$37,816 in 2017.

The median household income for Wayne County increased by 6.0 percent over the same time period from \$36,575 in 2012 to \$38,905 in 2017.

The median household income for the State of West Virginia increased by 8.3 percent over the same time period from \$40,400 in 2012 to \$44,061 in 2017.

Table II-6 compares the distribution of household income according to the 2012 Census and the 2012-2017 American Community Survey.



Table II-6 – Household Income in Huntington, WV

Items	2008-2012 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	21,582	100%	20,309	100%
Less than \$10,000	3,943	18.3%	3,459	17%
\$10,000 to \$14,999	2,348	10.9%	2,362	11.6%
\$15,000 to \$24,999	3,467	16.1%	3,171	15.6%
\$25,000 to \$34,999	2,572	11.9%	2,097	10.3%
\$35,000 to \$49,999	2,921	13.5%	2,592	12.8%
\$50,000 to \$74,999	2,960	13.7%	2,711	13.3%
\$75,000 to \$99,999	1,433	6.6%	1,828	9%
\$100,000 to \$149,999	1,120	5.2%	1,248	6.1%
\$150,000 to \$199,999	292	1.4%	306	1.5%
\$200,000 or more	526	2.4%	535	2.6%
Median Household Income				

Source: 2008-2012 and 2013-2017 ACS

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

The Median Income for a family of four (4) in the City of Huntington was \$47,035 for 2017.

Table II-7 identifies the FY 2019 HUD Income Limits applicable to the City of Huntington, which is a part of the Huntington-Ashland, WV-KY-OH HUD Metro FMR Area.



Table II-7 – FY 2019 Income Limits for the HUD Metro FMR Area

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits	12,490	16,910	21,330	25,750	30,170	32,750*	35,000*	37,250*
Very Low (50%) Income Limits	19,750	22,600	25,400	28,200	30,500	32,750	35,000	37,250
Low (80%) Income Limits	31,600	36,100	40,600	45,100	48,750	52,350	55,950	59,550

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

On February 14, 2019, HUD's CPD-19-02 Notice updated the Department's Low- and Moderate-Income Summary Data (LMISD) based on the American Community Survey 2011-2015 5-year estimates (2015 ACS). This data will replace the prior LMISD based on the American Community Survey 2006-2010 5-year estimates (2010 ACS) for the purposes of demonstrating compliance with the CDBG National Objective of providing benefit to low- and moderate-income persons on an area basis ("Area Benefit" or LMA). The following table highlights the current low- and moderate-income population in the City of Huntington. The block groups that have a population of more than 51% low- and moderate-income are **highlighted and bold**. The City of Huntington has an overall low- and moderate-income population of 50.70%.



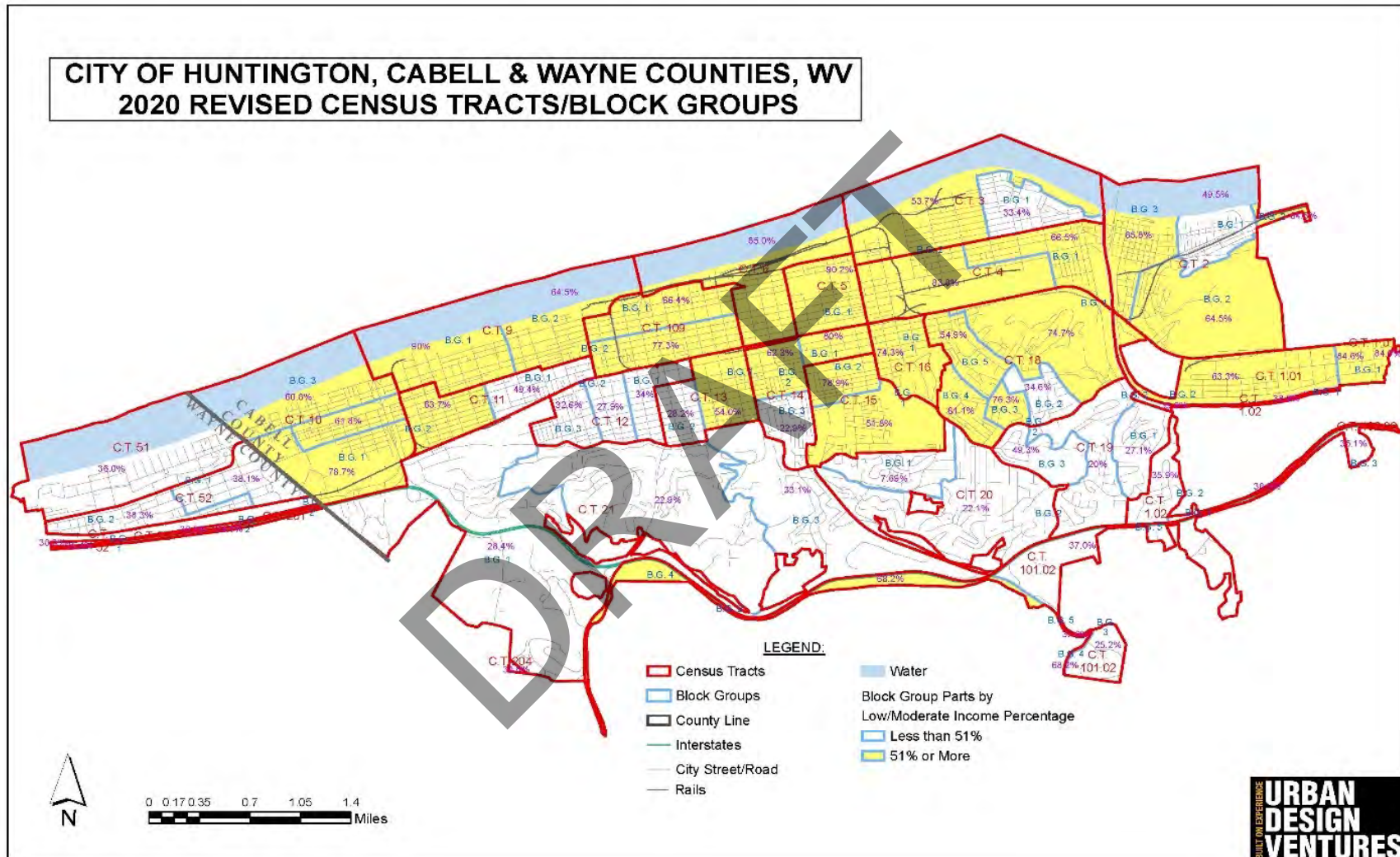
Table II-8 – Low- and Moderate-Income Population FY 2020 for Huntington

PLACE	COUNTY	CT	BG	LMI	TOT POP	PERCENT
Huntington	Cabell County	000101	1	715	845	84.62%
Huntington	Cabell County	000101	2	640	1,010	63.37%
Huntington	Cabell County	000102	1	350	900	38.89%
Huntington	Cabell County	000102	2	455	1,265	35.97%
Huntington	Cabell County	000200	1	285	575	49.57%
Huntington	Cabell County	000200	2	920	1,425	64.56%
Huntington	Cabell County	000200	3	755	880	85.80%
Huntington	Cabell County	000300	1	520	1,555	33.44%
Huntington	Cabell County	000300	2	355	660	53.79%
Huntington	Cabell County	000400	1	1,005	1,510	66.56%
Huntington	Cabell County	000400	2	1,115	1,330	83.83%
Huntington	Cabell County	000500	1	785	870	90.23%
Huntington	Cabell County	000600	1	970	1,140	85.09%
Huntington	Cabell County	000900	1	675	750	90.00%
Huntington	Cabell County	000900	2	545	845	64.50%
Huntington	Cabell County	001000	1	520	660	78.79%
Huntington	Cabell County	001000	2	430	695	61.87%
Huntington	Cabell County	001000	3	490	805	60.87%
Huntington	Cabell County	001100	1	235	475	49.47%
Huntington	Cabell County	001100	2	730	1,145	63.76%
Huntington	Cabell County	001200	1	255	750	34.00%
Huntington	Cabell County	001200	2	300	1,075	27.91%
Huntington	Cabell County	001200	3	400	1,225	32.65%
Huntington	Cabell County	001300	1	910	1,685	54.01%
Huntington	Cabell County	001300	2	345	1,220	28.28%
Huntington	Cabell County	001400	1	660	825	80.00%
Huntington	Cabell County	001400	2	365	585	62.39%
Huntington	Cabell County	001400	3	240	1,045	22.97%
Huntington	Cabell County	001500	1	565	1,090	51.83%
Huntington	Cabell County	001500	2	695	880	78.98%
Huntington	Cabell County	001600	1	825	1,110	74.32%
Huntington	Cabell County	001800	1	415	555	74.77%
Huntington	Cabell County	001800	2	220	635	34.65%
Huntington	Cabell County	001800	3	725	950	76.32%
Huntington	Cabell County	001800	4	665	820	81.10%
Huntington	Cabell County	001800	5	555	1,010	54.95%
Huntington	Cabell County	001900	1	160	590	27.12%



Huntington	Cabell County	001900	2	160	800	20.00%
Huntington	Cabell County	001900	3	400	810	49.38%
Huntington	Cabell County	002000	1	70	910	7.69%
Huntington	Cabell County	002000	2	545	2,460	22.15%
Huntington	Cabell County	002100	1	375	1,320	28.41%
Huntington	Cabell County	002100	2	250	1,090	22.94%
Huntington	Cabell County	002100	3	270	815	33.13%
Huntington	Cabell County	010102	3	150	595	25.21%
Huntington	Cabell County	010102	4	785	1,150	68.26%
Huntington	Cabell County	010102	5	465	1,255	37.05%
Huntington	Cabell County	010202	3	600	1,705	35.19%
Huntington	Cabell County	010900	1	415	625	66.40%
Huntington	Cabell County	010900	2	750	970	77.32%
Huntington	Wayne County	005100	1	715	1,985	36.02%
Huntington	Wayne County	005200	1	465	1,220	38.11%
Huntington	Wayne County	005200	2	255	665	38.35%
Huntington	Wayne County	020100	1	475	1,340	35.45%

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



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



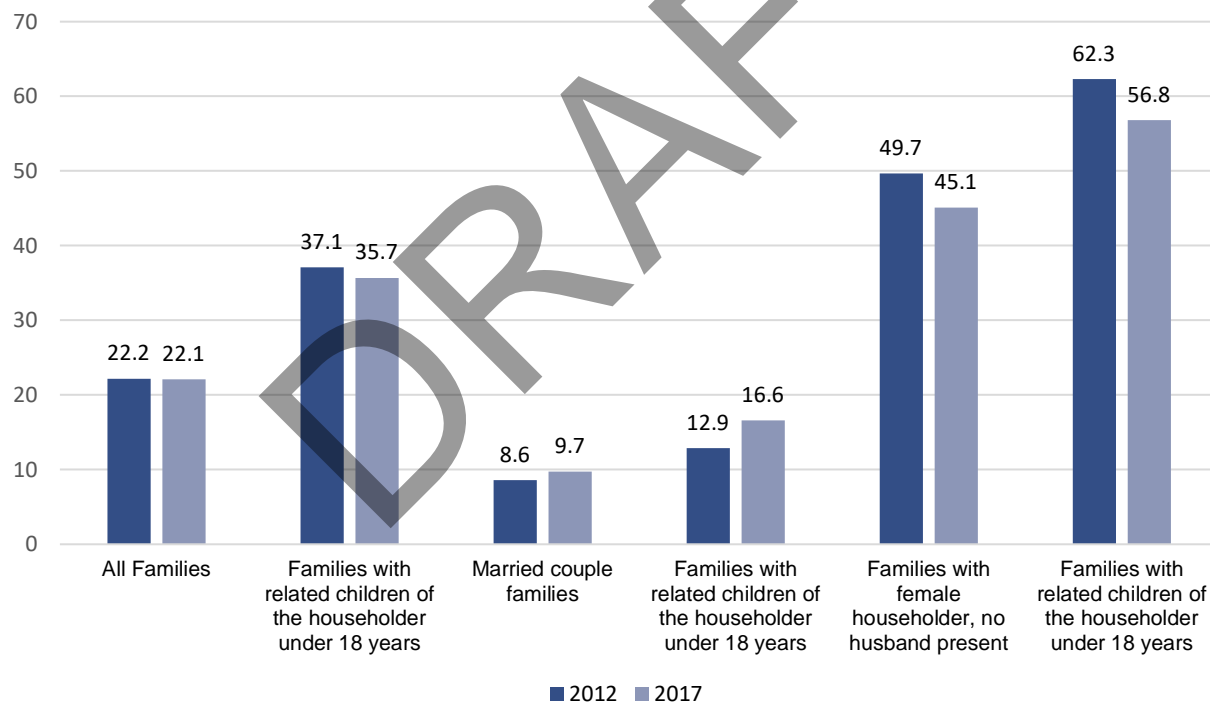
The low- and moderate-income census tracts are generally located in the northern portions of the City along the Ohio River.

In the City of Huntington, the percentage of all families living in poverty experienced a very slight decrease from 22.2% in 2012 to 22.1% in 2017. The percentage of female-headed householders with no husband present and with children under 18 years in poverty was 62.3% in 2012 and decreased to 56.8% in 2017 in the City. The number of single female-headed households in poverty in the City decreased from 49.7% to 45.1%.

Family and Household Poverty

City of Huntington poverty statistics for families with children are highlighted in the chart below

Chart II-5 - Percentage of Families and Households in Poverty in Huntington



Source: 2008-2012 and 2013-2017 ACS

Occupations

In 2012, according to 2008-2012 Estimates, the total number of eligible workers (population 16 years and over) in Huntington was 41,149 persons. In 2012, 55.1 percent (22,656 persons) of eligible workers were in the labor force and 4.5 percent (1,839 persons) of eligible workers in the work force were unemployed.

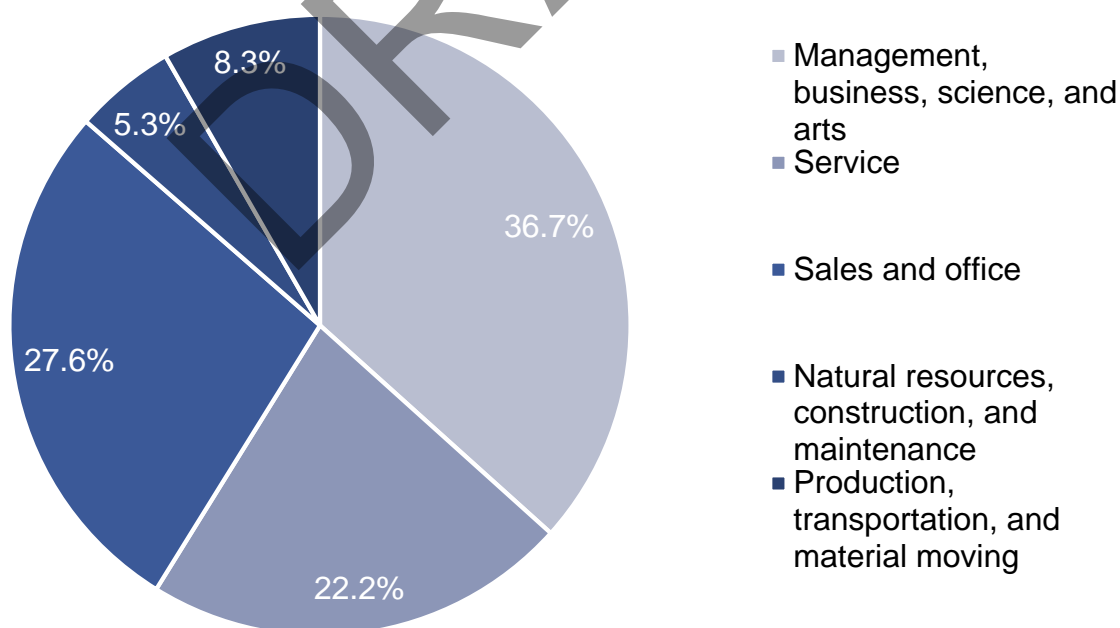
According to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in Huntington was 39,736 persons. In 2017, 51.3 percent (20,399 persons) of eligible workers were in the labor force and 4.1 percent (1,625 persons) of eligible workers in the work force were unemployed.

Workers in 2017 had a mean travel time to work of 17.9 minutes.

Per the 2013-2017 American Community Survey, an estimated 34.8 percent (7,075 households) of households in the Huntington receive income from Social Security. The mean Social Security Income for 2017 was \$16,084.

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

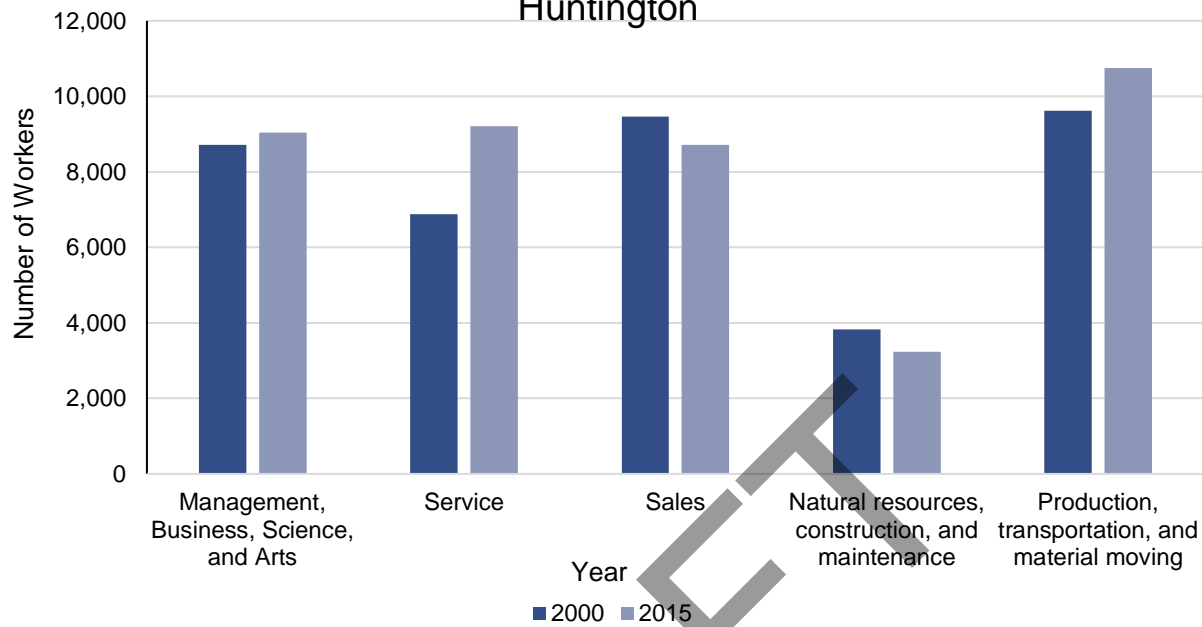
Chart II-6 - Occupations in Huntington



Source: 2013-2017 ACS

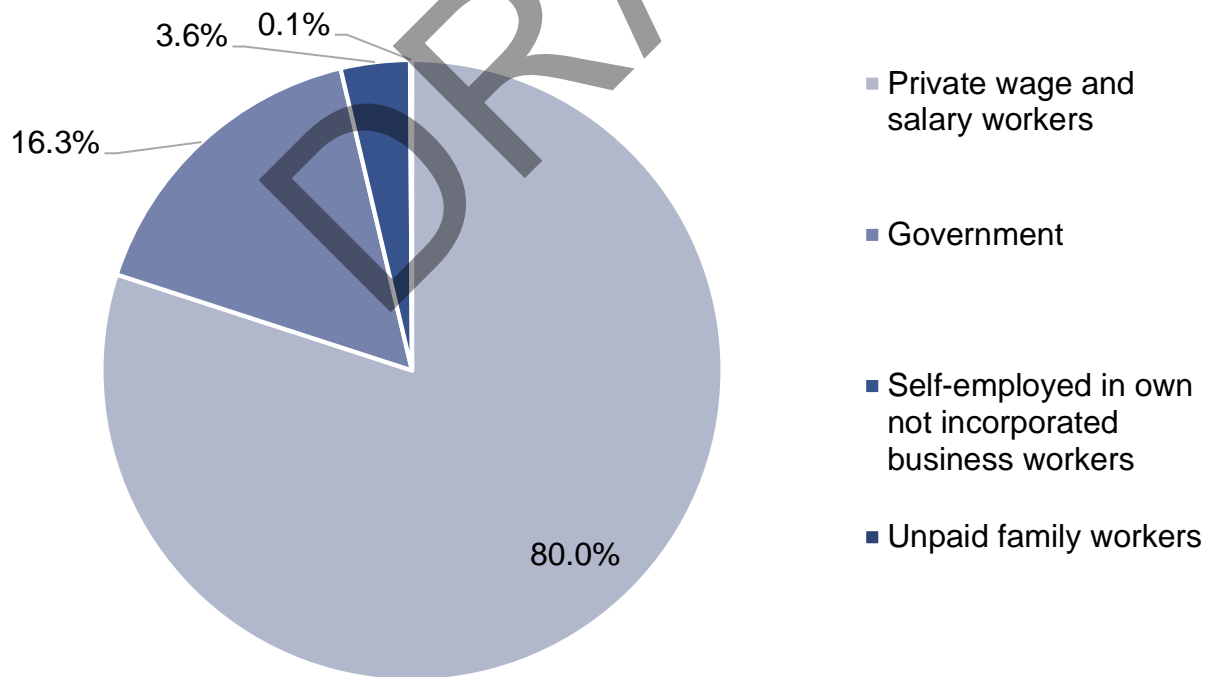


Chart II-7 - Worker Distribution by Occupation in
Huntington



Source: 2008-2012 and 2013-2017 ACS

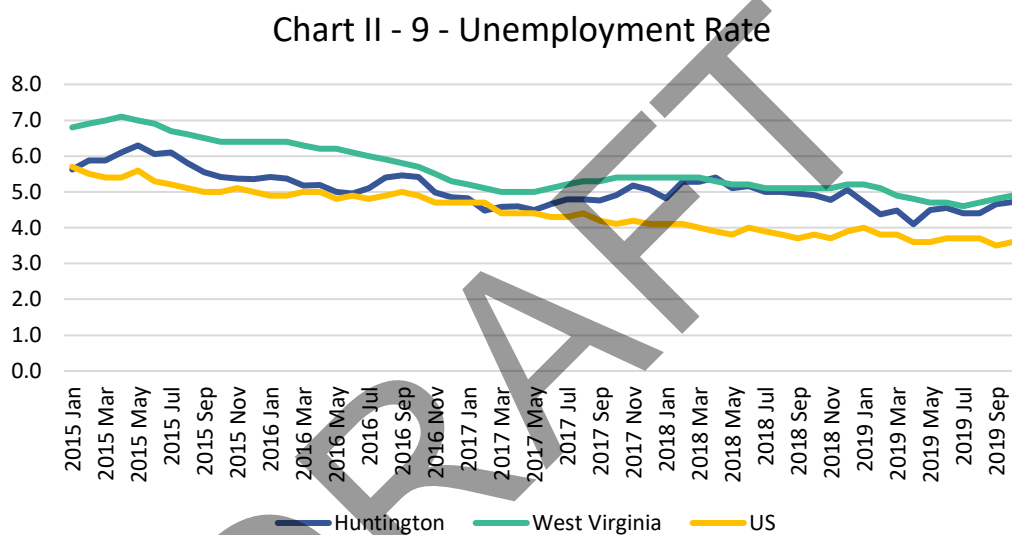
Chart II-8 - Worker Class in Huntington



Source: 2013-2017 ACS

Unemployment Rate

Available unemployment data covers the period of January 2015 to April 2019. The unemployment rates for the City of Huntington are represented by the dark blue line. The unemployment rate for the State of West Virginia is represented by the green “State” line. The State data was provided by the Bureau of Labor Statistics as seasonally adjusted, so manual adjustment was not required for comparison. The National Unemployment Rate is represented by the orange “National” line. The national data was provided by the Bureau of Labor Statistics as seasonally adjusted, so manual adjustment was not required for comparison.



Source: Bureau of Labor Statistics

From January 2015 to July 2019, the City of Huntington’s unemployment rate was slightly lower (an average of 0.51 percentage points) than the State’s unemployment rate and was slightly (0.7 percentage points) higher than then the average National Unemployment Rate (4.4 %). The City of Huntington’s unemployment rate was at its lowest point (4.1%) in April 2019. The City’s had its highest unemployment rate (6.3%) in May of 2015. From 2015-2019 the City of Huntington’s unemployment rate was always lower than the State of West Virginia’s, but was typically higher than the national average, however it more-or-less followed the same trend patterns as the state and nation.

The trends suggest that since January 2015, the economic situation in the State of West Virginia and in the City of Huntington lagged behind the national average. However, the City should be encouraged that its unemployment rate is better than the rest of the state.



D. Housing Profile:

Housing Profile

Approximately one-third (33.3%, 8,163 units) of the City of Huntington's housing stock were built prior to 1939, which is now over 80 years old. The largest grouping (33.3 percent, 88,163 units) of the City of Huntington's housing stock was built prior to 1939.

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

Table II-9 - Year Structure Built in Huntington

Year Structure Built	Number	Percentage
Built 2014 or Later	25	0.1%
Built 2010 to 2013	375	1.5%
Built 2000 to 2009	747	3%
Built 1990 to 1999	817	3.3%
Built 1980 to 1989	1,333	5.4%
Built 1970 to 1979	2,955	12%
Built 1960 to 1969	2,733	11.1%
Built 1950 to 1959	3,913	15.9%
Built 1940 to 1949,	3,472	14.2%
Built 1939 or Earlier	8,163	33.3%
Total	24,533	100%

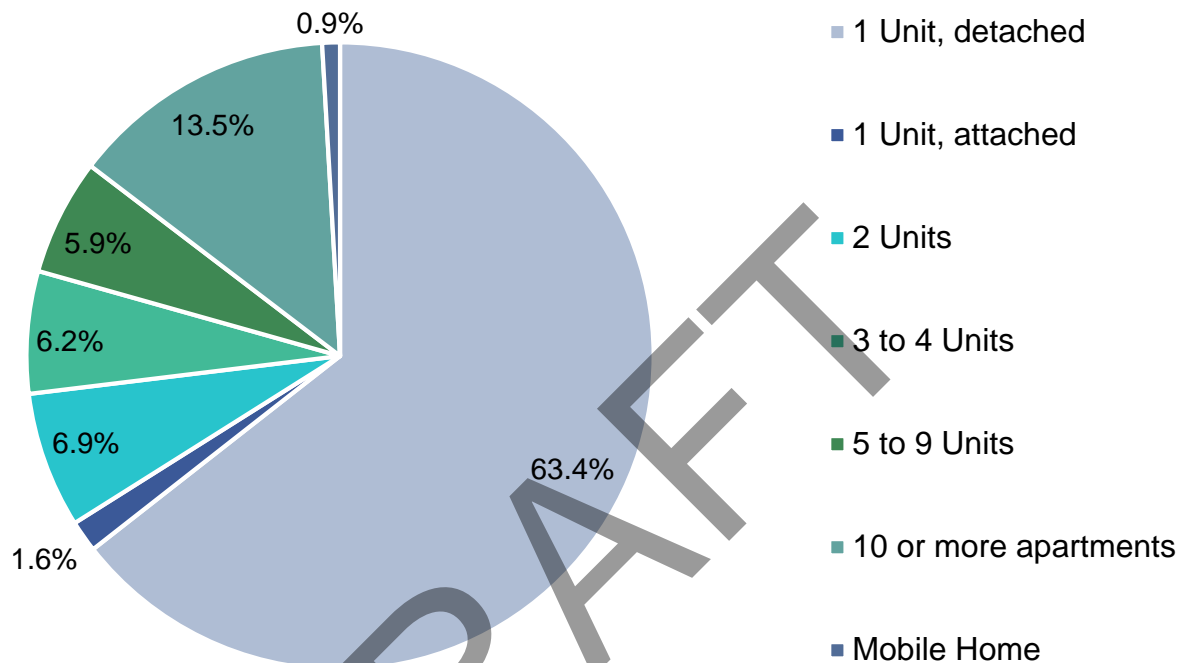
Source: 2013-2017 ACS

The majority of housing units in Huntington are single-family detached houses comprising 63.4% percent (24,533 units) of housing units. Multifamily residential structures of 10 or more units represent 10.0 percent (2,456 units) of all housing units.



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

Chart II-10 - Housing Units in the Huntington-Ashland, WV-OH-KY, MSA



Source: 2013-2017 ACS

From 2000-2018 there have been a total of 419 building permits issued, of which 198 were single family units, 221 were multi-family units, and 138 were 5+ units. On average there has been 22 building permits issued during that time period. In recent years (from 2013-2018) only 13 single family permits were issued. It may be beneficial for the City to focus on the construction of more single family units.

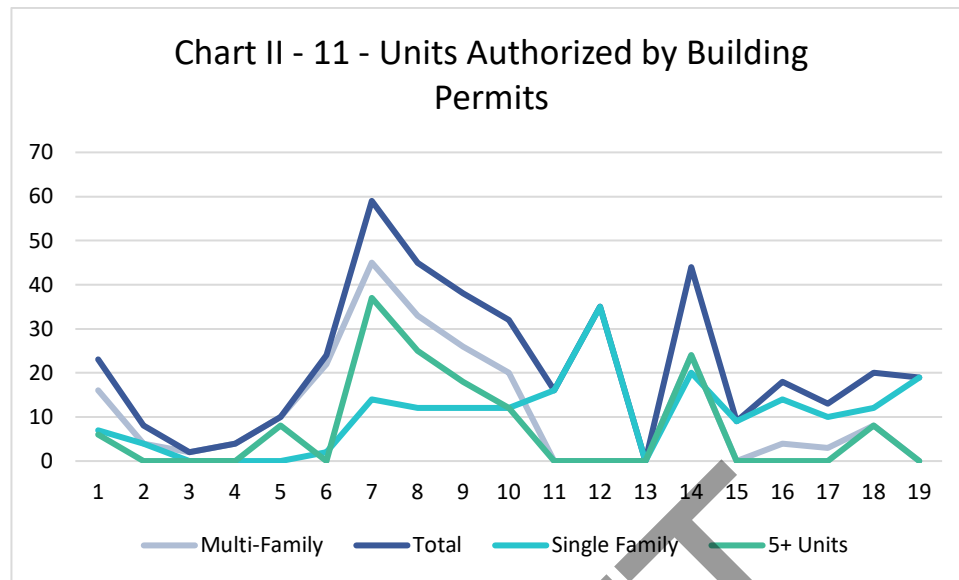
The following tables and charts contain data on the number of permits for residential construction issued by the City of Huntington.



Table II-10 – Units Authorized by Building Permits Huntington

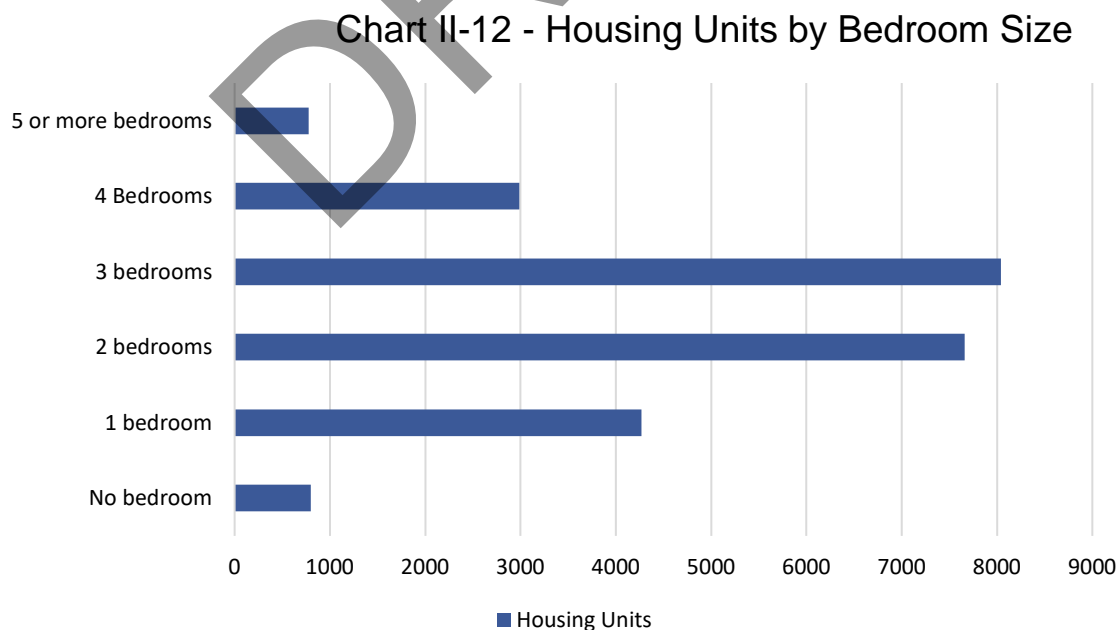
YEAR	Total	Single Family	Multi-Family	5+ Units
2018	23	7	16	6
2017	8	4	4	0
2016	2	0	2	0
2015	4	0	4	0
2014	10	0	10	8
2013	24	2	22	0
2012	59	14	45	37
2011	45	12	33	25
2010	38	12	26	18
2009	32	12	20	12
2008	16	16	0	0
2007	35	35	0	0
2006	0	0	0	0
2005	44	20	24	24
2004	9	9	0	0
2003	18	14	4	0
2002	13	10	3	0
2001	20	12	8	8
2000	19	19	0	0

Source: SOCDs Building Permits Database, HUD



Source: SOCDS Building Permits Database, HUD

According to the 2012-2017 American Community Survey, 32.7% (8,040) of the City's housing stock is three-bedroom units, 31.2% (7,663) of City's housing stock is two-bedroom units, 17.4% (4,268) of the City's housing stock is one-bedroom units, 12.2% (2,987) of the City's housing stock is four-bedroom units, 3.5% (798) of the City's housing stock is no-bedroom units, and 3.2% (777) of the City's housing stock is 5 or more bedroom units.





E. Housing Costs:

Owner Costs

The median monthly housing cost for owner-occupied households was \$11,199 in 2012 and \$10,182 in 2017. The median monthly housing cost for owner-occupied households decreased by 9.1 percent, or \$1,017, from 2012 to 2017. Dollar amounts have been adjusted for inflation.

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

Table II-11 Monthly Owner Costs in Huntington

Monthly Owner Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	11,199	100%	10,182	100%
Less than \$200	673	6%	693	6.8%
\$200 to \$299	1,760	15.7%	1,311	12.9%
\$300 to \$399	1,292	11.5%	1,429	14%
\$400 to \$499	1,222	10.9%	819	8%
\$500 to \$599	724	6.5%	777	7.6%
\$600 to \$699	836	7.5%	844	8.3%
\$700 to \$799	863	7.7%	590	5.8%
\$800 to \$899	827	7.4%	681	6.7%
\$900 to \$1,000	516	4.6%	702	6.9%
\$1,000 to \$1,499	1,732	15.5%	1,563	15.4%
\$1,500 to \$1,999	439	3.9%	424	4.2%
\$2,000 or more	315	2.8%	349	3.3%
Median (dollars)	\$590	-	\$608	-

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

The following Table II-12 illustrates housing costs for owner-households in 2012 and 2017 according to the 2008-2012 and 2012-2017 ACS.



Table II-12 – Monthly Owner Costs as a Percentage of Household Income

Owner Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	11,199	51.9 %	10,182	50.2%
Less than \$20,000	2,016	18%	1,718	16.9%
Less than 20 percent	448	4%	411	4%
20 to 29 percent	414	3.7%	298	2.9%
30 percent or more	1,165	10.4%	1,009	9.9%
\$20,000 to \$34,999	2,217	19.8%	1,623	15.9%
Less than 20 percent	1,198	10.7%	810	8%
20 to 29 percent	381	3.4%	300	2.9%
30 percent or more	638	5.7%	513	5%
\$35,000 to \$49,999	1,657	14.8%	1,486	14.6%
Less than 20 percent	874	7.8%	912	9%
20 to 29 percent	549	4.9%	336	3.3%
30 percent or more	246	2.2%	238	2.3%
\$50,000 to \$74,999	2,296	20.5%	1,860	18.3%
Less than 20 percent	1,545	13.8%	1,393	13.7%
20 to 29 percent	627	5.6%	383	3.8%
30 percent or more	112	1%	84	0.8%
\$75,000 or more	2,945	26.3%	3,293	32.3%
Less than 20 percent	2,710	24.2%	3,025	29.7%
20 to 29 percent	202	1.8%	234	2.3%
30 percent or more	34	0.3%	34	0.3%

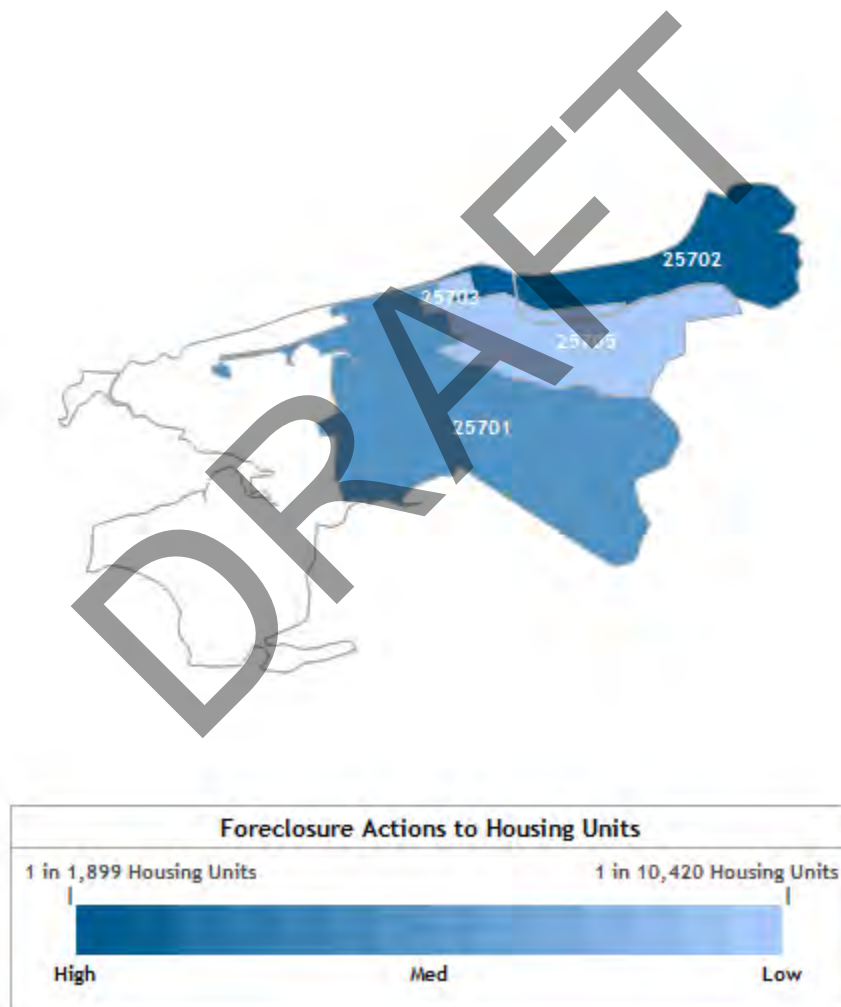
Source: 2008-2012 Census and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2012, 19.6 percent (2,195 units) of owner-occupied units were cost burdened and 18.3 percent (1,878 units) of owner-occupied households in 2017 were cost burdened.

Foreclosures

According to RealtyTrac, the City of Huntington had 15 properties in some stage of foreclosure in February 2020; a foreclosure rate of 1 in every 5,244 housing units. In December, the number of properties that received a foreclosure filing in Huntington, WV was 0% higher than the previous month and 200% higher than the same time last year. During the past twelve months, foreclosures have averaged about 12 with a high of 11 foreclosures in September 2019 and a low of 0 foreclosures in January 2019.

Chart II -13 Foreclosures in Huntington



Source: WWW.REALTYTRAC.COM



Renter Costs

The median monthly housing cost for renter-occupied households was \$593 in 2012; and \$667 in 2017. The median monthly housing cost for renter-occupied households increased by 12.5 percent, or \$74, from 2012 to 2017. Dollar amounts are adjusted for inflation.

Table II-13 illustrates mortgage status and selected monthly renter costs in 2012 and 2017.

Table II-13 Selected Monthly Renter Costs in Huntington

Monthly Renter Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	10,383	48.1%	10,127	49.9%
Less than \$100	219	2.1%	141	1.4%
\$100 to \$149	77	0.7%	76	0.8%
\$150 to \$199	135	1.3%	167	1.6%
\$200 to \$249	350	3.4%	447	4.4%
\$250 to \$300	375	3.6%	339	3.3%
\$300 to \$349	502	4.8%	378	3.7%
\$350 to \$399	350	3.4%	271	2.7%
\$400 to \$449	440	4.2%	389	3.8%
\$450 to \$499	863	8.3%	529	5.2%
\$500 to \$549	874	8.4%	608	6%
\$550 to \$599	769	7.4%	534	5.3%
\$600 to \$649	567	5.5%	646	6.4%
\$650 to \$699	669	6.4%	562	5.5%
\$700 to \$749	628	6%	927	9.2%
\$750 to \$799	568	5.5%	655	6.5%
\$800 to \$899	814	7.8%	805	7.9%
\$900 to \$999	432	4.2%	740	7.3%
\$1,000 to 1,249	698	6.7%	800	7.9%
\$1,250 to \$1,499	171	1.6%	157	1.6%
\$1,500 to 1,999	174	1.7%	246	2.4%
\$2,000 or more	9	0.1%	12	0.1%
No Cash Rent	699	6.7%	698	6.9%
Median (dollars)	593	-	667	-

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

Table II-14 illustrates housing costs for owner-households in 2012 and 2017 according to the 2008-2012 and 2013-2017 ACS.



Table II-14 Selected Monthly Renter Costs as a Percentage of Household Income

Renter Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	10,383	48.1%	10,127	49.9%
Less than \$20,000	5,304	24.6%	4,784	23.6%
Less than 20 percent	242	1.1%	365	1.8%
20 to 29 percent	503	2.3%	406	2%
30 percent or more	4,559	21.1%	4,013	19.8%
\$20,000 to \$34,999	1,765	8.2%	1,914	9.4%
Less than 20 percent	220	1%	230	1.1%
20 to 29 percent	724	3.4%	622	3.1%
30 percent or more	821	3.8%	1,062	5.2%
\$35,000 to \$49,999	1,176	5.4%	921	4.5%
Less than 20 percent	459	2.1%	361	1.8%
20 to 29 percent	513	2.4%	435	2.1%
30 percent or more	204	0.9%	125	0.6%
\$50,000 to \$74,999	605	2.8%	773	3.8%
Less than 20 percent	494	2.3%	513	2.5%
20 to 29 percent	100	0.5%	222	1.1%
30 percent or more	11	0.1%	38	0.2%
\$75,000 or more	416	1.9%	570	2.8%
Less than 20 percent	379	1.8%	555	2.7%
20 to 29 percent	37	0.2%	15	0.1%
30 percent or more	0	0%	0	0%
No cash rent	418	1.9%	467	2.3%

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



Table II-15 Gross Rent as a Percentage of Household Income in Huntington

Rental Cost as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	9,266	100%	8,962	100%
Less than 20 percent	1,110	12%	1,147	12.8%
20 to 24 percent	684	7.4%	877	9.8%
25 to 29 percent	799	8.6%	902	10.1%
30 to 34 percent	1,078	11.6%	798	8.9%
35 percent or more	902	9.7%	972	10.8%
Not computed	4,693	50.6%	4,266	47.6%
No Cash Rent	1,117	12.1%	1,165	13%

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

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2012, 62.7 percent (5,810 units) of renter-occupied units were cost burdened and 60.6 percent (5,431 units) of renter-occupied households in 2017 were cost burdened.

In 2012, 19.6 percent (2,195 units) of owner-occupied households were cost burdened whereas 62.7 percent (5,810 units) of renter-occupied households were cost burdened.

In 2017, 18.3 percent (1,878 units) of owner-occupied households were cost burdened whereas 60.6 percent (5,431 units) of renter-occupied households were cost burdened.

F. Household Housing Problems:

Summary of Housing Needs

There was very little change in the City of Huntington population between the 2005-2009 American Community Survey and 2011-2015 American Community Survey. Households decreased by 4% and household income increased by 10%. According to the Bureau of Labor Statistics Consumer Price Index (CPI), prices in 2015 are 11.1% higher than average prices as compared to prices in 2009. The dollar experienced an average inflation rate of 1.75% per year during this period. This relationship equated to a decrease in housing unit supply and an increase in housing demand. Unfortunately, even with the increase in median household incomes, housing became more expensive in terms of real dollars for the average household in the City. All of the CHAS data within this Analysis of



Impediments are for the City of Huntington only, and does not include the HOME Consortium.

Table II-16 – General Demographics for Huntington

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	49,138	48,940	-0%
Households	21,847	21,005	-4%
Median Income	\$27,181.00	\$29,873.00	10%

Source: 2005-2009 and 2011-2015 ACS (Most Recent Year)

The following data was provided by the U.S. Department of Housing and Urban Development (HUD) based on the 2011-2015 ACS data. The tables disaggregate households and housing problems based on the area's median household income (HAMFI).

Table II-17 – Household Types

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,555	3,590	2,985	1,820	8,065
Small Family Households	1,200	895	810	595	3,594
Large Family Households	89	114	85	59	385
Household contains at least one person 62-74 years of age	389	745	535	434	1,989
Household contains at least one person age 75 or older	244	710	620	240	599
Households with one or more children 6 years old or younger	699	293	271	234	468

Source: 2011-2015 CHAS



Table II-18 – Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	70	40	10	0	120	24	0	15	15	54
Severely Overcrowded - With >1.51 people per room (and none of the above problems)	4	0	0	0	4	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	25	14	0	0	39	0	0	4	0	4
Housing cost burden greater than 50% of income (and none of the above problems)	2,095	690	65	0	2,850	325	215	89	15	644
Housing cost burden greater than 30% of income (and none of the above problems)	535	675	580	65	1,855	130	440	385	180	1,135
Zero/negative Income (and none of the above problems)	535	0	0	0	535	105	0	0	0	105

Source: 2011-2015 CHAS



Table II-19 Housing Problems (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	2,195	745	75	0	3,015	355	215	110	30	710
Having none of four housing problems	1,089	1,435	1,325	905	4,754	280	1,210	1,475	875	3,840
Household has negative income, but none of the other housing problems	535	0	0	0	535	105	0	0	0	105

Source: 2011-2015 CHAS

Table II-20 Cost Burden Greater Than 30% But Less Than 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	810	340	180	1,330	120	208	155	483
Large Related	43	4	4	51	0	75	8	83
Elderly	330	285	114	729	163	283	168	614
Other	1,525	770	345	2,640	209	78	148	435
Total need by income	2,708	1,399	643	4,750	492	644	479	1,615

Source: 2011-2015 CHAS

Table II-21 Cost Burden Greater Than 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	635	230	0	865	110	74	0	184
Large Related	39	0	0	39	0	25	0	25
Elderly	145	87	0	232	63	84	39	186
Other	1,355	395	65	1,815	160	29	49	238
Total need by income	2,174	712	65	2,951	333	212	88	633

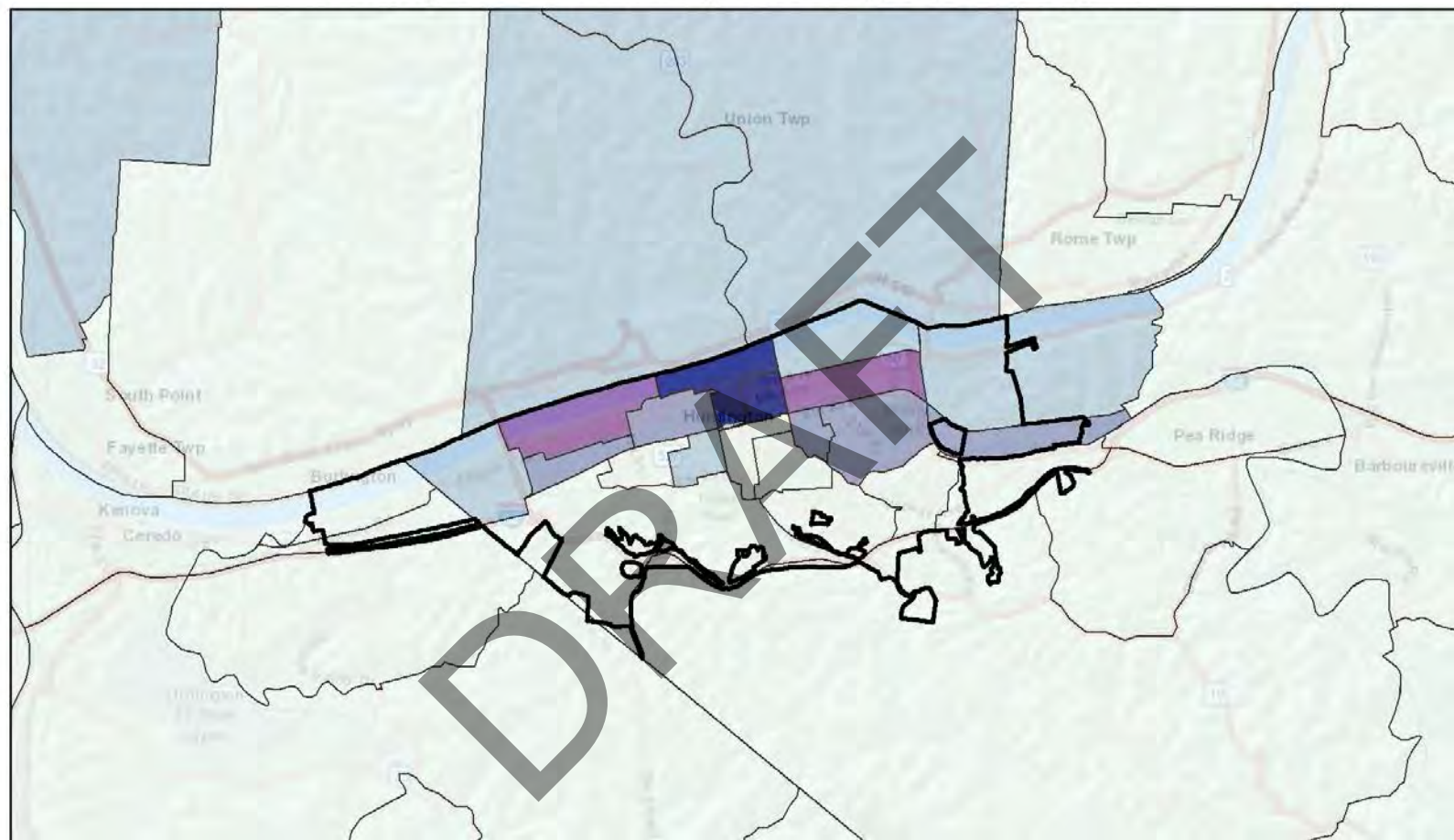
Source: 2011-2015 CHAS

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

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



Housing Cost Burden - City of Huntington, West Virginia



March 12, 2020

Override 1 HousingCostBurden

B25106_CB_PCT

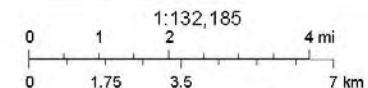
0-29.28% Paying>30%

29.28-38.78% Paying>30%

38.78-47.69% Paying>30%

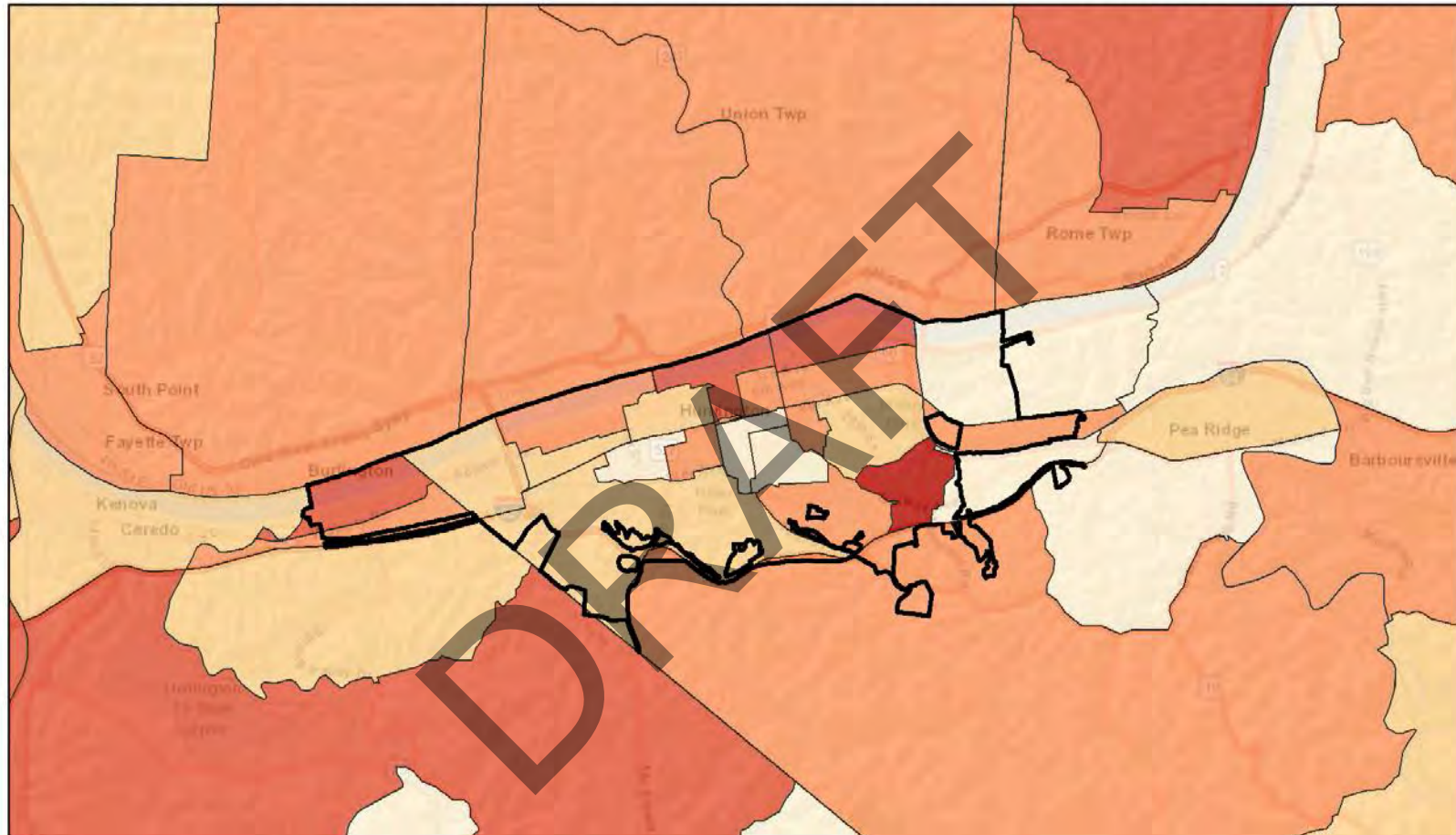
47.69-58.44% Paying>30%

>58.44% Paying>30%

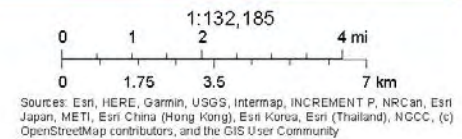


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

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

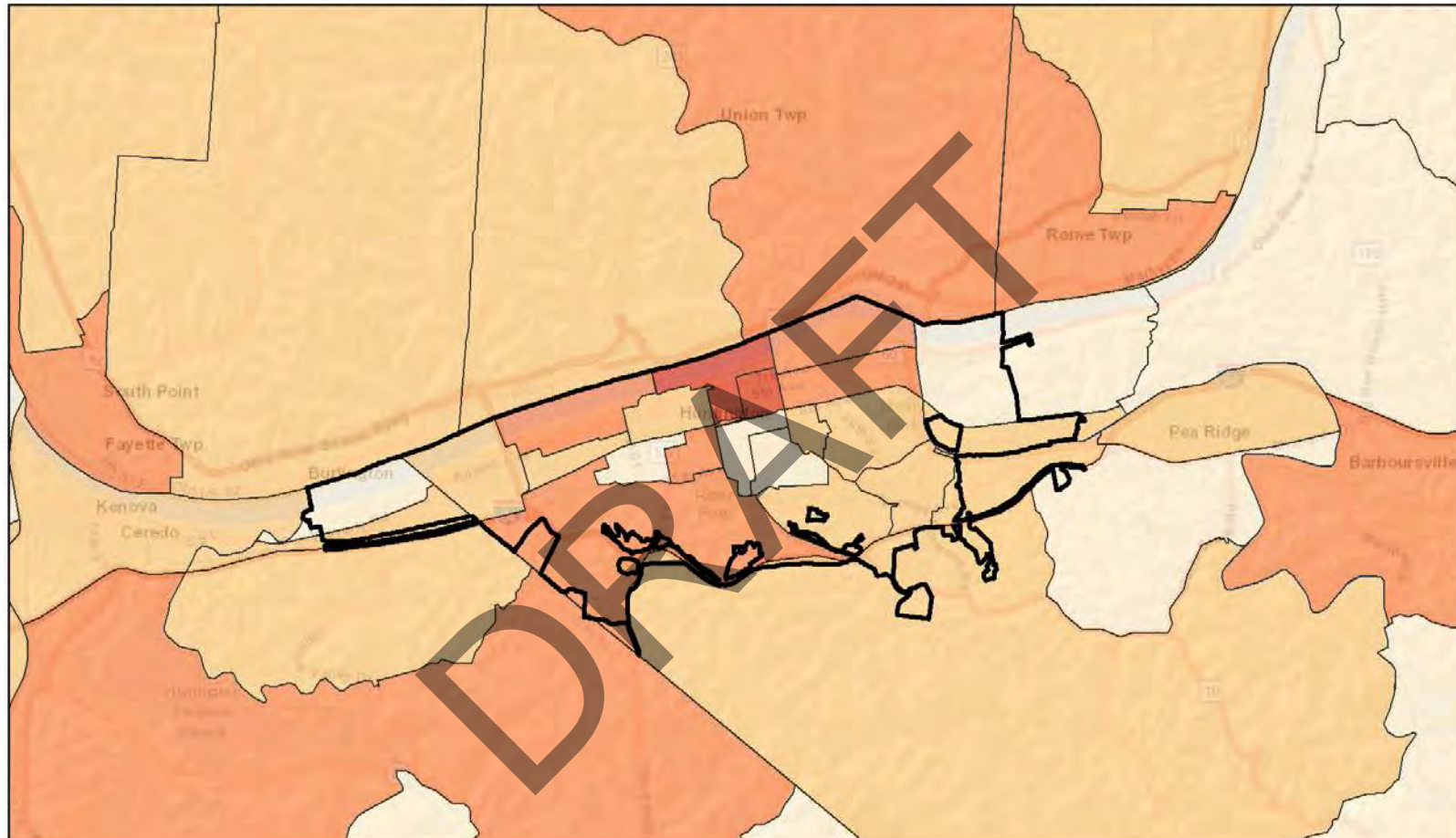


March 12, 2020

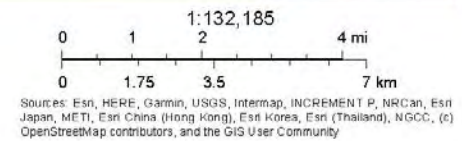
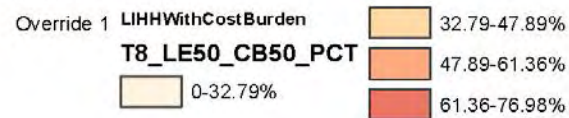




% Low Income Households with Severe Cost Burden - City of Huntington, West Virginia

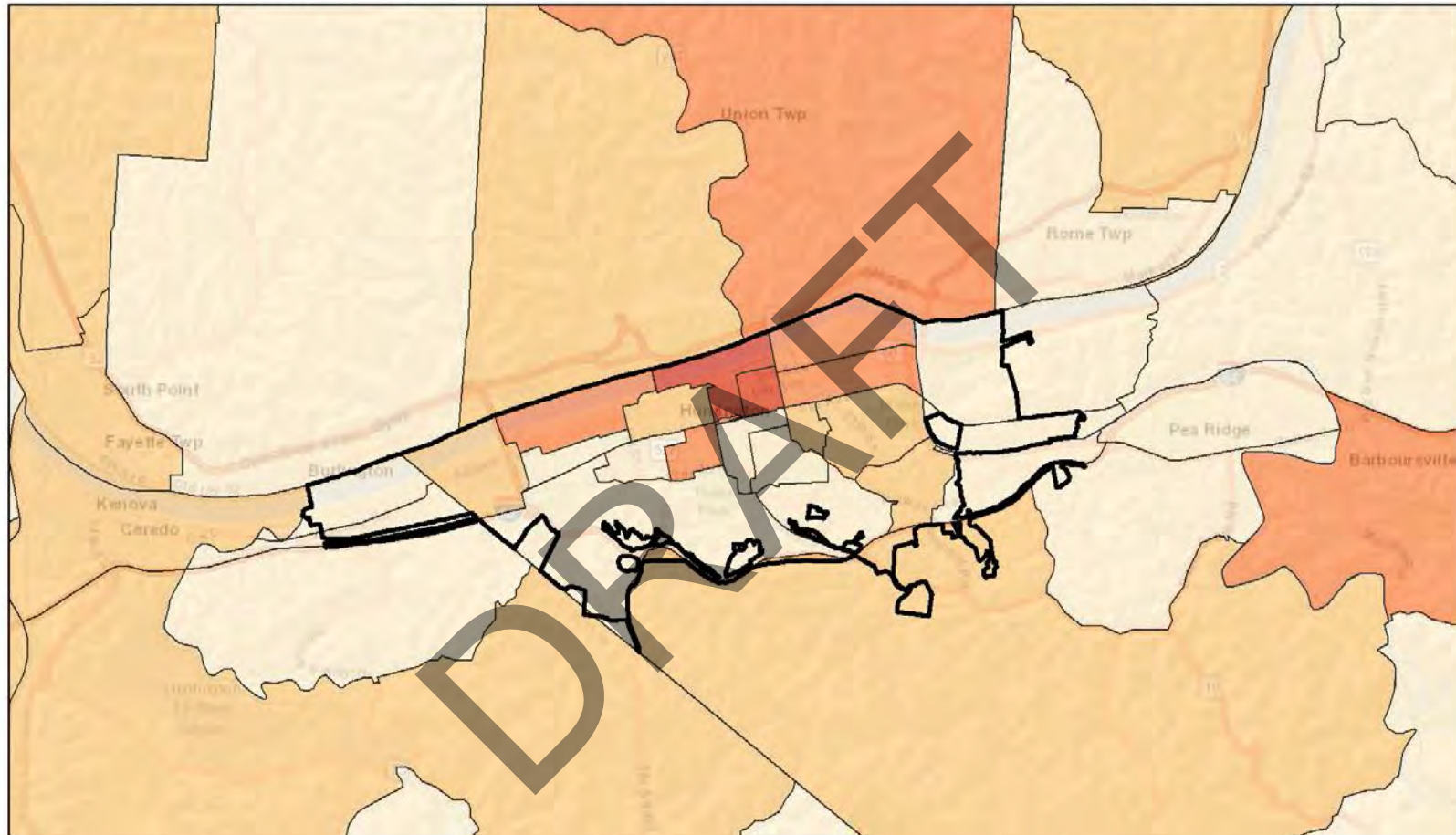


March 12, 2020





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



March 12, 2020

Override 1 **MIHHWithCostBurden**
T8_LE80_CB50_PCT

0-26.04%	26.04-38.21%
	38.21-49.70%
	49.70-64.42%

1:132,185

0 1 2 4 mi
0 1.75 3.5 7 km

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



Table II – 22 - Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	40	20	0	0	60	0	0	4	0	4
Multiple, unrelated family households	0	4	0	0	4	0	0	0	0	0
Other, non-family households	4	0	0	0	4	0	0	0	0	0
Total need by income	44	24	0	0	68	0	0	4	0	4

Source: 2011-2015 CHAS

The largest housing problem in the City of Huntington is housing affordability. According to the 2013-2017 ACS, 60.3% of all renter households are cost burdened by 30% or more and 18.3% of owner households with a mortgage are cost burdened by 30% or more.

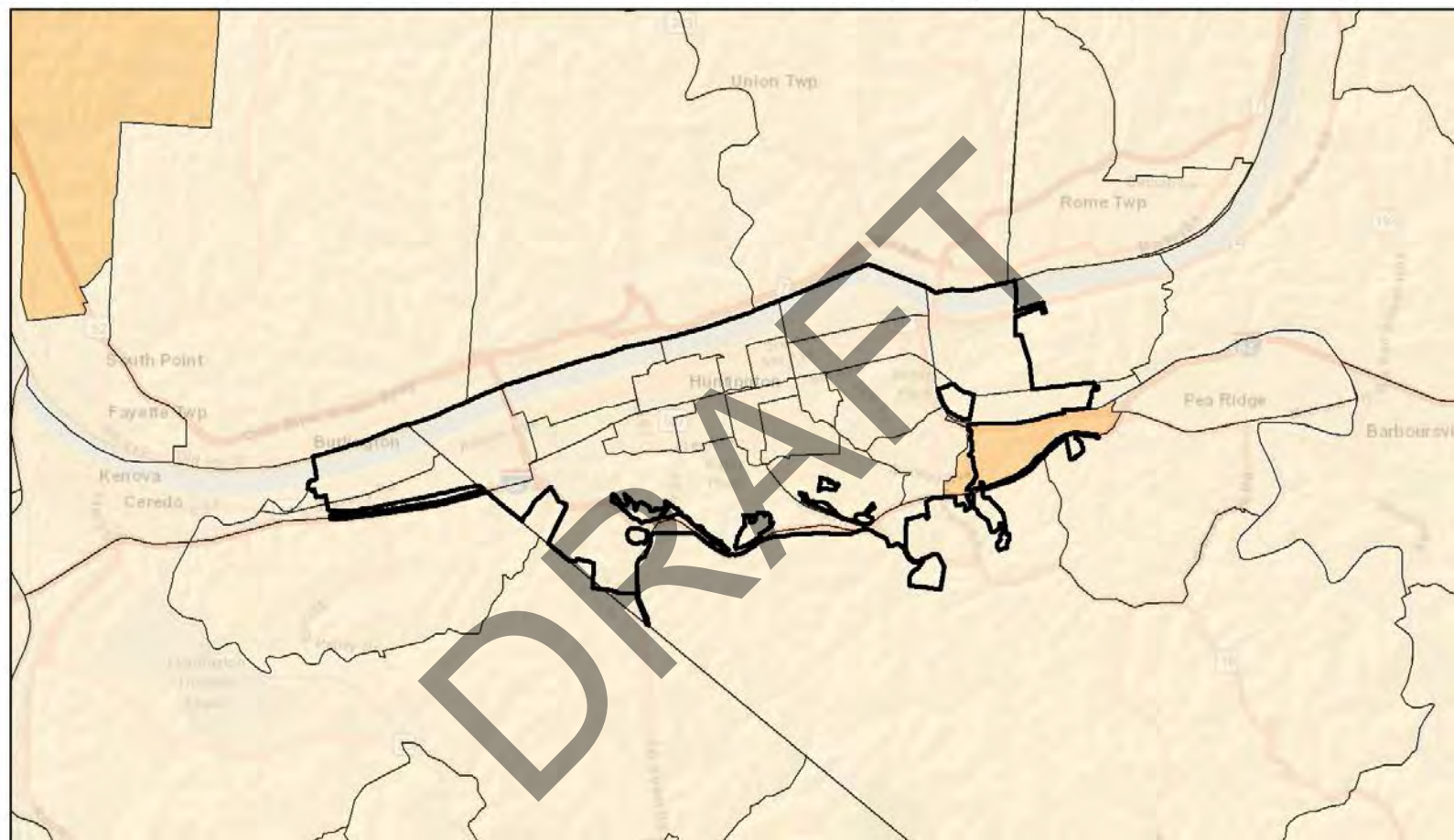
Additional housing problems that were recorded in consultations and citizen comments included handicap accessible housing, availability of senior housing, availability of group homes or communal living arrangement housing, housing density issues, and code compliance for housing. Lower income households and renter households are more likely to be affected by these housing problems.

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

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



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



March 12, 2020

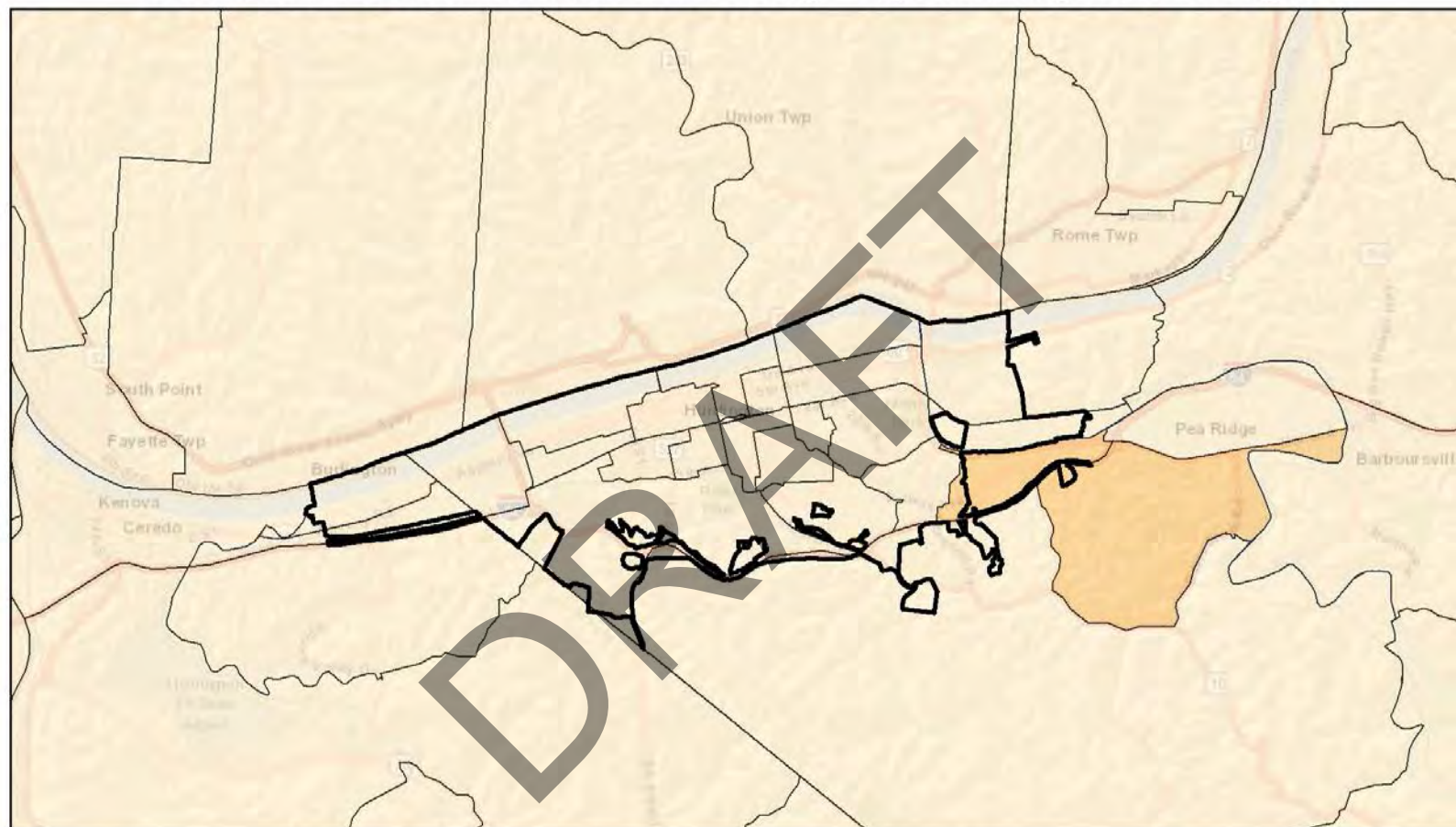
Override 1 **ELIHHWithOvercrowding** 10.84-21.85%
T10_LE30_OC_PCT
0-10.84%

1:131,015
0 1 2 4 mi
0 1.75 3.5 7 km

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



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



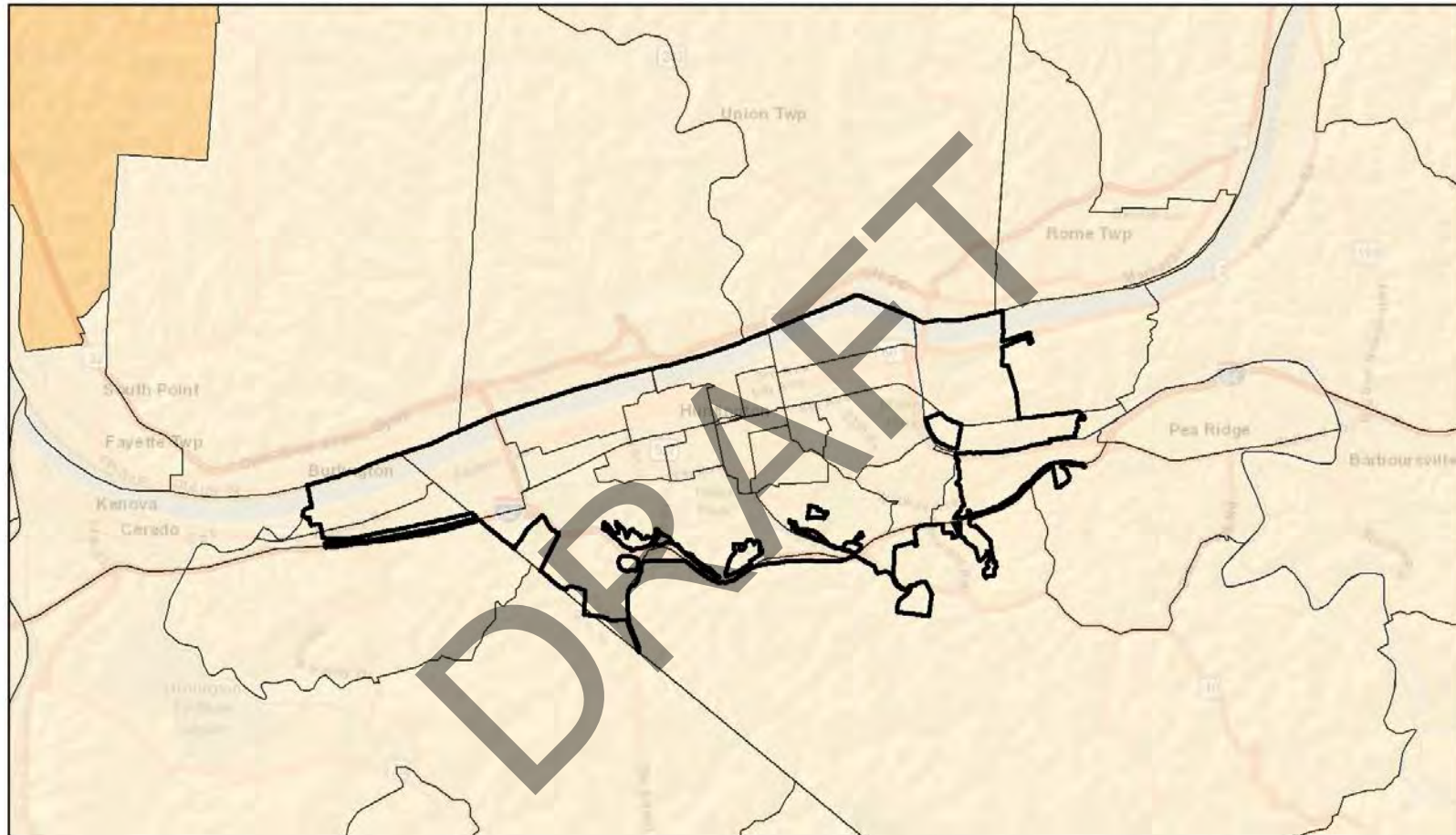
March 12, 2020

Override 1 LIHHWithOvercrowding
T10_LE50_OC_PCT
0-8.22%
8.22-16.81%

1:132,185
0 1 2 4 mi
0 1.75 3.5 7 km

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

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



March 12, 2020

Override 1 **MIHHWithOvercrowding** 6.81-14.56%
T10_LE80_OC_PCT
 0-6.81%

1:132,185
 0 1 2 4 mi
 0 1.75 3.5 7 km
 Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

G. Racial and Ethnic Housing Problems:

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

Table II – 23 - 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,220	704	640
White	2,695	569	440
Black / African American	343	120	155
Asian	64	0	45
American Indian, Alaska Native	40	0	0
Pacific Islander	0	0	0
Hispanic	34	15	0

Source: 2011-2015 CHAS

Table II – 24 - 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,070	1,510	0
White	1,775	1,345	0
Black / African American	234	100	0
Asian	4	4	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	29	20	0

Source: 2011-2015 CHAS



Table – 25 - 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,145	1,835	0
White	990	1,665	0
Black / African American	119	119	0
Asian	0	0	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	0	0
Hispanic	0	0	0

Source: 2011-2015 CHAS

Table – 26 - 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	275	1,530	0
White	219	1,385	0
Black / African American	0	84	0
Asian	0	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	30	35	0

Source: 2011-2015 CHAS

The racial/ethnic household composition of the City of Huntington according to the 2013-2017 ACS was 87.5% White, 8.2% Black/African American, 0.7% Asian, 0.3% American Indian Alaska Native, 0.0% Pacific Islander and 2.0% Hispanic or Latino. There were no disproportionately impacted group in terms of housing problems. However, there was one (1) disproportionately affected group 0-30% AMI Black/African American group represented 24% the “no/negative income, but none of the other housing problems” households.



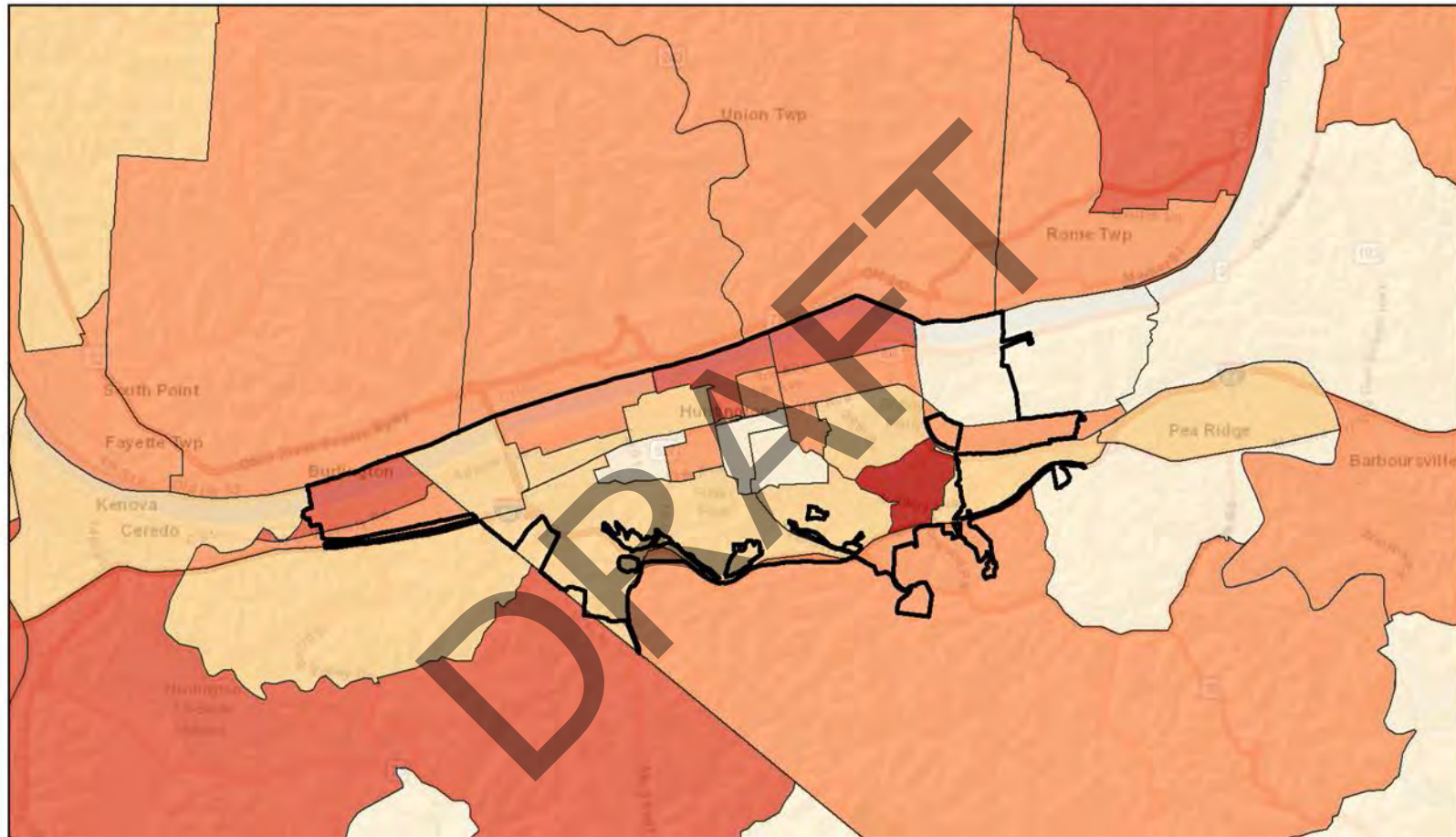
Table – 27 - 0%-30% of Area Median Income

Housing Problems	Has one or more of four severe housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,550	1,369	640
White	2,080	1,174	440
Black / African American	288	175	155
Asian	64	0	45
American Indian, Alaska Native	40	0	0
Pacific Islander	0	0	0
Hispanic	34	15	0

Source: 2011-2015 CHAS

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

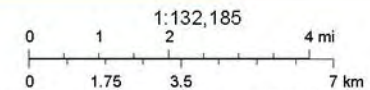
% Extremely Low Income Households with Any of the 4 Severe Housing Problems - Huntington, WV



March 12, 2020

Override 1 **ELIHHWithHousingProblems**
T2_LE30_HP2_PCT

0-39.29%	39.29-57.46%	>86.84%
	57.46-72.31%	
	72.31-86.84%	



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



Table – 28 - 30%-50% of Area Median Income

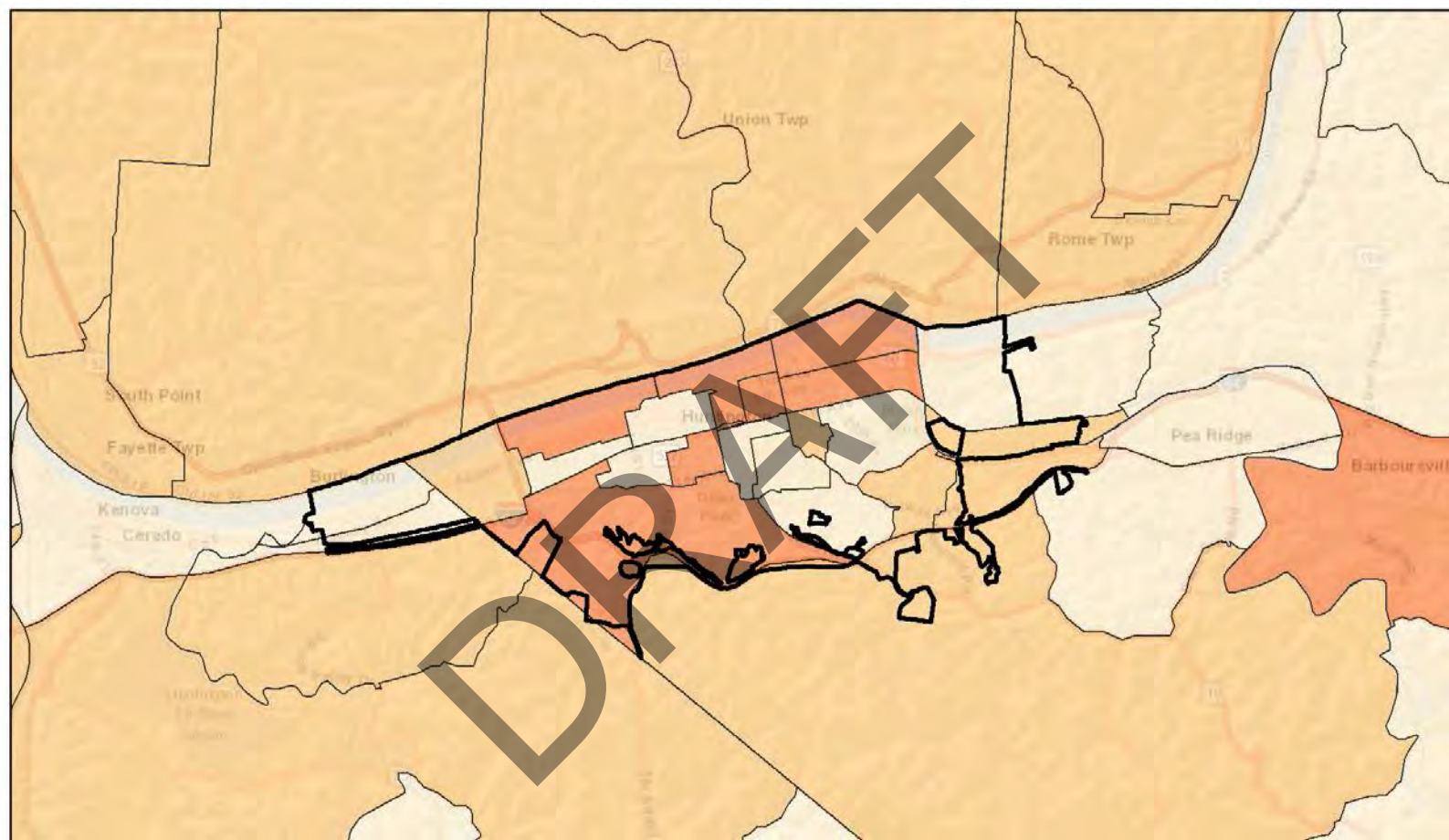
Housing Problems	Has one or more of four severe housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	960	2,645	0
White	760	2,370	0
Black / African American	165	179	0
Asian	4	4	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	25	24	0

Source: 2011-2015 CHAS

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

DRAFT

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



March 12, 2020

Override 1 LIHHWithHousingProblems
T2_LE50_HP2_PCT
0-38.54%
38.54-53.93%
53.93-67.07%

1:132,185
0 1 2 4 mi
0 1.75 3.5 7 km

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



Table – 29 - 50%-80% - of Area Median Income

Housing Problems	Has one or more of four severe housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	185	2,800	0
White	180	2,480	0
Black / African American	4	234	0
Asian	0	0	0
American Indian, Alaska Native	0	35	0
Pacific Islander	0	0	0
Hispanic	0	0	0

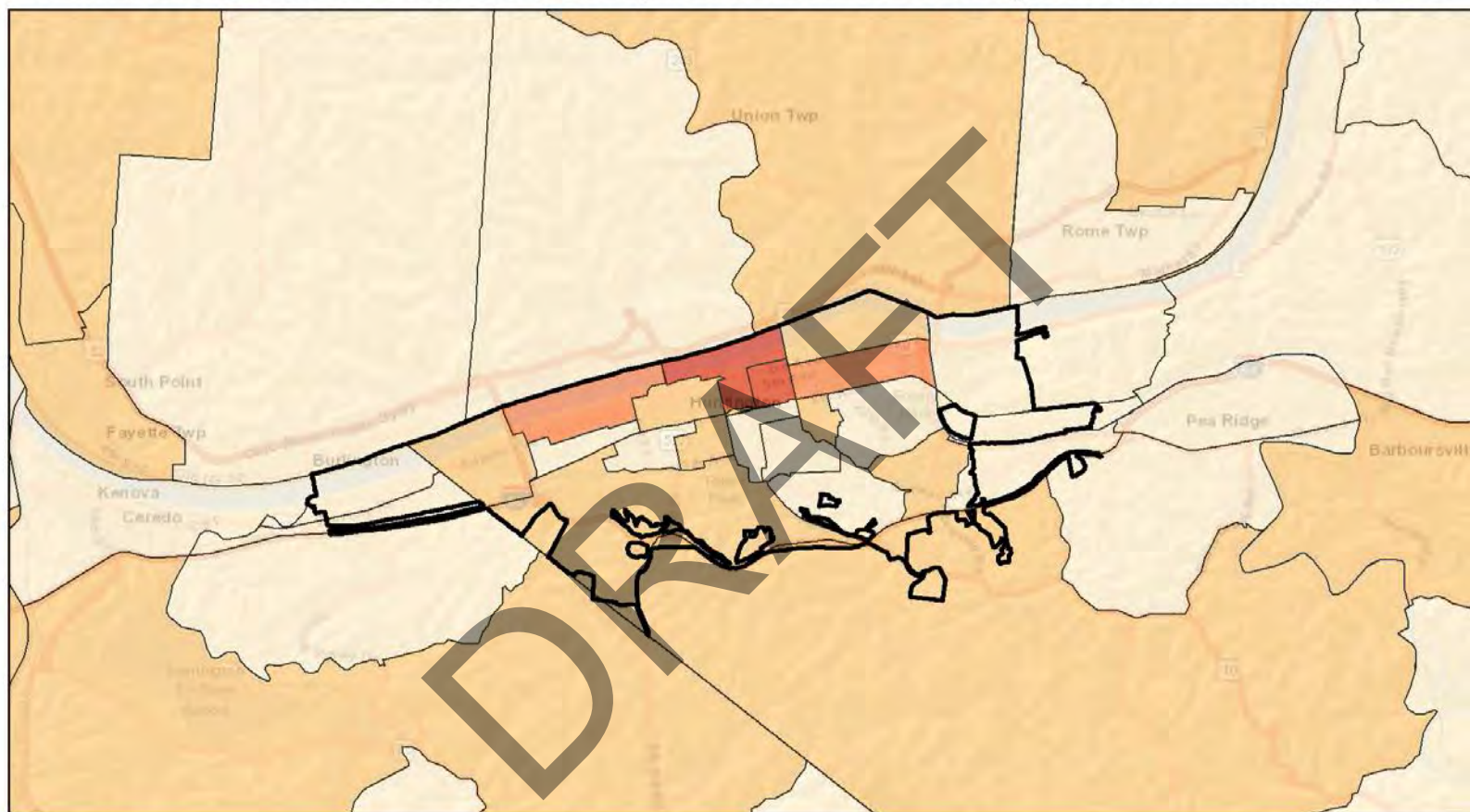
Source: 2011-2015 CHAS

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

DRAFT



% Moderate Income Households with Any of the 4 Severe Housing Problems - Huntington, WV



March 12, 2020

Override 1 **MIHHWithHousingProblems**
T2_LE80_HP2_PCT

0-30.19%	30.19-43.14%
	43.14-54.70%
	54.70-67.39%

1:132,185
0 1 2 4 mi
0 1.75 3.5 7 km

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



Table – 30 - 80%-100% of Area Median Income

Housing Problems	Has one or more of four severe housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	30	1,780	0
White	30	1,585	0
Black / African American	0	84	0
Asian	0	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	65	0

A severe housing problem is defined as one of the four following housing problems: 1. housing lacks complete kitchen facilities; 2. housing lacks complete plumbing facilities; 3. housing has more than 1.5 persons per room; and 4. housing cost burden is over 50%. There were no disproportionately impacted group in terms of severe housing problems. However, there was one (1) disproportionately affected group 0-30% AMI Black/African American group represented 24% the “no/negative income, but none of the other housing problems” households.

Racial and Ethnic Housing Cost Burden

Housing needs disaggregated by racial and ethnic cohorts were analyzed to determine if a group disproportionately experienced a housing cost burden as compared to the City's overall housing cost burdens. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing cost burdens. A housing cost burden is defined as household paying over 30% of household AMI on housing costs. The following table evaluating the 2011-2015 CHAS and ACS data address housing cost burdens in Huntington.



Table II – 31 - Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	13,459	3,285	3,629	645
White	12,060	2,890	2,980	440
Black / African American	859	249	470	155
Asian	108	10	69	45
American Indian, Alaska Native	45	20	20	0
Pacific Islander	30	0	0	0
Hispanic	225	35	59	0

Source: 2011-2015 CHAS

The racial/ethnic household composition of the City of Huntington according to the 2013-2017 ACS was 87.5% White, 8.2% Black/African American, 0.7% Asian, 0.3% American Indian Alaska Native, 0.0% Pacific Islander and 2.0% Hispanic or Latino. None (0) of the racial/ethnic groups were disproportionately affected by housing cost burdens.

H. Segregation

The following maps will help give a visual understanding of to any potential segregation patterns that exist in the City of Huntington.

Dot Map

The first map is a racial dot map representing one dot for every person counted during the 2010 Census. Each dot is color-coded by the individual's race and ethnicity. Whites are coded as orange; African-Americans, dark green; Asians, purple; Hispanics, blue; Native Americans, black; Other, red; and multi racial categories are coded as light green. The map was created by HUD through its Affirmatively Furthering Fair Housing Data and Mapping Tool. The map provides a picture of any areas that may have a grouping of non-White residents. The majority of the City of Huntington has a high concentration of white individuals, but there is a high concentration of African Americans in the central part of the City

Diversity Index

The second map calculates the diversity index per Census Tract in Huntington. "The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2013-2017. Lower index values between 0 and 20 suggest more homogeneity



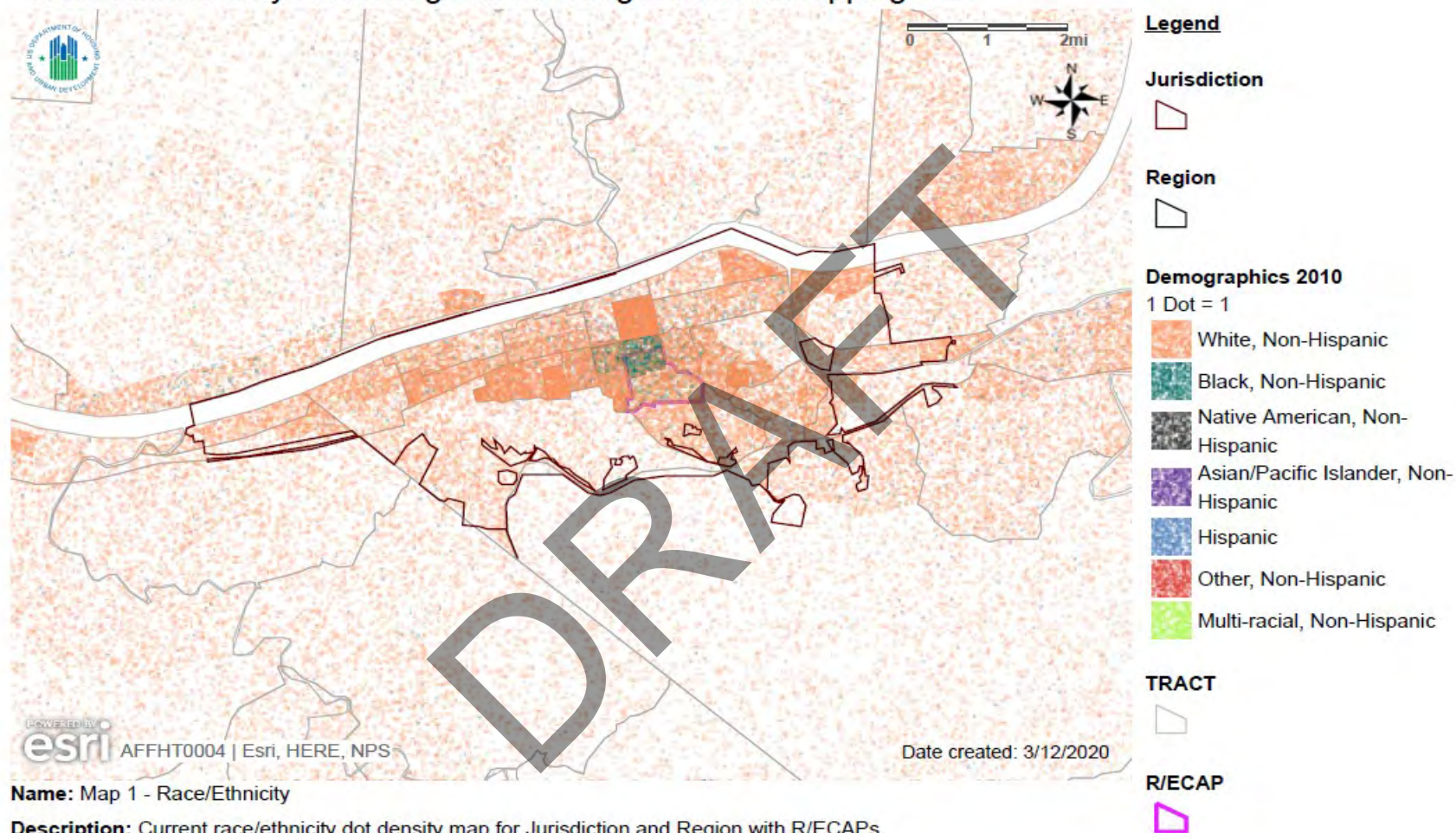
and higher index values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers. Data were obtained from the Census' American Community Survey 2013-2017 estimates and calculated by PolicyMap." (Source: PolicyMap.com) The majority of Huntington has a low diversity index, however the central part of the city has levels over 30 and even over 50. However, the map represents an overall high level of homogeneity in the City of Huntington.

Thiel Index

The third map provides the Thiel Index calculations per Census Tract in Huntington. "The Thiel Index is an index ranging from 0 to 1 that displays information about racial segregation. Lower index values below 0.20 suggest less segregation and higher index values above 0.40 suggest more segregation. The Thiel Index is a measure of how evenly members of racial and ethnic groups are distributed within a region, calculated by comparing the diversity of all sub-regions (Census Blocks) to the region as a whole. Patterns of racial segregation can emerge as a result of systemic barriers and opportunities or localized individual preferences. For example, highly segregated areas may be indicative of discriminatory housing practices or other related barriers. Data used in the calculation of this index were derived from the U.S. Census Bureau's 2010 Decennial Census." (Source: PolicyMap.com) The Thiel Index for all areas of the City reveal a low level of segregation in the City of Huntington.



HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

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

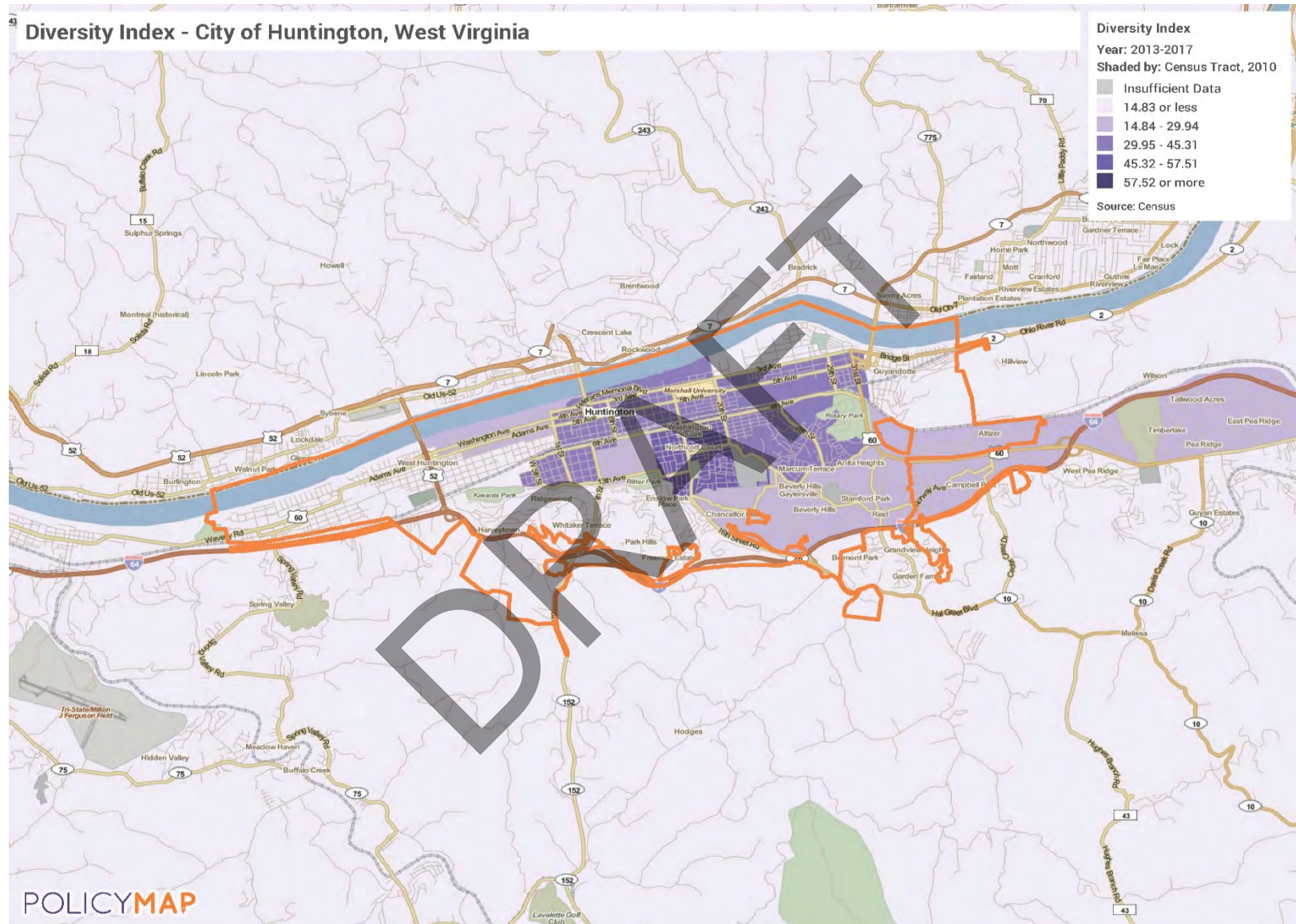
Jurisdiction: Huntington (CDBG, ESG)

Region: Huntington-Ashland, WV-KY-OH

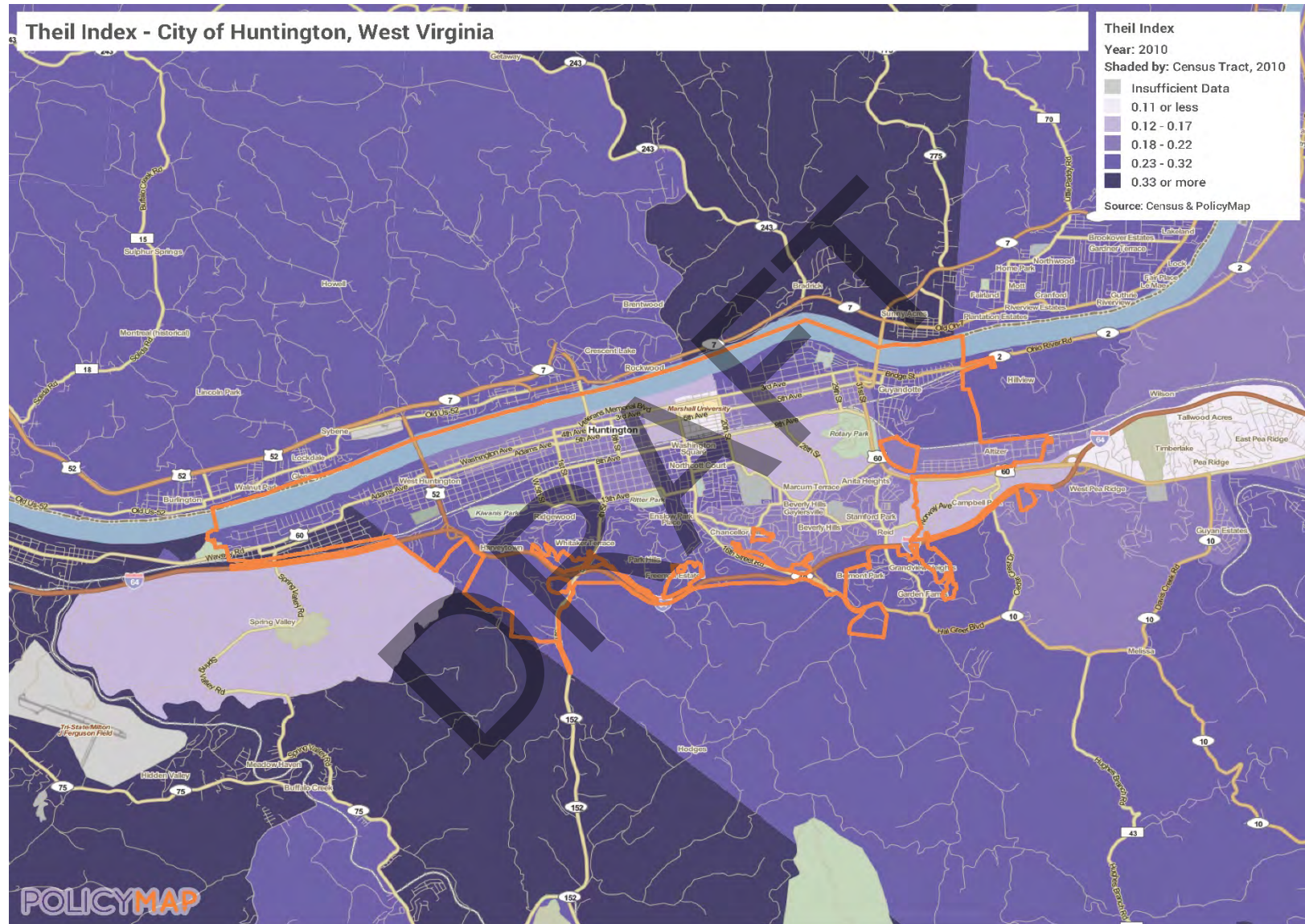
HUD-Provided Data Version: AFFHT0004

Source:

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



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



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



I. Disabled Households:

Table II-32 includes the 2013-2017 ACS estimates for the number of disabled individuals in the City of Huntington. The total population of disabled persons in the City of Huntington is estimated to be 21,511 persons which represents 20.9 percent of the total population of the City. The two largest disability types are cognitive and ambulatory difficulties. This high percentage of disabilities confirms the need for more accessible housing units.

Table II – 32 - Persons with Disabilities in Huntington

Disability Status of the Civilian Non-Institutional Population	2013-2017 ACS	
	#	%
Total non-institutionalized Population	47,304	-
Total Population with a disability	9,883	20.9%
Male	4,807	21.1%
Female	5,076	20.7%
White alone	8,661	21.4%
Black or African American alone	912	22.3%
American Indian and Alaska Native alone	42	41.2%
Asian alone	15	2.0%
Native Hawaiian and Other Pacific Islander alone	0	0.0%
Some other race alone	24	9.3%
Two or more races	229	14.5%
White alone, not Hispanic or Latino	8,640	21.7%
Hispanic or Latino (of any race)	55	5.9%
Population under 5	2,894	6.1%
With a hearing difficulty	37	1.3%
With a vision difficulty	13	0.4%
Population 5 - 17 years old	6,326	13.4%
With a hearing difficulty	77	1.2%
With a vision difficulty	59	0.9%
Population under 18	9,220	19.5%
With a cognitive difficulty	414	6.5%
With an ambulatory difficulty	22	0.3%
With a self-care difficulty	83	1.3%
Population 18 - 64 years old	31,159	65.9%



With a hearing difficulty	1,019	3.3%
With a vision difficulty	1,254	4.0%
With a cognitive difficulty	2,860	9.2%
With an ambulatory difficulty	3,394	10.9%
With a self-care difficulty	976	3.1%
With an independent living difficulty	1,974	6.3%
Population 65 years or older	6,925	14.6%
With a hearing difficulty	1,070	15.5%
With a vision difficulty	744	10.7%
With a cognitive difficulty	691	10.0%
With an ambulatory difficulty	2,157	31.1%
With a self-care difficulty	825	11.9%
With an independent living difficulty	1,335	19.3%

Source: 2013 – 2017 American Community Survey

DRAFT

III. Review/Update to Original Plan

Huntington's current "Analysis of Impediments to Fair Housing Choice" is dated 2015. The City staff reviewed their progress in addressing the goals of the AI twice a year during the preparation of the Annual Action Plan and the Consolidated Annual Performance and Evaluation Reports (CAPER). The existing Analysis of Impediments to Fair Housing Choice identified the following impediments, as well as created goals and strategies to address each impediment.

A. Summary of Impediments Huntington:

Impediment 1: FAIR HOUSING EDUCATION AND OUTREACH – There is a need to educate members of the community concerning their rights and responsibilities under the Fair Housing Act and to raise awareness, especially for low-income households, that all residents of the City have a right under federal law to fair housing choice.

Goal: Improve the public's knowledge and awareness of the Federal Fair Housing Act, and related laws, regulations, and requirements to affirmatively further fair housing in the City.

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

1-A: Continue to promote Fair Housing awareness through the media and with assistance from local/regional social service agencies, by providing educational awareness/opportunities for all persons to learn more about their rights and requirements under the Fair Housing Act and Americans with Disabilities Act.

1-B: Continue to make available and distribute literature and informational material concerning fair housing issues, an individual's rights, and landlord's responsibilities to affirmatively further fair housing.

1-C: Improve education for landlords on their responsibilities to make reasonable accommodations.

1-D: Improve the information on the City's website about whom to contact and how to file a fair housing complaint, as well as general Fair Housing information for homeowners and renters.

1-E: Strive for better intergovernmental cooperation between Federal, State, County, and local partners, as well as community groups and



developers, to effectively identify and address potential barriers to affordable housing choice.

FY 2015 Accomplishments

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.

The City provided funding for the following activities under FY 2015 to address the above impediment:

CD-15-01 General Administration - Expenses were paid to administer the Community Development Block Grant. This covered staff salaries and benefits, office expenses, planning services, and other facets of program management.

CD-15-02 Information & Referral Services - Expenses were paid to administer the Community Development Block Grant. This covered the staff salaries and benefits, office expenses, planning services, and other facets of program management.

FY 2016 Accomplishments

Department of Development and Planning Staff attended multiple community meetings, neighborhood association meetings, and citywide "Walks with the Mayor" where Fair Housing issues were discussed. Fair Housing literature was prominently displayed at the A.D. Lewis Community Center in the Fairfield East Neighborhood, as well as in the public lobby of the Huntington Police Department and the City branches of the Cabell County Public Library.

Additionally, the City provided funding for the following activities under FY 2016 to address the above impediment:

CD-16-01 CDBG General Administration & Planning: The City provided assistance to administer the Community Development Block Grant in the form of staff salaries and benefits, office expenses, planning services, and other facets of program management.

CD-16-02 Information & Referral Services: The City provided assistance to provide emergency assistance to homeless and near homeless persons providing them with referral and information regarding facilities and services.



CD-16-04 Coalition for the Homeless – Harmony House – Outreach/Transportation: The City provided funds to provide outreach/transportation services to assist agency clients.

CD-16-22 Administration / Delivery Costs: The City provided assistance for Administration and Delivery costs for its housing rehabilitation programs.

FY 2017 Accomplishments

Department of Development and Planning Staff attended multiple community meetings and neighborhood association meetings where Fair Housing issues were discussed. Fair Housing literature was prominently displayed at the A.D. Lewis Community Center in the Fairfield East neighborhood, as well as in the public lobby of the Huntington Police Department and the City branches of the Cabell County Public Library.

Additionally, the City provided funding for the following activities under FY 2017 to address the above impediment:

CD-17-01 CDBG General Administration & Planning: The City provided assistance to administer the Community Development Block Grant in the form of staff salaries and benefits, office expenses, planning services, and other facets of program management. The City proposed to assist one (1) organization and met that goal by assisting one (1) organization.

CD-17-02 Information & Referral Services: The City provided assistance to provide emergency assistance to homeless and near homeless persons providing them with referral and information regarding facilities and services.

CD-17-08 Coalition for the Homeless - Vanity Fair Fire Alarm Control Panel Replacement: The City provided funds to provide outreach/transportation services to assist agency clients.

CD-17-17 Administration / Delivery Costs: The City provided assistance for Administration and Delivery costs for its housing rehabilitation programs.

FY 2018 Accomplishments

Department of Development and Planning Staff attended multiple community meetings and neighborhood association meetings. Fair Housing literature was prominently displayed at the A.D. Lewis Community Center in the Fairfield East neighborhood, as well as in the



public lobby of the Huntington Police Department and the City branches of the Cabell County Public Library.

Additionally, the City provided funding for the following activities under FY 2018 to address the above impediment:

CD-18-01 CDBG General Administration & Planning: The City provided assistance to administer the Community Development Block Grant in the form of staff salaries and benefits, office expenses, planning services, and other facets of program management.

CD-18-02 Information & Referral Services: The City provided assistance to provide emergency assistance to homeless and near homeless persons providing them with referral and information regarding facilities and services.

CD-18-21 Administration / Delivery Costs: The City provided assistance for Administration and Delivery costs for its housing rehabilitation programs.

Impediment 2: PUBLIC POLICIES AND REGULATIONS – The City's Zoning Code needs additional definitions, provisions, and revisions to be compliant with the Federal Fair Housing Act, Section 504, and the Americans with Disabilities Act to affirmatively further fair housing.

Goal: Revise the City Zoning Code to affirmatively further fair housing.

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

2-A: The City should review the City's Zoning Ordinance and Building Codes for compliance with the Fair Housing Act, as amended.

2-B: Revise the definitions and add new definitions for the words: "Family," "Handicap (Disabled)," "Fair Housing Act," "Accessibility," "Visitability," etc.



FY 2015 Accomplishments

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.

The City were provided funding for the following activities under FY 2015 to address the above impediment:

The City reviewed and begun the updating process of the 1996 Zoning Ordinance during this CAPER period. The changes will be approved by the City Planning Commission during the FY 2016 CAPER period.

FY 2016 Accomplishments

The City of Huntington continued to work with an outside consultant to update and revise the City's Zoning Code. It is anticipated that the revised Zoning Code will be adopted by City Council in the new fiscal year.

Additionally, the City provided funding for the following activities under FY 2016 to address the above impediment:

CD-16-01 General Administration: Expenses were paid to administer the Community Development Block Grant. This covered staff salaries and benefits, office expenses, planning services, and other facets of program management.

CD-16-20 Volunteer Rehabilitation Program World Changers: The City provided assistance in cooperation with World Changers and other volunteer groups to make repairs for homeowners who qualified according to income limits set by the US Dept. of Housing and Urban Development. The City of Huntington paid for the materials, while the labor was provided by the World Changers. All repairs were made according to the City's codes and inspected by the City Building Inspector.

FY 2017 Accomplishments

The City of Huntington continued to work with an outside consultant to update and revise the City's Zoning Code. It is now anticipated that the revised Zoning Code will be adopted by City Council in the next fiscal year.

Additionally, the City provided funding for the following activities under FY 2017 to address the above impediment:



CD-17-01 General Administration – Expenses were paid to administer the Community Development Block Grant. This covered staff salaries and benefits, office expenses, planning services, and other facets of program management.

CD-17-15 Volunteer Rehabilitation Program – World Changers: The City provided assistance in cooperation with World Changers and other volunteer groups to make repairs for homeowners who qualified according to income limits set by the US Dept. of Housing and Urban Development. The City of Huntington paid for the materials, while the labor was provided by the World Changers. All repairs were made according to the City's codes and inspected by the City Building Inspector.

FY 2018 Accomplishments

The City of Huntington continued to work on updating and revising the City's Zoning Code. It is anticipated that the revised Zoning Code will be adopted by City Council in the new fiscal year.

Additionally, the City provided funding for the following activities under FY 2018 to address the above impediment:

CD-18-01 General Administration - Expenses were paid to administer the Community Development Block Grant. This covered staff salaries and benefits, office expenses, planning services, and other facets of program management.

CD-18-19 Volunteer Rehabilitation Program - World Changers: The City provided assistance in cooperation with World Changers and other volunteer groups to make repairs for homeowners who qualified according to income limits set by the US Dept. of Housing and Urban Development. The City of Huntington paid for the materials, while the labor was provided by the World Changers. All repairs were made according to the City's codes and inspected by the City Building Inspector.

Impediment 3: CONTINUING NEED FOR AFFORDABLE AND ACCESSIBLE HOUSING UNITS – The cost of housing units in the City has increased over the past ten years to the point that 51.3% of all renter households and 32.5% of owner households with a mortgage are paying more than 30% of their monthly incomes on the cost of their housing, which means that these households are considered cost overburdened.



Goal: Promote and encourage the construction and development of additional affordable rental and owner occupied housing units in the area, especially for households whose income is less than 80% of the median income.

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

3-A: Support and encourage both private developers and non-profit housing providers to develop plans for the construction of new affordable and accessible renter occupied and owner occupied housing that would be located in areas that provide access to employment opportunities, transportation, amenities, and services throughout the City.

3-B: Support and encourage the rehabilitation of existing housing units in the City to become decent, safe, and sound renter occupied and owner occupied housing that is affordable and accessible to lower income households.

3-C: Continue to enforce the ADA and Fair Housing requirements for landlords to make "reasonable accommodations" to their rental properties so they become accessible to tenants who are disabled, as well as educating the disabled how to request special accommodations.

FY 2015 Accomplishments

The City provided funding for the following activities under FY 2015 to address the above impediment:

CD-15-03 Coalition for the Homeless (Harmony House) - Funds were used to provide outreach/transportation for CHCH clients and increased the scope of the Downtown Green Team.

CD-15-19 Volunteer Rehabilitation Program – World Changers - In cooperation with World Changers and other volunteer groups, repairs were made for homeowners who qualified according to income limits set by the US Dept. of Housing and Urban Development. The City of Huntington provided funds for the materials and the labor was provided by the World Changers. All repairs were done according to city code and inspected by the City Building Inspector.

CD-15-20 Emergency Housing Rehab - The Emergency Housing Rehab program was available at a 0% interest to qualifying homeowners for installation of roofs, soffit, gutters, electrical upgrades, plumbing, etc.



HOME-15-29 CHDO Set-Aside City of Huntington – Uncommitted to date.

HOME-15-33 Homebuyer Assistance - Funds were used for a first-time homebuyer program in the Cabell-Huntington-Wayne HOME Consortium Area.

FY 2016 Accomplishments

The City of Huntington worked extensively with the Huntington Housing Authority, Habitat for Humanity, and a consortium of local lending institutions to create affordable rental housing and opportunities for affordable homeownership. In this CAPER period, the Huntington Housing Authority opened Huntington Gardens, a 40-unit senior midrise housing complex in the Fairfield West Neighborhood; this project was assisted with HOME funds. Lastly, three (3) income-qualified homebuyers were provided downpayment assistance in the form of no-interest loans during this CAPER period.

Additionally, the City provided funding for the following activities under FY 2016 to address the above impediment:

CD-16-02 Information & Referral Services: The City provided assistance to provide emergency assistance to homeless and near homeless persons providing them with referral and information regarding facilities and services.

CD-16-20 Volunteer Rehabilitation Program World Changers: The City provided assistance in cooperation with World Changers and other volunteer groups to make repairs for homeowners who qualified according to income limits set by the US Dept. of Housing and Urban Development. The City of Huntington paid for the materials, while the labor was provided by the World Changers. All repairs were made according to the City's codes and inspected by the City Building Inspector.

CD-16-21 Emergency Housing Rehab: The City provided assistance for the Emergency Housing Rehab program, which is a 0% interest loan program to qualifying homeowners for installation of roofs, soffit, gutters, electrical upgrades, plumbing, etc.

CD-16-24 Land Bank: The City provided assistance to the Land Bank to make essential repairs and payment of operating expenses needed to maintain the habitability of housing units acquired through tax foreclosure proceedings in order to prevent abandonment and deterioration.



FY 2017 Accomplishments

Seven (7) income-qualified homebuyers were provided downpayment assistance in the form of no-interest loans during this CAPER period.

Additionally, the City provided funding for the following activities under FY 2017 to address the above impediment:

CD-17-02 Information & Referral Services: The City provided assistance to provide emergency assistance to homeless and near homeless persons providing them with referral and information regarding facilities and services.

CD-17-15 Volunteer Rehabilitation Program – World Changers: The City provided assistance in cooperation with World Changers and other volunteer groups to make repairs for homeowners who qualified according to income limits set by the US Dept. of Housing and Urban Development. The City of Huntington paid for the materials, while the labor was provided by the World Changers. All repairs were made according to the City's codes and inspected by the City Building Inspector.

CD-17-16 Emergency Housing Rehab: The City provided assistance for the Emergency Housing Rehab program, which is a 0% interest loan program to qualifying homeowners for installation of roofs, soffit, gutters, electrical upgrades, plumbing, etc.

CD-17-20 Land Bank: The City provided assistance to the Land Bank to make essential repairs and payment of operating expenses needed to maintain the habitability of housing units acquired through tax foreclosure proceedings in order to prevent abandonment and deterioration.

FY 2018 Accomplishments

The City of Huntington worked extensively with the Huntington Housing Authority, Habitat for Humanity, and a consortium of local lending institutions to create affordable rental housing and opportunities for affordable homeownership. In this CAPER period, the Huntington Development corporation developed four (4) new affordable rental units with HOME funds. The City rehabilitated nine (9) single family households two (2) of which had accessibility improvements as part of the rehab. Lastly, one (1) income-qualified homebuyer was provided downpayment assistance in the form of no-interest loans during this CAPER period. Habitat for Humanity constructed three (3) new single family houses during this CAPER period.



Additionally, the City provided funding for the following activities under FY 2018 to address the above impediment:

CD-18-02 Information & Referral Services: The City provided assistance to provide emergency assistance to homeless and near homeless persons providing them with referral and information regarding facilities and services.

CD-18-19 Volunteer Rehabilitation Program - World Changers: The City provided assistance in cooperation with World Changers and other volunteer groups to make repairs for homeowners who qualified according to income limits set by the US Dept. of Housing and Urban Development. The City of Huntington paid for the materials, while the labor was provided by the World Changers. All repairs were made according to the City's codes and inspected by the City Building Inspector.

CD-18-20 Emergency Housing Rehab: The City provided assistance for the Emergency Housing Rehab program, which is a 0% interest loan program to qualifying homeowners for installation of roofs, soffit, gutters, electrical upgrades, plumbing, etc.

Impediment 4: PRIVATE LENDING AND INSURANCE PRACTICES –

The Home Mortgage Disclosure Act (HMDA) data suggests that there is a disparity between the approval rates of home mortgage loans originated from White and those originated from Minority applicants.

Goal: Approval rates for all originated home mortgage loans and insurance coverage should be fair, risk based, unbiased, and impartial, regardless of race, familial status and location.

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

4-A: Federal, state, local, and private funding should be used to provide a higher rate of public financial assistance to potential homebuyers in lower income neighborhoods to improve loan to value ratios, so that private lenders will increase the number of loans made in these areas.

FY 2015 Accomplishments

The City did not fund any projects to address this impediment in 2015.



FY 2016 Accomplishments

The City of Huntington has limited CDBG funds, but it should continue to fund its community improvement and housing programs in targeted low-income neighborhoods and increase public safety protection in these areas, which may reduce the insurance risk factors for homeowner insurance underwriting. The City helped fund the purchase of a fire engine/pumper truck for the City's Fire Department to serve the Guyandotte, Highlawn, Altizer, and Beverly Hills neighborhoods in 2016. The City is now funding the purchase of an Engine/Pumper at Fire Station 2 (University Station) to serve the area around Marshall University and the Fairfield Neighborhoods, continuing the City's efforts of funding activities serving low- and moderate-income persons. This funding in lower income neighborhoods may improve the loan-to-value ratio so that private lenders may increase the number of loans made in these areas.

Additionally, the City provided funding for the following activities under FY 2016 to address the above impediment:

CD-16-01 CDBG General Administration & Planning: The City provided assistance to administer the Community Development Block Grant in the form of staff salaries and benefits, office expenses, planning services, and other facets of program management.

CD-16-14 Huntington Fire Department Pumper Truck: The City provided assistance to the Huntington Fire Department for the purchase of a Fire Engine/Pumper to serve the Guyandotte, Highlawn, Altizer, and Beverly Hills Neighborhoods.

HOME-16-31, 33, and 35 Homebuyer Assistance: The City provided assistance to the Cabell-Huntington-Wayne HOME Consortium for the first-time homebuyer program.

FY 2017 Accomplishments

The City of Huntington has limited CDBG funds, but it should continue to fund its community improvement and housing programs in targeted low-income neighborhoods and increase public safety protection in these areas, which may reduce the insurance risk factors for homeowner insurance underwriting. The City helped fund the purchase of a fire engine/pumper truck for the City's Fire Department to serve the area around Marshall University and the Fairfield Neighborhoods, continuing the City's efforts of funding activities serving low- and moderate-income persons. This funding in lower income neighborhoods may improve the



loan-to-value ratio so that private lenders may increase the number of loans made in these areas.

Additionally, the City provided funding for the following activities under FY 2017 to address the above impediment:

CD-17-01 CDBG General Administration & Planning: The City provided assistance to administer the Community Development Block Grant in the form of staff salaries and benefits, office expenses, planning services, and other facets of program management.

CD-17-09 Huntington Fire Department - Pumper Truck: The City provided assistance to the Huntington Fire Department for the purchase of a Fire Engine/Pumper to serve area around Marshall University and the Fairfield Neighborhoods.

HOME-17-27 Homebuyer Assistance: The City provided assistance to the Cabell-Huntington-Wayne HOME Consortium for the first-time homebuyer program.

FY 2018 Accomplishments

The City of Huntington has limited CDBG funds, but it continues to fund its community improvement and housing programs in targeted low-income neighborhoods and increase public safety protection in these areas, which may reduce the insurance risk factors for homeowner insurance underwriting. The City continued to help fund the purchase of a fire engine/pumper truck for the City's Fire Department to serve the area around Marshall University and the Fairfield Neighborhoods, continuing the City's efforts of funding activities serving low- and moderate-income persons. This funding in lower income neighborhoods may improve the loan-to-value ratio so that private lenders may increase the number of loans made in these areas.

Additionally, the City provided funding for the following activities under FY 2018 to address the above impediment:

CD-18-01 CDBG General Administration & Planning: The City provided assistance to administer the Community Development Block Grant in the form of staff salaries and benefits, office expenses, planning services, and other facets of program management.

CD-18-10 Huntington Fire Department - Pumper Truck: The City provided assistance to the Huntington Fire Department for the purchase of a Fire



Engine/Pumper at Fire Station 2 (University Station) to serve the area around Marshall University and the Fairfield Neighborhoods.

CD-18-17 Huntington Fire Department - Maintenance Apparatus Doors: Funds were used to replace six bay doors with thick white insulated sections that will provide more security and energy savings. Fire Station #4 serves parts of the West Huntington neighborhood.

CD-18-18 Huntington Fire Department - Department Renovations: Funds were used to renovate a kitchen and bathroom at Fire Station #5 to serve the Guyandotte area

HOME-18-28 Homebuyer Assistance: The City provided assistance to the Cabell-Huntington-Wayne HOME Consortium for the first-time homebuyer program.

A. Fair Housing Complaints:

1. Huntington Human Relations Commission

According to the City's ordinance, the Huntington Human Relations Commission investigates and holds hearings on cases of alleged discrimination arising from the city's nondiscrimination ordinance. The commission may then issue subpoenas to investigate complaints and order fines for companies or individuals found committing discriminatory practices.

**Huntington Human Relations
Commission**
800 5th Ave, Huntington, WV
<https://pslegal.org/>

The Human Relations Commission was recently reestablished at the beginning of 2020 by the Huntington City Council. It is the first time the City has had a Human Relations Commission since 2011.

2. West Virginia Human Rights Commission

The West Virginia Human Rights Commission (WVHRC) is a subdivision of the West Virginia Department of Health & Human Resources. The mission statement of the WVHRC is as follows: The West Virginia Human Rights Commission will encourage and endeavor to bring about respect, tolerance, and mutual understanding

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



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

The Commissioners of the West Virginia Human Rights Commission in the past have voted unanimously to adopt a Resolution of the Commission to Prohibit Discrimination based on Sexual Orientation. However, the West Virginia State Legislature has failed to adopt sexual orientation as a protected class under the WV Employment and Housing Nondiscrimination Act.

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

Table IV-1 – WVHRC New Complaints Docketed

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

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

Table IV-2 – WVHRC Complaints Closed

Category	2010	2011	2012	2013	2014	Total
Employment	371	307	215	349	273	1,242
Housing	46	43	50	43	38	182
Public Accommodations	36	25	27	34	36	122
TOTALS	453	375	292	426	347	1,546

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

3. Fair Housing Assistance Program (FHAP) Agencies

The Fair Housing Assistance Program offers grants to state and local agencies that have sufficiently demonstrated to HUD that they support or enforce a fair housing law that is substantially equivalent to the Fair Housing Act. FHAP agencies carryout fair housing activities such as enforcement and education in order to protect families and individuals who believe that they have been the victims of housing discrimination.

4. Fair Housing & Equal Opportunity (FHEO-HUD)



The U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. According to the HUD FHEO complaint tracking system (TEAPOTS) the following complaints were filed from January 1, 2009 until May 30, 2019:



Table IV – 3 - HUD Reported Fair Housing Complaints 2009 - 2019

City of Huntington - January 1, 2013 - May 30, 2019

Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Huntington	West Virginia - Cabell County	02/19/09	09/30/11	Complainant failed to cooperate	Race	Discriminatory terms, conditions, privileges relating to rental
Huntington	West Virginia - Cabell County	02/23/09	02/18/10	Complaint withdrawn by complainant after resolution	Disability	Failure to permit reasonable modification
Huntington	West Virginia - Cabell County	03/20/09	06/29/10	Complaint withdrawn by complainant without resolution	Familial Status	Discriminatory advertising, statements and notices
Huntington	West Virginia - Cabell County	12/15/15	05/21/15	Unable to locate complainant	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation.
Huntington	West Virginia - Cabell County	02/19/09	05/23/09	Complaint withdrawn by complainant after resolution	Race	Discrimination in terms/conditions/privileges relating to rental.
Huntington	West Virginia - Cabell County	02/02/09	04/21/10	No Cause determination	Retaliation	Discrimination in terms/conditions/privileges/relating to rental
Huntington	West Virginia - Cabell County	02/03/09	05/22/09	Complaint withdrawn by complainant after resolution	Race	Discrimination in terms/privileges/relating to rental.
Huntington	West Virginia - Cabell County	02/03/09	5/23/09	Complaint withdrawn by complainant without resolution	Race	Discriminatory terms, conditions, privileges, or services and facilities
Huntington	West Virginia - Cabell County	02/19/09	09/30/09	Conciliation/settlement successful	Retaliation	Other discriminatory acts
Huntington	West Virginia - Cabell County	03/23/09	05/22/09	Complaint withdrawn by complainant after resolution	Race	Discrimination in terms/privileges/relating to rental.
Huntington	West Virginia - Cabell County	05/04/09	01/21/09	Conciliation/settlement successful	Disability	Discrimination in terms/conditions/privileges relating to rental
Huntington	West Virginia - Cabell County	09/02/09	01/12/10	No cause determination	Familial Status	Discrimination in terms/conditions/privileges relating to rental
Huntington	West Virginia - Cabell County	03/02/10	04/23/10	Conciliation/settlement successful	Race	Discriminatory refusal to sell and negotiate for sale
Huntington	West Virginia - Cabell County	07/14/10	09/24/10	Conciliation/settlement successful	Sex, Disability, Retaliation	Failure to make reasonable accommodation
Huntington	West Virginia - Cabell County	10/06/10	11/05/10	Conciliation/settlement successful	Disability	Failure to make reasonable accommodation
Huntington	West Virginia - Cabell County	02/08/11	06/27/11	Conciliation/settlement successful	Race, Sex, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities.



Huntington	West Virginia - Cabell County	08/11/14	02/22/16	Conciliation/settlement successful	Disability, Retaliation	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc); Failure to make reasonable accommodation
Huntington	West Virginia - Cabell County	10/07/14	06/12/15	No cause determination	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices
Huntington	West Virginia - Cabell County	03/15/17	08/14/18	Conciliation/Settlement successful	Familial Status	Discriminatory refusal to rent negotiate for rental; Discriminatory advertising, statements and notices.
Huntington	West Virginia - Cabell County	08/01/17	12/29/17	Complainant failed to cooperate	Disability	Discriminatory refusal to negotiate fore rental; Discrimination in terms/conditions/privileges relating to rental
Huntington	West Virginia - Cabell County	12/21/17	10/05/18	No cause determination	Disability	Failure to make reasonable accommodation
Huntington	West Virginia - Cabell County	03/11/19	07/18/19	Complainant failed to cooperate	Disability	Failure to make reasonable accommodation
Huntington	West Virginia - Wayne County	08/13/12	09/10/12	Conciliation/settlement successful	Familial Status	Discrimination in terms/conditions/privileges relating to rental

The fair housing complaints - in the City of Huntington - over the past ten years covered disability and race. The majority of reported issues were on the basis of disability; in particular, “failure to make reasonable accommodations.”

Table IV – 4 – Cabell County HUD Reported Complaints

Cabell County - January 1, 2013 - May 30, 2019						
Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Barboursville	West Virginia - Cabell County	12/20/10	03/30/11	Unable to locate complainant	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation
Huntington	West Virginia - Cabell County	02/19/09	09/30/11	Complainant failed to cooperate	Race	Discriminatory terms, conditions, privileges relating to rental
Huntington	West Virginia - Cabell County	02/23/09	02/18/10	Complaint withdrawn by complainant after resolution	Disability	Failure to permit reasonable modification
Huntington	West Virginia - Cabell County	03/20/09	06/29/10	Complaint withdrawn by complainant without resolution	Familial Status	Discriminatory advertising, statements and notices
Huntington	West Virginia - Cabell County	12/15/15	05/21/15	Unable to locate complainant	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation.



Barboursville	West Virginia - Cabell County	05/12/09	9/30/10	No cause or determination	Race, Familial Status	Discrimination in terms/conditions/privileges relating to rental
Barboursville	West Virginia - Cabell County	05/25/10	05/02/12	No cause or determination	Disability, retaliation	Discrimination in terms/conditions/privileges relating to rental
Barboursville	West Virginia - Cabell County	07/01/11	09/21/11	Complaint withdrawn by complainant without resolution	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Barboursville	West Virginia - Cabell County	04/16/13	11/15/13	No cause determination	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
Barboursville	West Virginia - Cabell County	10/17/14	12/11/14	Unable to locate complainant	Race	Discriminatory advertising statements and notices
Barboursville	West Virginia - Cabell County	06/29/18	10/31/18	No cause determination	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental.
Culloden	West Virginia - Cabell County	09/30/11	08/31/12	No Cause determination	Sex	Discriminatory refusal to rent
Huntington	West Virginia - Cabell County	02/19/09	05/23/09	Complaint withdrawn by complainant after resolution	Race	Discrimination in terms/conditions/privileges relating to rental.
Huntington	West Virginia - Cabell County	02/02/09	04/21/10	No Cause determination	Retaliation	Discrimination in terms/conditions/privileges/relating to rental
Huntington	West Virginia - Cabell County	02/03/09	05/22/09	Complaint withdrawn by complainant after resolution	Race	Discrimination in terms/privileges/relating to rental.
Huntington	West Virginia - Cabell County	02/03/09	5/23/09	Complaint withdrawn by complainant without resolution	Race	Discriminatory terms, conditions, privileges, or services and facilities
Huntington	West Virginia - Cabell County	02/19/09	09/30/09	Conciliation/settlement successful	Retaliation	Other discriminatory acts
Huntington	West Virginia - Cabell County	03/23/09	05/22/09	Complaint withdrawn by complainant after resolution	Race	Discrimination in terms/privileges/relating to rental.
Huntington	West Virginia - Cabell County	05/04/09	01/21/09	Conciliation/settlement successful	Disability	Discrimination in terms/conditions/privileges relating to rental
Huntington	West Virginia - Cabell County	09/02/09	01/12/10	No cause determination	Familial Status	Discrimination in terms/conditions/privileges relating to rental
Huntington	West Virginia - Cabell County	03/02/10	04/23/10	Conciliation/settlement successful	Race	Discriminatory refusal to sell and negotiate for sale
Huntington	West Virginia - Cabell County	07/14/10	09/24/10	Conciliation/settlement successful	Sex, Disability, Retaliation	Failure to make reasonable accommodation



Huntington	West Virginia - Cabell County	10/06/10	11/05/10	Conciliation/settlement successful	Disability	Failure to make reasonable accommodation
Huntington	West Virginia - Cabell County	02/08/11	06/27/11	Conciliation/settlement successful	Race, Sex, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities.
Huntington	West Virginia - Cabell County	08/11/14	02/22/16	Conciliation/settlement successful	Disability, Retaliation	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc); Failure to make reasonable accommodation
Huntington	West Virginia - Cabell County	10/07/14	06/12/15	No cause determination	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices
Huntington	West Virginia - Cabell County	03/15/17	08/14/18	Conciliation/Settlement successful	Familial Status	Discriminatory refusal to rent negotiate for rental; Discriminatory advertising, statements and notices.
Huntington	West Virginia - Cabell County	08/01/17	12/29/17	Complainant failed to cooperate	Disability	Discriminatory refusal to negotiate fore rental; Discrimination in terms/conditions/privileges relating to rental
Huntington	West Virginia - Cabell County	12/21/17	10/05/18	No cause determination	Disability	Failure to make reasonable accommodation
Huntington	West Virginia - Cabell County	03/11/19	07/18/19	Complainant failed to cooperate	Disability	Failure to make reasonable accommodation
Milton	West Virginia - Cabell County	02/08/11	04/19/12	Complaint withdrawn by complainant after resolution	Sex, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities
Milton	West Virginia - Cabell County	02/16/11	03/21/11	Conciliation/settlement successful	Disability	Failure to make reasonable accommodation
Milton	West Virginia - Cabell County	02/06/12	08/21/12	Co cause determination	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation

The fair housing complaints – in Cabell County - over the past ten years covered disability and race. The majority of reported issues were on the basis of disability; in particular, “failure to make reasonable accommodations.”



Table IV – 5 - HUD REPORTED FAIR HOUSING COMPLAINTS 2009 - 2019

Wayne County - January 1, 2013 - May 30, 2019

Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Huntington	West Virginia - Wayne County	08/14/12	09/10/12	Conciliation/settlement successful	Familial Status	Discrimination in terms/conditions/privileges relating to rental
Kenova	West Virginia - Cabell County	02/19/09	09/30/11	Conciliation/settlement successful	Familial Status	Discriminatory refusal to rent
Wayne	West Virginia - Wayne County	05/04/11	04/19/12	No cause determination	Disability	Discriminatory refusal to rent

The fair housing complaints – in Wayne County - over the past ten years covered disability and race. The majority of reported issues were on the basis of disability; in particular, “refused to rent.”

National Trends

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



Table IV – 6 - HUD and FHAP Housing Complaints Nationwide

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

Source: HUD FY 2014-2017 Annual Reports on Fair Housing

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

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

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

5. Local Human Relations Commissions

The City of Huntington has ordinances covering discrimination. The City of Huntington recognizes the following protected classes: “race, religion, color, national origin, ancestry, sex, sexual orientation, age, blindness, disability or veteran status...” (Source: City of Huntington, Code of Ordinances Chapter 147)

6. 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 participated in the information gathering through roundtable discussions, individual meetings, or through surveys:

- Branches Domestic Violence Shelter
- Cabell Public Library
- Cabell-Huntington Coalition for the Homeless
- Coalfield Development
- Habitat for Humanity
- Huntington Housing Authority
- Huntington Development Corporation
- Information and Referral
- Mountain State Centers for Independent Living
- Southwestern Community Action Council
- United Way of the River Cities
- Unlimited Future, Inc

Each of these agencies provided feedback on their and their clients' experiences concerning housing-related issues in the City of Huntington. Below is a list of key points from each of the meetings.

- Need for affordable housing
- Need for supportive services
- Need for employment opportunities
- Need for public transportation

Many agencies also provided suggestions of how to address the identified areas of inequality or discrimination in the City. Commonly suggested strategies to further fair housing in the City are included below:

- Provide more affordable housing
- Provide financial assistance to make housing more affordable
- Provide education and outreach on fair housing



B. Public Sector:

The Analysis of Impediments also examines public policies of the jurisdiction and the impact of those policies on fair housing choice. The City government controls land use and development through its comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the City Council. 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 and policies determine the community's commitment to housing goals and objectives; therefore, determining 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 Community Development Block Grant (CDBG) funds from HUD under the CDBG program. The City will receive approximately \$1,798,713 in CDBG funds for FY 2020. The City anticipates that CDBG funding levels will remain in flux for the foreseeable future.

The City annually allocates its CDBG funds to a number of eligible projects such as: public facility/infrastructure improvements, public services, the removal of slum and blight, and housing activities. For FY 2020, the City has proposed to allocate its estimated CDBG funds to the projects listed in the table below.

FY 2020 Estimated CDBG Allocation for the City of Huntington

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM	
General Administration (20% cap)	\$ 363,742.00
Information and Referral	\$ 5,000.00
A.D. Lewis Community Center	\$ 220,806.95
Fairfield East/HER Place	\$ 45,000.00
Tri-State Literacy Council	\$ 2,000.00
Sidewalk and Accessibility	\$ 100,930.78
Community Center Facility Improvement Fund	\$ 25,000.00
Huntington Fire Department	\$ 400,000.00
Information and Referral	\$ 5,000.00
Hite-Sanders Little League	\$ 25,482.00
Kiwanis Day Care	\$ 51,000.00



Volunteer Rehabilitation Program – World Changers	\$ 35,000.00
Emergency Housing Rehab	\$ 150,000.00
Demolition – Citywide	\$ 389,751.27
Total	\$1,818,713.00

The majority of the activities listed above are undertaken in low/mod income areas of the City, since this is a high priority for the City. The Direct Homeownership Assistance Grants are available to low-mod income clientele city-wide. Additionally, each activity meets the National Objective of serving a low/mod area, low/mod people, job creation, or reducing slum/blight. Many activities in each funding category specifically work to increase the supply of quality affordable housing units, as well as promote fair housing choice in the City.

The City of Huntington's FY 2020-2024 Five Year Consolidated Plan identified the following six (6) strategies to address the priority needs in the City:

Housing Strategy (High Priority) -

There is a need to improve the quality of the housing stock in the City of Huntington by increasing the amount of decent, safe, sound, and accessible housing for homeowners, renters, and homebuyers that is affordable to low- and moderate-income persons and families.

Goals: The following housing goals are:

- **HSG-1 Owner-occupied Housing Rehabilitation** - Continue to provide financial assistance to low- and moderate-income homeowners to rehabilitate their homes and provide emergency repairs as necessary.
- **HSG-2 Renter-occupied Rehabilitation** - Provide financial assistance to landlords to rehabilitate housing units that are rented to low- and moderate-income tenants.
- **HSG-3 Housing Construction** - Increase the supply of decent, safe, sound, and accessible housing that is affordable to homebuyers and renters in the community through rehabilitation of vacant buildings and new construction.
- **HSG-4 Home Ownership** - Continue to assist low- and moderate-income households to become homeowners by providing down

payment assistance, closing cost assistance, housing rehabilitation assistance, and requiring housing counseling training.

- **HSG-5 Fair Housing** - Promote fair housing choice through education, training, and outreach throughout the City of Huntington.

Homeless Strategy (High Priority) -

There is a need for housing and support services for homeless persons and persons at-risk of becoming homeless.

Goals: The following homeless goals are:

- **HMS-1 Continuum of Care** - Support the local Continuum of Care's (CoC) efforts to provide emergency shelter, transitional housing, and permanent supportive housing to persons and families who are homeless or who are at risk of becoming homeless.
- **HMS-2 Operation/Support** - Assist providers in the operation of housing and support services for the homeless and persons at-risk of becoming homeless.
- **HMS-3 Prevention and Housing** - Continue to support the prevention of homelessness through anti-eviction activities and programs for rapid re-housing.
- **HMS-4 Housing** - Support the rehabilitation of and making accessibility improvements to emergency shelters, transitional housing, and permanent housing for the homeless.
- **HMS-5 Permanent Housing** - Support the development of permanent supportive housing for homeless individuals and families.

Other Special Needs Strategy (High Priority) -

There is a continuing need for affordable housing, services, and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.

Goals: The following special needs goals are:

- **SNS-1 Housing** - Increase the supply of affordable, decent, safe, sound, and accessible housing for the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs through rehabilitation of existing buildings and new construction.

- **SNS-2 Social Services** - Support social service programs and facilities for the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs
- **SNS-3 Accessibility** - Improve the accessibility of owner occupied housing through rehabilitation and improve renter occupied housing by making reasonable accommodations for the physically disabled and by removing architectural barriers.

Community Development Strategy (High Priority) -

There is a need to improve the public and community facilities, infrastructure, public social/welfare services, food program, public safety, clearance, and the quality of life for all residents throughout the City of Huntington.

Goals: The following community development goals are:

- **CDS-1 Community Facilities** - Improve the parks, recreational centers, trails, libraries, and all public and community facilities in the City.
- **CDS-2 Infrastructure** - Improve the public infrastructure through rehabilitation, reconstruction, and new construction.
- **CDS-3 Accessibility Improvements** - Improve the physical and visual accessibility of community facilities, infrastructure, and public buildings.
- **CDS-4 Public Services** - Improve and enhance public services including; programs for youth, the elderly, disabled, and other public service programs for low- and moderate-income persons.
- **CDS-5 Public Safety** - Improve the public safety facilities, equipment, and ability to respond to emergency situations.
- **CDS-6 Clearance/Demolition** - Remove and eliminate slum and blighting conditions through the demolition of vacant, abandoned and dilapidated structures on a spot basis and/or area-wide basis.
- **CDS-7 Revitalization** - Promote neighborhood revitalization in strategic areas of the City through acquisition, demolition, rehabilitation, code enforcement, infrastructure improvements, housing construction, public and community facilities improvements, etc.
- **CDS-8 Historic Preservation** - Promote historic preservation and adaptive reuse of existing buildings in the community through financial incentives.

Economic Development Strategy (Low Priority) -

There is a need to increase employment, job training, technical assistance, workforce development, infrastructure improvements, and economic empowerment of low- and moderate-income residents in the City.

Goals: The following economic development goals are:

- **EDS-1 Employment** - Support and encourage new job creation, job retention, workforce development, employment, and job training services for the unemployed and underemployed persons.
- **EDS-2 Financial Assistance** - Support business and commercial growth through expansion and new development through technical assistance programs and low interest loans.
- **EDS-3 Redevelopment Program** - Plan and promote the development, redevelopment and revitalization of economically distressed areas of the City.
- **EDS-4 Financial Incentives** - Support and encourage new economic development through local, state and Federal tax incentives and programs such as Tax Incremental Financing (TIF), tax abatements (LERTA), Enterprise Zones/Entitlement Communities, Section 108 Loan Guarantees, Economic Development Initiative (EDI) funds, etc.

Administration, Planning, and Management Strategy (High Priority) -

There is a continuing need for planning, administration, management, and oversight of Federal, state, and local funded programs.

Goals: The following administration, planning, and management goals are:

- **AMS-1 Overall Coordination** - Provide program management and oversight for the successful administration of Federal, State, and local funded programs, including planning services for special studies, annual action plans, five year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports, environmental review and clearance, fair housing, Section 106 consultation, and compliance with all Federal, State, and local laws and regulations.



- **AMS-2 Special Studies/Management** - Promote new development by providing funds to assist with the preparation of special studies, plans, and management activities related to these activities.
- **AMS-3 Fair Housing** - Provide funds for training, education, outreach, and monitoring to affirmatively further fair housing in the City of Huntington.

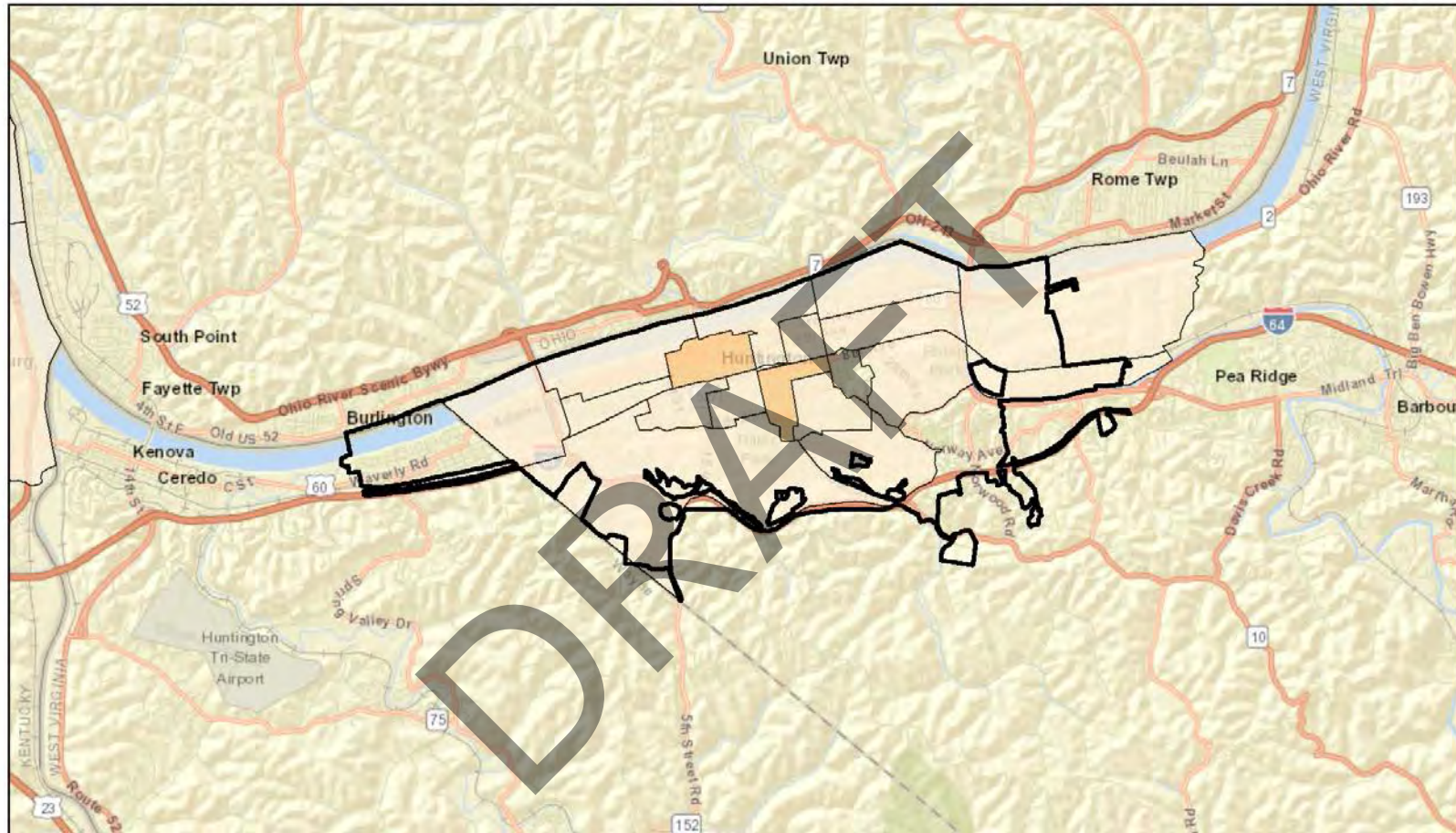
The following attached maps illustrate the locations of CDBG funded activities in the City of Huntington:

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

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CDBG Funding - City of Huntington, West Virginia



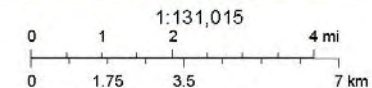
March 13, 2020

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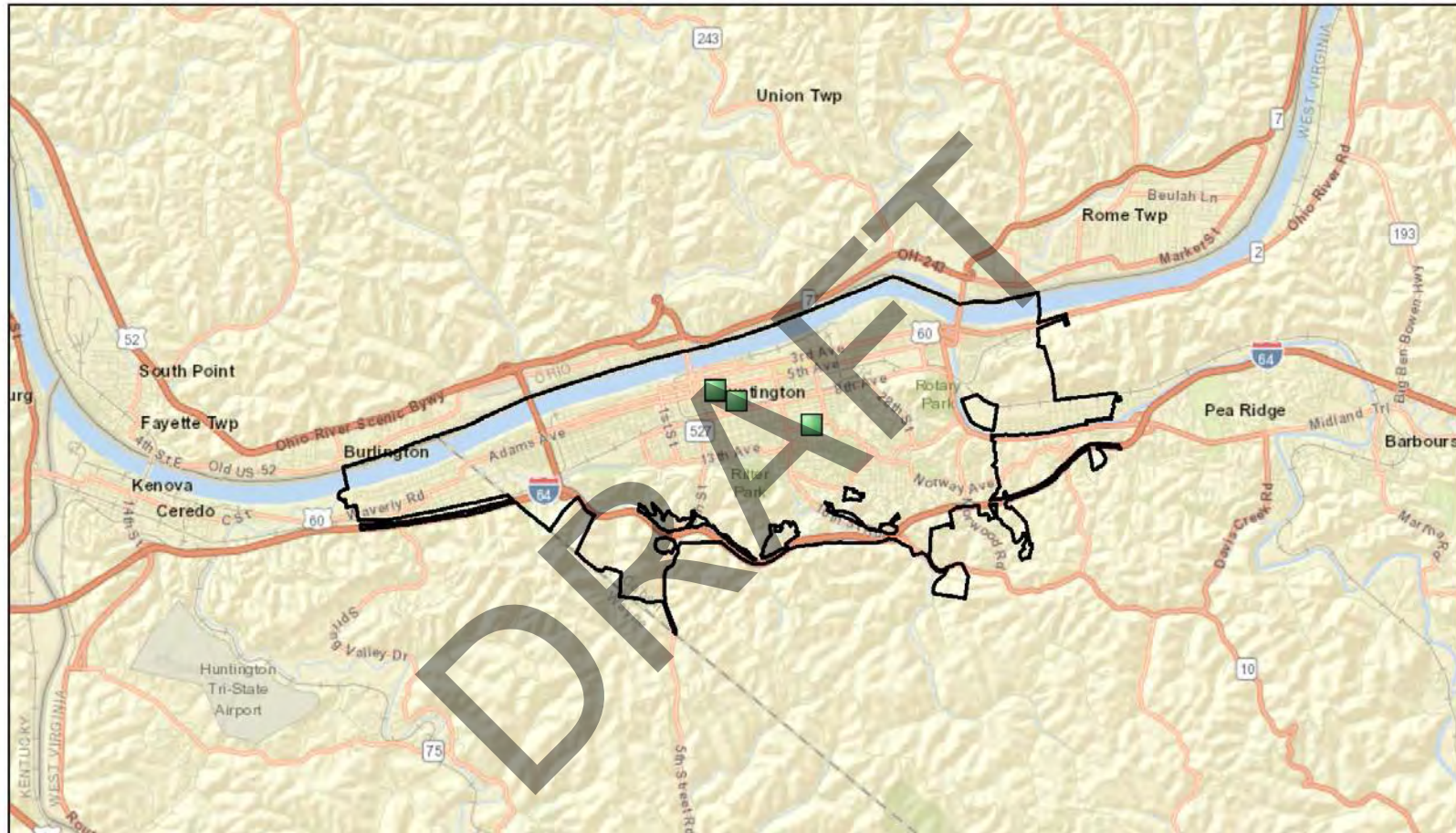
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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



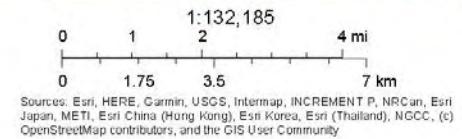
CDBG Acquisition Activities - City of Huntington, West Virginia



March 13, 2020

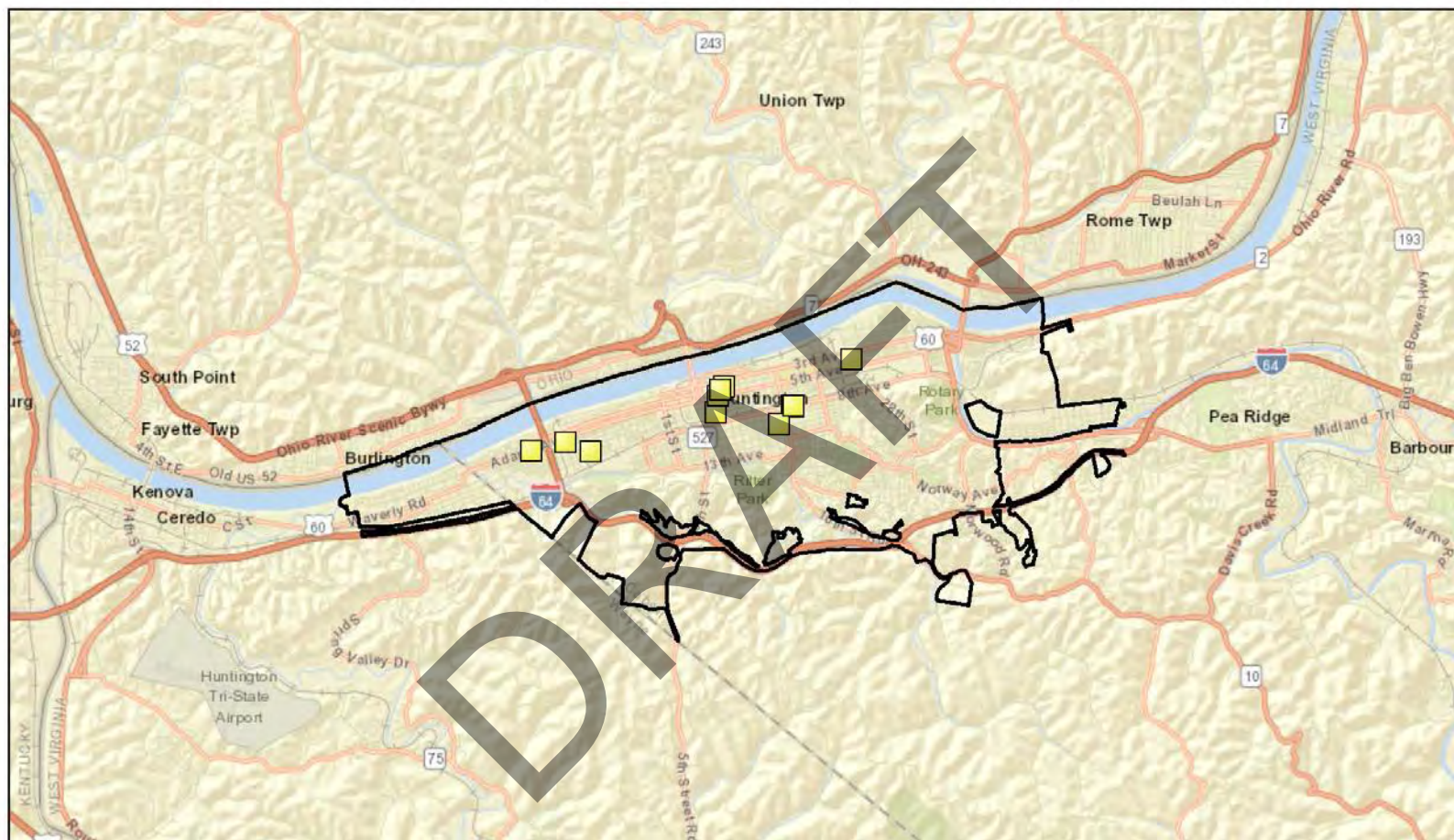
 CDBG Activity (Acquisition)

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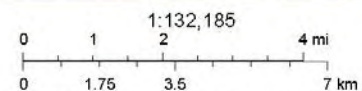
CDBG Economic Development Activities - City of Huntington, West Virginia



March 13, 2020

 CDBG Activity (Economic Development)

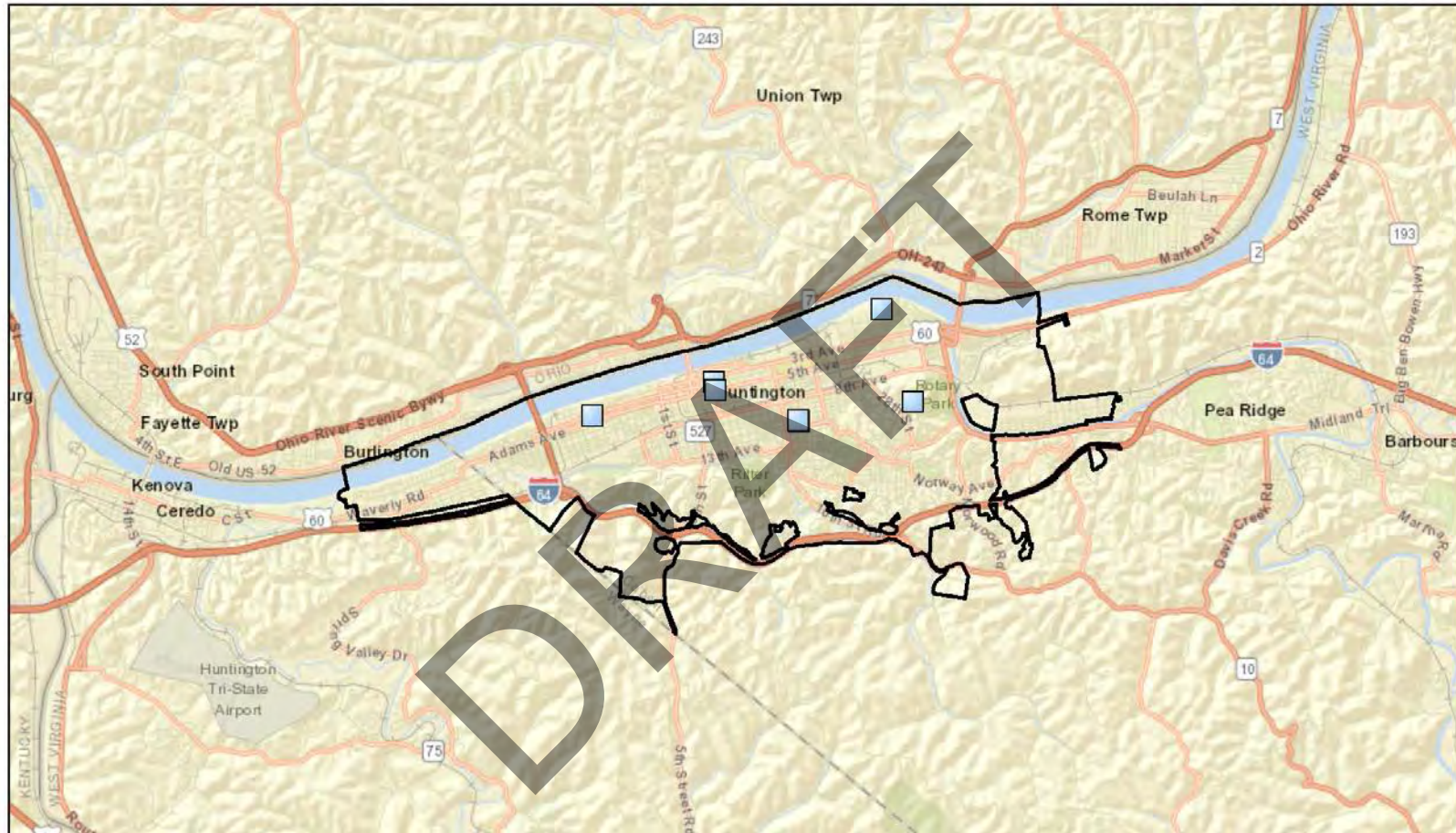
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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



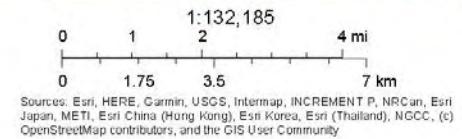
CDBG Housing Activities - City of Huntington, West Virginia



March 13, 2020

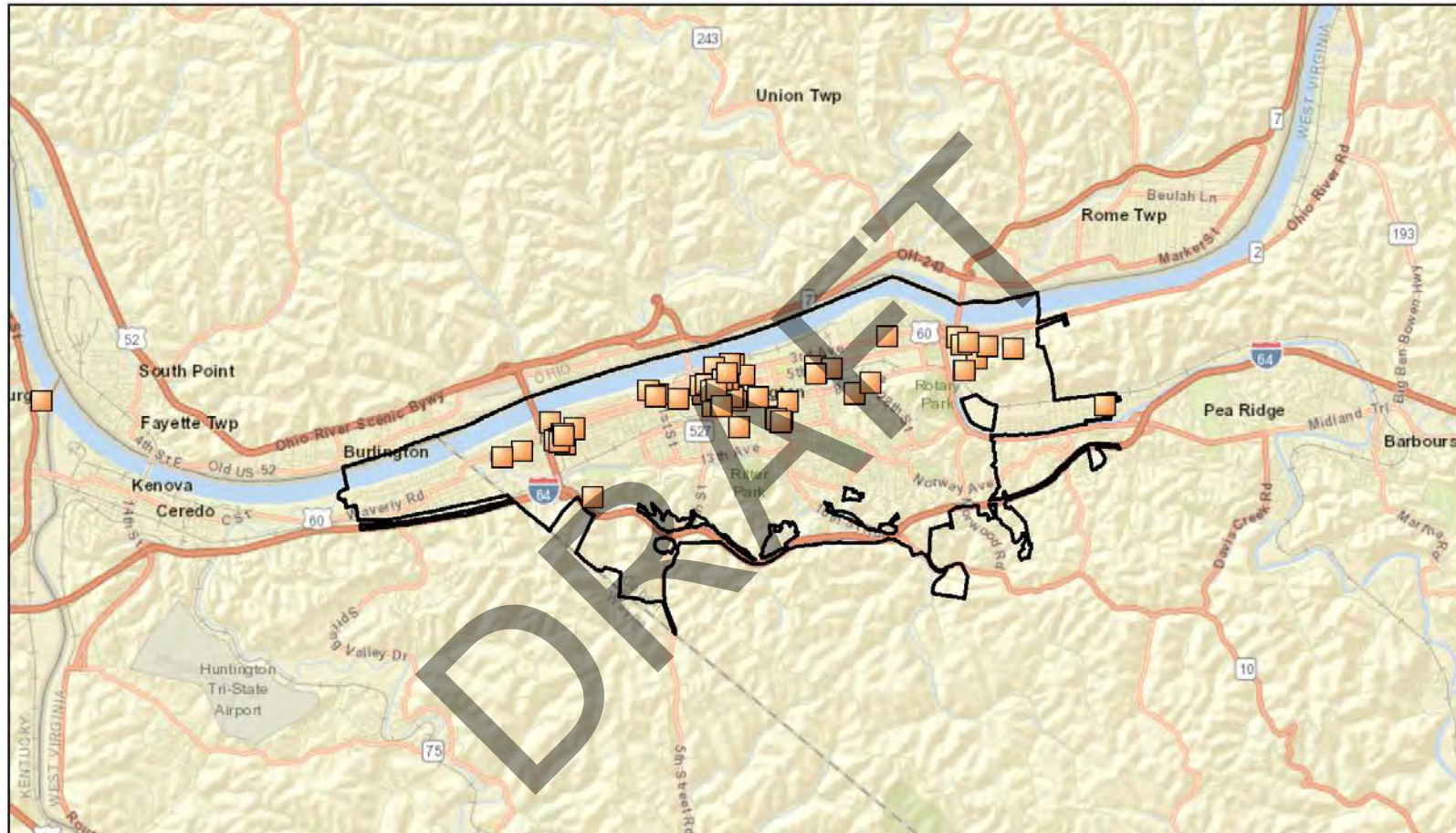
■ CDBG Activity (Housing)

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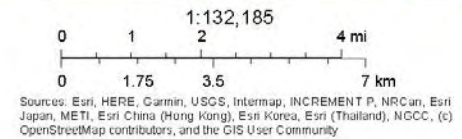
CDBG Public Improvements Activities - City of Huntington, West Virginia



March 13, 2020

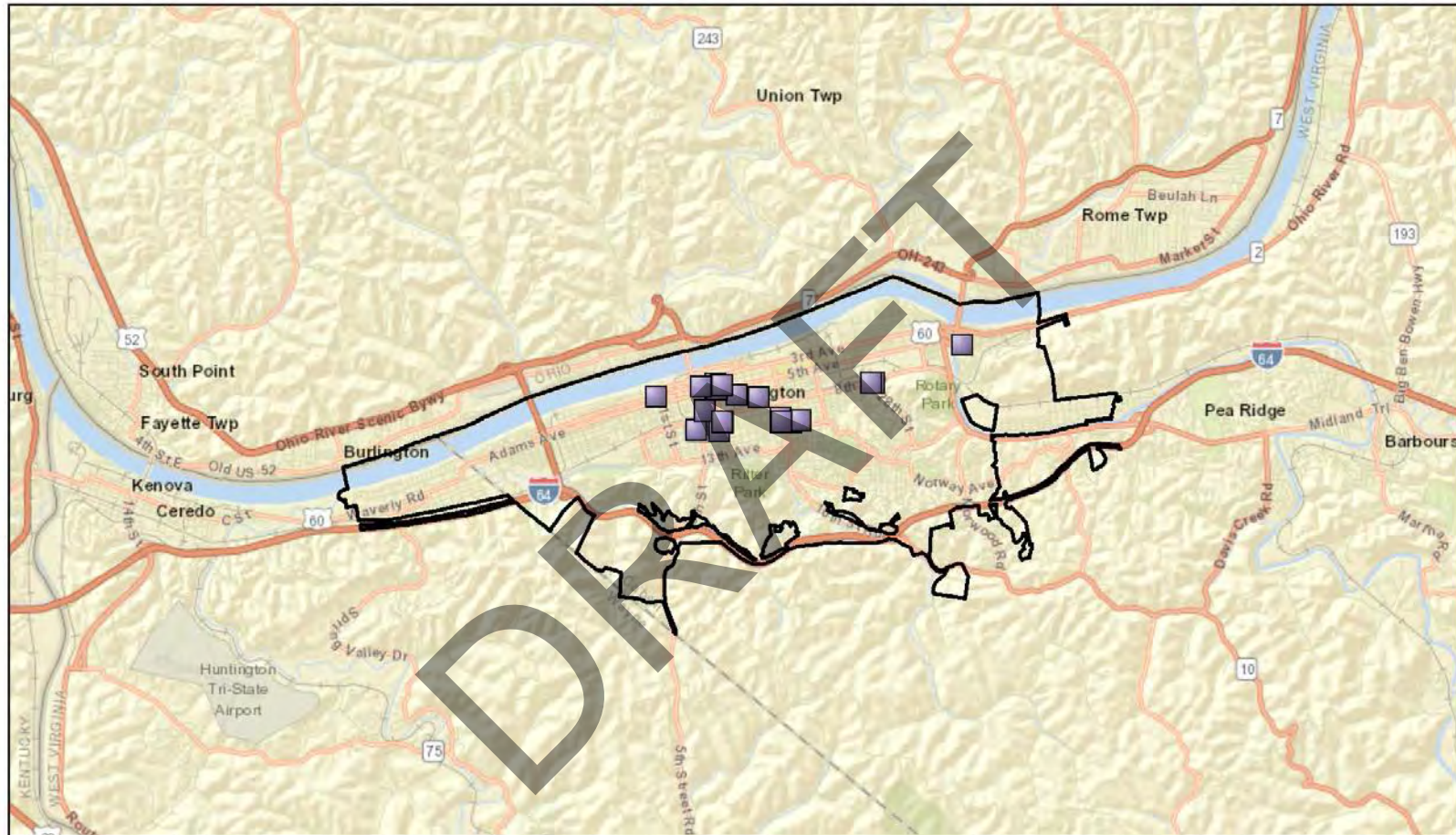
Orange square CDBG Activity (Public Improvements)

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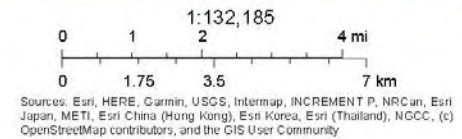
CDBG Public Services Activities - City of Huntington, West Virginia



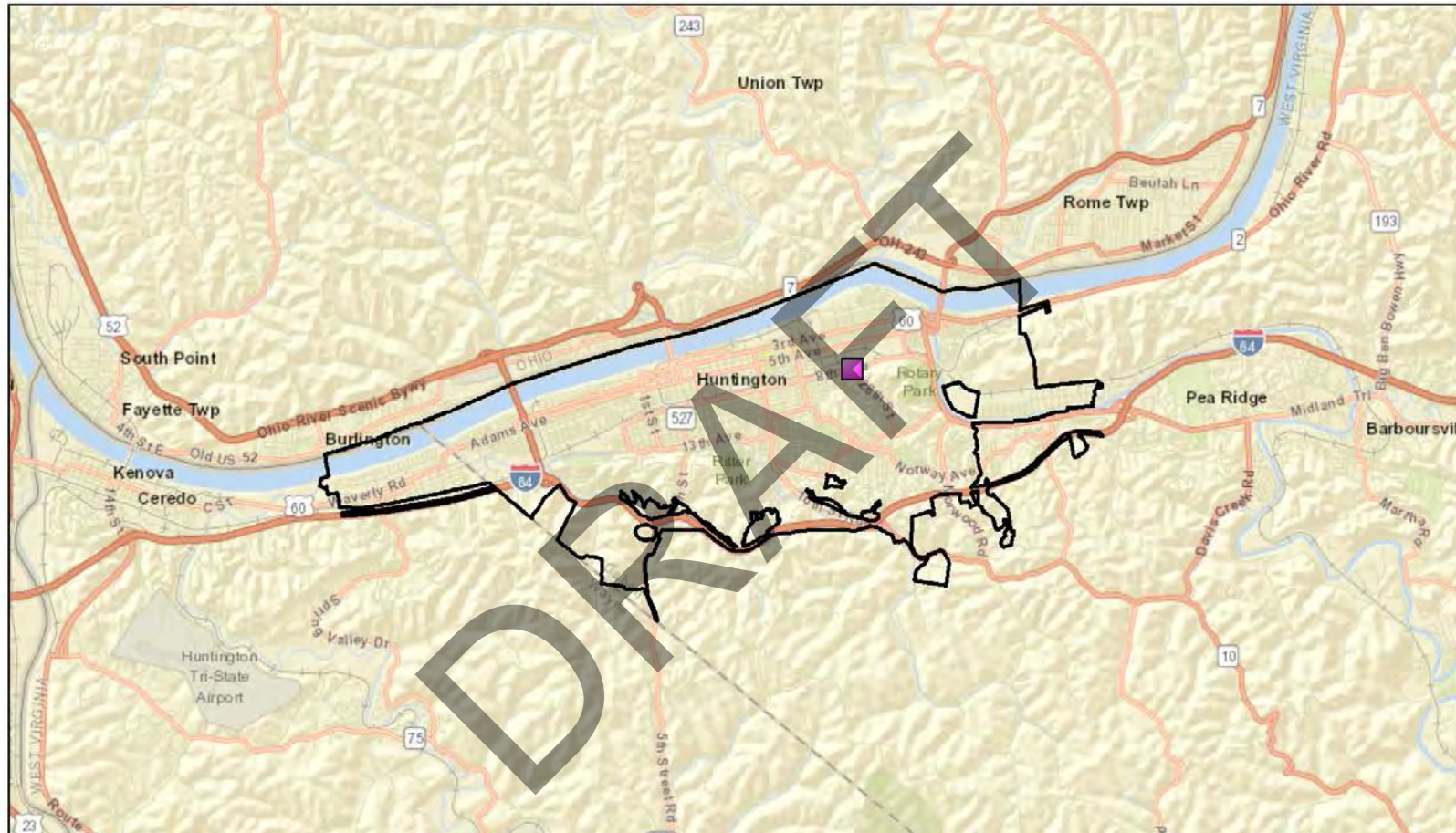
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■ CDBG Activity (Public Services)

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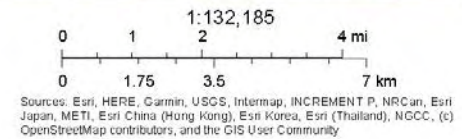
Other CDBG Activities - City of Huntington, West Virginia



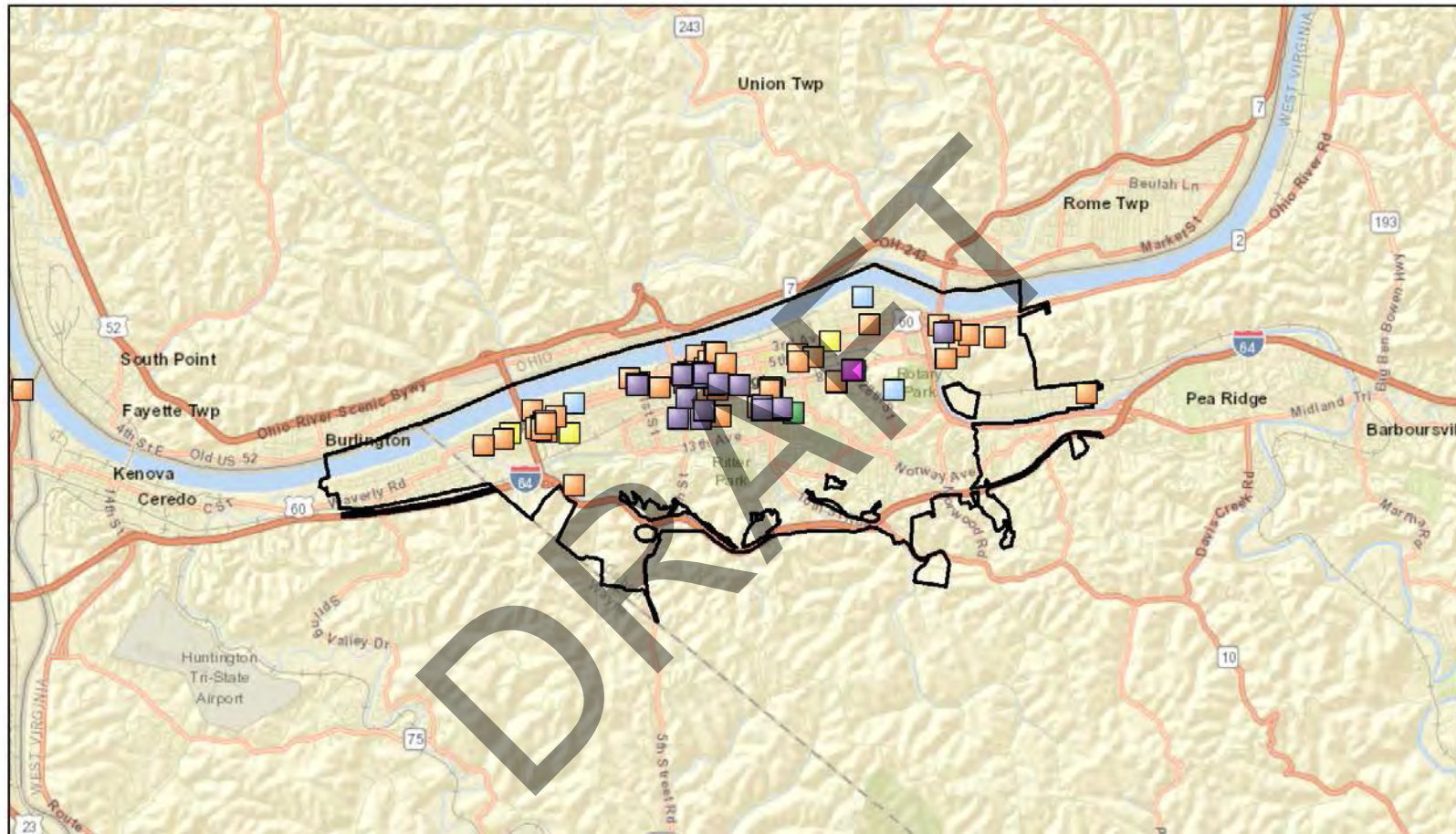
March 13, 2020

■ CDBG Activity (Other)

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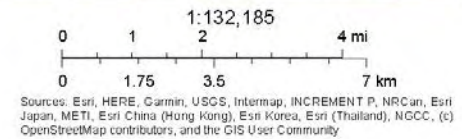
CDBG All Activities - City of Huntington, West Virginia



March 13, 2020

- | | |
|---|--|
| ■ CDBG Activity (Other) | ■ CDBG Activity (Housing) |
| ■ CDBG Activity (Public Services) | ■ CDBG Activity (Economic Development) |
| ■ CDBG Activity (Public Improvements) | ■ CDBG Activity (Acquisition) |

Override 1





2. HOME Program

The City of Huntington receives HOME funds as an entitlement City under the program. The City of Huntington will receive \$698,488 in HOME funds for the FY 2020.

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

3. Emergency Solutions Grant (ESG) Funds

The City of Huntington receives ESG funds as an entitlement City under the program. The City of Huntington will receive \$156,111 in ESG funds for the FY 2020.

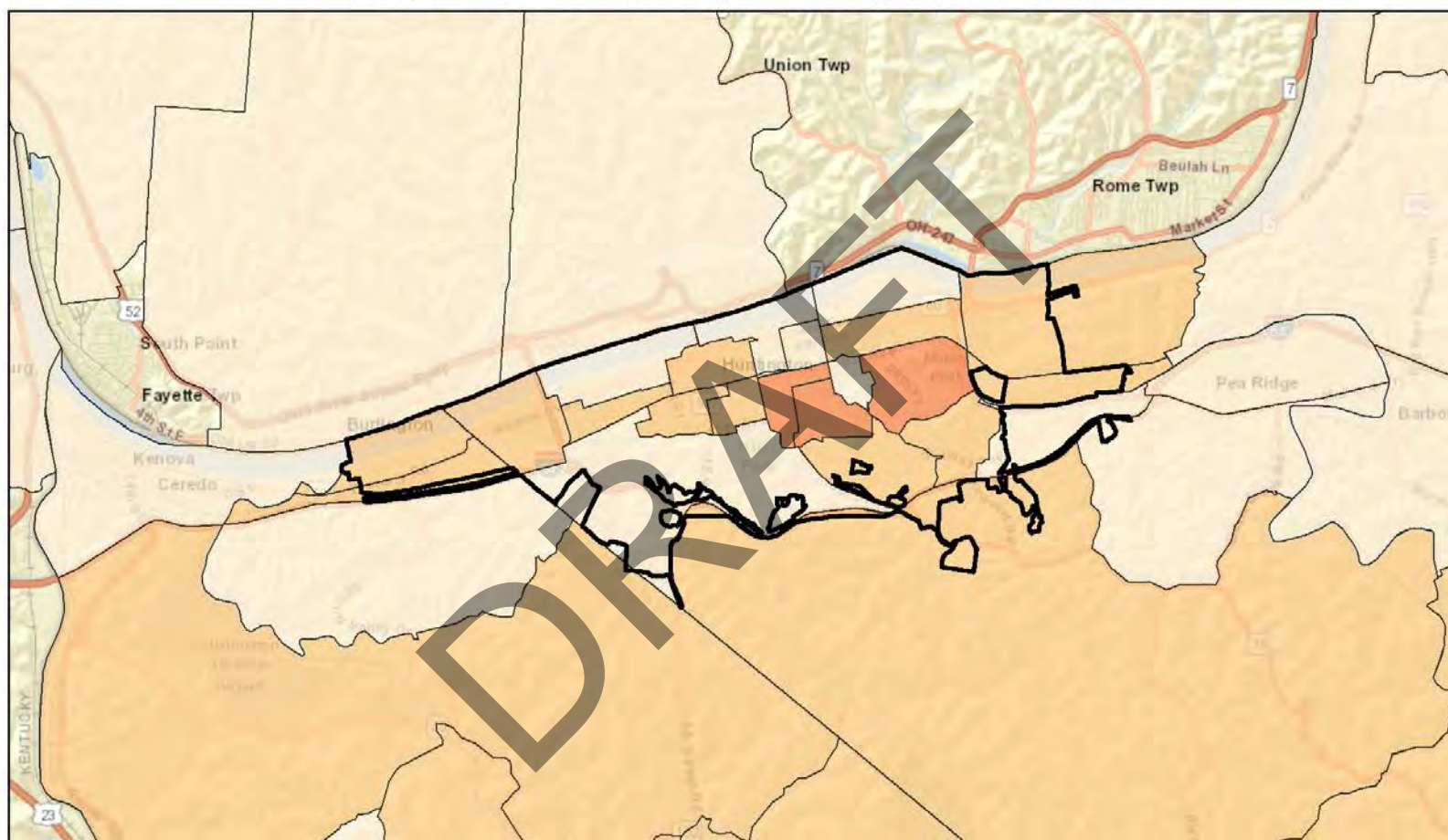
4. Housing Opportunity for Persons with AIDS (HOPWA) Funds

The City of Huntington does not receive HOPWA funds.

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HOME Activity Funding - City of Huntington, West Virginia



March 13, 2020

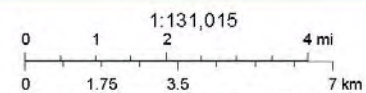
Override 1 **HOMEActivitiesFunding**

CPDMAPSO_IDIS_ACTV_HOME_TRACT_TOTAL_AMT

\$0-\$227,178.01

\$227,178.01-\$631,104.19

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



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



5. Public Housing, HUD Assisted Housing, and Low Income Housing Tax Credits

The City of Huntington has a variety of affordable housing options, including public housing managed by the Huntington Housing Authority. There are also several privately managed HUD-assisted developments throughout the City. These affordable housing developments and Section 8 Vouchers are located across the City in areas of varying income, demographics, and housing tenure.

Housing Authority

The Huntington Housing Authority (HHA) is the Public Housing Authority serving the City of Huntington. HHA owns and manages 773 units of public housing of which 773 units are in the City of Huntington. The Housing Authority was approved to administer 1,331 Section 8 Housing Choice Vouchers (1,244 leased) and 100 HUD Veterans Affairs Supportive Housing Vouchers; 88 HUD VASH vouchers were under lease at this time.

The Housing Authority owns and manages the following Public Housing Communities:

- Northcott Court – 806 Hal Greer Blvd
- Marcum Terrace – 1300 Marcum Terrace
- W K. Elliot Garden Apartments – 640 9th Avenue
- Fairfield Towers – 1701 Franklin Avenue
- Madison Manor – 101 8th Avenue
- Dotson Courtyard – 831 7th Street
- Northcott Court Additional Units – 22 Northcott Court

According to the HHA's website the mission of the Housing Authority is to promote adequate and affordable housing, economic opportunity, and a suitable living environment, free from discrimination for low-income families, very low-income families, persons with disabilities, or the elderly.

There are approximately 161 households on the Section 8 Housing Choice Waiting List. Of those households: 26 are elderly households; and 26 have disability or accessibility requirements. There are 195 elderly applicants waiting for public housing.

As of August 2018, there were 375 families on the Huntington Housing Authority's Public Housing Waiting List. Of those on the waiting list: 125 (25%) were extremely low-income; 200 (40%) were very low-income; and 175 (35%) were low-income. The largest demand for affordable housing

on the waiting list is for affordable housing for the extremely low-income households.

The most immediate needs of the families on the waiting list include: decent, safe, sanitary and affordable housing; supportive services such as employment training; access to transportation to commute to work, shopping, and medical services; and living wage job opportunities.

Homeless Facilities

The following is a list of CoC member supported facilities:

- Cabell-Huntington Coalition for the Homeless
- Cabell County Family Resource Network
- Information and Referral Services
- Cabell County Community Services Organization
- Huntington WV Housing Authority
- Mingo County Housing Authority
- Huntington City Mission
- City of Huntington – Dept. of Development and Planning
- Branches – Domestic Violence
- Prestera Center for Mental Health Services
- Mayor's Committee on Diversity
- Tri-State Aids Task Force
- Stepping Stones, Inc.
- Huntington Habitat for Humanity
- Green Acres, Inc.
- Veterans Administration – Center Outreach
- Valley Health Systems
- WV Dept. of Health & Human Resources – Cabell County
- Ebenezer Medical Outreach, Inc.
- Marshall University Department of Psychology
- Marshall University Center of Excellence for Recovery
- United Way of the River Cities, Inc.
- TEAM for WV Children
- Volunteers of America



- Housing Development Corporation
- VA Medical Center
- Recovery Point WV
- Cabell County Board of Education
- Salvation Army
- Social Security Administration
- WV Division of Rehabilitation Services
- HUD Community Representative
- PATH Program
- Housing First Team
- Golden Girl Group Home
- CONTACT
- ProAct
- Legal Aid of West Virginia
- Southwestern Community Action Council WV
- Southwestern Community Action Council Headstart
- Southwestern Community Action Council, Supportive Services for Veteran Families
- Kanawha Valley Collective
- WV Bureau for Public Health
- Cabell-Huntington Health Department
- Western Regional Jail
- Centers for Disease Control
- City Church
- Ryan White Program

Low Income Housing Tax Credit (LIHTC) Housing

The following is a list of Low Income Housing Tax Credit housing in the City of Huntington.

Table IV – 6 - LIHTC PROJECTS in Huntington

HUD ID Number	Project Name	Project Address	Project City	Project State	Project ZIP Code	Total Number of Units	Total Low-Income Units
WVA19900020	ASHLEY PLACE	2744a Guyan Ave	Huntington	WV	25702	1	1
WVA19970055	SIMMS SCHOOL APTS	1680 11th Ave	Huntington	WV	25701	20	20
WVA19980035	PINE VALLEY/LENA APTS	2373 Spring Valley Dr	Huntington	WV	25704	18	18



WVA20000035	DUNHILL APTS	6032 Hubbards Branch Rd	Huntington	WV	25704	32	N/A
WVA20010015	HUNTINGTON HIGH RENAISSANCE	900 Eighth St	Huntington	WV	25701	42	42
WVA20040055	HAMLETS	112 Hamlet Ln	Huntington	WV	25702	50	50
WVA20050055	PARKS	100 Park Cir	Huntington	WV	25704	50	50
WVA20070035	GLENBRIER APTS	60 Marti Jo Dr	Huntington	WV	25702	80	80
WVA20100005	ARTISAN HEIGHTS APTS	834 28th St	Huntington	WV	25705	22	22
WVA20110800	FOUNDER'S LANDING	601 26th St W	Huntington	WV	25704	66	66
WVA20140055	SHOALS MANOR APTS	3720 Manor Dr	Huntington	WV	25704	24	N/A
WVA20160002	HUNTINGTON GARDENS	1663 Doulton Avenue	Huntington	WV	25701	40	40

Source: <https://lihtc.huduser.gov/>

There are twelve (12) LIHTC projects with 445 units of affordable rental housing in the City.

Multifamily Housing

The following is a list of HUD Multifamily housing in the City of Huntington:

Table IV – 7 – HUD Multifamily Housing in Huntington

HUD ID	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	TOTAL ASSISTED UNITS	TOTAL UNITS	ASSISTANCE
800236741	SMV - Huntington Health & Rehabilitation Center	1720 17th Street	Huntington	WV	25701	0	99	Insured-Unsubsidized
800244600	Madison Park Healthcare	700 Madison Avenue	Huntington	WV	25704	0	59	Insured-Unsubsidized
800023544	Betsy Broh House	1625 6TH AVE	HUNTINGTON	WV	25703	6	7	202/811
800023557	Cabell-Huntington Unity Apartments, Inc.	600 6TH ST	HUNTINGTON	WV	25701	24	25	202/811
800023591	Evergreen Place	900 5TH AVE W	HUNTINGTON	WV	25704	19	19	202/811
800023595	Forrest Bluff Apts.	7150 BEECH DR	HUNTINGTON	WV	25705	143	144	Insured-Subsidized
800023613	Highlawn Place	1130 3RD AVE	HUNTINGTON	WV	25701	133	133	Insured-Subsidized
800023622	Adams Landing	820 Virginia Ave W	HUNTINGTON	WV	25704	84	85	Insured-Subsidized
800023641	Mary E. Woelfel Group	921 23rd St	HUNTINGTON	WV	25703	6	6	202/811



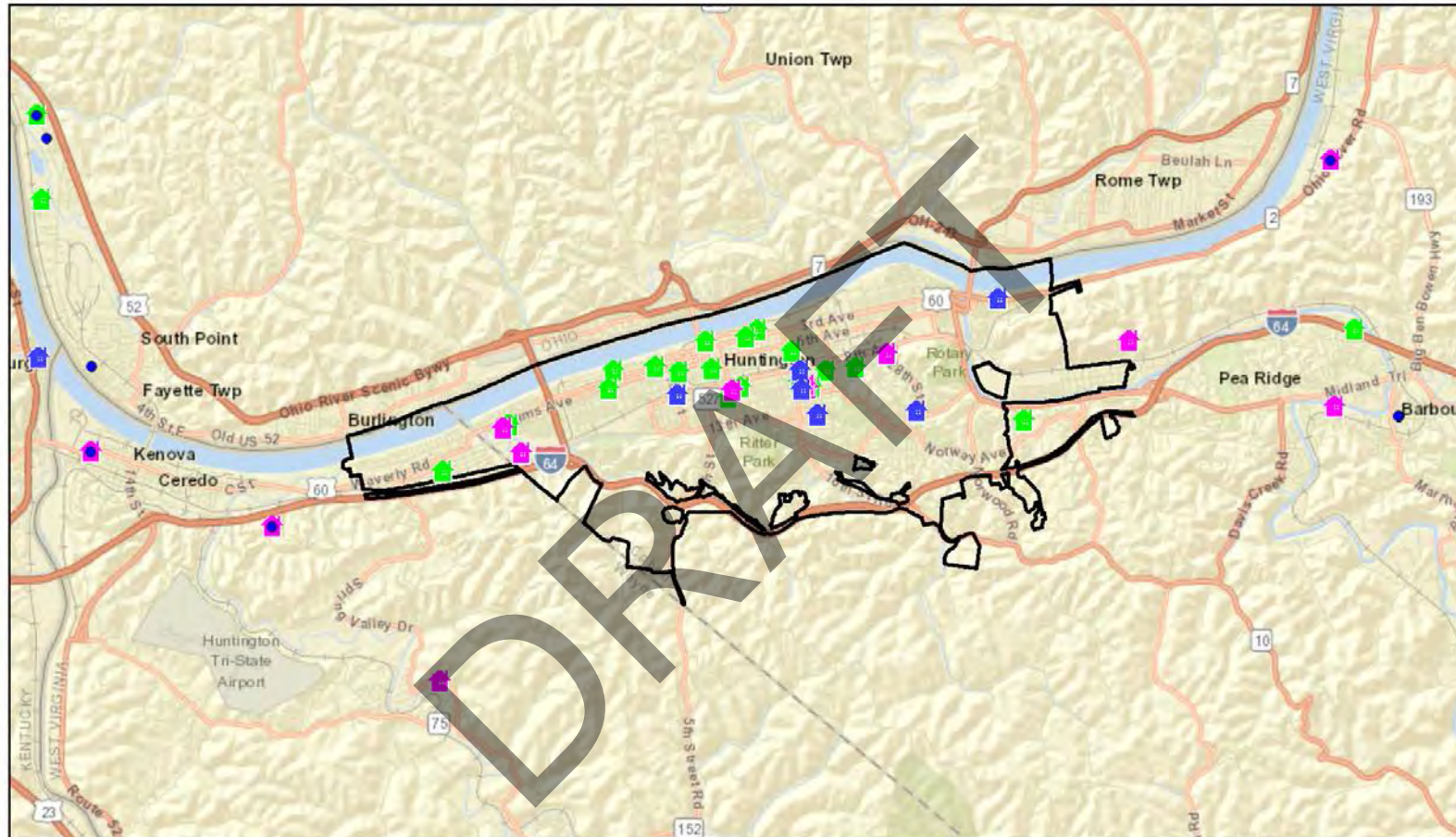
	Home							
800023685	Riverview Manor	99 13th St	HUNTINGTON	WV	25701	114	114	Subsidized - Previously Insured
800023688	Rotary Gardens Apts	65 SMITH DRIVE	HUNTINGTON	WV	25705	144	144	Subsidized - Previously Insured
800023725	West View Manor	601 VETERANS MEMORIAL BLVD	HUNTINGTON	WV	25701	100	101	Insured-Subsidized
800023728	Founder's Landing	2402 5th Ave W	Huntington	WV	25704	66	66	Insured-Subsidized
800061005	Fairfield Apartments	1690 11th Avenue	HUNTINGTON	WV	25701	17	17	202/811
800061085	Washington Avenue Apartments	201 Washington Ave	HUNTINGTON	WV	25701	10	10	202/811
800112247	Eden Park	732 10th Ave	Huntington	WV	25701	20	20	202/811
800211206	G.R. Vale Home	928 9th AVENUE	HUNTINGTON	WV	25705	5	5	202/811
800213085	Oak Tree Apartments	1905-1909 9th Street	HUNTINGTON	WV	25705	6	6	202/811
800215698	Westmoreland Apartments	3609 Hughes St	Huntington	WV	25704	20	20	202/811
800218289	Green Gables	520 2nd Street, East	HUNTINGTON	WV	25691	9	9	202/811
800232294	Spruce Manor	1631-1633 10th Avenue	Huntington	WV	25701	6	6	202/811

Source: https://www.hud.gov/program_offices/housing/mfh/presrv/mfhpreservation

There are twenty-one (21) active HUD Multifamily Housing projects with 1,095 units of affordable rental housing in the City.

Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the City. Illustrated in the following maps, there are no distinct patterns of concentration of HUD assisted housing units. The City, as well as the Housing Authority, are aware of the concerns of concentrating low-income housing units within proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing, but are also providing financial investments into the existing HUD assisted affordable housing units.

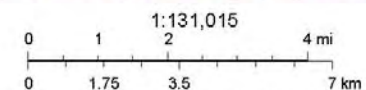
Locations of Assisted Housing - City of Huntington, West Virginia



March 13, 2020

- USDA Rural Housing
- Multifamily Properties - Assisted
- Public Housing Development
- LIHTC Property

Override 1

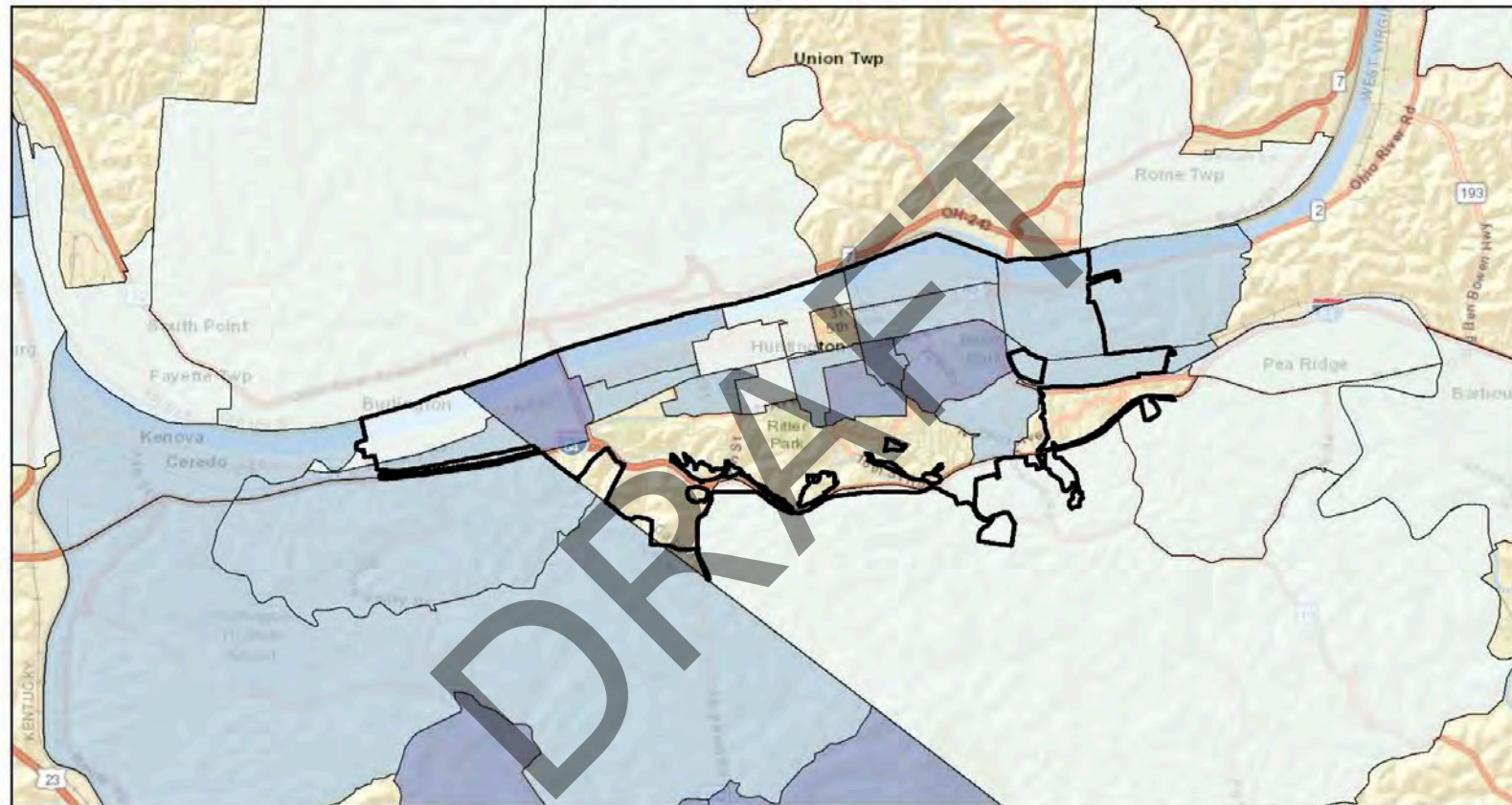


Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



Source: HUD CPD Maps

CPD Maps - Voucher Concentration



February 14, 2020

Override 1 VoucherConcentration
HCV_PCT_RENTER_OCC_UNITS
0-7.26%
7.26-15.58%
15.58-29.12%

1:131,015
0 1 2 4 mi
0 1.75 3.5 7 km

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

Source: HUD CPD Maps

6. Planning, Zoning, and Building Codes

Zoning Ordinances can be overtly discriminatory by limiting development or occupancy of housing based on a resident's race, sex, religion, national origin, color, disability, or familial status. Additionally, discrimination, albeit unintentional, can occur when a facially neutral ordinance has a disparate impact on a protected class. An example of this has been litigated over the years as a limitation in the definition of a family as 4 or fewer unrelated adults. A ceiling of four or fewer unrelated individuals in a household may be considered discriminatory if it can be proven that this limitation disproportionately affects minorities, large families with children, or individuals with disabilities. The Fair Housing Act also makes it unlawful to refuse to make reasonable accommodations, or changes to rules, policies practices, or services, when such accommodations are necessary to allow a person with a disability full access to use or enjoy a dwelling. Under the Fair Housing Act, an accommodation is considered reasonable if it does not impose an undue financial or administrative burden and it does not fundamentally alter the zoning ordinance.

City of Huntington

The City of Huntington is currently in the process of revising its zoning ordinance. The latest revisions will update the City's definitions on the following: family, disabled, and group residential facility.

City of Huntington Building Codes

The City of Huntington uses the International Building Code, 2015 Edition.

The International Building Code is a model code and that is in compliance with the Federal laws and regulations governing fair housing and accessibility.

Building inspections are administered by the Department of Inspections & Permits. The Building Codes are enforced through plan review and inspections. Interviews with the Department of Inspections & Permits staff indicated that developers and contractors are abiding by the State and Federal accessibility regulations and there does not appear to be any blatant violations.

Accessibility Regulations

HUD encourages its grantees to incorporate "visitability" principles into their designs. Housing that is "visitable" includes the most basic level of accessibility that enables persons with disabilities to visit the home of a



friend, family member, or neighbor. “Visitable” homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have at least a 32-inch clear opening. As a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for disabled persons. The City of Huntington appears to be in full compliance with the HUD visitability standards.

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

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

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

The Fair Housing Act prohibits discrimination in the sale or rental of housing. It also requires that landlords must make reasonable modifications to dwellings and common areas to accommodate persons who have a disability. For all new residential buildings of four or more units built after March 13, 1991: public and common areas must be accessible to persons with disabilities; doors and hallways must be wide enough for wheelchairs; all housing units must have accessible routes into and through the unit; there must be accessible light switches, outlets, thermostats; bathroom walls must be reinforced to allow for the installation of grab bars; and kitchens and baths must be accessible so they can be used by persons in wheelchairs.

7. Limited English Proficiency (LEP) Persons

Section 601 of Title VI the Civil Rights Act of 1964 is the Federal Law that protects individuals from discrimination on the basis of their race, color, or national origin in programs or activities that receive Federal financial assistance. One type of national origin discrimination is discrimination based on a person’s inability to speak, read, write, or understand English. In certain situations, failure to ensure that persons with LEP can effectively



participate in, or benefit from, Federally assisted programs may violate the Civil Rights Act.

According to the 2013-2017 American Community Survey for the City of Huntington, 3.6% of residents speak a language other than English at home. Of those residents, 65.4% report that they speak English less than “very well.” The following languages are spoken at home:

English	96.4%
Spanish	1.3%
Other Indo-European languages	0.7%
Asian and Pacific Island languages	1.5%
Other languages	0.2%

The largest non-English speaking populations in the City are Spanish, Asians, and Pacific Islanders.

8. Four Factor Analysis

The City as a CDBG entitlement community is required to develop a plan for persons of different national origins that cannot speak, read, write, or understand English to ensure that LEP persons have meaningful access to CDBG funded programs and services, as well as all City programs and services. As such, the City has updated its Four Factor Analysis. The purpose of the Four Factor Analysis is to determine the reasonableness of language assistance for LEP persons based on the following:

a. Number or Proportion of LEP persons in the population to be served. It is estimated that the County has zero (0) non-English speaking populations that exceed the 5% or 1,000 person LEP limit.

b. Frequency with which LEP persons come into contact with the program activity or service. The City of Huntington Housing & Community Development Department uses CDBG funds for activities that directly assist City residents, such as housing and public service activities, some are through subrecipient non-profit provider agencies. Additionally, the City uses CDBG funds for public infrastructure and facility improvements, projects that do not directly assist City residents. However, the City encourages public participation in the identification and implementation of public infrastructure and facility improvement activities.

According to the FY 2019 CAPER and Report PR-23, the total beneficiaries of CDBG assistance in FY 2018 were 10,557 individuals:



8,486 were White; 1,425 were Black/African American; 501 were Other Multi-racial; 56 were Hispanic; 49 were American Indian/Alaskan Native; 39 were Asian; 39 were Black/African American and White; 17 Native Hawaiian/Other Pacific islander; and 1 was Asian and White.

c. Importance of the service, information, program, and/or activity.

The City's CDBG housing and public service activities are critical to the City's residents for access to decent, safe, sanitary, and affordable housing, as well as necessary in terms of supportive services to maintaining residents' quality of life. The City, local advocacy groups and organizations, and its subrecipient agencies must be able to outreach and interact with LEP persons to make CDBG programs and services accessible to LEP persons.

d. Resources, financial and human, available to the recipient.

Translation and interpretive services are vital for housing and public services activities and would be provided by the City, either through City staff or a community liaison, to any beneficiary that requires those services. Additionally, CDBG citizen participation materials and public notices will be published with the statement, "Any non-English speaking person wishing to attend the public hearing should contact Scott Lemley at least seven (7) calendar days prior to the meeting and a (Language) interpreter will be provided. This document and program materials are available in (Language) upon request."

The City does not have a formal written Language Access Plan. Specific to the CDBG Program. Specific to the CDBG Program, its staff and subrecipients, utilize the following language assistance plan to assist LEP persons:

- Engaging advocacy groups to promote services available through the CDBG Program
- Interpretation and translation services by partnering with LEP groups, faith based organizations, and schools
- Referrals to community liaisons proficient in the language of LEP persons
- Notices and training to staff of the availability of LEP services
- Advertising language services in outreach documents
- Utilize HUD translated documents found at:
https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep



9. Taxes

While real estate tax rates may not be an impediment to fair housing choice, the amount and method of calculation of taxes impacts the affordability of housing especially as it relates to housing in the surrounding area.

The following table shows the millage rates for the City of Huntington:

Table IV – 8 - Tax Rates in Huntington for 2018

	Class 2	Class 3	Class 4
Huntington	1.6912	0.0	3.3824

Class 2 – Owner-Occupied Property
Classes 3 & 4 – Non-Owner-Occupied Property
Source: Cabell County Assessor

10. Comprehensive Plan

The City last updated its comprehensive plan (Plan 2025) in 2013. to provide Huntington with tools and techniques to implement Plan 2025's vision of reinvestment in local infrastructure, housing and businesses.

In accordance with West Virginia law, Plan 2025 includes each of the following requirements:

- **Land Use:** Designate the current and set goals and programs for the proposed general distribution, location and suitable uses of land, including but not limited to
 - Residential, commercial, industrial, agricultural, recreational, educational, public, historic, conservation, transportation, infrastructure or any other use of land;
 - Population density and building intensity standards;
 - Growth and/or decline management;
 - Projected population growth or decline; and
 - Constraints to development, including identifying flood-prone and subsidence areas.

- **Housing:** Set goals, plans and programs to meet the housing needs for current and anticipated future residents of the jurisdiction, including but not limited to:
 - Analyzing projected housing needs and different types of housing needed, including affordable housing and universally designed housing accessible to persons with disabilities;
 - Identifying the number of projected necessary housing units and sufficient land needed for all housing needs;
 - Addressing substandard housing;
 - Rehabilitating and improving existing housing; and
 - Adoptive reuse of buildings into housing
- **Community design:** Consistent with the land use component, set goals, plans and programs to promote a sense of community, character and identity.
- **Historic preservation:** identify historical, scenic, archaeological, architectural or similar significant lands or buildings, and specify preservation plans and programs so as not to unnecessarily destroy the past development which may make a viable and affordable contribution in the future.
- **Economic Development:** Establish goals, policies, objectives, provisions and guidelines for economic growth and vitality for current and anticipated future residents of the jurisdiction, including, but not limited to:
 - Opportunities, strengths and weaknesses of the local economy and workforce;
 - Identifying and designating economic development sites and/or sectors for the area; and
 - Type of economic development sought, correlated to the present and projected employment needs and utilization of residents in the area
- **Preferred development areas:** consistent with the land use component, identify area where incentives may be used to encourage

development, infill development or redevelopment in order to promote well designed and coordinated communities and prevent sprawl.

- **Renewal and/or redevelopment:** Consistent with the land use component, identify slums and other blighted areas and set goals, plans, and programs for the elimination of such slums and blighted areas and for community renewal, revitalization and/or redevelopment.
- **Financing:** Recommend to the governing body short and long-term financing plans to meet the goals, objectives, and components of the comprehensive plan.
- **Public Services:** Set goals, plans and programs, to ensure public safety, and meet the medical, cultural, historical, community, social educational, and disaster needs of the current and anticipated future residents of jurisdiction.
- **Infrastructure:** Designate the current and set goals, plans and programs, for the proposed locations, capabilities, and capacities of all utilities, essential utilities and equipment, infrastructure and facilities to meet the needs of current and anticipated future residents of the jurisdiction.
- **Transportation:** Consistent with the land use component, identify the type, location, programs, goals and plans to meet the intermodal transportation needs of the jurisdiction, including but not limited to:
 - Vehicular, transit, air, port, railroad, river and any other mode of transportation system;
 - Movement of traffic and parking;
 - Pedestrian and bicycle systems; and
 - Intermodal transportation
- **Rural:** Consistent with the land use component, identify land that is not intended for urban growth and set goals, plans and programs for growth and/or decline management in the designated rural areas.
- **Recreation:** Consistent with the land use component, identify land, and set goals, plans and programs for recreational and tourism use in the area.



11. Section 504 Plan

The City has a Section 504 Plan and it updates the plan on a regular basis.

12. Section 3 Plan

The City of Huntington is in the process of revising its Section 3 Plan.

HUD's definition of Section 3 is:

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

All Section 3 covered contracts for the City of Huntington include the following clause (referred to as the Section 3 clause):

A. The work to be performed under this contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (Section 3). The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by Section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.

B. The parties to this contract agree to comply with HUD's regulations in 24 CFR part 135, which implement Section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 135 regulations.

C. The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this Section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and



applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.

D. The contractor agrees to include this Section 3 clause in every subcontract subject to compliance with regulations in 24 CFR part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR part 135. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR part 135.

E. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 135.

F. Noncompliance with HUD's regulations in 24 CFR part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

G. With respect to work performed in connection with Section 3 covered Indian housing assistance, Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of Section 3 and Section 7(b) agree to comply with Section 3 to the maximum extent feasible, but not in derogation of compliance with Section 7(b).

13. Transportation

Renting or owning an affordable home is not the only factor in a resident's quality of life and access to fair housing. Having access to transportation, whether it is a private vehicle or a public bus, is just as important as the

cost of rent or a mortgage. Mobility determines whether a resident can access work, education, services, or healthcare.

Tri-State Transit Authority

The City of Huntington's local bus system is administered by the Tri-State Transit Authority (TTA). TTA operates throughout the greater Huntington



urban area. According to TTA's websites there are currently 15 fixed routes, and they operate from 5:45 AM to 11:30 PM on Monday through Saturday. Additionally, TTA offers "dial-a-ride" paratransit services.

TTA transit fares start with a base cash fare of \$1.00, although seniors and people with disabilities pay just \$.50. TTA offers 31-Day Unlimited Rides passes for \$35.00, and daily passes for \$4.00. Dial-A-Ride fares are \$2.00 for basic fares. TTA also offers "value cards" which can load \$5 to \$10, and serve like debit cards for the electronic fare boxes. Travel outside of Huntington's city limits will cost an additional 25 cents.

Greyhound Bus

The Huntington Greyhound station is open from 5:30 AM until 2:00 PM on Monday through Fridays, and is open 5:30 AM until 11:00 AM on Saturday, Sundays, and Holidays.

KYOVA Interstate Planning Commission

KYOVA Interstate Planning Commission (KYOVA) serves as the Metropolitan Planning Organization (MPO) for the Tri-State area of West Virginia, Kentucky, and Ohio. KYOVA is responsible for funding, financial oversight, and regional transit planning for the area. KYOVA's mission is "to plan for an orderly, cost-effective, multi-modal transportation system for all citizens of the service area. With support of local officials, the Commission plans for sound transportation improvements, which facilitate the movement of goods and people in a safe and efficient manner."

KYOVA 2040 Integrated Metropolitan Transportation Plan

The plan's goals describe the needs of the area up until 2040. The Plan utilizes both qualitative and quantitative methods of research.

The Plan outlines the following Goals:

- **Goal 1: Preserve, maintain, and enhance the existing transportation system**

Objectives:

- Give priority to projects that improve the condition of the existing transportation system or upgrade existing transportation facilities.
- Improve connections between modes of transportation
- Seek opportunities to use access management and design treatments to improve the mobility of strategic corridors.

- **Goal 2: Support the economic vitality of the region, especially by enabling global competitiveness, productivity, and efficiency.**

Objectives:

- Improve access to intermodal facilities (ports, aviation, inland terminals) for people and freight.
- Integrate into the planning process the aviation needs of the region, whether general aviation or commercial, as a way to attract additional economic activity.
- Subscribe to efforts that encourage the development of tourism in the region

- **Goal 3: Improve the operational efficiency of the transportation network.**

Objectives:

- Encourage initiatives that promote transit and other transportation modes as alternatives to the single occupancy vehicle.
- Promote operational efficiency through the use of technological improvements.

- Support measures that reduce travel during peak demand hours.
 - Identify opportunities to integrate intelligent Transportation Systems (ITS) as a part of an overall transportation management strategy.
- **Goal 4: Enhance the safety of the transportation systems for all users.**

Objectives:

- Provide a safe traveling experience for all users by implementing safety measures at high priority crash locations and improving facilities for bicyclists and pedestrians.
 - Promote programs and projects that reduce the number and severity of traffic accidents, especially at railroad crossings.
 - Give priority to construction projects that eliminate roadway hazards, which would improve safety.
 - Support the development and implementation of roadway design standards that improve highway safety.
- **Goal 5: Enhance the security of the transportation system for all users.**

Objectives:

- Review each transportation improvement for its impact on neighborhoods, travel times, and access to community services.
 - Give priority to construction projects that eliminate roadway hazards and improve security.
 - Support the development and implementation of roadway design standards that improve highway security.
 - Protect the capacity of I-64, strategic bridges and other regional corridors that serve as evacuation routes for natural disasters.

- Maintain and enhance the security of the existing disaster evacuation systems.

- **Goal 6: Protect and enhance the environment and promote energy conservation.**

Objectives:

- Continue to develop plans and programs that will help the KYOVA region achieve the federal clean air regulations.
- Integrate land use and transportation policies to limit impacts to sensitive land, focus development in prime locations, encourage trips by modes other than personal automobiles, and enhance the region's quality of life.
- Minimize direct and indirect environmental impacts of the transportation system by first considering improvements to the existing systems before selecting strategic locations for newly constructed facilities.
- Minimize any detrimental impacts of proposed transportation improvements upon neighborhoods.
- Support mixed-use development to encourage biking and walking, in turn improving the KYOVA region's environment and the health of its citizens.

- **Goal 7: Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight.**

Objectives:

- Connect homes, parks, community activity centers, employment hubs, and other key destinations to one another through a coordinated network of bicycle facilities off road trains.
- Promote a pedestrian-friendly environment by filling gaps and improving connectivity throughout the sidewalk system and to key destination or activity nodes

- Create a system of interconnected streets to improve mobility and distribute traffic efficiently and appropriately by purpose and function.
 - Encourage Complete Streets initiatives, streetscape and traffic calming features in roadway designs for collector and residential streets.
- **Goal 8: Maintain financial responsibility in the development and preservation of the transportation system.**

Objectives:

- Uphold cost-effective operating strategies for all transportation services
- Ensure that all transportation projects and program stylize available funds in the most cost-effective and financially responsible manner possible.
- Give priority to those transportation projects and programs that provide the greatest net benefit at the least cost.
- Seek out additional federal and state transportation funds whenever possible.

KYOVA 2040 Integrate Metropolitan Transportation Plan

14. Education

School districts, particularly “good” school districts, is an oft-cited reason for families to move to an area. In the past 15 years, the State of West Virginia and Cabell County have invested over one-hundred million dollars into the district. This effort was to help modernize the schools, and to foster a 21st century learning environment for students. The districts focus and beliefs are to cultivate a culture that is “safe nurturing, compassionate, inviting” that respects both individuals and cultures, and their vision is that ‘every graduate will be accepted into a career or post-secondary option.



Assessment Achievement

Subject	Mastery Level	Mastery Pct
Mathematics	Does Not Meet Standard	30.33%
Mathematics	Exceeds Standard	20.30%
Mathematics	Meets Standard	18.92%
Mathematics	Partially Meets Standard	30.45%
Reading	Does Not Meet Standard	23.96%
Reading	Exceeds Standard	20.31%
Reading	Meets Standard	28.68%
Reading	Partially Meets Standard	27.05%
Science	Does Not Meet Standard	24.38%
Science	Exceeds Standard	13.10%
Science	Meets Standard	20.50%
Science	Partially Meets Standard	42.02%

Source: West Virginia Department of Education

West Virginia's statewide assessments provide an opportunity for students to demonstrate what they know while providing information to students and parents about how well students are progressing toward mastering West Virginia's content standards. It is clear that there is room for improvement in Cabell County Schools as nearly 1/3 (30.33%) of students do not meet the standard in mathematics, nearly 1/4 (23.96%) of students do not meet the standard in reading, and nearly 1/4 (24.38%) of students do not meet the standard in science. According to the Cabell County 2019-2020 Strategic Plan, the district has a graduation rate of 89%. This is 11% higher than the 2013 graduation rate.

According to 2019 enrollment numbers from the West Virginia Department of Education, there are a total of 12,111 students enrolled in Cabell County Schools. Eighty-three percent (10,145 students) of the student population are white; 7.2% (868 students) of the student population are multi-racial; 6.4% (775 students) of the student population are Black or African American; 1.5% (182 students) of the student population are Hispanic or Latino; 1.0% (120 students) of the student population are Asian; and 0.2% (20 students) of the student population are American Indian/Alaskan.

The District receives 54% (\$86,635,666) of its funding from the State of West Virginia, 35% (\$57,048,416) of its funding from local governments, and 11% (\$17,762,936) of its funding from the Federal Government.

The Cabell County Schools adopted a Strategic Plan for the 2019-2020 school year, which identifies the following goals:



- **Achievement and Growth:** All Cabell County students will be engaged in a rigorous and relevant curriculum in order to meet the annual targets in proficiency, which will result in 53.57% in ELA and 40.38% of students achieving proficiency in Math by May 2020

Strategies

- Appropriate evaluation of Pre-K Students Determining Eligibility
 - Improving Instructional Practices for Students Achievement
 - Schools Improvement Model through needs assessment and monthly embedded coaching with school administration and staff
 - Continues training and support for teachers utilizing the LETRS modules
 - Summer Enrichment Camp
 - Partnership with Riverpark Hospital
- **Organizational Excellence:** In the 2019-2020 school year, Cabell County Schools will be transparent in district finances, policies and instructional support for student and educator growth that is measured with State and Federal requirements to support the district's goals.

Strategies

- Resources and Funding
 - Provide Coordination for Instructional Support
 - Board of Education Presentations
 - Cabinet/Management meetings
- **Communication and Engagement:** Cabell County Schools will continue to build a system of support for all students through effective school to home and home to school communication using the learning management system. We will see an increase of use

by 20% by end of the year. Effective stakeholder engagement will be measured through increased usage of a variety of media platforms.

Strategies

- Cabell County Safety Committee
- Chronic Absence Initiative
- Positive Relationships with Students, Staff and Families.
- **Governance and Trust:** Through monthly board workshops, principal meetings, and professional development sessions, the district will provide policy updates and reports on professional development sessions and survey data to support student and educator growth that is aligned with State and Federal funding, during the 2019-2020 school year.

Strategies

- Instructional Focus and Updates During All Board Meetings
- Policy Updates to align with WV Code and WVDE Policy
- Instructional Leadership Training for all School Administrators
- Future Ready Initiative
- Professional Development Aligned to Strategic Plan Goals

C. Private Sector:

The private sector has traditionally generated the most easily recognized impediments to fair housing choice in regard to discrimination in the sale, rental or advertising of dwellings; the provision of brokerage services; or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibit 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, and national origin.

1. Real Estate Practices

The Huntington Board of Realtors is the local organization of real estate brokers operating in the Huntington Area. 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 obligates its members to maintain professional standards including efforts to affirmatively further fair housing. In order for realtors to maintain their license in West Virginia they must annually complete continuing education courses which includes fair housing education. All members are required to complete 2.5 hours of ethics training every 4 years. In the event of a complaint of discrimination, the Huntington Board of Realtors has policies in place to handle such complaints. There have not been any fair housing complaints against local area realtors reported in the last few years.

2. Real Estate Advertising

Under Federal Law, no advertisement 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 from *The Herald Dispatch* and several electronic sources such as: *Facebook*, *Craigslist*, *Realtor.com*, *Rent.com*, and *Zillow.com*. Some of the sources included a disclaimer from the publisher indicating that each advertisement is subject to the Federal Fair Housing Act and that all dwellings advertised are available on an equal opportunity basis. Most of the sources included the Fair Housing logo. None of the publications appeared to contain discriminatory language nor prohibited occupancy by any protected class.

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/. The most recent HMDA Data is that of 2018, which is the data that was used for this analysis. The following tables provide an analysis of the HMDA data in the (MSA). The MSA includes all of Cabell County and Wayne County, West Virginia. The home loans included in this report represent loans on 1- to 4-family and manufactured homes from the following loan



types: 1) FHA, USDA and VA; 2) Conventional; 3) Refinancings; and 4) Home Improvement.

Table IV-10 compares lending in Cabell and Wayne Counties to the Huntington-Ashland, WV-OH-KY MSA. Lending in the Counties has been extracted from the MSA data based on census tract. Conventional loans in the Counties comprised 37.1.% of the number of such loans in the MSA as a whole and 32.6% of the value of such loans.

Table IV – 10 – Home Loans Purchased by Location of Property and Type of Loan

Area	FHA, USDA & VA		Conventional		Refinancing		Home Improvement Loans	
	#	Amount	#	Amount	#	Amount	#	Amount
Cabell County	322	\$42,520,000	1,252	\$182,480,000	331	\$58,865,000	117	\$8,905,000
County Loans as a % of MSA Loans	20.3%	20.3%	24.6%	27.4%	21.9%	28.5%	23.0%	30.4%
Wayne County	142	\$16,320,000	363	\$34,535,000	103	11,125,000	39	\$2,015,000
County Loans as a % of MSA Loans	8.9%	7.8%	7.1%	5.2%	6.8%	5.4%	7.7%	6.9%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/WV/26580/1>

Table IV-11 shows the conventional loan applications in **Cabell and Wayne Counties**. Sixty-five percent of the loan applications in the Cabell County were originated, while just over a fifth (20.2%) were denied, 10.9%% were withdrawn and 3.4% were approved but not accepted. Fifty-four percent of the loan applications in Wayne County were originated, while 28.7% were denied, 11.9% were withdrawn, and 4.9% were approved but not accepted.



Table IV – 11 – Home Loans Purchased by Location of Property and Type of Loan

Loan		Loans Originated	Approved, Not Accepted	Applications Denied	Applications Withdrawn	File Closed for Incompleteness
FHA, USDA & VA	Cabell County	322	10	87	95	17
	Wayne County	142	5	42	39	13
	MSA	1,590	46	483	411	140
Conventional	Cabell County	1,252	64	377	179	71
	Wayne County	363	43	224	74	56
	MSA	5,095	326	1,862	793	349
Refinancings	Cabell County	331	19	80	48	19
	Wayne County	103	9	35	24	3
	MSA	1,514	102	486	242	91
Home Improvement Loans	Cabell County	117	12	81	15	7
	Wayne County	39	1	40	4	4
	MSA	508	35	358	54	27

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/WV/26580/1>

The following Table IV-12 outlines the disposition of loans in the **Huntington-Ashville, WV-OH-KY MSA** by income level (data for only the City of Huntington is not available). Loan applications from low-income households have the highest denial rates by a large margin, while upper-income households have the lowest denial rates and highest origination rates. The percentage of loans originated and percentage of applications denied are both correlated with income, whereas the higher the income level, the more likely the application will be approved and loan originated.



Table IV – 12 Disposition of Loan Applications by Income of Applicant

Loan	Income	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, USDA & VA	Less than 50% of MSA/IL median	244	107	43.9%	3	1.2%	79	32.4%	36	14.8%	19	7.8%
	50-79% of MSA/IL median	460	261	56.7%	6	1.3%	94	20.4%	80	17.4%	19	4.1%
	80-99% of MSA/IL median	391	241	61.6%	10	2.6%	69	17.6%	50	12.8%	21	5.4%
	100-119% of MSA/IL median	361	229	63.4%	6	1.7%	58	16.1%	56	15.5%	12	3.3%
	120% or more of MSA/IL median	1,164	723	62.1%	18	1.5%	176	15.1%	184	15.8%	63	5.4%
Conventional	Less than 50% of MSA/IL median	539	184	34.1%	16	3.0%	251	46.6%	46	8.5%	42	7.8%
	50-79% of MSA/IL median	1,137	547	48.1%	49	4.3%	375	33.0%	97	8.5%	69	6.1%
	80-99% of MSA/IL median	876	489	55.8%	38	4.3%	227	25.9%	74	8.4%	48	5.5%
	100-119% of MSA/IL median	779	449	57.6%	42	5.4%	188	24.1%	62	8.0%	38	4.9%
	120% or more of MSA/IL median	4,776	3,160	66.2%	174	3.6%	799	16.7%	493	10.3%	150	3.1%
Refinance	Less than 50% of MSA/IL median	170	77	45.3%	9	5.3%	54	31.8%	19	11.2%	11	6.5%
	50-79% of MSA/IL median	289	142	49.1%	15	5.2%	93	32.2%	33	11.4%	6	2.1%
	80-99% of MSA/IL median	232	135	58.2%	8	3.4%	58	25.0%	25	10.8%	6	2.6%
	100-119% of MSA/IL median	209	119	56.9%	11	5.3%	47	22.5%	23	11.0%	9	4.3%



Home Improvement	120% or more of MSA/IL median	1,363	906	66.5%	50	3.7%	222	16.3%	132	9.7%	53	3.9%
	Less than 50% of MSA/IL median	85	22	25.9%	1	1.2%	52	61.2%	8	9.4%	2	2.4%
	50-79% of MSA/IL median	115	42	36.5%	4	3.5%	60	52.2%	4	3.5%	5	4.3%
	80-99% of MSA/IL median	102	49	48.0%	2	2.0%	37	36.3%	5	4.9%	3	2.9%
	100-119% of MSA/IL median	87	36	41.4%	4	4.6%	39	44.8%	-	0.0%	1	1.1%
	120% or more of MSA/IL median	569	341	59.9%	24	4.2%	154	27.1%	36	6.3%	14	2.5%
Total	Less than 50% of MSA/IL median	1,038	390	37.6%	29	2.8%	436	42.0%	109	10.5%	74	7.1%
	50-79% of MSA/IL median	2,001	992	49.6%	74	3.7%	622	31.1%	214	10.7%	99	4.9%
	80-99% of MSA/IL median	1,601	914	57.1%	58	3.6%	391	24.4%	154	9.6%	78	4.9%
	100-119% of MSA/IL median	1,436	833	58.0%	63	4.4%	332	23.1%	141	9.8%	60	4.2%
	120% or more of MSA/IL median	7,872	5,130	65.2%	266	3.4%	1,351	17.2%	845	10.7%	280	3.6%
	TOTAL	13,948	8,259	59.2%	490	3.5%	3,132	22.5%	1,463	10.5%	591	4.2%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/WV/26580/1>

Table IV-13 shows the disposition of loans disaggregated by minority status for the **Huntington-Ashville, WV-OH-KY MSA**. The number of applications for conventional loans submitted by White applicants outnumbers minority applicants in each of the loans analyzed. White applicants have a higher origination rate than every other minority listed. Due to the low number of minorities in Huntington it can be difficult to fairly analyze the following data, as some of the races listed have less than 5 total applications.



Table IV – 13 Disposition of Loan Applications by Race/Ethnicity of Applicant

Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, USDA & VA	2 or more minority races	2	1	50.0%	-	0.0%	1	50.0%	-	0.0%	-	0.0%
	American Indian or Alaska Native	9	5	55.6%	-	0.0%	1	11.1%	3	33.3%	-	0.0%
	Asian	1	1	100.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Black or African American	46	35	76.1%	-	0.0%	5	10.9%	4	8.7%	2	4.3%
	Joint	27	9	33.3%	-	0.0%	6	22.2%	11	40.7%	1	3.7%
	Native Hawaiian or Other Pacific Islander	1	-	0.0%	-	0.0%	-	0.0%	-	0.0%	1	100.0%
	Race Not Available	202	91	45.0%	4	2.0%	64	31.7%	28	13.9%	15	7.4%
	White	2,382	1,448	60.8%	42	1.8%	406	17.0%	365	15.3%	121	5.1%
	Hispanic or Latino	12	8	66.7%	-	0.0%	2	16.7%	1	8.3%	1	8.3%
Conventional	2 or more minority races	3	1	33.3%	-	0.0%	1	33.3%	-	0.0%	1	33.3%
	American Indian or Alaska Native	25	8	32.0%	-	0.0%	11	44.0%	3	12.0%	3	12.0%
	Asian	62	38	61.3%	-	0.0%	17	27.4%	5	8.1%	2	3.2%
	Black or African American	63	24	38.1%	4	6.3%	24	38.1%	8	12.7%	3	4.8%
	Joint	57	34	59.6%	2	3.5%	13	22.8%	3	5.3%	5	8.8%
	Native Hawaiian or Other Pacific	4	-	0.0%	-	0.0%	4	100.0%	-	0.0%	-	0.0%



	Islander											
	Race Not Available	691	440	63.7%	11	1.6%	146	21.1%	73	10.6%	21	3.0%
	White	7,520	45,50	60.5%	309	4.1%	1,646	21.9%	701	9.3%	314	4.2%
	Hispanic or Latino	79	34	43.0%	-	0.0%	31	39.2%	8	10.1%	6	7.6%
Refinance	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	0	-	-	-	-	-	-	-	-	-	-
	Asian	7	3	42.9%	-	0.0%	2	28.6%	1	14.3%	1	14.3%
	Black or African American	5	5	100.0%	-	0.0%	-	0.0%		0.0%		0.0%
	Joint	24	5	20.8%	2	8.3%	11	45.8%	4	16.7%	2	8.3%
	Native Hawaiian or Other Pacific Islander	9	8	88.9%		0.0%		0.0%	1	11.1%		0.0%
	Race Not Available	234	152	65.0%	5	2.1%	44	18.8%	25	10.7%	8	3.4%
	White	2,156	1,341	62.2%	95	4.4%	429	19.9%	211	9.8%	80	3.7%
	Hispanic or Latino	1	1	100.0%		0.0%		0.0%		0.0%		0.0%
Home Improvement	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%
	Asian	9	4	44.4%	-	0.0%	5	55.6%	-	0.0%	-	0.0%
	Black or African American	12	4	33.3%	2	16.7%	5	41.7%	1	8.3%	-	0.0%



	Joint	4	1	25.0%	-	0.0%	3	75.0%	-	0.0%	-	0.0%
	Native Hawaiian or Other Pacific Islander	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%
	Race Not Available	59	28	47.5%	2	3.4%	23	39.0%	4	6.8%	2	3.4%
	White	896	471	52.6%	31	3.5%	320	35.7%	49	5.5%	25	2.8%
	Hispanic or Latino	15	7	46.7%	-	0.0%	7	46.7%		0.0%	1	6.7%
Total	2 or more minority races	5	2	40.0%	0	0.0%	2	40.0%	0	0.0%	1	20.0%
	American Indian or Alaska Native	35	13	37.1%	0	0.0%	13	37.1%	6	17.1%	3	8.6%
	Asian	79	46	58.2%	0	0.0%	24	30.4%	6	7.6%	3	3.8%
	Black or African American	126	68	54.0%	6	4.8%	34	27.0%	13	10.3%	5	4.0%
	Joint	112	49	43.8%	4	3.6%	33	29.5%	18	16.1%	8	7.1%
	Native Hawaiian or Other Pacific Islander	15	8	53.3%	0	0.0%	5	33.3%	1	6.7%	1	6.7%
	Race Not Available	11,86	711	59.9%	22	1.9%	277	23.4%	130	11.0%	46	3.9%
	White	12,954	7810	60.3%	477	3.7%	2,801	21.6%	1,326	10.2%	540	4.2%
	2 or more minority races	107	50	46.7%	0	0.0%	40	37.4%	9	8.4%	8	7.5%
	Total	14,619	8,757	59.9%	509	3.5%	3,229	22.1%	1,509	10.3%	615	4.2%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/WV/26580/1>

The following Table IV-14 through IV - 18 will compare denial rates per racial/ethnic group and income to identify any group that may have higher denial rates than another. **Groups with 10% higher denial rates than average are disproportionate and will be highlighted.**



Table IV – 14 Disposition of Loan Applications by Race/Ethnicity and Income of Applicant

Less than 50% of MSA/IL Median - Huntington												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, USDA & VA	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	0	-	-	-	-	-	-	-	-	-	-
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	2	-	0.0%	-	0.0%	2	100.0%	-	0.0%	-	0.0%
	Joint	0	-	-	-	-	-	-	-	-	-	-
	Native Hawaiian or Other Pacific Islander	1	-	0.0%	-	0.0%	-	0.0%	-	0.0%	1	100.0%
	Race Not Available	22	3	13.6%	-	0.0%	15	68.2%	4	18.2%		0.0%
	White	219	104	47.5%	3	1.4%	62	28.3%	32	14.6%	18	8.2%
	Hispanic or Latino	2	2	100.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
Conventional	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	5	1	20.0%	-	0.0%	2	40.0%	1	20.0%	1	20.0%
	Asian	2	1	50.0%	-	0.0%	1	50.0%	-	0.0%	-	0.0%
	Black or African American	8	2	25.0%	3	37.5%	2	25.0%	1	12.5%	-	0.0%
	Joint	1	1	100.0%	-	-	-	0.0%	-	0.0%	-	0.0%
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-



Refinance	Race Not Available	42	6	14.3%		0.0%	24	57.1%	5	11.9%	7	16.7%
	White	481	173	36.0%	13	2.7%	222	46.2%	39	8.1%	34	7.1%
	Hispanic or Latino	5	3	60.0%		0.0%	1	20.0%		0.0%	1	20.0%
	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	0	-	-	-	-	-	-	-	-	-	-
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	5	1	20.0%	2	40.0%	1	20.0%	1	20.0%	-	-
	Joint	0	-	-	-	-	-	-	-	-	-	-
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	10	2	20.0%	-	0.0%	6	60.0%	2	20.0%	-	-
Home Improvement	White	155	74	47.7%	7	4.5%	47	30.3%	16	10.3%	11	7.1%
	Hispanic or Latino	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%
	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	1	-	0.0%	1	100.0%	-	0.0%	-	0.0%	-	0.0%
	Joint	0	0	-	-	-	-	-	-	-	-	-
	Native Hawaiian or Other Pacific Islander	0	0	-	-	-	-	-	-	-	-	-



Total	Race Not Available	5	-	0.0%	-	0.0%	4	80.0%	-	0.0%	1	20.0%
	White	78	22	28.2%	-	0.0%	47	60.3%	8	10.3%	1	1.3%
	Hispanic or Latino	1	1	100.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	2 or more minority races	0	0	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	6	1	16.7%	0	0.0%	3	50.0%	1	16.7%	1	16.7%
	Asian	2	1	50.0%	0	0.0%	1	50.0%	0	0.0%	0	0.0%
	Black or African American	16	3	18.8%	6	37.5%	5	31.3%	2	12.5%	0	0.0%
	Joint	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Native Hawaiian or Other Pacific Islander	1	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	100.0%
	Race Not Available	79	11	13.9%	0	0.0%	49	62.0%	11	13.9%	8	10.1%
	White	933	373	40.0%	23	2.5%	378	40.5%	95	10.2%	64	6.9%
	Hispanic or Latino	9	6	66.7%	0	0.0%	2	22.2%	0	0.0%	1	11.1%
	Total	1,047	396	37.8%	29	2.8%	438	41.8%	109	10.4%	75	7.2%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/WV/26580/1>

Table IV – 15 Disposition of Loan Applications by Race/Ethnicity and Income of Applicant

50-79% of MSA/IL Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, USDA & VA	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-



	American Indian or Alaska Native	1		0.0%		0.0%	1	100.0%		0.0%		0.0%
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	8	7	87.5%		0.0%		0.0%	1	12.5%	-	0.0%
	Joint	1	-	0.0%	1	100.0%	-	0.0%	-	0.0%	-	0.0%
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	30	14	46.7%		0.0%	7	23.3%	6	20.0%	3	10.0%
	White	420	240	57.1%	6	1.4%	85	20.2%	73	17.4%	16	3.8%
	Hispanic or Latino	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%
Conventional	2 or more minority races	2	1	50.0%	-	0.0%	-	0.0%	-	0.0%	1	50.0%
	American Indian or Alaska Native	7	3	42.9%	-	0.0%	3	42.9%	1	14.3%	-	0.0%
	Asian	4	3	75.0%	-	0.0%	-	0.0%	-	0.0%	1	25.0%
	Black or African American	12	5	41.7%	-	0.0%	6	50.0%	1	8.3%	-	0.0%
	Joint	3	1	33.3%	-	0.0%	-	0.0%	-	0.0%	2	66.7%
	Native Hawaiian or Other Pacific Islander	2	-	0.0%	-	0.0%	2	100.0%	-	0.0%	-	0.0%
	Race Not Available	62	24	38.7%	1	1.6%	25	40.3%	7	11.3%	5	8.1%
	White	1045	510	48.8%	48	4.6%	339	32.4%	88	8.4%	60	5.7%
	Hispanic or Latino	17	5	29.4%		0.0%	8	47.1%	2	11.8%	2	11.8%
Refinancing	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-



	American Indian or Alaska Native	2	1	50.0%		0.0%	1	50.0%	-	0.0%	-	0.0%
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	3	2	66.7%	-	0.0%	1	33.3%	-	0.0%	-	0.0%
	Joint	0	-	-	-	-	-	-	-	-	-	-
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	18	5	27.8%	-	0.0%	6	33.3%	5	27.8%	2	11.1%
	White	266	134	50.4%	15	5.6%	85	32.0%	28	10.5%	4	1.5%
	Hispanic or Latino	1	1	100.00%	0	0.0%	-	0.0%	-	0.0%	-	0.0%
Home Improvement	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	0	-	-	-	-	-	-	-	-	-	-
	Asian	1	1	100.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Black or African American	3	-	0.0%	-	0.0%	3	100.0%	-	0.0%	-	0.0%
	Joint	0	-	-	-	-	-	-	-	-	-	-
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	6	2	33.3%	-	0.0%	4	66.7%	-	0.0%	-	0.0%
	White	105	39	37.1%	4	3.8%	53	50.5%	4	3.8%	5	4.8%
	Hispanic or Latino	3	2	66.7%	-	0.0%	-	0.0%	-	0.0%	1	33.3%
Total	2 or more minority races	2	1	50.0%	0	0.0%	0	0.0%	0	0.0%	1	50.0%



American Indian or Alaska Native	10	4	40.0%	0	0.0%	5	50.0%	1	10.0%	0	0.0%
Asian	5	4	80.0%	0	0.0%	0	0.0%	0	0.0%	1	20.0%
Black or African American	26	14	53.8%	0	0.0%	10	38.5%	2	7.7%	0	0.0%
Joint	4	1	25.0%	1	25.0%	0	0.0%	0	0.0%	2	50.0%
Native Hawaiian or Other Pacific Islander	2	0	0.0%	0	0.0%	2	100.0%	0	0.0%	0	0.0%
Race Not Available	116	45	38.8%	1	0.9%	42	36.2%	18	15.5%	10	8.6%
White	1,836	923	50.3%	73	4.0%	562	30.6%	193	10.5%	85	4.6%
Hispanic or Latino	22	8	36.4%	0	0.0%	9	40.9%	2	9.1%	3	13.6%
Total	2,023	1,000	49.4%	75	3.7%	630	31.1%	216	10.7%	102	5.0%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/WV/26580/1>

Table IV – 16 Disposition of Loan Applications by Race/Ethnicity and Income of Applicant

80-99% of MSA/IL Median

Loan	Cohort	Total Apps #	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
			#	%	#	%	#	%	#	%	#	%
FHA, USDA & VA	2 or more minority races	1	1	100.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	American Indian or Alaska Native	3	2	66.7%	-	0.0%	-	0.0%	1	33.3%	-	0.0%
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	6	4	66.7%	-	0.0%	1	16.7%	1	16.7%	-	0.0%
	Joint	4	1	25.0%	-	0.0%	1	25.0%	2	50.0%	-	0.0%
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	26	12	46.2%	-	0.0%	8	30.8%	5	19.2%	1	3.8%



	White	351	221	63.0%	10	2.8%	59	16.8%	41	11.7%	20	5.7%
	Hispanic or Latino	4	3	75.0%		0.0%	1	25.0%	-	0.0%	-	0.0%
Conventional	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	2	1	50.0%	-	0.0%	1	50.0%	-	0.0%	-	0.0%
	Asian	7	4	57.1%	-	0.0%	2	28.6%	1	14.3%	-	0.0%
	Black or African American	8	4	50.0%	-	0.0%	3	37.5%	-	0.0%	1	12.5%
	Joint	9	5	55.6%	1	11.1%		0.0%	2	22.2%	1	11.1%
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	46	18	39.1%	1	2.2%	19	41.3%	6	13.0%	2	4.3%
	White	804	457	56.8%	36	4.5%	202	25.1%	65	8.1%	44	5.5%
	Hispanic or Latino	6	4	66.7%		0.0%	2	33.3%	-	0.0%	-	0.0%
Refinance	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	2	1	50.0%	-	0.0%	-	0.0%	1	50.0%	-	0.0%
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	3	1	33.3%	-	0.0%	1	33.3%	1	33.3%	-	0.0%
	Joint	0	-	-	-	-	-	-	-	-	-	-
	Native Hawaiian or Other Pacific Islander	1	-	0.0%	-	0.0%	-	0.0%	-	0.0%	1	100.0%
	Race Not Available	21	8	38.1%		0.0%	9	42.9%	3	14.3%	1	4.8%
	White	205	125	61.0%	8	3.9%	48	23.4%	19	9.3%	5	2.4%
	Hispanic or Latino	2	1	50.0%	1	50.0%	-	0.0%	-	0.0%	-	0.0%
Home Improvement	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	0	-	-	-	-	-	-	-	-	-	-
	Asian	0	-	-	-	-	-	-	-	-	-	-



	Black or African American	2	1	50.0%	-	0.0%	1	50.0%	-	0.0%	-	0.0%
	Joint	1	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Native Hawaiian or Other Pacific Islander	0	0	-	-	-	-	-	-	-	-	-
	Race Not Available	7	1	14.3%	-	0.0%	5	71.4%	-	0.0%	1	14.3%
	White	92	46	50.0%	2	2.2%	36	39.1%	5	5.4%	3	3.3%
	Hispanic or Latino	1	1	100.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
Total	2 or more minority races	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	American Indian or Alaska Native	7	4	57.1%	0	0.0%	1	14.3%	2	28.6%	0	0.0%
	Asian	7	4	57.1%	0	0.0%	2	28.6%	1	14.3%	0	0.0%
	Black or African American	19	10	52.6%	0	0.0%	6	31.6%	2	10.5%	1	5.3%
	Joint	14	6	42.9%	1	7.1%	1	7.1%	4	28.6%	1	7.1%
	Native Hawaiian or Other Pacific Islander	1	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	100.0%
	Race Not Available	100	39	39.0%	1	1.0%	41	41.0%	14	14.0%	5	5.0%
	White	1452	849	58.5%	56	3.9%	345	23.8%	130	9.0%	72	5.0%
	Hispanic or Latino	13	9	69.2%	1	7.7%	3	23.1%	0	0.0%	0	0.0%
	Total	1,614	922	57.1%	59	3.7%	399	24.7%	153	9.5%	80	5.0%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/WV/26580/1>

Table IV – 17 Disposition of Loan Applications by Race/Ethnicity and Income of Applicant

100-119% of MSA/IL Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, USDA & VA	2 or more minority races	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%
	American Indian or Alaska Native	3	2	66.7%	-	0.0%	-	0.0%	1	33.3%	-	0.0%
	Asian	0	-	-	-	-	-	-	-	-	-	#DIV/0!



	Black or African American	4	4	100.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Joint	2	1	50.0%	-	0.0%	1	50.0%	-	0.0%	-	0.0%
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	18	9	50.0%	1	5.6%	5	27.8%	3	16.7%	-	0.0%
	White	333	213	64.0%	5	1.5%	51	15.3%	52	15.6%	12	3.6%
	Hispanic or Latino	3	2	66.7%	-	0.0%	-	0.0%	-	0.0%	1	33.3%
Conventional	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	0	-	-	-	-	-	-	-	-	-	-
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	3	2	66.7%	-	0.0%	1	33.3%	-	0.0%	0	0.0%
	Joint	0	-	-	-	-	-	-	-	-	-	-
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%
	White	38	35	92.1%	4	10.5%	0	0.0%	41	107.9%	1	2.6%
	Hispanic or Latino	2	-	0.0%	-	0.0%	2	100.0%	-	0.0%	-	0.0%
	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
Refinance	American Indian or Alaska Native	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	2	-	0.0%	-	0.0%	1	50.0%	1	50.0%	-	0.0%
	Joint	0	-	-	-	-	-	-	-	-	-	-
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	12	5	41.7%	-	0.0%	6	50.0%	1	8.3%	-	0.0%
	White	194	114	58.8%	11	5.7%	39	20.1%	21	10.8%	9	4.6%



Home Improvement	Hispanic or Latino	4	3	75.0%	-	0.0%	-	0.0%	-	0.0%	1	25.0%
	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	0	-	-	-	-	-	-	-	-	-	-
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	3	2	66.7%		0.0%	1	33.3%		0.0%	0	0.0%
	Joint	0	-	-	-	-	-	-	-	-	-	-
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%
	White	38	35	92.1%	4	10.5%	-	0.0%	41	107.9%	1	2.6%
	Hispanic or Latino	2	-	0.0%	-	0.0%	2	100.0%	-	0.0%	-	0.0%
Total	2 or more minority races	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
	American Indian or Alaska Native	4	2	50.0%	0	0.0%	1	25.0%	1	25.0%	0	0.0%
	Asian	0	-	-	-	-	-	-	-	-	-	-
	Black or African American	12	8	66.7%	0	0.0%	3	25.0%	1	8.3%	0	0.0%
	Joint	2	1	50.0%	0	0.0%	1	50.0%	0	0.0%	0	0.0%
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	32	14	43.8%	1	3.1%	13	40.6%	4	12.5%	0	0.0%
	White	603	397	65.8%	24	4.0%	90	14.9%	155	25.7%	23	3.8%
	Hispanic or Latino	11	5	45.5%	0	0.0%	4	36.4%	0	0.0%	2	18.2%
	Total	665	427	64.2%	25	3.8%	113	17.0%	161	24.2%	25	3.8%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/WV/26580/1>



Table IV – 18 Disposition of Loan Applications by Race/Ethnicity and Income of Applicant

120% or More of MSA/IL Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, USDA & VA	2 or more minority races	0	-	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	2	1	50.0%	-	0.0%	-	0.0%	1	50.0%	-	0.0%
	Asian	1	1	100.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Black or African American	24	20	83.3%	-	0.0%	1	4.2%	2	8.3%	1	4.2%
	Joint	20	7	35.0%	-	0.0%	3	15.0%	9	45.0%	1	5.0%
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-
	Race Not Available	102	52	51.0%	1	1.0%	29	28.4%	10	9.8%	10	9.8%
	White	1015	642	63.3%	17	1.7%	143	14.1%	162	16.0%	51	5.0%
	Hispanic or Latino	0	-	-	-	-	-	-	-	-	-	-
Conventional	2 or more minority races	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%
	American Indian or Alaska Native	10	3	30.0%	-	0.0%	4	40.0%	1	10.0%	2	20.0%
	Asian	39	24	61.5%	-	0.0%	11	28.2%	3	7.7%	1	2.6%
	Black or African American	27	10	37.0%	1	3.7%	10	37.0%	4	14.8%	2	7.4%
	Joint	40	26	65.0%	-	0.0%	11	27.5%	1	2.5%	2	5.0%
	Native Hawaiian or Other Pacific Islander	1	-	0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%



Refinance	Race Not Available	289	177	61.2%	6	2.1%	58	20.1%	41	14.2%	7	2.4%
	White	4369	2920	66.8%	167	3.8%	703	16.1%	443	10.1%	136	3.1%
	Hispanic or Latino	39	18	46.2%	-	0.0%	14	35.9%	6	15.4%	1	2.6%
	2 or more minority races	2	1	50.0%	-	0.0%	-	0.0%	-	0.0%	1	50.0%
	American Indian or Alaska Native	5	5	100.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Asian	8	1	12.5%	-	0.0%	5	62.5%	1	12.5%	1	12.5%
	Black or African American	8	8	100.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Joint	0	-	-	-	-	-	-	-	-	-	-
	Native Hawaiian or Other Pacific Islander	75	45	60.0%	1	1.3%	15	20.0%	10	13.3%	4	5.3%
	Race Not Available	1265	846	66.9%	49	3.9%	202	16.0%	121	9.6%	47	3.7%
	White	5	3	60.0%	-	0.0%	1	20.0%	1	20.0%	-	0.0%
	Hispanic or Latino	2	1	50.0%	-	0.0%	-	0.0%	-	0.0%	1	50.0%
Home Improvement	2 or more minority races	0	0	-	-	-	-	-	-	-	-	-
	American Indian or Alaska Native	0	0	-	-	-	-	-	-	-	-	-
	Asian	5	1	20.0%	-	0.0%	4	80.0%	-	0.0%	-	0.0%
	Black or African American	6	3	50.0%	1	16.7%	1	16.7%	1	16.7%	-	0.0%
	Joint	3	-	0.0%	-	0.0%	3	100.0%	-	0.0%	-	0.0%
	Native Hawaiian or Other Pacific Islander	0	-	-	-	-	-	-	-	-	-	-



Total	Race Not Available	31	17	54.8%	2	6.5%	8	25.8%	4	12.9%	-	0.0%
	White	524	320	61.1%	21	4.0%	138	26.3%	31	5.9%	14	2.7%
	Hispanic or Latino	8	3	37.5%	-	0.0%	5	62.5%	-	0.0%	-	0.0%
	2 or more minority races	3	1	33.3%	0	0.0%	1	33.3%	0	0.0%	1	33.3%
	American Indian or Alaska Native	17	9	52.9%	0	0.0%	4	23.5%	2	11.8%	2	11.8%
	Asian	53	27	50.9%	0	0.0%	20	37.7%	4	7.5%	2	3.8%
	Black or African American	65	41	63.1%	2	3.1%	12	18.5%	7	10.8%	3	4.6%
	Joint	63	33	52.4%	0	0.0%	17	27.0%	10	15.9%	3	4.8%
	Native Hawaiian or Other Pacific Islander	76	45	59.2%	1	1.3%	16	21.1%	10	13.2%	4	5.3%
	Race Not Available	1687	1092	64.7%	58	3.4%	297	17.6%	176	10.4%	64	3.8%
Total	White	5913	3885	65.7%	205	3.5%	985	16.7%	637	10.8%	201	3.4%
	Hispanic or Latino	49	22	44.9%	0	0.0%	19	38.8%	6	12.2%	2	4.1%
	Total	7,926	5155	65.0%	266	3.4%	1371	17.3%	852	10.7%	282	3.6%

The number of White, non-Hispanic high-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 as a whole, regardless of income.

The following tables offer a closer look at the denial rates of conventional loans by denial reason, race, gender and income level. For those earning less than 50% of median income, Debt-to-Income Ratio was the most common reason, respectively. For those earning 50-79% of median income Credit History was the most common reasons for denial. For applicants earning 80-119% and 120% of the median income the most



common reason for denial was Credit History. Credit History and large amounts of debt – mostly student loans – have been preventing low-mod income individuals in participating in the City's HOME downpayment assistance program, and is a problem that needs to be addressed.

DRAFT



Table IV – 19 Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income

FHA, FSA/RHS and VA Loans																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	2 or more minority races	2		0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	1	50.0%
	American Indian or Alaska Native	9	1	11.1%	-	0.0%	--	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Asian	1	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Black or African American	46	1	2.2%	-	0.0%	1	2.2%	-	0.0%	-	0.0%		0.0%	1	2.2%	-	0.0%	2	4.3%
	Joint	27	2	7.4%	-	0.0%	3	11.1%	1	3.7%		0.0%		0.0%	-	0.0%	-	0.0%	-	0.0%
	Native Hawaiian or Other Pacific Islander	1	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Race Not Available	202	9	4.5%	2	1.0%	11	5.4%	25	12.4%	-	0.0%	-	0.0%	14	6.9%	-	0.0%	3	1.5%
	White	2382	83	3.5%	11	0.5%	103	4.3%	85	3.6%	16	0.7%	10	0.4%	59	2.5%	2	0.1%	37	1.6%
Ethnicity	Ethnicity Not Available	230	8	3.5%	2	0.9%	14	6.1%	24	10.4%	-	0.0%	-	0.0%	13	5.7%	-	0.0%	4	1.7%



	Hispanic or Latino	12	-	0.0%	-	0.0%	2	16.7%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Joint	17	-	0.0%	-	0.0%	1	5.9%	-	0.0%	1	5.9%	-	0.0%	1	5.9%	-	0.0%	-	0.0%
	Not Hispanic or Latino	2411	88	3.6%	11	0.5%	101	4.2%	87	3.6%	15	0.6%	10	0.4%	60	2.5%	2	0.1%	39	1.6%
Gender	Female	495	22	4.4%	3	0.6%	27	5.5%	26	5.3%	6	1.2%	3	0.6%	21	4.2%	-	0.0%	6	1.2%
	Joint	653	21	3.2%	4	0.6%	43	6.6%	34	5.2%	2	0.3%	-	0.0%	21	3.2%	-	0.0%	7	1.1%
	Male	942	47	5.0%	5	0.5%	42	4.5%	34	3.6%	8	0.8%	7	0.7%	19	2.0%	2	0.2%	27	2.9%
	Sex Not Available	97	6	6.2%	1	1.0%	6	6.2%	17	17.5%	-	0.0%	-	0.0%	13	13.4%	-	0.0%	3	3.1%
Income	Less than 50% of MSA/IL median	244	24	9.8%	1	0.4%	13	5.3%	11	4.5%	5	2.0%	2	0.8%	16	6.6%	-	0.0%	7	2.9%
	50-79% of MSA/IL median	460	27	5.9%	3	0.7%	17	3.7%	24	5.2%	3	0.7%	1	0.2%	9	2.0%	1	0.2%	9	2.0%
	80-99% of MSA/IL median	391	15	3.8%	3	0.8%	19	4.9%	15	3.8%	3	0.8%	3	0.8%	7	1.8%	-	0.0%	4	1.0%
	100-119% of MSA/IL median	361	10	2.8%	2	0.6%	13	3.6%	14	3.9%	1	0.3%	-	0.0%	7	1.9%	1	0.3%	10	2.8%
	120% or more of MSA/IL median	1164	19	1.6%	4	0.3%	54	4.6%	47	4.0%	4	0.3%	3	0.3%	34	2.9%	-	0.0%	11	0.9%



Table IV – 20 Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income

Conventional Loans																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	2 or more minority races	3		0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	1	33.3%		0.0%	-	0.0%	3	-
	American Indian or Alaska Native	25	1	4.0%	-	0.0%	4	16.0%	2	8.0%	-	0.0%	1	4.0%	2	8.0%	-	0.0%	25	1
	Asian	62	4	6.5%	1	1.6%	6	9.7%	3	4.8%	-	0.0%	2	3.2%		0.0%	-	0.0%	62	4
	Black or African American	63	2	3.2%	-	0.0%	13	20.6%	3	4.8%	-	0.0%	1	1.6%	2	3.2%	2	3.2%	63	2
	Joint	57	1	1.8%	-	0.0%	3	5.3%	6	10.5%	-	0.0%		0.0%	1	1.8%	-	0.0%	57	1
	Native Hawaiian or Other Pacific Islander	4	1	25.0%	-	0.0%	3	75.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	4	1
	Race Not Available	691	37	5.4%	1	0.1%	47	6.8%	24	3.5%	-	0.0%	13	1.9%	17	2.5%	7	1.0%	691	37
	White	7520	378	5.0%	16	0.2%	729	9.7%	235	3.1%	23	0.3%	93	1.2%	46	0.6%	68	0.9%	7520	378



Ethnicity	Ethnicity Not Available	866	49	5.7%	3	0.3%	77	8.9%	24	2.8%	1	0.1%	27	3.1%	17	2.0%	8	0.9%	866	49
	Hispanic or Latino	79	4	5.1%		0.0%	19	24.1%	5	6.3%		0.0%	1	1.3%	2	2.5%	-	0.0%	79	4
	Joint	47	3	6.4%	-	0.0%	6	12.8%	1	2.1%	-	0.0%	-	0.0%	1	2.1%	-	0.0%	47	3
	Not Hispanic or Latino	7433	368	5.0%	15	0.2%	703	9.5%	243	3.3%	22	0.3%	83	1.1%	48	0.6%	69	0.9%	7433	368
Gender	Female	1661	111	6.7%	3	0.2%	207	12.5%	57	3.4%	3	0.2%	26	1.6%	16	1.0%	18	1.1%	1661	111
	Joint	3580	141	3.9%	6	0.2%	306	8.5%	103	2.9%	11	0.3%	36	1.0%	20	0.6%	27	0.8%	3580	141
	Male	2581	144	5.6%	8	0.3%	251	9.7%	97	3.8%	9	0.3%	39	1.5%	22	0.9%	27	1.0%	2581	144
	Sex Not Available	603	28	4.6%	1	0.2%	41	6.8%	16	2.7%	-	0.0%	10	1.7%	10	1.7%	5	0.8%	603	28
Income	Less than 50% of MSA/IL median	539	103	19.1%	3	0.6%	98	18.2%	7	1.3%	2	0.4%	16	3.0%	3	0.6%	12	2.2%	539	103
	50-79% of MSA/IL median	1137	109	9.6%	5	0.4%	160	14.1%	34	3.0%	4	0.4%	28	2.5%	10	0.9%	9	0.8%	1137	109
	80-99% of MSA/IL median	876	55	6.3%	2	0.2%	100	11.4%	27	3.1%	1	0.1%	20	2.3%	6	0.7%	12	1.4%	876	55
	100-119% of MSA/IL median	779	33	4.2%	1	0.1%	90	11.6%	33	4.2%	2	0.3%	11	1.4%	7	0.9%	4	0.5%	779	33
	120% or more of MSA/IL median	4776	118	2.5%	6	0.1%	347	7.3%	168	3.5%	14	0.3%	36	0.8%	42	0.9%	39	0.8%	4776	118



Table IV – 21 Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income

Refinance																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	2 or more minority races	7	1	14.3%	-	0.0%	1	14.3%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	American Indian or Alaska Native	5	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Asian	24	-	0.0%	-	0.0%	6	25.0%	1	4.2%	-	0.0%	1	4.2%	1	4.2%	-	0.0%	2	8.3%
	Black or African American	9	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	Joint	234	8	3.4%	1	0.4%	16	6.8%	10	4.3%	-	0.0%	1	0.4%	7	3.0%	-	0.0%	1	0.4%
	Native Hawaiian or Other Pacific Islander	2156	111	5.1%	3	0.1%	162	7.5%	62	2.9%	11	0.5%	3	0.1%	32	1.5%	-	0.0%	19	0.9%
	Race Not Available	249	8	3.2%	1	0.4%	16	6.4%	10	4.0%	1	0.4%	1	0.4%	6	2.4%	-	0.0%	1	0.4%
	White	13	-	0.0%	-	0.0%	-	0.0%	2	15.4%		0.0%		0.0%	1	7.7%	-	0.0%	-	0.0%



Ethnicity	Ethnicity Not Available	13	-	0.0%	-	0.0%	1	7.7%	1	7.7%		0.0%		0.0%	1	7.7%	-	0.0%	-	0.0%
	Hispanic or Latino	2160	112	5.2%	3	0.1%	168	7.8%	60	2.8%	10	0.5%	4	0.2%	32	1.5%	-	0.0%	21	1.0%
	Joint	482	31	6.4%	3	0.6%	42	8.7%	16	3.3%	2	0.4%		0.0%	15	3.1%	-	0.0%	4	0.8%
	Not Hispanic or Latino	1071	50	4.7%	1	0.1%	73	6.8%	24	2.2%	4	0.4%		0.0%	13	1.2%	-	0.0%	7	0.7%
Gender	Female	674	35	5.2%	-	0.0%	60	8.9%	25	3.7%	5	0.7%	4	0.6%	7	1.0%	-	0.0%	11	1.6%
	Joint	208	4	1.9%	-	0.0%	10	4.8%	8	3.8%		0.0%	1	0.5%	5	2.4%	-	0.0%	-	0.0%
	Male	170	20	11.8%	1	0.6%	15	8.8%	3	1.8%	1	0.6%	1	0.6%	9	5.3%	-	0.0%	2	1.2%
	Sex Not Available	289	21	7.3%	1	0.3%	32	11.1%	20	6.9%	2	0.7%		0.0%	7	2.4%	-	0.0%	3	1.0%
Income	Less than 50% of MSA/IL median	232	15	6.5%	-	0.0%	22	9.5%	9	3.9%	2	0.9%	2	0.9%	2	0.9%	-	0.0%	4	1.7%
	50-79% of MSA/IL median	209	11	5.3%	1	0.5%	21	10.0%	6	2.9%	1	0.5%		0.0%	3	1.4%	-	0.0%	-	0.0%
	80-99% of MSA/IL median	1363	52	3.8%	1	0.1%	90	6.6%	33	2.4%	5	0.4%	2	0.1%	18	1.3%	-	0.0%	10	0.7%
	100-119% of MSA/IL median	7	1	14.3%	-	0.0%	1	14.3%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%
	120% or more of MSA/IL median	5	-	0.0%	-	0.0%		0.0%	--	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%



Table IV – 22 Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income

Home Improvement Loans																				
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	2 or more minority races	1		0.0%	-	0.0%	1	100.0%		0.0%	-	0.0%		0.0%	-	0.0%	-	0.0%	1	
	American Indian or Alaska Native	9	1	11.1%	-	0.0%	2	22.2%	1	11.1%	-	0.0%	1	11.1%	-	0.0%		0.0%	9	1
	Asian	12		0.0%	-	0.0%	5	41.7%	-	0.0%	-	0.0%		0.0%		0.0%		0.0%	12	
	Black or African American	4	1	25.0%	-	0.0%	-	0.0%	2	50.0%	-	0.0%		0.0%		0.0%		0.0%	4	1
	Joint	1		0.0%	-	0.0%	1	100.0%	-	0.0%	-	0.0%		0.0%		0.0%		0.0%	1	
	Native Hawaiian or Other Pacific Islander	59	5	8.5%	-	0.0%	12	20.3%	3	5.1%	-	0.0%	2	3.4%	1	1.7%	-	0.0%	59	5
	Race Not Available	896	54	6.0%	4	0.4%	181	20.2%	52	5.8%	2	0.2%	6	0.7%	7	0.8%	10	1.1%	896	54
	White	64	7	10.9%	-	0.0%	12	18.8%	3	4.7%		0.0%	3	4.7%	1	1.6%	-	0.0%	64	7
Ethnicity	Ethnicity Not Available	15		0.0%	-	0.0%	6	40.0%	1	6.7%		0.0%	-	0.0%	-	0.0%	-	0.0%	15	



	Hispanic or Latino	6	1	16.7%	-	0.0%	3	50.0%	-	0.0%	-	0.0%	-	0.0%	-	0.0%	--	0.0%	6	1
	Joint	897	53	5.9%	4	0.4%	181	20.2%	54	6.0%	2	0.2%	6	0.7%	7	0.8%	10	1.1%	897	53
	Not Hispanic or Latino	206	14	6.8%	1	0.5%	57	27.7%	15	7.3%		0.0%	1	0.5%	2	1.0%	1	0.5%	206	14
Gender	Female	429	24	5.6%	2	0.5%	73	17.0%	22	5.1%	2	0.5%	3	0.7%	1	0.2%	3	0.7%	429	24
	Joint	299	19	6.4%	1	0.3%	66	22.1%	20	6.7%		0.0%	4	1.3%	4	1.3%	6	2.0%	299	19
	Male	48	4	8.3%		0.0%	6	12.5%	1	2.1%		0.0%	1	2.1%	1	2.1%		0.0%	48	4
	Sex Not Available	85	10	11.8%		0.0%	34	40.0%	3	3.5%		0.0%	1	1.2%	2	2.4%	1	1.2%	85	10
Income	Less than 50% of MSA/IL median	115	16	13.9%	2	1.7%	31	27.0%	6	5.2%		0.0%	1	0.9%	1	0.9%	2	1.7%	115	16
	50-79% of MSA/IL median	102	9	8.8%		0.0%	23	22.5%	5	4.9%		0.0%	2	2.0%	2	2.0%	1	1.0%	102	9
	80-99% of MSA/IL median	87	5	5.7%		0.0%	26	29.9%	8	9.2%		0.0%	1	1.1%	1	1.1%	2	2.3%	87	5
	100-119% of MSA/IL median	569	20	3.5%	1	0.2%	84	14.8%	36	6.3%	2	0.4%	4	0.7%	2	0.4%	4	0.7%	569	20
	120% or more of MSA/IL median	1		0.0%		0.0%	1	100.0%		0.0%		0.0%		0.0%		0.0%		0.0%	1	



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

While this data provides an insight into lending patterns in the Huntington-Ashland, WV-OH-KY, MSA, it should be noted that data identifying race that is unique to the City level would yield more conclusive findings and provide a more accurate understanding of any existing lending issues in the City. However, this data is not available.

4. Insurance

There was not suitable data available to determine if discrepancies existed in the rates and amounts of insurance coverage available to minority households in the City of Huntington. Further investigation and assessment are needed to determine if there is a barrier to fair housing choice.

D. Citizen Participation:

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

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

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

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

- City of Huntington Departments – January 21, 2020
- Economic Development & Job Training – January 23, 2020
- Huntington Human Relations Commission – January 22, 2020
- Homeless Services – January 22, 2020
- Housing Providers – January 22, 2020
- Faith-Based Organizations – January 21, 2020
- Social Services – January 23, 2020

Any identified stakeholders that were not available to attend the meeting, as well as some of the aforementioned stakeholders, were then called to either (1) follow-up if they partook in either of the Community Meetings or (2) discuss fair housing issues with agencies/individuals who were unable to attend one of the Public Meetings.

Public Hearing: The City of Huntington held one (1) Public hearing to engage the public and local organizations/agencies and help identify

issues impacting Fair Housing Choice. The Public Hearing was held on Wednesday, January 22, 2019 in City Council Chambers.

There was 1 (one) resident attendee at the public hearing held on January 22, 2019. Additionally, the fifteen (15) scheduled meetings with various government staff, social service organizations, housing agencies, and realtors were well-attended. Public Meetings were advertised in the “The Herald Dispatch,” the largest newspaper in circulation in the area.

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

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

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

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

The online survey produced 343 responses. Actions to spread knowledge of the surveys included sending the survey to neighborhood organizations and associations for distribution, and emailing the link to interested parties. The information provided in these anonymous surveys were crucial in developing an accurate assessment of fair housing issues in the City.

The following is a summary of the 343 responses received:

Notable Characteristics

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

- The majority of respondents are female at 67.18%.
- The vast majority (83.27%) of respondents are White.
- Just over 2/3 (68.6%) of the respondents were under the age of 50. More than two-fifths of respondents were under the age of 40 (41.16%).
- Of those that answered the question, 55.38% were either a two-person or three-person household.
- 74.44% of respondents felt that residents of the City did not know how to report fair housing violations, and 63.53% thought fair housing complaints were not reported due to distrust of process.

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

Accessibility:

- 65.43% of respondents believe that there is a need for curb and sidewalk improvements in the City.
- 20.37% of respondents believe there is not enough handicap access in their neighborhoods.
- 22.55% of respondents believe there is a need for ADA surfacing to recreational facilities.
- 22.88% of respondents believe there is a need for more ADA Equipment at recreational facilities.

Employment:

- 77.58% of respondents believe that there is a lack of job opportunities.
- 37.12% of respondents cite the lack of transportation as a barrier to employment.
- 39.15% of respondents cite lack of childcare as a barrier to employment.
- 31.32% of respondents cite the lack of job training as a barrier to employment.

Housing:

- 42.90% said that there is a need for affordable housing.
- 77.95% said that negligent landlords were a major issues in the City.

- 53.78% said there is a need for major housing rehabilitation.
- 50.15% of respondents believe that there is a need for more code enforcement.
- 15.11% of respondents cite lead paint and pipes as a problem.

Fair Housing:

- Only 7.42% of respondents are aware that residents can make reasonable housing accommodation requests to their landlords.
- 61.84% believed residents did not know who to contact, and 31.80% were unsure of who to contact.

Reasons Fair Housing Complaints Are Not Reported:

- 56.44% specifically mention fear of retaliation, including eviction, legal reprisal, and poor retreatment.
- 74.44% point to a lack of knowledge in reporting practices as a cause.
- 44.36% of respondents believed the process took too long.
- 63.53% of respondents believed that distrust of the process contributes to the lack of reporting.

Transportation:

- 46.64% of respondents stated believe that there are not enough service hours for public transit.
- 29.83% of respondents believed that there is a lack of parking in the City.
- 56.72% of respondents believe that the City needs more walkability.
- 26.89% of respondents felt that the bus routes are too disconnected.

Other:

- 28.67% of respondents use some type of medical social service.
- 10.75% of respondents use some type of mental health social service.
- 54.12% of respondents do not use any type of social service.
- 89.54% of respondents believed that drugs are a crime issue in the City.
- 86.77% of respondents believed that theft is a crime issue in the City.



The following table illustrates the types of situations that may result in further discriminations and/or barriers to fair housing in the City of Huntington:

Table IV – 23 - Resident Survey Results

	Strongly Agree	Agree	Neutral / Unsure	Disagree	Strongly Disagree
State or Local Laws and policies that limit housing choice	12.00%	20.00%	54.80%	7.60%	5.60%
Lack of fair housing organizations in the City	14.68%	34.52%	38.49%	7.14%	5.16%
Lack of knowledge among bankers/lenders regarding fair housing	12.45%	27.31%	48.19%	6.43%	5.62%
Lack of knowledge among landlords and property managers regarding fair housing	25.79%	35.32%	26.98%	6.75%	5.16%
Lack of Knowledge among real estate agents regarding fair housing	13.55%	25.50%	45.42%	7.97%	7.57%
Lack of knowledge among residents regarding fair housing	30.52%	38.96%	24.90%	1.61%	4.02%
Lack of accessible housing for persons with disabilities	24.80%	33.60%	34.80%	3.60%	3.20%
Lack of accessibility in neighborhoods (i.e. curb cuts)	29.92%	34.43%	29.10%	3.69%	2.87%
Lack of fair housing education	28.00%	41.20%	24.40%	2.80%	3.60%
Lack of affordable housing in certain areas	40.65%	30.89%	19.92%	4.88%	3.66%
Concentration of subsidized housing in certain neighborhoods	32.67%	31.87%	29.48%	3.59%	2.39%
Other barriers	14.20%	15.91%	66.48%	0.00%	3.41%

Source: Citizen Survey

Public Meeting on the Draft AI Public Comments

The 2020-2024 Analysis of Impediments to Fair Housing Choice was made available on the City of Huntington's website at <http://www.cityofhuntington.com/>, and hardcopy were available upon request.



In discussions with residents and other invested parties, the following comments were made:

- **Housing Opportunities:**

- There is a shortage of affordable housing in the City of Huntington that is decent, safe, and sanitary.
- Much of the City's housing stock is in need of major rehab.
- The population and the housing supply of the City of Huntington have been decreasing. However, the population is decreasing at a faster rate.
- The number of renter-occupied and owner-occupied units have been decreasing in the City of Huntington.
- Due to large amounts of student debt, individuals are struggling to find housing loans.

- **Cost Overburden:**

- Lower household incomes create cost overburdened housing conditions; According to the 2013-2017 ACS approximately 18.3% of homeowners and 60.8% of renters in the City are cost overburdened of 30% or more.
- Individuals and families in the lowest-income areas struggle to find high wage jobs.
- The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs.

- **Disability/Accessibility:**

- There is a lack of housing in the City that is accessible and affordable for the elderly, the disabled, and persons with special needs.
- The denial by some landlords to make reasonable modifications and accommodations limits the amount of accessible units in the City that are for rent for persons with special needs.
- The limited public transportation network in the City is not convenient for lower income households to go to: work, health care, shopping, etc., which limits the choices where a low-income household can live.
- The City of Huntington not designed for walkability, and there is a need for sidewalks in many portions of the City.



- Landlords will frequently refuse to make reasonable modifications and accommodations, and discriminate against elderly tenants.

- **Fair Housing:**

- Tenants and homebuyers do not always file housing discrimination complaints when they have been discriminated against, either because they do not know about the Fair Housing Act or they do not know where to report complaints.
- There is a lack of awareness of tenants' rights and landlords' responsibilities, including what reasonable modifications and accommodations are.

DRAFT

V. Actions 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.

The City of Huntington's FY 2020-2024 Analysis of Impediments to Fair Housing Choice has identified the following impediments, goals, and strategies to affirmatively further fair housing.

- **Impediment 1: Fair Housing Education and Outreach**

There is a need to educate members of the community concerning their rights and responsibilities under the Fair Housing Act and to raise awareness, especially for low-income households, that all residents of the City have a right under federal law to fair housing choice.

Goal: Improve the public's knowledge and awareness of the Federal Fair Housing Act, and related laws, regulations, and requirements to affirmatively further fair housing in the City.

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

1-A: Continue to promote Fair Housing awareness through the media and with assistance from local/regional social service agencies, by providing educational awareness/opportunities for all persons to learn more about their rights and requirements under the Fair Housing Act and Americans with Disabilities Act.

1-B: Continue to make available and distribute literature and informational material concerning fair housing issues and an individual's rights.

1-C: Educate landlords on their responsibilities to make reasonable accommodations for disabled tenants.

1-D: Update the information on the City's website about whom to contact and how to file a fair housing complaint, as well as general Fair Housing information for homeowners and renters.

1-E: Strive for better intergovernmental cooperation between Federal, State, County, and local partners, as well as community groups and developers, to effectively identify and address potential barriers to affordable housing choice.

- **Impediment 2: Public Policies and Regulations**

The City's Zoning Code needs additional definitions, provisions, and revisions to be compliant with the Federal Fair Housing Act, Section 504, and the Americans with Disabilities Act, to affirmatively further fair housing.

Goal: The City's Zoning Code and land development policies will promote and affirmatively further fair housing.

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

2-A: The City should review the City's Zoning Ordinance and Building Codes for compliance with the Fair Housing Act, as amended.

2-B: Continue to revise and update definitions and add new definitions for the words: "Family," "Handicap (Disabled)," "Fair Housing Act," "Accessibility," "Visitability," etc.

2-C: Annually review the City's zoning ordinance and land development controls to be consistent with the City's goal to affirmatively further fair housing.

- **Impediment 3: Continuing Need for Affordable and Accessible Housing Units**

There is a lack of affordable and accessible housing units in the City of Huntington as the supply of affordable and accessible housing has not kept pace with the demand of individuals desiring to live independently.

Goal: Construction rehabilitation, and development of additional affordable rental and owner occupied housing units in the area, especially for households whose income is less than 80% of the median income will increase annually to meet the demand for housing.

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

3-A: Support and encourage both private and non-profit housing developers to undertake plans for the construction of new affordable and accessible renter and owner occupied housing that would be located in areas that provide access to employment opportunities, transportation, amenities, and services throughout the City.



3-B: Support and encourage the rehabilitation of existing housing units in the City to become decent, safe, and sound renter and owner occupied housing that is affordable and accessible to lower income households.

3-C: Continue to enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so units become accessible to tenants who are disabled, as well as educating the disabled how to request special accommodations.

- **Impediment 4: Private Lending and Insurance Practices**

The Home Mortgage Disclosure Act (HMDA) data suggests that there is a disparity between the approval rates of home mortgage loans originated from White and those originated from Minority applicants.

Goal: Approval rates for all originated home mortgage loans and insurance coverage should be fair, risk based, unbiased, and impartial, regardless of race, familial status and location.

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

4-A: Federal, state, local, and private funding should be used to provide a higher rate of public financial assistance to potential homebuyers in lower income neighborhoods to improve loan to value ratios, so that private lenders will increase the number of loans made in these areas.

4-B: Monitoring of the HMDA data should be accomplished periodically for compliance with the Fair Housing Act by an outside independent agency.



VI. Certification

Signature Page:

I hereby certify that this 2020 Analysis of Impediments to Fair Housing Choice is in compliance with the intent and directives of the Community Development Block Grant Program regulations.

Steve Williams Mayor, City of Huntington, WV

Date

Attached is the Resolution of the June 22, 2020 City Council Meeting approving the FY 2020-2024 Analysis of Impediment to Fair Housing Choice.