



**Analysis of Impediments
To
Fair Housing
2020-2024**



Analysis of Impediments to Fair Housing 2020-2024

Introduction

In conjunction with the Community Development Block Grant (CDBG) Program, the U.S. Department of Housing and Urban Development (HUD) requires that the City of Manhattan (the City) to complete an Analysis of Impediments to Fair Housing choice, and develop strategies and activities to overcome the effects of identified impediments, and maintain records that reflect the analysis and actions. The City will fund actions taken to overcome the effects of impediments to fair housing choice through the City's CDBG allocation.

Impediments to fair housing are defined as any actions, omissions, or decisions taken because of race, religion, sex, disability, familial status, or national origin that have any effect of restricting housing choice or the availability of housing choice.

This Analysis of Impediments reviews the City's laws, regulations, administrative procedures and practices, to assess how these may affect the location, availability and accessibility of housing. It also examines forces, public and private, which may affect fair housing choice for all protected classes within the City.

Methodology and Participants

The City's Community Development Department staff conducted the Analysis of Impediments during the development of the 2020-2024 Consolidated Plan. City staff gathered Information from numerous departments, agencies and data sources as shown below, and reviewed it for relevance to this analysis.

- U.S. Census Bureau – *American Community Survey data*
- U.S. Department of Housing and Urban Development – *Comprehensive Housing Affordability Strategy (CHAS) data*
- City of Manhattan: Human Resources and Risk Reduction Departments
- City of Manhattan: Community Development Zoning Ordinance
- Consumer Financial Protection Bureau: Federal Financial Institutions Examination Council and Community Reinvestment Act Reports
- Fort Riley U.S. Army Base, Plans, Analysis & Integration Office
- Kansas Human Rights Commission, *Annual Reports 2009 Et Seq.*
- Kansas State University (KSU) Registrar's Office & Office of Dining & Housing
- Kansas Department of Labor, Labor Market Information Services
- Riley County: Economic Development Office and Appraiser's Office
- Manhattan Area Housing Partnership, Inc.
- Manhattan Housing Authority
- Manhattan Chamber of Commerce
- Housing & Credit Counseling, Inc.
- Kansas Legal Services, Inc.

City of Manhattan Background Data

Geography

Manhattan is located in Northeastern Kansas approximately 120 miles west of Kansas City, with an area of approximately 20.3 square miles. The majority of the Manhattan city limits lie in southeastern Riley County, with a small commercial portion of the City in southwestern Pottawatomie County. Within the city limits, all of Manhattan’s residential areas are in Riley County.

Population

The 2018 American Community Survey (ACS) estimates Manhattan’s population was 55,489 persons, a 6.13% overall increase in population since 2010. The composition of residents in Manhattan is unique given the presence of Kansas State University and the U.S. Army Base at Fort Riley. The ACS estimates that 17.46% of Manhattan’s population are members of minority groups, a 12.18% increase since 2010. Of this percentage, 6.9% were Hispanic or Latino, and 10.2% were foreign born. People identifying as Hispanic/Latino for all races represented a 1.07% increase in population, people identifying as Asian were 23.2% of the increase, and people who identified as two or more races were 24.58% of the increase, while the percentage of people who identified as white accounted for 4.9% of the increase from 2010. According to 2018 ACS estimates, 6.28% of the population identified as veterans.

2018 Estimated Population by Minority Status	Manhattan		KSU Fall 2019	
	Number	Percent	Students	Percent
<u>All Persons</u>	<u>55,489</u>	<u>100.00%</u>	<u>18,454</u>	<u>100.00%</u>
White	45,801	82.54%	14,026	75.76%
Black or African American	2,932	5.28%	487	2.63%
American Indian and Alaska Native	191	0.34%	84	0.45%
Asian	3,313	5.97%	391	1.71%
Native Hawaiian and Other Pacific Islander	72	0.13%	16	0.08%
Two or More Races	2,255	4.06%	608	3.29%
All Other Races/Unspecified	925	1.67%	205	1.11%
International Students with Visas at KSU			1,384	7.49%
Hispanic (all races)	3,832	6.91%	1,327	7.19%
Foreign Born (all races)	5,665	10.2%		
<i>Source: U.S. Census Bureau and KSU Registrar’s Office</i>				

Manhattan has a diverse community of foreign-born persons representing 10.2% of the total population, and approximately 7% of the Kansas State University population. Of all foreign-born persons in Manhattan in 2018, 58% were from Asian nations, 24.4% were from Latin American nations, 10.8% were from European nations, and 5.8% were from an African nation. The remaining 1% were from various other nations.

Language

The 2018 ACS estimates that of people 5 years of age and over living in Manhattan, 12.5% spoke a language other than English at home. Asian and Pacific Islander languages represented 4.0%, Spanish

languages represented 4.2% and 2.9% spoke an Indo-European language. Approximately 1.4% spoke some other language. Since the 2010 Census, Spanish languages represented a 1.5% increase and Asian and Pacific Islander languages experienced a .9% increase.

Age

The 2018 ACS estimates more than half of Manhattan's population (51.3%) was 24 years of age and younger with the majority of that group, 27.5%, between the age of 20 and 24. People between the ages of 25 and 64 comprised 40.3%, and 8.4% of the population was 65 and over.

Disability

Among non-institutionalized people in Manhattan in 2018, the ACS estimates 9.9% of the total population reported as having a disability. The percent reporting a disability varied by age: 28.9% of the 5,280 people reporting to have a disability were 65 and older; 8.9% were between the ages of 18 to 64; and 4% were under 18.

Education

Manhattan is considered well educated as 96% of residents over age 25 have at least earned a high school diploma, and approximately 52% have a Bachelor's degree or higher, and 25.3% have a graduate degree. An estimated 4% did not graduate high school.

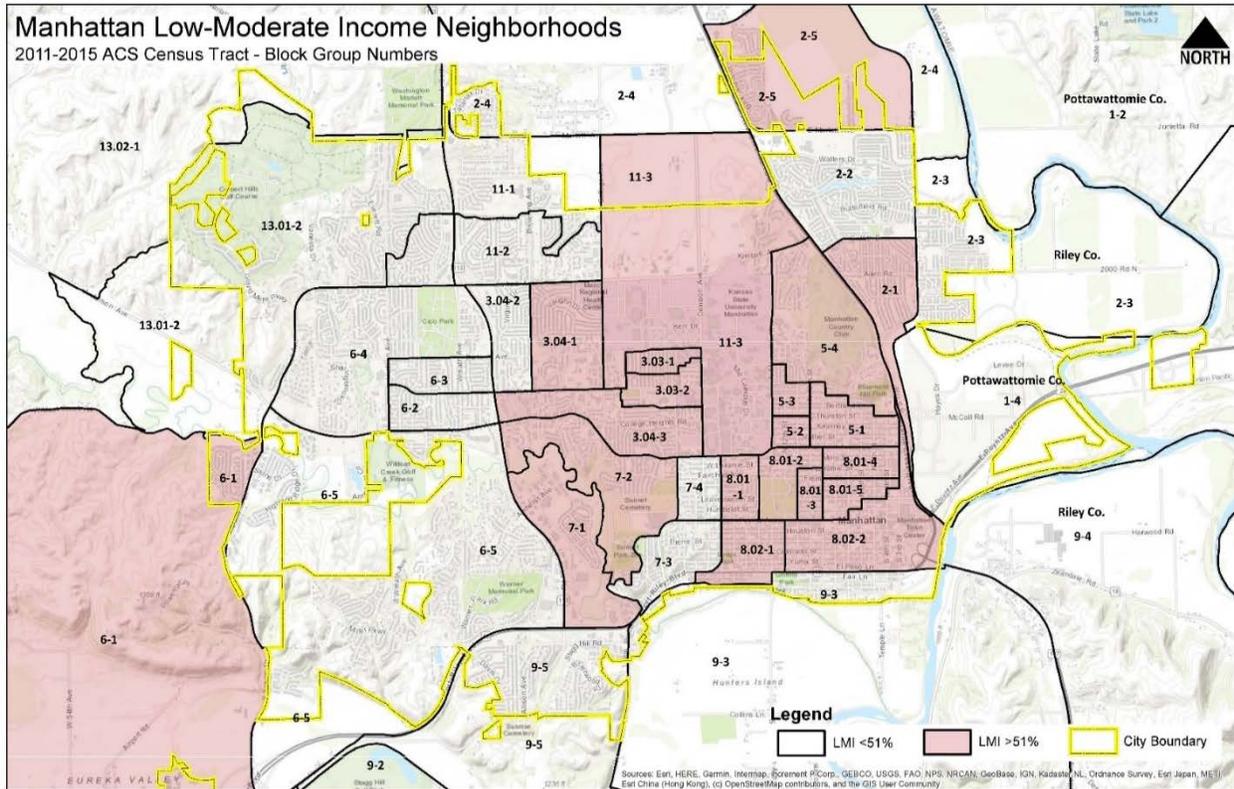
Households and Families

Manhattan is primarily composed of small family household arrangements where 46.2% of households are families of all types; householders living alone represent 33.4% of all households, and 20.4% of households are other non-family arrangements. Approximately 45% of families have children under the age of 18. Of the 9,447 family arrangements, 78.9% are married couples, 5.7% are males with no wife present, and 15.4% are females with no husband present. The average household size is 2.41 persons, and the average family size is 2.93 persons.

Income

The 2018 ACS data indicates that Manhattan Median Family Income (MFI) was \$49,279, and Median Non-family income was \$32,163. In 2018, 25.40% of all Manhattan residents had an income below the poverty threshold for the previous 12 months. Of all the people at or below the poverty threshold, 6.7% were in families, and 48% were unrelated individuals 15 years of age and older, with 30% between the ages of 18 to 64 years. Manhattan residents with some sort of health insurance coverage (public or private) is 94.30% of the non-institutionalized population.

Of the full-time, year-round workers with earnings, at least 40.46% were earning less than 80% of Manhattan's median family income, and therefore are classified as Low and Moderate Income (LMI) households. While still significant, the measure remains essentially flat, as it reflects a decrease from the 2010 measure of 41% earning less than 80% of the Median Income, yet is a slight increase from the 2014 measure of 39%. Male Median Income was 12.8% higher than Female Median Income. Female head of households with related children under the age of 5 represented nearly 37.7% of the families whose income was below the poverty level. The map below identifies the neighborhoods where 51% of the population is at or below the median income.



Employment

The 2018 ACS data indicates that the City of Manhattan, Kansas had 48,218 people who were age 16 and over. Approximately 68.6% of these people were in the labor force and 31.4% were not in the labor force, with 13.3% identifying as retired. Of the entire employed labor force, 64.20% were private salary and wage workers; 31.3% were federal, state, or local government workers; and 4.3% were self-employed. The City’s largest employers are Kansas State University, Fort Riley, USD 383, Champion Powered by GTM Sportswear, and Ascension Via Christi. The 5-year trend is that there are 1.6% more people in the workforce, yet the number of retired persons has also increased by 1%. Private employment dropped by 1.6 %, while Government workers increased by .5%, and self-employed persons increased by 1.0%.

Fort Riley is a United States Army Installation approximately 15 miles west of Manhattan with a total economic impact population of 67,267, which includes both on and off post military and civilian employees, contractors, family members, veterans and retirees within the surrounding Flint Hills Region, including Clay, Dickinson, Geary, Morris, Pottawatomie, Riley, Saline and Wabaunsee Counties. In Fiscal Year 2019, the military strength was 14,985, with an additional 3,818 civilian population and 2,160 other civilians including contractors—totaling 20,963.

Since 2012, the U.S. Department of Agriculture (USDA) and the U.S. Department of Homeland Security (DHS) have been working to bring online a new National Bio and Agro-Defense Facility (NBAF) in Manhattan, Kansas. This state-of-the-art bio-containment facility will study foreign animal, emerging, and zoonotic (transmitted from animals to humans) diseases that threaten the U.S. animal, agricultural and public health. In 2015, the DHS Science and Technology Directorate began constructing the facility for the USDA, which will own, manage and operate the NBAF once fully commissioned, expected in 2021. USDA’s Agricultural Research Service (ARS) and the Animal and Plant Health Inspection Service (APHIS) will also

conduct foreign animal disease research, training, and diagnostics in the facility, bringing 400 full-time employees by the time it is fully operational.

Top Area Employers	Area City	Goods & Service	Total Employees (FT & PT)
Fort Riley – Military, Civilian & Contractor	Manhattan	Military- Related	20,963
Kansas State University	Manhattan	Higher Education	6,136
USD #383	Manhattan/Ogden	Public Schools	1,600
Champion Powered by GTM Sportswear	Manhattan	Retail & Manufacturing	660
Ascension Via Christi Hospital	Manhattan	Healthcare	570
Meadowlark Hills	Manhattan	Retirement & Assisted living	515
Foot Locker Distribution Center	Junction City	Warehouse & Distribution	500-600
Smithfield Packaged Meats	Junction City	Meat Packing	400-500
Walmart	Manhattan	Retail	412
Walmart	Junction City	Retail	400-500
Caterpillar	Wamego	Manufacturing	410
The Onyx Collection, Inc.	Belvue	Manufacturing	400

Source: Manhattan Chamber of Commerce

Housing Profile

According to the 2018 ACS, Manhattan had 23,440 housing units available, of which 20,439 were occupied, and 3,001 were vacant. Housing type consisted of 61.3% being tenant-occupied, 38.7% owner-occupied, and 4.4% were mobile homes. Housing built before 1979 represents 49.4% of all housing stock, and housing built after 2010 comprised 9.6% of stock. Of all housing units available, 48.7% were single-family houses either not attached to any other structure or attached to one or more structures (commonly referred to as “townhouses” or “row houses”). Multi-unit structures or those buildings that contained two or more **apartments** constituted 46.9% of all housing units, and 4.4% were mobile homes, while the ACS classifies any remaining housing units as “other,” which include boats, recreational vehicles, vans, etc. The median number of rooms in all housing units is 4.9 and 50.7% of all housing units had 3 or more bedrooms.

The ACS 2018 currently estimates the vacancy rate for owner-occupied units at 1.3%, and 10.5% for rentals. The high percentage of developed rental housing in Manhattan is due to the transient nature of students at Kansas State University and military members stationed at the Fort Riley U.S. Army Base.

The U.S. Department of Housing and Urban Development (HUD) helps low-income households rent affordable units through a subsidy program called Section 8. The Section 8 program relies on a combination of data from private rental market rates and local housing market conditions, to determine an affordable rate, called the Fair Market Rate (FMR), for two-bedroom units. HUD uses two bedrooms as the standard for calculating Fair Market Rent and the 2013-2017 5-year American Community Survey (ACS) estimates of 2-bedroom gross rents calculated for each FMR area were used as the new basis for the new FY2020 rates. HUD estimates FMRs for efficiency units, one-bedroom units, three-bedroom units,

and units of other sizes, using the two-bedroom estimate as a base, which makes the FMR a good barometer of local rental market trends.

Fair Market Rent (FMR) estimates for the Manhattan, KS, Metropolitan Statistical Area began in 2010. In 2018, the two-bedroom FMR rate in Manhattan saw its largest single year increase, going up by 21.15% for a two-bedroom apartment. In 2019, the FMR for a two-bedroom experienced a 6.9% decrease, followed by a 2.6% increase in 2020.

Listed in the table below are the Fair Market Rents for the Manhattan MSA from 2010, the first year that Manhattan was an Entitlement Community:

Recent History of Fair Market Rents By Unit Bedrooms					
FMR Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Final FY 2010	\$ 435	\$ 502	\$ 609	\$ 848	\$ 997
Final FY 2011	\$ 442	\$ 509	\$ 618	\$ 860	\$ 1,011
Final FY 2012	\$ 481	\$ 554	\$ 673	\$ 937	\$ 1,101
Final FY 2013	\$ 627	\$ 631	\$ 830	\$ 1,196	\$ 1,470
Final FY 2014	\$ 594	\$ 598	\$ 786	\$ 1,132	\$ 1,392
Final FY 2015	\$ 586	\$ 590	\$ 776	\$ 1,118	\$ 1,374
Final FY 2016	\$ 688	\$ 692	\$ 912	\$ 1,329	\$ 1,590
Final FY 2017	\$ 627	\$ 631	\$ 837	\$ 1,210	\$ 1,471
Final FY 2018	\$ 762	\$ 767	\$ 1,014	\$ 1,463	\$ 1,779
Final FY 2019	\$ 722	\$ 727	\$ 944	\$ 1,330	\$ 1,658
Final FY 2020	\$ 752	\$ 757	\$ 969	\$ 1,334	\$ 1,701

Source: HUD FY 2020 Fair Market Rent Documentation System

The City requires landlords to register their rental units, and there are approximately 1,651 landlords who own 4,630 structures that contain a total of 12,973 units. The City does not currently track the number of bedrooms per unit. Rents range in price, and may be based on quality and age of the unit, available square footage, proximity to amenities and recreation, or favored areas such as shopping areas, the Downtown/Mall area, or Aggieville, the KSU Campus, or near major highways. The median market rate for a 2-bedroom unit in December of 2018 was \$908.

Fort Riley, through partnership with Corvais Property Management, maintains 4,415 family housing units on base for soldiers and their families, and 6,317 barracks spaces for single soldiers, which addresses the housing need of approximately 70% of enlisted personnel. Approximately 1,800 soldiers and 800 civilian employees of the base reside in Riley County. As drawdown of foreign deployments continue, the Army expects longer local deployments and a stable number of families accompanying their soldiers. The civilian employment on the base has slightly increased in the last five years, and construction employment on the base has been relatively stable. Pending any Department of Defense (DOD) base realignments, the effect of the base on the Manhattan housing market for the next several years should be relatively stable.

The Manhattan campus of Kansas State University had 18,454 students enrolled in the fall of 2019, but only had housing for approximately 5,750 individuals and foreign students and their families. The balance of the local campus student population and KSU employees live either in Sororities, Fraternities, or in private housing in Manhattan and the surrounding towns and rural areas. The demand for on-campus housing has been consistently greater than the on-campus housing supply. The 2018 addition of 540 beds has increased supply of on-campus housing for the next few years; however, distance learning combined with other factors continues to place downward pressure on student population. The next housing type that the KSU Office of Dining and Housing will be interested in constructing will likely be apartment style units, which it has been doing in portions of the Jardine housing area on campus.

Key housing statistics listed below are from U.S. Census and 2018 ACS data for tenant and owner occupied housing.

Tenant Occupied

- **60.0%** of all rental units are affordable to households with incomes between 50% and 80% of HUD MFI.
- **15.2%** of all rental units are affordable to households with incomes between 30% and 50% of HUD MFI.
- **3.0%** of all rental units are affordable to households with incomes less than 30% of HUD MFI.
- **54%** of all tenants pay 30% or more of their income to rent, based on ACS 2018 data.
- **2.34 persons** is the average household size of tenant-occupied units.
- **\$ 908** is the ACS 2018 estimate for median rent cost.

Owner Occupied

- **23.4%** of all units for sale are affordable to households at 80% of HUD MFI.
- **15.4%** of all units for sale are affordable to households at 50% of Median Income.
- **0%** of all units for sale are affordable to households at 30% of Median Income.
- **62.15%** of all housing units have mortgage.
- **22.6%** of homeowners **with** a mortgage paid 30% or more to monthly housing costs.
- **10.1%** of homeowners **without** a mortgage paid 30% or more to monthly housing costs.
- **2.53 persons** was the average household size of owner-occupied units.
- **\$213,750** is the ACS 2018 estimated **median** price for a home in Manhattan, Kansas

Housing Problems:

The four categories of Housing Problems defined by HUD are those lacking a complete kitchen, lacking complete plumbing facilities, more than 1 person per room, or cost burden greater than 30% of income.

HUD defines disproportionately greater housing need as when a racial or ethnic group experiences housing problems at a rate higher than 10% of the rate for the Adjusted Median Income (AMI) level as a whole. HUD defines *Severe Housing Costs* as paying more than 50% of income to housing costs, and *Severe Overcrowding* as more than 1.5 people per room. Income classifications are a percentage of area median income (AMI) and are as follows:

- Extremely low income: 0% - 30% of AMI
- Low income: 30.1% - 50% of AMI
- Moderate income: 50.1% - 80% of AMI

Each year, HUD receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These "CHAS" data (Comprehensive Housing Affordability Strategy) tables demonstrate the extent of housing problems and housing needs, particularly for low-income households. HUD provides the CHAS data to local governments to plan how to spend HUD funds. The most current data on the table below is from 2011-2015 CHAS. It summarizes the percentage difference of each racial/ethnic group experiencing housing problems at each level of Adjusted Median Income, and includes all of the four housing problems by Race and Ethnicity.

Summary of Populations with One or More Housing Problems					Household has no or negative income but none of the other housing problems
Housing Problems	0-30% AMI	30%-50% AMI	50%-80% AMI	80-100% AMI	Only 0-30% AMI report this issue
Jurisdiction as a whole	82.59%	83.25%	51.45%	27.05%	13.21%
White	81.38%	82.91%	54.06%	29.84%	14.86%
Black / African American	94.64%	93.75%	72.86%	6.25%	0.00%
Asian	90.91%	81.82%	8.33%	11.76%	5.30%
American Indian, Alaska Native	72.73%	100.00%	0.00%	0.00%	0.00%
Pacific Islander	0.00%	50.00%	0.00%	0.00%	0.00%
Hispanic	92.05%	87.18%	59.88%	13.46%	6.28%

Of all of the groups that experienced a disproportionately greater need and for all housing units, LMI Black/African American populations at all levels of low income, appear to have a disproportionate housing problem, as well as very low income Native Americans.

ACS Data from 2014-2018, also shows that 54.1 % of **Renters**, 22.65% of all **homeowners with** a mortgage, and 10.18% of **homeowners without** a mortgage have housing costs that are more than 30% of their income.

Housing Cost Burden	<=30% of Income	30-50% of income	>50% of income	No / negative income (not computed)
Jurisdiction as a whole	59.98%	17.51%	18.91%	3.60%
White	61.04%	17.84%	18.50%	2.62%
Black / African American	57.75%	15.96%	22.07%	4.23%
Asian	62.56%	12.97%	14.83%	9.64%
American Indian, Alaska Native	54.55%	9.09%	36.36%	0.00%
Pacific Islander	78.95%	21.05%	0.00%	0.00%
Hispanic	46.12%	25.00%	20.26%	8.62%

The assessment of just cost burden above indicates that it is greatest housing problem for all races and ethnicities, and that the disproportionate need for Black/African Americans is related to issues other than cost, while for Native Americans the issues are related specifically to cost. Hispanic persons also have a borderline disproportionate need that are related to a combination of issues including cost.

Overcrowding

HUD defines overcrowding as a unit with more than one person per room, and it has declined in the City since the 2010 Census high of 9.1% for all housing units, of which 7% were overcrowded tenant-occupied units. In 2013, the City modified the zoning for neighborhoods near campus in order to permit development of higher density housing developments, and in 2016 and 2017, one developer constructed over 600 new rental units, which allowed the vacancy rate for rentals to moderate some from earlier years. These actions appear to have resulted in a decrease in overcrowding in all housing units; as the most current estimates for all overcrowded units is currently at 3.4% in 2018.

Condition of Rental Housing

The Risk Reduction Division of the Manhattan Fire Department investigates all complaints regarding the condition of rental housing. The City advises Landlords when corrective action must be taken and remediation is pursued for issues that involve health and safety. If Landlords do not address the issues, the City may take enforcement action as allowed by ordinance and adopted code.

The City of Manhattan does not have its own definitions to describe housing condition; however, all new housing must meet adopted codes. The City has adopted the 2018 International Building Code Series, including the Residential Code and Existing Building Code, and the 2017 National Electrical Code. The City uses the Federal Fair Housing guidelines for accessibility compliance in covered multifamily dwellings, which references the American National Standards Institute (ANSI) requirements for accessibility

Lead Based Paint

According to the ACS 2018 data, 49.4% of all housing units in Manhattan were built prior to 1979. The City assumes that any structure built prior to 1978 contains lead-based paint, and any housing rehabilitation performed by the City where paint is disturbed includes a lead based paint risk assessment. The City uses the assessment to identify hazards, which require lead safe work practices. The City requires all general contractors who successfully bid projects to be State authorized as lead activity firms, and must employ certified lead safe workers. A certified lead based paint inspector monitors lead paint related work and reports control measures to the State office. The City of Manhattan will continue to use lead safe work practices in all rehabilitation activities pursuant to 40 CFR 745.80 subpart E.

Ownership Market

The homeownership rate has declined over the last 5 years by 0.6%; while the vacancy rate for single-family homes has also declined slightly to 1.3%. The increase in an equal amount of available rental units suggests that some single-family housing stock has been converted to rental units. The local real estate market has fluctuated with regard to the number of annual sales and the changes in average prices since 2010, but overall has trended downward since 2014. The median housing costs for mortgaged owners was \$1,586 in 2018.

Manhattan Ownership Market										
Year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Homes Sold	584	587	655	701	738	767	797	732	712	675
Average Price	\$193,186	\$189,505	\$195,495	\$197,495	\$208,485	\$212,457	\$217,035	\$217,720	\$215,260	\$222,793

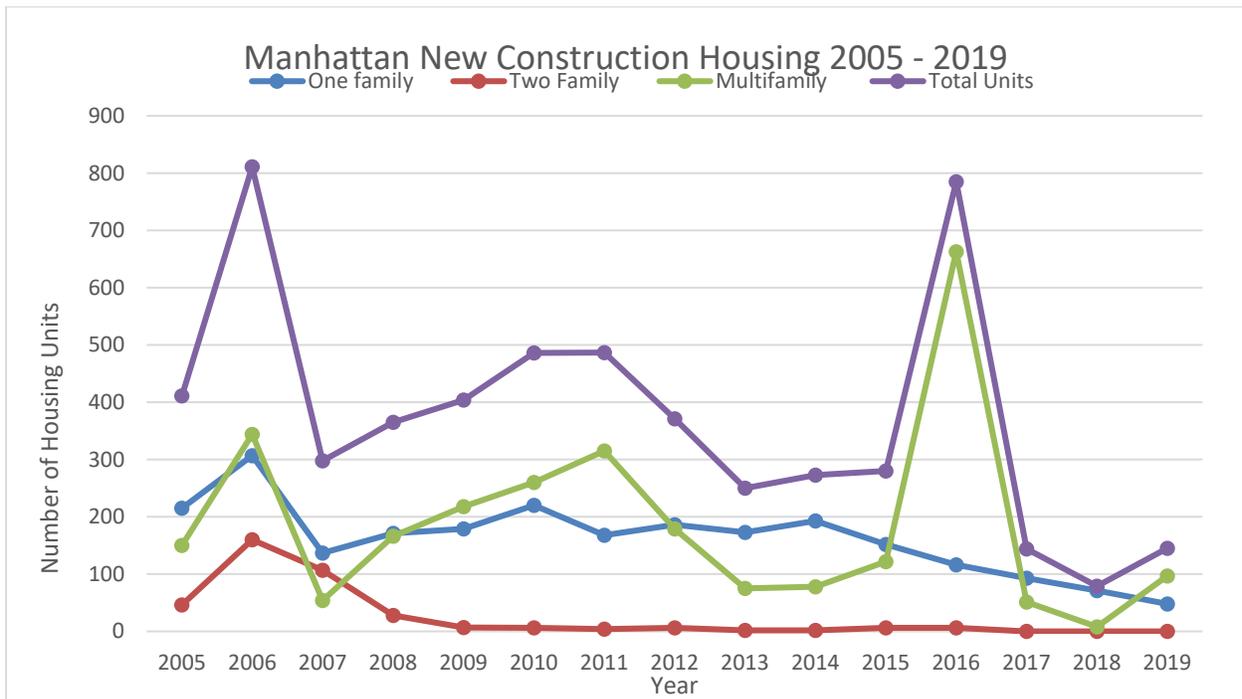
Source: Riley County Appraisers' Office and includes single-family homes and townhomes sold in valid open-market transactions only.

Housing Stock Condition

According to the 2018 ACS, approximately 49.4% of Manhattan’s housing stock was built prior to 1979. Of the entire housing stock, ACS 2018 data indicates that only 0.40% of all occupied housing units lack complete plumbing, and 0.90% lack a complete kitchen. This is a decrease in the number of units without complete plumbing facilities (.69% in 2010) and an increase in the number of units without complete kitchen facilities (.54% in 2010). This may be due to any number of reasons including conversion of older homes where tenants share a common area, homeowners renting rooms, and buildings not intended to be rentals being used for residential use, among others. The City will continue to monitor these issues, and will take steps to address them as discovered.

This data also estimates that 1.2% of units are overcrowded, and 2.2% of units are severely overcrowded. HUD defines ‘Overcrowding’ as having greater than one person per room, and in the 2010 census, the percentage of units overcrowded was 5.5%. Projections in 2014 indicated the percentage of overcrowded units had increased to 7.5%. The City responded and up-zoned an area east of Kansas State University to the Urban Core Residential District to allow for greater density and a concentration of student housing near the University, which resulted in several multi-unit housing developments. Other housing developments begun after in 2016 have contributed to increased supply of rental units and contributed to the estimate of overcrowding decreasing to 3.4%.

New Construction



Source: Manhattan Risk Reduction Department, January 2020

New construction activity in Manhattan has varied since the national real estate and economic downturn in 2008 - 2009. The City of Manhattan was relatively unaffected by the Crisis and saw an increase in housing until 2010-2011, when new construction in Manhattan experienced a steep decline, particularly in new multi-family housing units. The number of new single-family home permits stayed relatively flat until 2014, when it began a steady decline. From 2016 to 2017, Manhattan experienced a sharp spike in

multi-family housing unit permits, due to one-developer beginning construction of 600+ new multifamily units, which dropped back to typical levels in 2018. Most recent data indicates the trend for 2019 again appears to indicate an increase in multi-housing units, while single-family housing construction continues to decline. The current estimated vacancy rate for single-family housing is 1.3 % of all single-family units, and indicates a shortage of this type of housing.

The City continues to work with private developers to provide housing choices. The City promotes neighborhoods that contain a mix of land uses and diversified housing options to serve a growing and changing population, including housing that is affordable throughout the community. City Administration is currently combining Subdivision and Zoning Regulations into a new Unified Development Ordinance, which the City anticipates adopting in 2020. This consolidation is intended to ease barriers to development and allow for the construction of higher density residential buildings. The Manhattan Urban Area Planning Board and Manhattan City Commission develop, adopt and update the Comprehensive Plan and other policy and regulatory documents for the City.

The City also utilizes an annual Capital Improvements Plan process to identify and fund public infrastructure projects that support a wide variety of housing development. This important process identifies and addresses infrastructure needs that directly affect all neighborhoods and amenities, especially as relates to flooding, transportation options, utilities, and healthy lifestyles.

Over the past several years, the City has encouraged the development of new multi-family housing units in various ways, which has resulted in an increased supply of rental housing, and a healthier vacancy rate. The Manhattan Area Housing Partnership, Inc., (MAHP) a local CHDO, and other private partners continues to work to provide affordable housing. In 2017, it was awarded tax credits to develop 42 new low-income units, and in 2019 was awarded tax credits and state operated Home Funds to develop 36 affordable senior housing units. The City has acted positively on resolutions of support for these projects and in some cases, waived building permit fees and utility hookup fees. In 2019, the City donated land purchased at a tax auction to the MAHP for the affordable senior living development.

Manhattan Housing Authority

A seven-member Board of Commissioners appointed by the Mayor, with the consent of the City Commission, governs the Manhattan Housing Authority (MHA). The Executive Director manages the day-to-day operations and 8 staff members. The mission of the MHA is to assist income-qualified persons with decent, safe and affordable housing in an efficient, ethical and professional manner. MHA policies consistently follow and affirmatively further HUD's fair housing goals.

The Manhattan Housing Authority is the only Public Housing Authority (PHA) in Manhattan that owns and operates housing units. MHA operates six public housing properties, with a total 232 units, consisting of the following: Apartment towers 88 units; Baehr Place 20 units; Carlson Plaza 47 units; Pottawatomie Court 28 units; Hudson Circle 19 units; and Flint Hills Place 30 units. The MHA manages an additional 78 units in two tax-credit housing communities. The MHA is also responsible for the disbursement of 197 Section 8 Housing Choice Vouchers, 55 Veterans Affairs Supportive Housing Vouchers, and 25 Family Reunification Vouchers.

Currently, there are 73 applicants on the public housing waiting list, 14 of which are waiting for a one-bedroom unit. There are currently 129 applicants on the Section 8 Housing Choice Voucher (tenant-based) waiting list, with applications dating back to 2018.

In 2014, the MHA was awarded a Capital Fund Reserve for Emergencies and Natural Disasters (Emergency Funds) grant to renovate the Apartment Towers, the first high rise in Manhattan that is also a public housing structure. The funds from this grant were allocated towards basic interior renovations, and removal of mold and asbestos. The HUD funding did not include window replacement, and during renovation of the building, contractors discovered other issues with the sanitary sewer lines in and under the building. The City provided the MHA with a \$1 million bond in order to complete the additional needed repairs, including window replacement. This renovation alone accounts for improvements to 40% of the MHA’s available units.

The Manhattan Housing Authority was designated as a “Troubled Performer” as of 12/31/2018 in the Public Housing Assessment System. This is a direct result of the Apartment Towers renovations, which depleted MHA’s capital reserves. Additionally, MHA experienced higher than normal vacancy rates once the units at Apartment Towers were back online in late 2018. MHA was further challenged to lease the efficiency units, in part due to the increased area median income, which made some potential clients ineligible. Also contributing to the higher vacancy rates was the transfer of 15 residents back to the Apartment Towers, which vacated other public housing units they were temporarily occupying during the renovations. Finally, because the Apartment Towers renovations reduced financial available resources, MHA reduced maintenance staff through normal attrition, resulting in increased unit turnaround times. All of these factors had a combined impact on the Financial, Capital Fund and Management scores of the Public Housing Assessment System.

The MHA is working with the Department of Housing and Urban Development (HUD) to increase these scores through monthly monitoring of financial and occupancy scores, as well as on-site technical assistance as necessary. The City is aware of these issues that caused the troubled designation and has determined that by assisting with some needed fire safety improvements, the City will relieve some of the pressure on the MHA’s capital reserve fund, allowing it to replenish. The City also plans to set aside funds for future improvements at MHA facilities. The MHA has continued to provide maximum assistance to the Manhattan Community, and is working to rebuild its capital reserve funds.

Manhattan Housing Authority Public Housing Race & Ethnicity of Low Income Families		Manhattan Area Housing Partnership, Inc. Race & Ethnicity of Low Income Families	
White	59.61%	White	50.49%
Black or African American	30.79%	Black or African American	26.21%
Asian	1.39%	Asian	3.88%
American Indian and Alaska Native	0.23%	Two or More Minority Races	1.94%
Native Hawaiian/other Pacific Islander	1.16%	Joint (White/Minority Race)	5.34%
Joint (White/Minority Race)	6.37%	Information not available	12.14%
Hispanic (all races)	16.78%	Hispanic (all races)	5.34%

Manhattan Area Housing Partnership, Inc.

The Manhattan Area Housing Partnership (MAHP), Inc. is a Community Housing Development Organization (CHDO) and private non-profit corporation dedicated to bringing quality affordable housing to the Manhattan community, as well as dedicated specialized services to low/moderate income persons (LMI) through their Financial Assurance Program.

The Financial Assurance Program assists Social Security and Veteran’s Administration benefit recipients who cannot adequately manage their monthly disability benefit payments, and whose benefits depend on a third party payee. Staff works directly with LMI disabled individuals to help them budget and pay for their housing, food, medical, and other needs required to maintain independence. MAHP, Inc. is the only Social Security Administration approved organizational payee in the Manhattan area.

MAHP owns and operates low-income housing developed with HUD HOME funds and low income housing tax credits received from the Kansas Housing Resources Corporation. The MAHP owns 201 affordable units in nine developments, and manages 143 units in eight of them. The MHA manages the other 58 units for the MAHP. The MAHP also collaborated with the MHA in the first joint venture in Kansas with the rehabilitation of the Flint Hills Apartments, a public housing and tax credit venture.

In 2019, MAHP was awarded tax credits and State operated HOME funds to develop an additional 36 affordable senior living units.

MAHP accepts Section 8 vouchers from the MHA and the North Central Flint Hill Area Agency on Aging.

The North Central Flint Hills Area Agency for Aging and Disability is a private, non-profit organization that plans, coordinates and provides services in 18 north central Kansas counties to enhance the quality and dignity of life for older Kansans and those living with disabilities, as well as their families and family caregivers. It serves as the area-wide Aging and Disabilities Resource Center. Its programs and services are partially funded by the Older Americans Act through the Kansas Department for Aging and Disability Services and through voluntary participant contributions. It is also a HUD recognized PHA that covers rural areas in 18 counties, and utilizes HUD provided Tenant-Based Rental Assistance (TBRA) vouchers for its clients, but does not own or operate any housing in Manhattan.

Evaluation of Manhattan’s Current Fair Housing Activities

Fair Housing Enforcement

The City created the Manhattan Human Relations Commission in 1964. Later the name changed to the Manhattan Human Rights and Service Board (HRSB). The local ordinance that created the Board authorizes it to “receive and investigate complaints of discrimination in housing, employment, and public accommodations.” The protected classes mirror the federal and state statutes; however, the local ordinance adds sexual orientation and gender identity as protected classes.

The HRSB is a public body and does not have the training or capacity to perform investigations of tenant complaints. The HRSB will accept complaints and refer them on to Housing and Credit Counseling, Inc., (HCCI) which is a HUD accredited housing counseling agency. In 2019, the HRSB received 21 complaints, of which it referred 18 to HCCI, and gave 10 of those additional referrals to other local agencies including the Manhattan Fire Department Risk Reduction Office (4), the Riley County Health Department (4), and the MHA (2). Of the 3 complaints **not referred to HCCI**, 2 were referred the Risk Reduction Office and the Health Department, and 1 to the Ft. Riley Housing office as well as received assistance with completing a HUD/DOJ ADA housing complaint.

HCCI provides counseling to both Tenants and Landlords, and receives referrals from a number of local agencies in addition to the City. HCCI counsels Landlords and Tenants to provide information on their Rights and Responsibilities as such as proper procedures, legal requirements in relation to renting, filing

complaints, evictions, late rent payments, illegal fees, and other myriad issues related to the tenant-landlord relationship. HCCI will advocate for Tenants, when Landlords are in obvious violation of the Fair Housing Act, or the Kansas Landlord Tenant Act. In Calendar Year 2019, HCCI performed tenant/landlord counsels for 94 Manhattan residents in 34 households.

Kansas Legal Services, Inc. is a Non-profit agency that provides essential civil legal services to Low and Moderate Income Manhattan residents. Among the various issues clients may have, the local office also fields housing complaints from Tenants. In 2019, KLS assisted 76 tenants with landlord issues, 7 of which went to court, in which 4 were settled, and 3 had a judgement rendered. KLS does not counsel landlords.

HUD officially investigates housing complaints in Manhattan. From 2013 to 2017, HUD completed 6 discrimination complaints. In two of these cases, a HUD issued a “No Cause Determination”, meaning the investigation revealed no evidence to support the Complainant’s allegation(s) of discrimination against the Respondents. In two of these cases, the parties agreed to settle the case, signed a Conciliation Agreement, and the Complainant received relief (i.e., monetary, housing, change in policy, etc.). In the final two cases, the Complainant worked out a resolution to the complaint with the Respondent and withdrew the complaint.

Identification of Impediments to Fair Housing Choice

Zoning and Subdivision Regulations

There are no known negative effects of City Zoning and Subdivision regulations in regards to affordable housing and residential investment.

The City implements its planning and zoning authority through the Manhattan Urban Area Comprehensive Plan, the Manhattan Urban Area Subdivision Regulations and the Manhattan Zoning Regulations. The City is currently combining the Subdivision and Zoning Regulations into a new Unified Development Ordinance and anticipates adoption in 2020. The Manhattan Urban Area Planning Board and Manhattan City Commission develop, adopt and update the Comprehensive Plan and other policy and regulatory documents for the City.

The Comprehensive Plan was last updated in 2015 and guides land use, growth management and development in the Manhattan area, and was developed through a joint planning initiative with Riley County and Pottawatomie County. The Plan’s study area is 93 square miles and identifies new and expanded growth areas in the two counties, as well as potential redevelopment areas within the City. The process also included an update to the 2000 Manhattan Area Transportation Strategy (MATS), which focuses on a broad range of multi-modal transportation issues. This plan is reviewed annually and amended as needed, such as to incorporate the new Bicycle - Pedestrian Systems Plan, which addresses multi-modal needs at a finer scale than MATS.

The Manhattan Urban Area Comprehensive Plan contains elements which promote neighborhoods containing a mixture of land uses and diversified housing options to serve a growing and changing population, including housing that is affordable, neighborhoods that incorporate multi-modal connectivity, neighborhood commercial areas, schools, and parks and open space. Housing and neighborhood goals include maintaining the quality and character of established neighborhoods throughout the community and ensuring that infill and redevelopment is compatible with existing neighborhoods and is appropriate in size, scale, design, and use, while addressing needs of all citizens.

New neighborhoods will be located where residents of all ages, abilities, and financial means will have access to the full range of infrastructure, facilities, and services to lead active, healthy lifestyles.

The City bases its effort to provide healthy, livable neighborhoods that offer a variety of lifestyle options on the following guiding principles:

- Expanded housing options to meet the needs of a changing community;
- Revitalization of established and core area neighborhoods; and
- Access to amenities that encourage active and healthy lifestyles.

The Manhattan Urban Area Comprehensive Plan is a living document that will incorporate, as needed other plans and updates to ensure as much as possible safe, fair and equitable housing choice.

Building Codes

The City has adopted the 2018 International Building Code Series, and the 2017 National Electrical Code. The City prefers to use the Federal Fair Housing guidelines for accessibility compliance in covered multifamily dwellings, which references the American National Standards Institute (ANSI) requirements for accessibility. The Risk Reduction Division of the Manhattan Fire Department ensures through the permitting and enforcement process that new multifamily housing containing four or more dwelling units complies with all federal regulations of the Fair Housing Act. There are no known negative effects of City Building Codes in regards to affordable housing and residential investment.

Private Sector Lending

Beginning in 2010, local lending institutions became subject to federal reporting as required by the Home Mortgage Disclosure Act (HMDA) and the Federal Financial Institution Exam Council (FFIEC) for all Metropolitan Statistical Areas (MSA). Current data from the FFIEC show that there are no underserved census tracts in the City.

2019 FFIEC Census Report - Summary Census Housing Information
State: 20 - KANSAS (KS)
County: 161 - RILEY COUNTY



State Code	County Code	Tract Code	Total Housing Units	1- to 4-Family Units	Median House Age (Years)	Inside Principal City?	Owner Occupied Units	Vacant Units	Owner Occupied 1- to 4- Family Units	Renter Occupied Units
20	161	0002.00	4103	3574	29	Yes	2051	464	2051	1588
20	161	0003.03	520	276	50	Yes	73	46	73	401
20	161	0003.04	2434	1195	41	Yes	627	80	627	1727
20	161	0005.00	2170	1287	45	Yes	258	187	258	1725
20	161	0006.00	3839	2612	22	Yes	2057	338	2045	1444
20	161	0007.00	1805	1447	51	Yes	849	175	849	781
20	161	0008.01	2182	1240	65	Yes	272	204	272	1706
20	161	0008.02	1130	844	68	Yes	363	138	345	629
20	161	0009.00	2721	2361	37	Yes	1286	331	1286	1104
20	161	0010.02	1891	1802	38	No	26	254	26	1611
20	161	0011.00	2944	1141	29	Yes	761	369	733	1814
20	161	0013.01	1501	1004	25	Yes	750	187	750	564
20	161	0013.02	2317	2271	41	Yes	1677	317	1677	323
20	161	9800.00	0	0	0	Yes	0	0	0	0

The Community Reinvestment Act (CRA) is a United States federal law designed to encourage commercial banks and savings associations to help meet the needs of borrowers in all segments of their communities, including low-and moderate-income neighborhoods. There are 23 financial institutions in the City that

originate loans and all have a Community Reinvestment Act (CRA) rating of satisfactory or higher. The tables below examine dispositions of applications for conventional loans by race, ethnicity, and income.

HOME MORTGAGE DISCLOSURE ACT FOR: MSA/MD: 31740 - MANHATTAN, KS						
DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 2018						
1- TO 4-FAMILY AND MANUFACTURED HOMES BY RACE, ETHNICITY, AND INCOME OF APPLICANT						
RACE:	Applications Received	Loans Originated	App's. Approved But Not Accepted	App's. Denied	App's. With-drawn	Files Closed For Incomplete-ness
AMERICAN INDIAN/ALASKA NATIVE	10	4	1	2	3	0
ASIAN	58	39	1	11	7	0
BLACK OR AFRICAN AMERICAN	61	32	0	16	8	5
NATIVE HAWAIIAN/OTHER PACIFIC ISLND	5	3	0	2	0	0
WHITE	1893	1443	35	195	187	33
2 OR MORE MINORITY RACES	1	1	0	0	0	0
JOINT (WHITE/MINORITY RACE)	69	46	0	12	8	3
RACE NOT AVAILABLE	201	116	5	32	41	7
ETHNICITY						
HISPANIC OR LATINO	72	46	1	11	14	0
NOT HISPANIC OR LATINO	1933	1454	34	216	189	40
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	46	33	0	4	8	1
ETHNICITY NOT AVAILABLE	247	151	7	39	43	7
INCOME OF APPLICANTS						
LESS THAN 50% OF MSA/MD MEDIAN	229	125	9	69	17	9
50-79% OF MSA/MD MEDIAN	434	318	4	64	44	4
80-99% OF MSA/MD MEDIAN	162	103	3	24	26	6
100-119% OF MSA/MD MEDIAN	435	329	9	37	52	8
120% OR MORE OF MSA/MD MEDIAN	1038	809	17	76	115	21
TOTAL	2298	1684	42	270	254	48
Report Date: 02/25/2020						

Assessment of Impediments to Fair Housing Choice

Current analysis of public sector policy indicates that there appears to be no institutional impediments to fair housing choice. City regulations are designed to protect the health, safety and welfare of citizens and may affect the cost of housing; however, these regulations are not designed to discourage choice or availability of housing. The City's upcoming 18-month Housing Market Analysis and Policy study will include an examination of City regulations in conjunction with the modified UDO to identify any potential future issues. If the study reveals that issues exist, City Administration will propose appropriate actions to address the identified issue.

Analysis of both qualitative and quantitative data on housing in Manhattan resulted in the identification of the following impediments to fair housing choice:

Affordability

Data suggests a disparity between income and the cost of housing in the City. According to 2011-2015 confirmed ACS estimates, 50.84% of the population within City Limits was Low and Moderate Income by HUD standards. ACS 2018 Data implies that approximately 50% of the population remains LMI, yet 54% of renters, 22.65% of Homeowners **with a mortgage**, and 10.1 % of homeowners **without a mortgage** are paying more than 30% of their income to housing costs. Only 15% of all rentals and houses for sale are affordable for people earning up to 50% of Median income and lower, yet nearly 26% of the households in Manhattan are Low-to Moderate Income earners.

Accessibility

The economic feasibility of retrofitting older housing stock for accessibility improvements may be an impediment to both landlords and to Low and Moderate Income homeowners. The City performs accessibility rehabilitation for LMI homeowners as one of its CDBG Housing Rehabilitation activities. The Manhattan Housing Authority (MHA) integrates the needs of disabled individuals into their daily operations, and maintains 17 handicap dwelling units in 5 of its properties.

Fair Housing Education

There is a lack of knowledge in the community regarding Fair Housing Laws, or where to find such information, especially for new landlords. Landlords and tenants need to be educated on fair housing rights and responsibilities, particularly the Service Members Relief Act given the influence of Fort Riley on the Manhattan housing market. The City has created a Fair Housing brochure and maintains a Fair Housing website, <https://cityofmhk.com/1745/Fair-Housing>, which includes links to HUD provided information for individuals and the Housing Discrimination Complaint process, to help inform the community regarding Fair Housing issues.

Since 2012, the City has conducted an annual Fair Housing Seminar. Each year, the City presents discussions, with questions and answers following each discussion session. Topics have included the Service Member Relief Act, Section 8 processes and rules, Code issues, the Kansas Landlord Tenant Act, the Fair Housing Act and other issues. Landlords, Tenants, and other interested attendees are asked to submit topics that they would like more information on for the next year. Agencies and groups that have presented include HCCI, the Ft. Riley JAG office, Risk Reduction, Off-Campus Student Housing, and others.

Manhattan Housing Authority

The MHA follows the procedure set forth in its Tenant Selection and Waiting List Management Plan, pursuant to the requirements of the Standards for Public Housing Authority Tenant Selection Criteria [24 CFR 960.204.]. In filling an actual or expected vacancy, the MHA offers the dwelling unit to an applicant in the appropriate sequence, with the goal of accomplishing de-concentration of poverty and income-mixing objectives. The number and types of families on waiting lists for public housing and section 8 rental assistance change with the circumstances of the applicants and the availability of housing.

Actions to Address Public and Private Fair Housing Choice

To address identified impediments, the City of Manhattan will continue the following activities to affirmatively further Fair Housing Choice:

- Provide Fair Housing brochures, and information on the City website regarding Landlord/Tenant rights and responsibilities
- Conduct annual Fair Housing public seminars to educate landlords, tenants and others as interested.
- Continue to work closely with Kansas State University and Fort Riley to promote Fair Housing education and practices.
- Encourage local developers to create and maintain affordable housing.
- Support Fair Housing Month activities.
- Encourage efforts to deconcentrate public housing.
- Continue to administer the Manhattan Housing Rehabilitation Program to maintain existing affordable housing stock, address emergency repairs and to increase the accessibility of housing units available.
- Periodically review zoning and subdivision regulations to determine the effect, if any, on housing affordability and accessibility.
- Encourage and support neighborhood involvement social media.
- Continue to expand the establishment of neighborhood groups through the Neighborhood MHK to improve the community's livability and quality of life.

While this analysis specifically addresses Fair Housing issues in Manhattan only, the City has in the past, collaborated with the Flint Hills Regional Council (FHRC) on the 2015 Fair Housing and Equity Assessment (FHEA)/Regional Analysis of Impediments (RAI), which included the counties of Geary, Lyon, Morris, Pottawatomie, Riley, and Wabaunsee. In 2019, the City undertook a study that will examine issues and opportunities involved with the potential annexation of a portion of Blue Township in Pottawatomie County that has developed at urban densities in the unincorporated east edge of the City.

In 2020, the City Commission authorized an 18-month Housing Market Analysis and Policy study to examine housing needs concerning availability and suitability, as well as to examine City policies that may enhance or hinder housing development. From this study, the City will assess housing needs and issues, adjust policies that may hinder housing development for all levels of wage earners, and develop useful tools to guide housing development decision making on an ongoing basis.