



LEE'S SUMMIT
MISSOURI®



Analysis of Impediments to Fair Housing Choice

February 2025

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Introduction

FAIR HOUSING PLANNING

Equal access to housing choice is crucial to America's commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. The Act was amended in 1988 to provide stiffer penalties, establish an administrative enforcement mechanism and to expand its coverage to prohibit discrimination on the basis of familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD's Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD's housing and community development programs. The AFFH requirements are derived from Section 808(e)(5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department's housing and urban development programs in a manner to affirmatively further fair housing.¹

Local communities like Lee's Summit, MO that receive grant funds from HUD through its entitlement process satisfy this obligation by performing an "Analysis of Impediments to Fair Housing Choice" (AI). In an AI, grantees evaluate barriers to fair housing choice and develop strategies and actions to overcome identified impediments based on their histories, circumstances, and experiences. Through this process, communities promote fair housing choice for all persons, including classes protected under the Fair Housing Act, and promote racially and ethnically inclusive patterns of housing occupancy, identify structural and systematic barriers to fair housing choice, and promote housing that is physically accessible and usable by persons with disabilities.

HUD presumes that a grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments, including:

¹ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 1: Fair Housing Planning Historical Overview, Page 13)*. March 1996.

- Analyzing and eliminating housing discrimination within the jurisdiction.
- Promoting fair housing choice for all persons.
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy.
- Promoting housing that is physically accessible to all persons to include those persons with disabilities.
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document AFFH actions in the annual performance reports that are submitted to HUD.

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlines procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule stipulated that grantees and housing authorities take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under HUD's final rule, grantees must take actions to:

- Address disparities in housing need.
- Replace segregated living patterns with integrated and balanced living patterns.
- Transform racially / ethnically concentrated areas of poverty into areas of opportunity.
- Foster and maintain compliance with civil rights and fair housing laws.

To assist grantees affirmatively further fair housing, HUD provided publicly available data, maps, and an assessment tool to use to evaluate the state of fair housing within their communities and set locally-determined priorities and goals. HUD's final rule mandated that most grantees begin submitting to HUD an assessment developed using these tools in 2017; however, a 2018 HUD notice withdrew the requirement to prepare such assessments. A subsequent notice further required that grantees instead prepare and keep on file a current Analysis of Impediments to Fair Housing Choice. In 2020, HUD further relaxed requirements to complete an AI, allowing grantees to instead certify that they are affirmatively furthering fair housing.

Mosaic Community Planning assisted the City of Lee's Summit in the preparation of this Analysis of Impediments to Fair Housing Choice. This AI follows HUD's *Fair Housing Planning Guide* but also incorporates elements of HUD's assessment tool established in the 2015 final rule. In some places, it uses data developed by HUD for use by grantees as part of the Affirmatively Furthering Fair Housing final rule.

DEFINITIONS

Affirmatively Further Fair Housing

To Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”²

Affordable

Though local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

- HUD defines as “affordable” housing that costs no more than 30% of a household’s total monthly gross income. For rental housing, the 30% amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30% amount would include the mortgage payment, property taxes, homeowners’ insurance, and any homeowners’ association fees.

Fair Housing Choice

In carrying out this Analysis of Impediments to Fair Housing Choice, the City of Lee’s Summit used the following definition of “Fair Housing Choice”:

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

² U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013.

Impediments to Fair Housing Choice

As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include:³

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Protected Classes

The following definition of federally protected classes is used in this document:

- Title VIII of the Civil Rights Act of 1968 prohibits housing discrimination based on race, color, national origin or ancestry, sex, or religion. The 1988 Fair Housing Amendments Act added familial status and mental and physical handicap as protected classes.

DATA SOURCES

Decennial Census Data

Data collected by the Decennial Census for 2020, 2010, and 2000 is used in this Assessment (older Census data is only used in conjunction with more recent data in order to illustrate trends). The Decennial Census data is used by the U.S. Census Bureau to create several different datasets:

- **2020, 2010, and 2000 Census Summary File 1 (SF1):** This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. Though this dataset is very broad in terms of coverage of the total population, it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status,

³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.

- **2000 Census Summary File 3 (SF3):** Containing sample data from approximately one in every six U.S. households, this dataset is compiled from respondents who received the “long form” Census survey. This comprehensive and highly detailed dataset contains information on such topics as ancestry, level of education, occupation, commute time to work, and home value. The SF3 dataset was discontinued for the 2010 Census, but many of the variables from SF3 are included in the American Community Survey.

American Community Survey (ACS)

The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately three million addresses rather than an actual count (like the Decennial Census's SF1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- **ACS Multi-Year Estimates:** More current than Census 2020 data, this dataset is one of the most frequently used. Because sampling error is reduced when estimates are collected over a longer period of time, five-year estimates will be more accurate (but less recent) than one-year estimates. The 2018 to 2022 ACS five-year estimates are used most often in this assessment.
- **HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T):** HUD's AFFH Data and Mapping Tool provides a series of online, interactive maps and data tables to assist grantees in preparing fair housing analyses. Topics covered include demographics and demographic trends; racial and ethnic segregation; housing problems, affordability, and tenure; locations of subsidized housing and Housing Choice Voucher use; and access to educational, employment, and transportation opportunities. This report uses HUD's latest data and maps, AFFHT0006, which was released in July 2020. HUD's source data includes the American Community Survey (ACS), Decennial Census / Brown Longitudinal Tract Database (BLTD), Comprehensive Housing Affordability Strategy (CHAS), Longitudinal Employer-Household Dynamics (LEHD), HUD's Inventory Management System (IMS) / Public and Indian Housing (PIH) Information Center (PIC), and others. For a complete list of data sources,

please see HUD's Affirmatively Furthering Fair Housing Data and Mapping Tool Data Documentation, available online at:

<https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf>

Community Participation

COMMUNITY ENGAGEMENT OVERVIEW

An important component of the research process for this Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs in Lee's Summit. The project team used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders, including community workshops, stakeholder interviews, resident focus groups, and a community-wide survey.

Community Workshops

The City of Lee's Summit hosted virtual and in-person community workshops to understand issues of fair housing and access to opportunity. Each workshop began with a brief presentation that provided an overview of the Analysis of Impediments to Fair Housing Choice, the community engagement process, the project webpage and survey, the project timeline, and the types of analysis to be included in the study. The presentation was followed by an interactive discussion of fair housing and access to opportunity. One workshop was held virtually via Zoom—residents could join online or by phone—and one was held in-person at Lee's Summit City Hall. A total of 10 participants joined a community workshop. Workshop dates and times are shown below:

TABLE 1. COMMUNITY WORKSHOP DATES, TIMES, AND LOCATIONS

Community Workshop 1:	Monday, April 1, 2024; 6:00 p.m. Lee's Summit City Hall (Strother Room) 220 SE Green St. Lee's Summit, MO 64063
Community Workshop 2:	Tuesday, April 30, 2024, 6:00 PM Virtual (via Zoom)

Stakeholder Interviews and Resident Focus Groups

The planning team also engaged with stakeholders representing a variety of perspectives through in-depth individual interviews. Discussion topics included barriers to fair housing, housing discrimination, access to opportunity, and fair housing resources. A total of 12 community stakeholders participated in a stakeholder interview, representing a range of viewpoints, including fair housing, affordable housing, home builders, community and economic development, education, public health, health services, mental health, substance use services, food access, senior services, domestic violence services, homelessness housing and services, other public services, small businesses, public safety, local government, and others.

In addition to stakeholder interviews, the planning team engaged with residents in focus groups facilitated through Truman Heritage Habitat for Humanity and Lee's Summit CARES, a local nonprofit coalition organization focused on promoting healthy behaviors and activities for youth and families. The focus groups included an interactive discussion of housing and community development needs and fair housing issues. Six residents participated in the focus groups.

Overall, one or more representatives from at least 17 organizations and agencies participated in a stakeholder interview, community input session, focus group, or written request for information. Organizations and agencies from which someone participated in the development of this AI include:

- City of Lee's Summit City Council
- City of Lee's Summit City Manager
- City of Lee's Summit Development Services
- City of Lee's Summit Fire Department
- Coldwater of Lee's Summit
- Hillcrest KC
- Hope House
- Jackson County Public Health
- Lee's Summit CARES
- Lee's Summit Social Services
- Mid-America Regional Council
- Missouri Commission on Human Rights
- Pro Deo Youth Center
- Rediscover Mental Health
- Tailor Made Exteriors
- Truman Heritage Habitat for Humanity
- U.S. Department of Housing and Urban Development FHEO

Community Survey

A final method for obtaining community input was a 23-question survey available to the public, including people living and/or working in Lee's Summit and other stakeholders. The survey was available from January through May 2024 via the project website, Isconplan.com. Hard copies were available by request to the City of Lee's Summit Development Services Department. A total of 243 survey responses were received.

Public Comment Period and Public Hearing

The City of Lee's Summit held a 30-day public comment period to receive comments on the draft Analysis of Impediments to Fair Housing Choice from xx to xx, 2024. During that time, copies of the draft plans were available for public review on the City's website, and residents and stakeholders could provide written comments. Residents and stakeholders could also mail or deliver written comments to the Development Services Department at 220 SE Green St. Lee's Summit, or e-mail comments to info@mosaiccommunityplanning.com. The City received xx comments on the draft plans. The City held a public hearing on the draft plans on xx at xx. A summary of community engagement results is provided in the following section. Complete survey results and evidence of outreach materials can be found in the appendix.

Publicity for Community Engagement Activities

Advertisement for the community workshops and survey targeted the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations. Public notice of community input opportunities was given to residents through announcements on the project website (Isconplan.com), the City's website and social media, newspaper articles, and e-mails to community stakeholders. Stakeholder interview invitations were sent to more than 30 contacts representing a variety of viewpoints including elected officials and staff, housing developers, nonprofit organizations, homeless housing and service providers, mental health service providers, organizations serving people with disabilities, family and senior services, workforce development organizations, and others. Meeting advertisements noted that accommodations (including translation, interpretation, or accessibility needs) were available if needed; no requests for accommodations were received.

FIGURE 1. ADVERTISEMENT FOR COMMUNITY WORKSHOPS



COMMUNITY ENGAGEMENT RESULTS

Results from community workshops, stakeholder interviews, and focus groups are summarized below. All comments and surveys were accepted. Public input is summarized in this section, with complete survey results provided as an appendix. Please note that the comments below represent the community input received in the course of developing this plan and do not necessarily reflect the views of the City of Lee's Summit.

Stakeholder Interview, Community Workshop, and Focus Group Results

- 1. What types of housing needs are greatest in the community (e.g., workforce housing, affordable rental housing, housing for people who are homeless, assistance for first-time homebuyers, rehab/repair programs for homeowners, housing for seniors or people with disabilities, etc.)? How important a need is affordable multifamily rental housing?**

Affordable/ Workforce Housing

- There is a general lack of affordable housing across the region, which has a gap of 64,000 affordable units.
- There is a need for housing options for low- and moderate-income residents and for living wages. Rents are too high.
- While there are job openings in the area, folks are not finding they can take these jobs. There are a lot of service jobs opening, and a lot of development is happening with new shops/restaurants opening. We're seeing folks who are struggling to afford to live in the community even while working full time at some of these positions.
- Low-income people can't afford rent increases. People with limited incomes, who have a history of issues with credit and need education often know homeownership is the best for their family but don't know how to obtain it. Habitat for Humanity helps fill those gaps and helps to educate them.
- Units in good condition and larger units are not affordable for many people. There are not a lot of affordable options in the city for low-income families.
- There is a lack of rental housing under \$1,500 in the city.

- A one-bedroom in the area is \$1,100+. And the new rentals being built are high-end luxury units that are even higher, and that doesn't include utilities. People have to move to other areas in Jackson County and Kansas City, but if they have children, they would prefer to be in Lee's Summit for the school district. If they find a rental here, they are sacrificing their food budget to pay rent.
- There is a lack of subsidized housing.
- There is a lack of workforce housing in the city. Where are single teachers living?
- Service employees who work in the city cannot afford to live in Lee's Summit. It is not fair to expect people to provide services and not have housing available.
- Some residents who work in Lee's Summit drive up to two hours because they can't find affordable housing in Lee's Summit.
- Building modest-sized homes through a community land trust model would support affordability.
- Finding affordable housing for folks who complete the program at Hillcrest is difficult. New construction homes are \$500,000. There are no starter homes for first-time homebuyers or affordable rentals, so a lot of people who want to stay and have decent jobs in education can't stay in Lee's Summit. A first-year teacher can't afford to live in Lee's Summit, even in a rental.
- There is a need for affordable starter homes. Starter homes exist in design but not in price.
- Previously affordable housing is being sold to corporations, so the supply of affordable housing is dwindling. Many apartment complexes are no longer owned by local entities.
- For all apartments being built, 5% to 10% should be available for low-income households. That could be a way to add affordable housing to the city's inventory. There are one or two places in Kansas City that have the 5% to 10% requirement for affordable units in apartments, but there needs to be more than that.
- Recent multifamily developments have been luxury apartments, not attainable housing.
- There is a need for attainable housing for downsizing older adults and young adults.

- There are houses in surrounding cities that may be half the price of a similar unit in Lee's Summit. I haven't seen a house in Lee's Summit for less than \$200,000. Less than two years ago, they were everywhere.
- Increased property taxes contribute to reduced housing affordability. There is a lawsuit targeting Jackson County property assessments.
- Residents and families on fixed incomes need affordable housing. Even with financial planning, their income is limited. Many older residents are on waiting lists for affordable housing and are struggling. Organizations like Coldwater help support households until they can get back on their feet.
- Building material costs are high, which increases housing costs.
- There is some low-income housing in Lee's Summit, but owners are selling to managers based out of state who turn these units into market rate units.

Housing for Residents Transitioning from Homelessness/ Community Education

- Lee's Summit needs to acknowledge that there is a homeless problem in order to address it. The city has Hillcrest Transitional Housing, but its only 16 apartments, and it only meets the needs of the working homeless. There is a two-week waiting period for Hillcrest.
- There are homeless residents that are living behind churches or living in their cars. There is a lack of understanding about homelessness and homeless needs.
- It all starts with emergency shelter for folks experiencing homelessness. There is not a lot of appetite for that in Lee's Summit. The City may want that but getting the constituents on board is difficult.
- There is a need for affordable transitional housing with enough space for families with children. Rents are generally \$1,100 or more, and people transitioning from homelessness need more affordable rents.
- Many families would prefer to stay in Lee's Summit to be in a better neighborhood. The city is missing out on great families because it doesn't have affordable housing, transportation, and affordable medical care.
- When families are barely making rent, living paycheck to paycheck, and have an issue such as an illness or car repairs, they may become homeless again.
- There is a need to replicate Hillcrest's programs in Lee's Summit. It would be helpful when residents come out of Hillcrest's programs if there were landlords that would accept those families knowing they came from those programs and provide lower

rents (\$300 to \$800). There should be rewards for landlords who will work with lower-income residents transitioning from homelessness and provide lower rents.

- The lack of education about homelessness we have going on here is a struggle. There's an attitude that homelessness is the result of poor personal choices and not larger systemic issues. For those who are literally living on the street, what do we do?

Planning and Leadership to Support Affordable Housing Development

- Some planning work is needed to give serious consideration to planning affordable housing and senior housing.
- The way elected officials approach decisions that affect housing is something to look into as well. If there were an opportunity to participate in more conversations around decision-making, it would be interesting to see.
- There is a need to evaluate land use and how cities and elected officials approach housing. The City isn't serious about affordable housing development.
- There is a negative perception around creating opportunities for affordability and no genuine commitment to increasing affordable housing options.
- There is a well-known developer in the area building high end housing, the largest developers in the metro area. They proposed a subdivision in Lee Summit that was attempting to be at an affordable price point because the developer saw the need, but they were shot down by the Planning Commission because the values were too low relative to the values the City wanted. The developer was trying to develop units priced at \$275,000 per unit, which isn't affordable for a moderate-income family.
- Lee's Summit needs to be intentional about making homeownership accessible and affordable, so more families have the opportunity to build wealth and to make sure the city is diverse and equitable.

Diverse Housing Types and the Zoning to Support Them

- There is a need for affordable apartments, townhomes, and starter homes.
- There is a need for 'missing middle' housing and attainable housing types.
- Any kind of multifamily, additional townhomes, and duplexes are needed, and not just for the homeless or people at risk of homelessness. For those retiring there is nowhere to downsize, which becomes a financial and physical burden.

- Lee's Summit doesn't build cottage communities ever or duplexes. Building more of those might help with affordability.
- The City's zoning promotes larger homes over smaller starter homes and apartments. There is nowhere to start to build equity and move up. Prices are going up even for the homes that were more affordable pre-COVID. There is a need for more starter homes. For young couples who are starting out, that is a big debt to start out with.
- There is a need to make sure that new developments have high-quality designs.

Improvements to Housing Quality

- Conditions of housing and impact health. Inspections may not be enforced.
- There may be retaliation from landlords when tenants speak up about housing issues, such as peeling/chipping paint, mold/mildew, or fire/ carbon monoxide alarms not working.

Senior Housing Options

- The older adult population has grown substantially.
- Seniors need different housing options, such as affordable apartments and senior communities. The housing being built now is for wealthy people.
- A lot of seniors are struggling to keep up increasing property taxes, utility costs, and home maintenance costs. While the cost of the home may not have changed, people on a fixed income are struggling to keep up with these costs.

Addressing Perceptions About Affordable Housing

- People are scared of bringing more affordable housing or a shelter into the city because they think it will bring their property values down, but there are enough people in Lee's Summit for whom that is not their primary concern.
- A lack of community acceptance and community awareness of the need for affordable housing fuels political reluctance.
- There's a lot of pushback regarding affordable housing because the people who are against it are very vocal, even though there may not be many of them... they're loud enough so that's what the city thinks we're all like, even if that's not the case.

Home Repair Programs

- There is a need for minor home repair programs. There are nonprofit organizations in Kansas City that help people if they need repairs or a new roof. There are not a lot of options like that in Lee's Summit.
- Lee's Summit has people who have aged in place. There is a need for home repair and home modifications. The ability to stay independent in their homes is a growing issue.
- Mid America Regional Council provides home modification assistance.

Fair Housing Resources and Education

- Source of income discrimination (SSI income, housing vouchers) is an issue.
- Eviction has been a real challenge especially as the demand for housing has increased.
- People are scared of filing complaints, or they don't know their rights.

Accessible Housing for People with Disabilities

- New apartments meet ADA guidelines but not universal design standards. It is not a welcoming environment.

Housing for People with Special Needs

- The city does not address the housing needs of people with special needs. Rediscover Mental Health has housing for this population, but it is very limited.

Homebuyer Assistance

- Homebuyer assistance is needed because prices have gone up.
- Downpayment assistance of \$5,000 to 6,000 used to be enough. Now \$20,000 to \$40,000 is needed.

Infrastructure and Land to Support Housing Development

- Infrastructure and cost of land are barriers to housing development.
- It is difficult to find property already served by infrastructure outside of the city limits.

Housing Navigation Assistance

- Affordable housing information available is difficult to navigate. There is a website of affordable housing listings but landlords still have to put their information on the site.

Emergency Preparedness/ Housing That is Resilient to Disasters

- In terms of emergency preparedness – if the city had a disaster that occurred that impacted the homes in our jurisdiction, what does that recovery process look like?

2. What parts of the city are generally seen as areas of opportunity (i.e., places people aspire to live, places that offer good access to schools, jobs, and other amenities)? What makes them attractive places to live? Are there barriers someone might face in moving to one of these areas?

- Lee's Summit is generally seen as a city of opportunity. It has higher education opportunities, jobs, parks and natural assets.
- The area surrounding downtown is an area of opportunity. It is close to schools and has great parks. However, most areas of opportunity have houses that cost more than \$400,000.
- New Longview is an area of opportunity. It has newer neotraditional housing stock (alley setup) and is next to a park and community center. It is in a good area for schools.
- The city itself is seen as an area of opportunity, but it is a challenge to afford to live in Lee's Summit.
- The city has missed out on opportunities to present itself as a more welcoming community (e.g., pride flags during Pride Month, spotlighting women-owned/minority-owned businesses).
- There is an image of Lee's Summit as a place where the rich white people live. There's low hanging fruit that the city can take to eliminate some of these barriers.
- Transportation is a barrier. Lee's Summit is disconnected from Kansas City as a suburb.
- In Lee's Summit, opportunity is equal around town. Shopping, schools, library access, and school and sports programs for kids are all even around the city.
- Lee's Summit is an area of opportunity in the Kansas City area, but it's not easy for homebuyers to afford a house. The barrier is primarily affordability. Lee's Summit is

an area of Kansas City that has some of the best schools in the country. It's an area people are trying to get into, but it's difficult with taxes and affordability. Jackson County and Lee's Summit are areas of opportunity.

- Almost all of Lee's Summit is an area of opportunity. The city has a fantastic school district, and the Parks and Recreation Department is stellar, but many folks can't afford to live here.
- Lee's Summit does a phenomenal job of making the neighborhoods look great. There are good opportunities everywhere. The schools are excellent. Lee's Summit students have the opportunity to get job training at any school; they just need to tap into those resources. Students can graduate high school as a sophomore in college at any Lee's Summit school. Even with the youth court, if a student gets in trouble at school, they get the chance to write a letter or do community service hours and the opportunity to not have it on their record. They can write a letter of apology and go back into the school system.
- There are low-income neighborhoods and HUD housing in Lee's Summit, but they look great, so people might not know they exist. Hillcrest is beautiful. It has no signs and is a great property.
- The northern and downtown parts of Lee's Summit and the Douglas corridor are areas of opportunity.
- There has been development on the outskirts to the west, to the east, and in the furthest north and south portions of Lee's Summit.

3. Do residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might impact housing choices? Are you aware of any housing discrimination?

- Residents were not aware of any housing discrimination going on in the city, but noted that it probably does happen.
- The city continually sees Not in My Backyard attitudes. Race, gender identity, etc. are all issues. It's more of an unspoken understanding when people are not welcome in a neighborhood. In an average income neighborhood of all homeowners, a mixed-race couple moved in, and it was interesting to see how the community reacted to that. Residents are charged to be allies. It was palpable the difference in things neighborhood residents were saying and how they acted differently around new neighbors.

- Qualifying in the rental communities may require 2.5 or 3 times the rent, making it difficult to qualify for rentals.
- A lack of ADA compliant homes could serve as a barrier.
- Transportation is a big issue. There are a lot of people in Jackson County who have to find rides or carpool to access services because they don't have transportation and there is no bus that gets them where they need to go. And if the one person with a car isn't available, they just don't get to come to get food at that time.
- Discrimination is a factor, whether it's known or an underlying issue. When I was coming out of homelessness, I applied to one of the townhomes on my block and the lady didn't even give me a chance to move in. After she found out about me going into Hillcrest, I had already found a place. I don't know if it was discrimination, but I felt like it was—the fact that I was a single mother with three kids.
- Race- and income-based discrimination exist.
- Making a down payment is a challenge for young people and working-class people such as fire fighters and teachers. Workers in these professions should be able to live in the community they serve, but it's been a challenge. It's a matter of quality of life if you have to drive over 30 minutes back and forth and have kids or other scheduling issues.
- Many clients have mentioned that they tried to find housing on their own and haven't been able to. So, case managers help them work through that and help them navigate the search. Most of the time when they apply for housing, they get denied. They have some suspicions that these denials have been based on discrimination; sometimes they can't even figure out a reason.
- I am not personally aware of any instances of housing discrimination – I am 100% sure that there is, but no one will speak up. I will say that I've found that sometimes it's easier to find housing for my minority clients in areas outside of Lee's Summit than inside the city.

4. Are people in the area segregated in where they live? If so, what causes this segregation to occur?

- Yes, the region is segregated. The Black population is among the most segregated. The Hispanic population is growing. There is a significant Indian population in Overland Park and sizeable refugee populations.

- There are historical patterns of segregation in the region.
- There are areas of town that certain communities go towards because of accessibility. There are some areas with Spanish language accessibility where the businesses speak Spanish and people gravitate towards.
- People are segregated, and price is the number one reason for that. There are some Section 8 developments and apartment complexes and Housing Authority developments, and that causes segregation. They have been in the city a long time and change ownership a lot.
- Lee's Summit doesn't have any qualified low- or moderate-income census tracts for CDBG funds anymore.

5. Are public resources (e.g., parks, schools, roads, police & fire services, etc.) available evenly throughout all neighborhoods in Lee's Summit?

- Public resources are evenly available and abundant in Lee's Summit.
- Everything is provided except for transportation. Even areas with poverty have nice parks.
- The only two issues are affordable housing and transportation.
- The city has six community centers.
- Resources are equally dispersed because the City partners with Rediscover, which provides services throughout the community.
- The City does a good job of making sure everything looks even across neighborhoods. Transitional housing is well-kept and not labeled, so you wouldn't be able to tell. They've done remodeling to the schools that were less well-off than the others so you can't tell that there's a difference.
- Anyone in the community can reach out and schedule local transportation but it comes at a cost.
- Residents need to have a personal vehicle. The city is very suburban. There is an express metro stop that goes to one part of Lee's Summit, but there isn't city-wide public transportation.
- Restaurants and grocery stores of all kinds are available. Organic and less expensive grocery stores are available.
- The City does a great job of with public resources. It has more high-end grocery stores, so residents tend to pay more for groceries in the area. The city has two

Aldi's, and the rest are midwestern names. The trend is more high-end products. The city doesn't have a Save-A-Lot or more affordable food, but it has great variety.

- There are only two schools that have special education programs, and one of them seems very ill-equipped. There used to be a special education teacher that would rotate and go to each school; now they are only stationed at two. What happens to the kids with autism that aren't at those schools? Do they have to transfer?
- There is a lack of awareness of services and resources provided throughout the community.
- For access to resources, residents have to know where to go, and some people don't know where to go.
- Lots of free food distribution happens. People can go to Coldwater to get food. I just heard of a trailer park in a certain area, and I heard they give food there and also get access to whatever else they need. There's a pastor that lives over there and will be meeting him just to make sure their needs are met.
- There are disparities in property maintenance across neighborhoods. There was a new apartment complex on Chipman Road, and the property manager just didn't do maintenance.

6. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area?

Stakeholders noted several fair housing services in the area, including:

- MARC has played a role with AFFH under the Obama administration and partnered with some of the regional communities, but the AFFH rule has gone back and forth a bit.
- Legal Aid of Western Missouri and Heartland Center for Jobs and Freedom offer fair housing services but don't have capacity to serve Lee's Summit. They have self-help resources and hotlines.
- There are local groups that work together for fair housing. There is a tenant committee in Kansas City that fights legal battles. They made it so that landlords can't require income that is three times the rent and can only look at crimes that are violent. Landlords are also required to accept Housing Choice Vouchers. These rules don't apply to Lee's Summit right now but are expected

to grow out to suburban areas. The rules would have to be adopted by each area.

- The Housing Authority offers fair housing programs.
- Some services are in place, but it's not clear how fair housing laws are enforced. There is a need for more work to better serve clients and to improve residents' understanding of fair housing rights. There is a need to provide more education on fair housing rights in leasing agreements.
- Landlord complaints have been handled as expected at the City level.
- Fair housing services are well coordinated but have had some leadership changes and concerns around that.

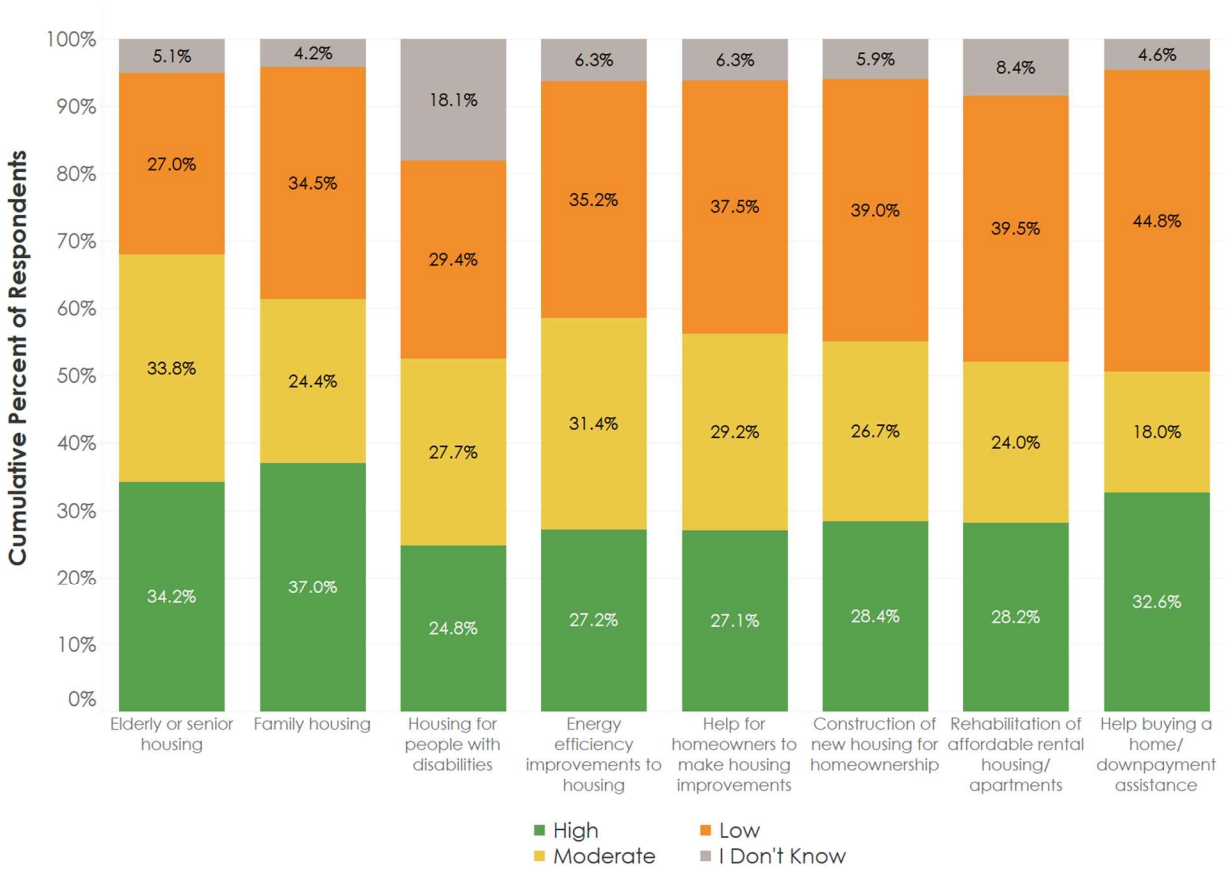
COMMUNITY SURVEY RESULTS

The community survey asked residents and stakeholders about barriers to neighborhood resources, affordable housing, provision of public services, and fair housing access in the city and county. A total of 243 people responded to the survey, representing a range of age groups, income levels, races and ethnicities, and zip codes.

Respondents' Thoughts about Housing Needs

When asked about housing needs in Lee's Summit, survey respondents noted that the highest levels of need for help were for elderly or senior housing, family housing, housing for people with disabilities, energy efficiency improvements to housing, and help for homeowners to make housing improvements (see Figure 2). Construction of new housing for homeownership, rehabilitation of affordable rental housing/ apartments, and help buying a home/ downpayment assistance were also noted as high- or moderate-level needs by more than 50% of survey respondents, indicating a broad need for affordable, accessible housing in the city.

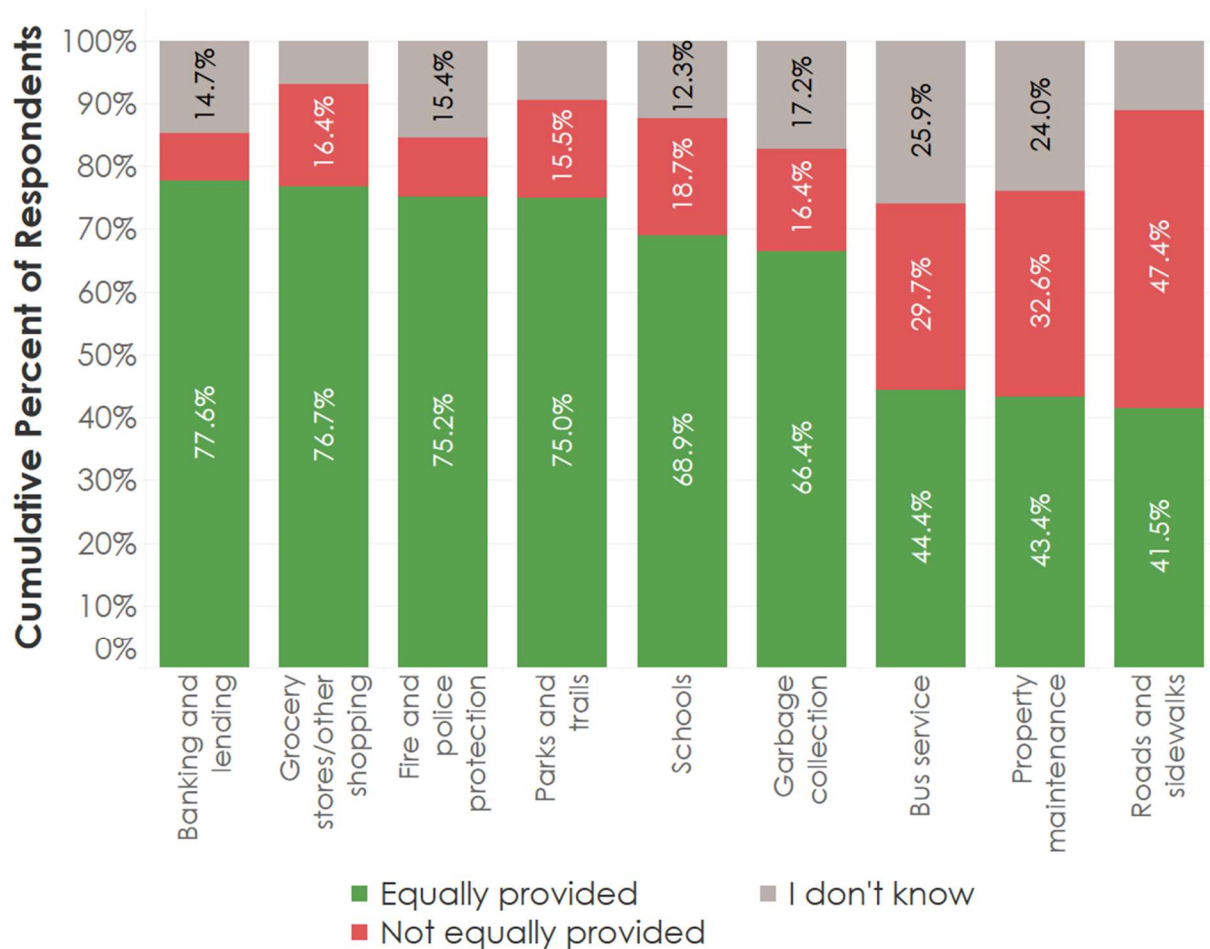
FIGURE 2. RESPONSES TO “PLEASE RATE THE FOLLOWING AFFORDABLE HOUSING NEEDS IN LEE’S SUMMIT ON A SCALE RANGING FROM A LOW NEED TO A HIGH NEED.” FROM THE COMMUNITY SURVEY



Respondents' Thoughts about Access to Community Resources

When asked about the distribution of community resources in Lee's Summit, survey respondents indicated that banking and lending, grocery stores and other shopping, fire and police protection, and parks and trails are most equally provided across neighborhoods (see Figure 3). Survey respondents rated roads and sidewalks, property maintenance, and bus service as the resources that are least equally provided across the city's neighborhoods.

FIGURE 3. RESPONSES TO “THINKING ABOUT THE AVAILABILITY AND QUALITY OF COMMUNITY RESOURCES IN LEE’S SUMMIT, PLEASE CHECK WHETHER YOU THINK EACH OF THE FOLLOWING ARE PROVIDED EQUALLY IN ALL NEIGHBORHOODS.” FROM THE COMMUNITY SURVEY



Respondents' Thoughts about Fair Housing

Most survey participants reported understanding or somewhat understanding their fair housing rights (50.4% and 24.6%, respectively; see Figure 4). While only 24.6% of respondents said that they did not know their fair housing rights, 40.5% said they would not know where to file a housing discrimination complaint (see Figure 5).

FIGURE 4. RESPONSES TO “ARE YOU AWARE OF YOUR RIGHTS UNDER THE FAIR HOUSING ACT?” FROM THE COMMUNITY SURVEY

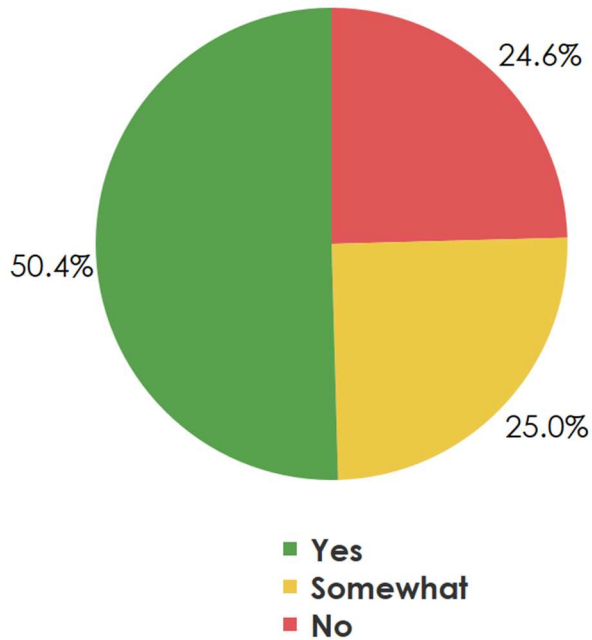
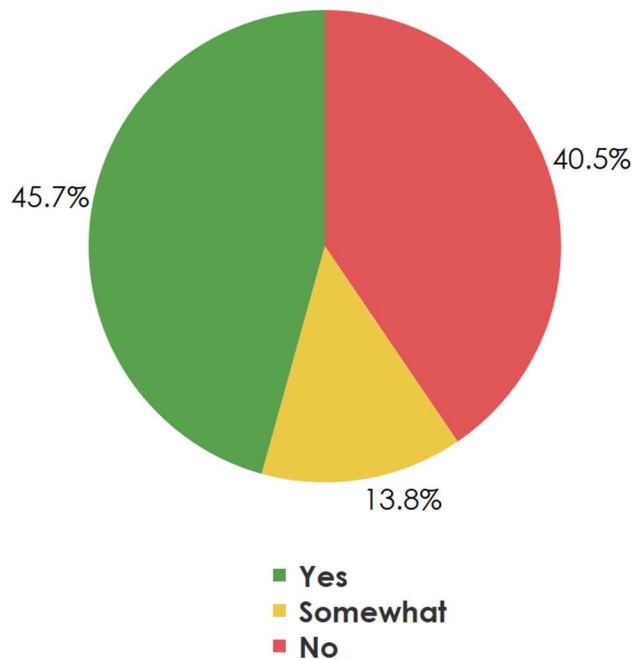


FIGURE 5. RESPONSES TO “DO YOU KNOW WHERE TO FILE A HOUSING DISCRIMINATION COMPLAINT?” FROM THE COMMUNITY SURVEY



Nine survey participants experienced housing discrimination while looking for housing in Lee's Summit. Of those nine respondents:

- Eight noted that they were discriminated against by landlords or property managers, two by real estate agents, and one by mortgage lenders (respondents could select more than one source of discrimination).
- Familial status (single parent with children, family with children, expecting a child) was the most common basis for discrimination, cited by six people, followed by race/color (three people), disability (three people), gender/sex (two people), and religion (one person).
- Only one of the respondents who experienced discrimination filed a complaint. Reasons for not filing discrimination complaints included not knowing what good it would do (identified by five people), not knowing where to file (identified by four people), being afraid of retaliation (one person).

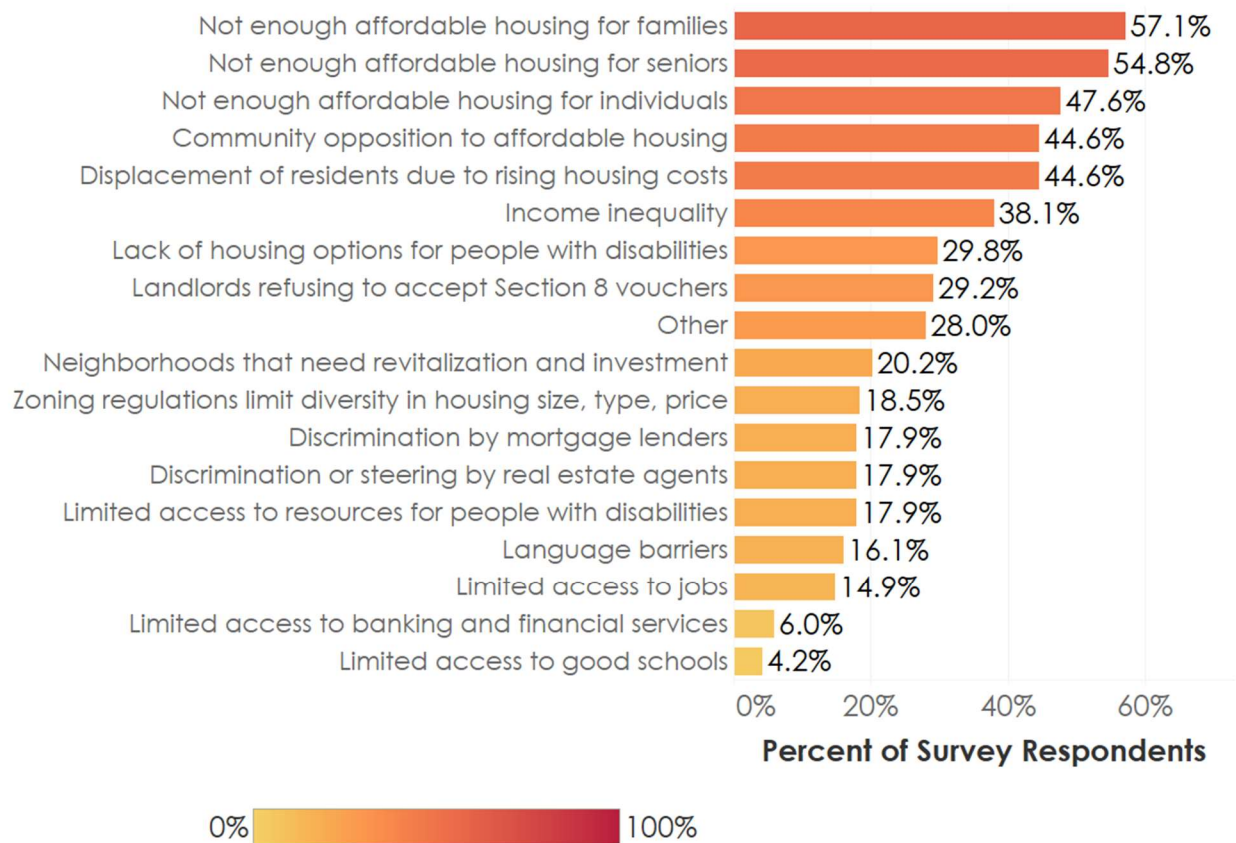
28.9% of respondents said they believe housing discrimination is an issue or may be an issue in the city, while 54.3% said they do not believe housing discrimination is an issue.

When asked to select any factors that are barriers to fair housing in Lee's Summit, respondents most often identified the following (see Figure 6):

- Not enough affordable housing for families (57.1%)
- Not enough affordable housing for seniors (54.8%)
- Not enough affordable housing for individuals (47.6%)
- Community opposition to affordable housing (44.6%)
- Displacement of residents due to rising housing costs (44.6%)

Notably, the top responses focused on a lack of supply of affordable and accessible housing in the city. Similarly, respondents indicated a need to reduce opposition to affordable housing and limit the displacement of residents due to rising housing costs.

FIGURE 6. RESPONSES TO “DO YOU THINK ANY OF THE FOLLOWING ARE BARRIERS TO FAIR HOUSING IN LEE’S SUMMIT? (CHECK ANY THAT APPLY.)” FROM THE COMMUNITY SURVEY



Socioeconomic Profile

BACKGROUND

Lee's Summit is located within Jackson County and Cass County, both of which are within the Kansas City, MO-KS Metropolitan Statistical Area (MSA). The city was home to an estimated 101,108 residents as of the 2020 Census. Residents of Lee's Summit comprise around 14% of Jackson County's total population and about 4.6% of the MSA's total population. The most recently available estimates from the 2018-2022 American Community Survey (centered in 2020) show that the city's population has grown by about 15% since the 2006-2010 estimates (centered in 2008), while the MSA's population has grown at a slower rate of about 9%⁴.

DEMOGRAPHIC PROFILE

Race and Ethnicity

White residents are the predominant racial or ethnic group in Lee's Summit, comprising more than three-fourths of the total population (77%). Black residents make up an estimated 9% of the city's population, and residents of two or more races make up approximately 5.6%. Hispanic and Latino residents comprise a similar share of the population (5.3%).

Other racial and ethnic groups are significantly less represented, with Asian and Pacific Islander residents accounting for just 2.5% of all residents and Native American residents accounting for 0.1%. Residents of other races make up 0.4% of the population. Relative to the MSA, Lee's Summit has a larger share of white residents and smaller shares of other racial or ethnic groups.

As shown in Table 3, Lee's Summit has become slightly more diverse over time. Black and Hispanic residents have increased in population share, while shares of white and Native American residents have decreased slightly. Shares of Asian or Pacific Islander increased from 2010 to 2014 and subsequently decreased to pre-2010 levels in the 2018-2022 estimates. Data for residents of two or more races or other races was

⁴ 2020 U.S. Census data provides more accurate information on race and ethnicity, while 2018-2022 ACS data provides the most current population estimates. Both data sets are included in the tables below: table 2 includes race, ethnicity, and total population data from the 2020 Census, while table 3 includes the same data from the 2018-2022 ACS.

unavailable in earlier data sources. The share of white residents also decreased over the same time period in the Kansas City MO-KS MSA. The share of Black residents decreased as well, while the share of Hispanic and Asian/Pacific Islander residents increased.

National Origin

Lee's Summit is home to approximately 4,362 foreign-born residents, who make up about 4.3% of the city's population. The most common birth country for foreign-born residents is Mexico, with foreign-born residents from Mexico comprising 0.5% of the total population. The next most common birth country is India, accounting for 0.4% of all residents. Residents born in Vietnam, the Philippines, or Bosnia and Herzegovina round out the top five most common birth countries of foreign-born residents, each accounting for 0.3% or less of the population.

Foreign-born residents make up a significantly larger share of the population in the MSA (10.8%). The most common country of birth for these residents in both jurisdictions is Mexico, followed by India, but the remaining top three countries of origin differ. Guatemala is the third most common country of origin for foreign-born residents in the MSA, followed by China (excluding Hong Kong and Taiwan) and Honduras.

Limited English Proficiency (LEP)

Residents of Lee's Summit and the Kansas City MSA report very high levels of English proficiency. Fewer than 1% of residents in each area have limited English proficiency (LEP), defined as speaking English less than "very well."

In Lee's Summit, Tagalog is the most common language spoken at home by residents with limited English proficiency, followed by Spanish and Chinese (including Mandarin and Cantonese). However, in the Kansas City MSA, the most common LEP language is Spanish, followed by Other Asian/Pacific Islander languages and Other and Unspecified Languages.

Between both geographies, Spanish LEP speakers in the Kansas City MSA account for the largest share, making up approximately 0.5% of the total population. All other shares of LEP speakers accounted for 0.1% or less of the total city and MSA populations.

Disability

As of the 2018-2022 American Community Survey, 8.9% of Lee's Summit residents and 11.9% of MSA residents have at least one disability. Lee's Summit's disability rate is lower than both the U.S. overall disability rate of 12.9% and Missouri overall disability rate of 14.5%.

The most common disability type in Lee's Summit and the Kansas City MO-KS MSA is an ambulatory disability, or a disability that impacts a person's ability to walk. An estimated 4.0% of Lee's Summit residents have this type of disability, while 6.1% of MSA residents do. This disability type is particularly significant in the need for accessible housing, as people with ambulatory disabilities often require modifications such as ramps and wider hallways.

Independent living (having difficulty doing errands alone such as visiting a doctor's office or shopping) and cognitive difficulties are the second and third most common disabilities in Lee's Summit, impacting 3.9% and 3.3% of all residents, respectively. As with ambulatory disabilities, these shares are higher in the MSA — 5.3% of MSA residents experience an independent living difficulty, and 4.9% experience a cognitive impairment. These two disability types are significant in the need for disability-accessible housing in that they are both more likely to involve live-in care, requiring housing that is large enough for a live-in caregiver. Self-care difficulties may also require live-in care but are less common in Lee's Summit, with 1.2% of residents experiencing this type of disability.

Hearing and vision disabilities affect 2.8% and 1.3% of Lee's Summit residents, respectively. These disability types may also require accessibility additions or modifications for suitable housing. In particular, residents with these disabilities may require special considerations for emergency systems, such as safe fire escape routes for visually impaired residents or visual rather than auditory fire alarms for hearing impaired residents.

Age

The age distributions within the City of Lee's Summit and the Kansas City MSA are very similar, with those under 18 years old making up a slightly larger share in Lee's Summit (25.8%) relative to the MSA (23.8%).

In Lee's Summit, 25.8% of residents are children under the age of 18, 59.5% of the population is working-aged (aged 18-64), and 15.3% of the population is aged 65 and up. Lee's Summit's population is slightly younger than that of the United States, in which 22.1% of the population is under age 18 and 16.5% is over age 65.

Analysis of American Community Survey 5-Year Estimates show that the share of the working aged population (18 to 64 years) has decreased over time, while the share of the population over age 65 has grown in both the city and the MSA. As the share of adults at or above retirement age continues to grow, the City will need to consider the housing needs of elderly adults when developing and rehabilitating housing.

Sex

Female residents make up a slightly larger share of the population (51.6%) than male residents in Lee's Summit. Similarly, in the MSA, 50.5% of the population is female, a rate similar to the national average of 50.9% female residents.

Family Type

Households with children under the age of 18 comprise 35% of Lee's Summit households, with 70.0% of such households headed by a couple, 18.4% headed by a female householder with no partner, and 11.6% by a male householder with no partner. Couples without children comprise nearly a third of Lee's Summit households (32.9%). Approximately 28.8% of Lee's Summit households have at least one member aged 65 or older, and an estimated 9.0% of all households are householders aged 65 or over and living alone. Shares of household types are similar in the MSA, although Lee's Summit has a slightly higher share of households with children (35% versus 30.3%).

From the 2006-2010 American Community Survey to the 2018-2022 survey, the share of households with children decreased slightly, from 39.5% to 35.9% of households. At the same time, the share of nonfamily households increased slightly, from 26.9% to 28.3% of all households.

TABLE 2. DEMOGRAPHIC OVERVIEW

Demographic Indicator	Lee's Summit			Kansas City, MS-KO MSA		
	#	%		#	%	
RACE / ETHNICITY						
Non-Hispanic or Latino						
White	78,003	77.1%		1,501,275	68.5%	
Black	8,886	8.8%		257,939	11.8%	
Asian or Pacific Islander	2,514	2.5%		71,079	3.2%	
Native American	232	0.2%		8,190	0.4%	
Other Race	379	0.4%		8,509	0.4%	
Two or More Races	5,696	5.6%		115,810	5.3%	
Hispanic or Latino	5,398	5.3%		229,233	10.5%	
TOTAL POPULATION	101,108	100%		2,192,035	100%	
NATIONAL ORIGIN FOR FOREIGN-BORN RESIDENTS						
#1 Region of Origin	Mexico	502	0.5%	Mexico	41,635	1.9%
#2 Region of Origin	India	437	0.4%	India	11,859	0.5%
#3 Region of Origin	Vietnam	285	0.3%	Guatemala	5,446	0.2%
#4 Region of Origin	Philippines	249	0.2%	China, excluding Hong Kong and Taiwan	5,237	0.2%
#5 Region of Origin	Bosnia and Herzegovina	173	0.2%	Honduras	4,946	0.2%
TOTAL FOREIGN-BORN POPULATION	4,362	4.3%		150,518	10.8%	

Demographic Indicator	Lee's Summit			Kansas City, MS-KO MSA		
	#		%	#		%
LIMITED ENGLISH PROFICIENCY (LEP LANGUAGE)						
#1 LEP Language	Tagalog (incl. Filipino)	75	0.1%	Spanish	10,287	0.5%
#2 LEP Language	Spanish	42	0.0%	Other Asian/Pacific Islander Languages	1,510	0.1%
#3 LEP Language	Chinese (incl. Mandarin, Cantonese)	34	0.0%	Other languages	1,204	0.1%
#4 LEP Language	Other languages	26	0.0%	Other Indo-European languages	1,192	0.1%
#5 LEP Language	Russian, Polish, or other Slavic languages	23	0.0%	Chinese (incl. Mandarin, Cantonese)	983	0.0%
TOTAL LEP POPULATION		229	0.4%		17,805	0.8%
AGE						
Under 18		26,102	25.8%		521,586	23.8%
18 to 64		60,181	59.5%		1,332,703	60.8%
65+		15,445	15.3%		336,461	15.3%
DISABILITY TYPE						
Ambulatory Difficulty		3,838	4.0%		123,176	6.1%
Independent Living Difficulty		2,886	3.9%		87,867	5.3%
Cognitive Difficulty		3,147	3.3%		100,345	4.9%
Hearing Difficulty		2,810	2.8%		75,040	3.5%
Vision Difficulty		1,322	1.3%		46,191	2.1%

Demographic Indicator	Lee's Summit		Kansas City, MS-KO MSA	
	#	%	#	%
Self-Care Difficulty	1,142	1.2%	42,177	2.1%
TOTAL POPULATION WITH A DISABILITY	8,951	8.9%	258,152	11.9%
SEX				
Male	49,523	49.0%	1,084,347	49.5%
Female	52,205	51.6%	1,106,403	50.5%
FAMILY TYPE				
Households with Children	13,621	35.0%	263,555	30.3%
Couple with Children	9,539	24.5%	170,777	19.6%
Female Householder, No Partner, Children	2,504	6.4%	53,284	6.1%
Male Householder, No Partner, Children	1,578	4.1%	39,494	4.5%
Couple without Children	12,817	32.9%	247,284	28.4%
Households with one or more members aged 65+	10,631	27.3%	240,389	27.6%
Householder aged 65+ living alone	3,508	9.0%	92,296	10.6%
TOTAL HOUSEHOLDS	38,919	100.0%	869,964	100.0%
Data Sources: 2020 U.S. Census Redistricting Data; 2018-2022 5-Year American Community Survey, Tables S1601, S05006, DP02, S0101, S1810, and S1101				

NOTE: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total households, and disability, which is out of total non-institutionalized population. The most populous places of birth and languages at the city and regional levels may not be the same and are thus labeled separately.

NOTE: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total households.

TABLE 3. DEMOGRAPHIC TRENDS

Demographic Indicator	2006-2010		2010-2014		2018-2022	
	#	%	#	%	#	%
City of Lee's Summit						
<i>Race/Ethnicity</i>						
White, Non-Hispanic	72,852	83.7%	76,038	81.9%	80,519	79.2%
Black	7,151	8.2%	8,095	8.7%	8,991	8.8%
Hispanic/Latino	2,828	3.3%	3,621	3.9%	4,984	4.9%
Asian or Pacific Islander	1,951	2.2%	2,489	2.7%	2,229	2.2%
Native American	250	0.3%	87	0.1%	91	0.1%
TOTAL POPULATION	87,027		92,813		101,728	
<i>National Origin</i>						
Foreign-Born	2,812	3.2%	3,514	3.8%	4,362	4.3%
<i>Limited English Proficiency</i>						
LEP	956	1.0%	1,151	1.2%	1,431	1.4%
<i>Age</i>						
Under 18	24,084	27.7%	25,770	27.8%	26,102	25.7%
18 to 64	53,258	61.2%	55,858	60.2%	60,181	59.2%
65+	9,685	11.1%	11,185	12.1%	15,445	15.2%
<i>Sex</i>						
Male	41,585	47.8%	44,641	48.1%	49,523	48.7%
Female	45,442	52.2%	48,172	51.9%	52,205	51.3%
<i>Family Type</i>						
Families with Children	13,043	39.5%	13,194	39.1%	13,972	35.9%
Nonfamily Households	8,885	26.9%	8,746	25.9%	11,006	28.3%

Demographic Indicator	2006-2010		2010-2014		2018-2022	
	#	%	#	%	#	%
Kansas City, MO-KS MSA						
Race/Ethnicity						
White, Non-Hispanic	1,504,051	75.2%	1,504,088	73.7%	1,554,546	71.0%
Black	244,148	12.2%	253,023	12.4%	260,587	11.9%
Hispanic/Latino	153,703	7.7%	173,127	8.5%	210,542	9.6%
Asian or Pacific Islander	46,640	2.3%	52,639	2.6%	68,797	3.1%
Native American	7,458	0.4%	7,651	0.4%	4,255	0.2%
TOTAL POPULATION	1,999,718		2,040,869		2,190,750	
National Origin						
Foreign-Born	120,651	6.0%	131,221	6.4%	150,518	6.9%
Limited English Proficiency						
LEP	75,254	3.8%	73,761	3.6%	79,047	3.6%
Age						
Under 18	515,653	25.8%	514,850	25.2%	521,586	23.8%
18 to 64	1,249,647	62.5%	1,268,789	62.2%	1,332,703	60.8%
65+	234,418	11.7%	257,230	12.6%	336,461	15.4%
Sex						
Male	978,275	48.9	1,000,049	49.0%	1,084,347	49.5%
Female	1,021,443	51.1%	1,040,820	51.0%	1,106,403	50.5%
Family Type						
Families with Children	270,293	34.2%	262,089	33.1%	265,546	30.5%
Nonfamily Households	265,688	33.7%	275,272	34.7%	316,165	36.3%
Data Sources: American Community Survey, 2006-2010, 2010-2014, 2018-2022, tables S0101, S0601, B05006, S1601, and S1101						

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY

The Analysis of Impediments to Fair Housing Choice uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (RECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least three times that of the tract average for the metropolitan area, whichever is lower) and a non-white population of 50% or more. Using a metric that combines demographic and economic indicators helps to identify a jurisdiction's most vulnerable communities.

The racial and ethnic composition of neighborhoods with concentrations of poverty in the United States is disproportionate relative to the U.S. population overall. According to the U.S. Department of Health and Human Services, Black and Latino populations comprise nearly 80% of the population living in areas of concentrated poverty in metropolitan areas, but only account for 42.6% of the total poverty population in the U.S.⁵ Overrepresentation of these groups in areas of concentrated poverty can exacerbate disparities related to safety, employment, access to jobs and quality education, and conditions that lead to poor health.

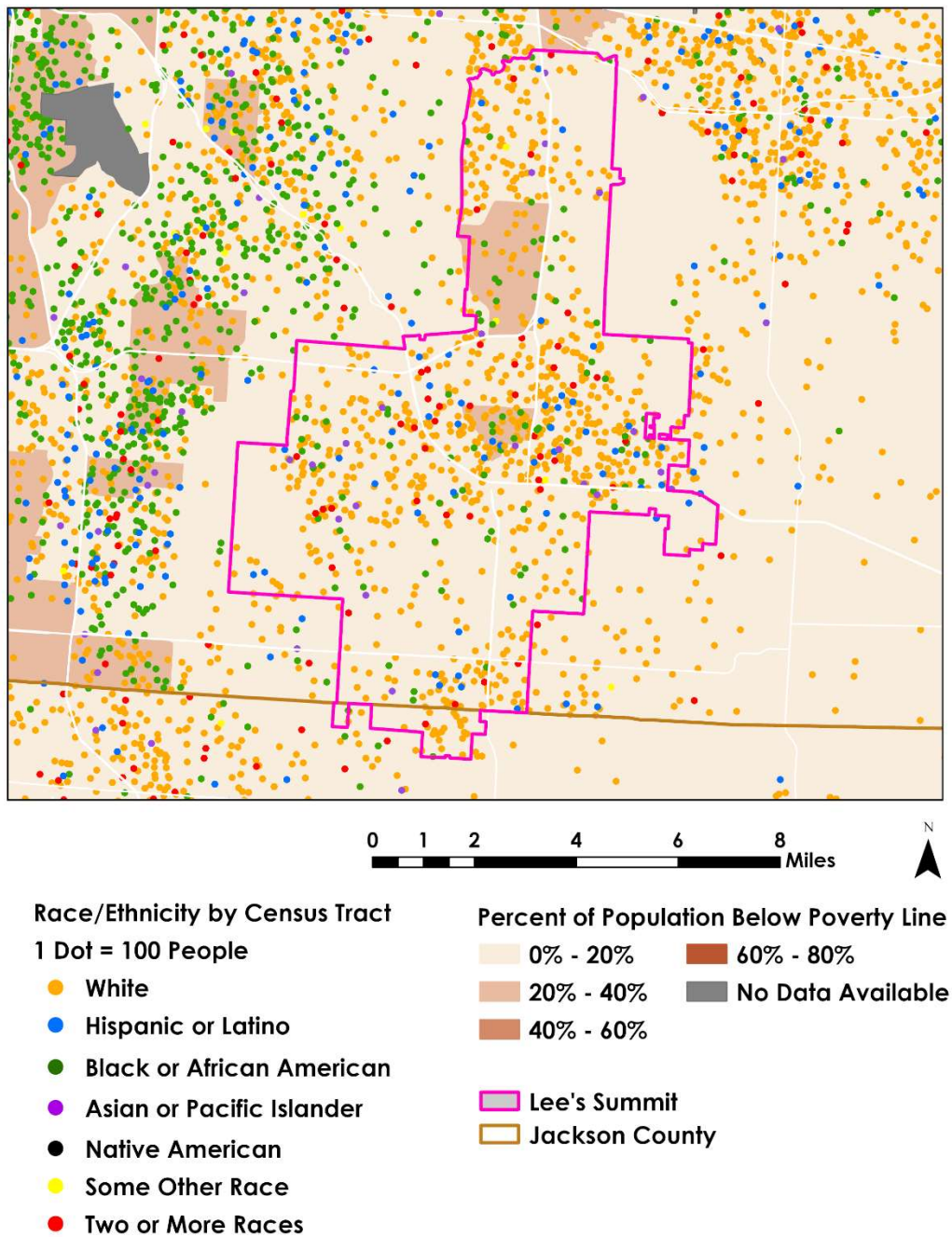
Identification of RECAPs is significant in determining priority areas for reinvestment and services to ameliorate conditions that negatively impact RECAP residents and the larger region. Since 2000, the prevalence of concentrated poverty has expanded by nearly 75% in both population and number of neighborhoods. Poverty is concentrated within the largest metro areas, but suburban regions have experienced the fastest growth in poverty.⁶

As of the 2018-2022 American Community Survey five-year estimates, there were no census tracts in Lee's Summit that met the definition of a R/ECAP (see Figure 7).

⁵ United States, Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. "Overview of Community Characteristics in Areas with Concentrated Poverty." ASPE Issue Brief, May 2014, https://aspe.hhs.gov/system/files/pdf/40651/rb_concentratedpoverty.pdf.

⁶ Kneebone, Elizabeth. "The Growth and Spread of Concentrated Poverty, 2000 to 2008-2012." The Brookings Institution, 29 July 2016, www.brookings.edu/interactives/the-growth-and-spread-of-concentrated-poverty-2000-to-2008-2012/.

FIGURE 7. RACE/ETHNICITY AND PERCENT OF POPULATION BELOW POVERTY IN LEE'S SUMMIT, 2022



Source: 2018-2022 American Community Survey 5-Year Estimates

Segregation and Integration

BACKGROUND

Communities experience varying levels of segregation among different racial, ethnic, and socioeconomic groups. High levels of residential segregation often lead to conditions that exacerbate inequalities among population groups within a community. Increased concentrations of poverty and unequal access to jobs, education, and other services are some of the consequences of high residential segregation.⁷

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968 not only encouraged segregation, but mandated restrictions based on race in specific neighborhoods. The Fair Housing Act of 1968 outlawed discriminatory housing practices but did little to address the existing segregation and inequalities. Other federal housing policies and programs, like Section 8 and HOPE VI, have been implemented in an effort to ameliorate the negative effects of residential segregation and reduce concentrations of poverty. Despite these efforts, the repercussions of the discriminatory policies and practices continue to have a significant impact on residential patterns today.

RACE AND ETHNICITY

Figures 8, 9, and 10 map the population in the city of Lee's Summit by race and ethnicity using 2000, 2010, and 2020 Census data. Population distribution patterns by race and ethnicity throughout the city and county indicate that white residents comprise the majority of the city's population, while numbers of multiracial, Black, Hispanic/Latino, and Asian/Pacific Islander residents have increased each decade. The spatial distribution of the region's total population has remained relatively similar, with neighborhoods becoming more densely populated over time. The central

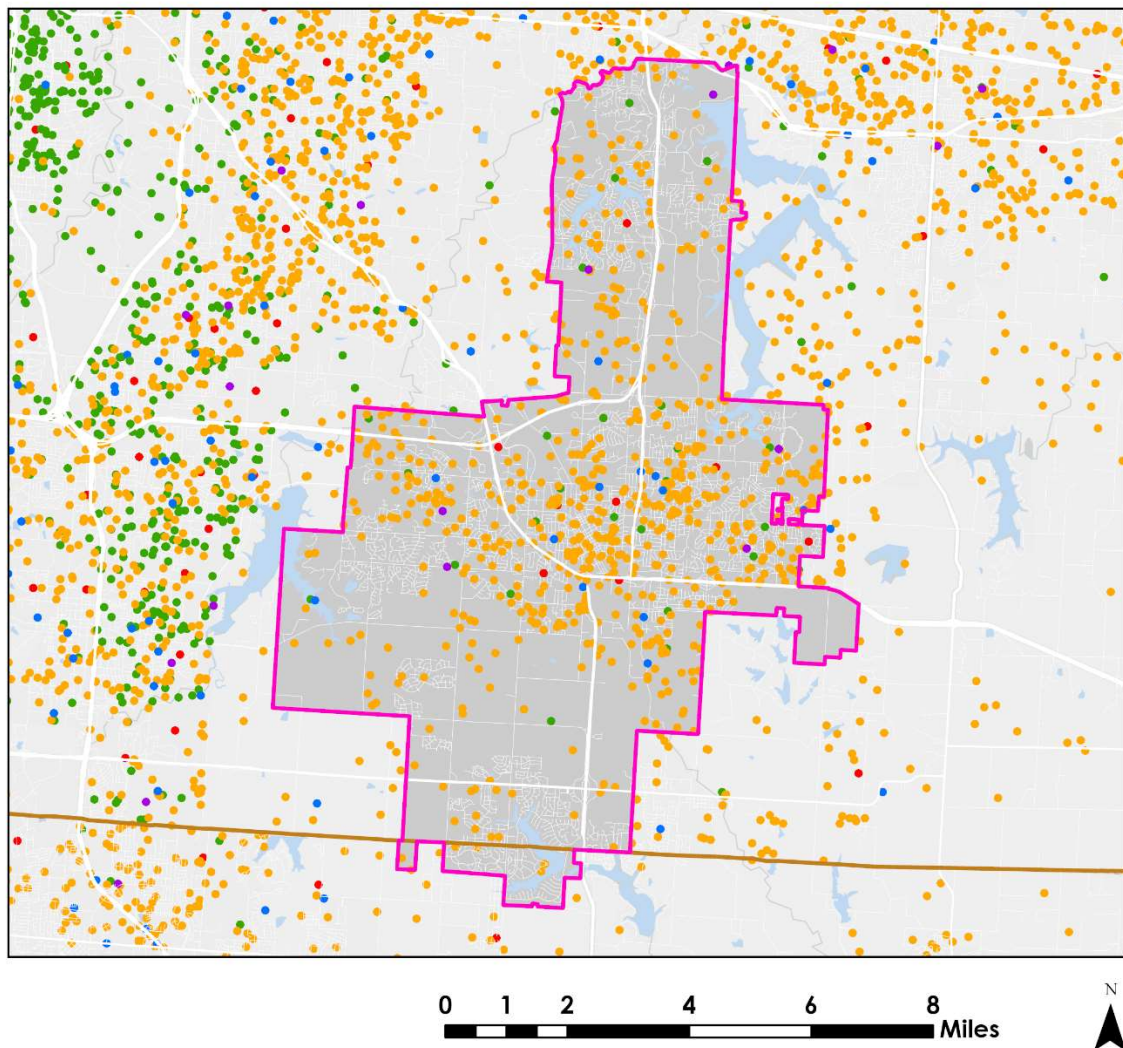
⁷ Massey, D. (1990). *American Apartheid: Segregation and the Making of the Underclass*. *American Journal of Sociology*, 96(2), 329-357. Retrieved from <http://www.jstor.org/stable/2781105>.

portions of Lee's Summit have the greatest residential density, while the southern area of the city has a lower density of residents.

As Figures 8 through 10 demonstrate, since the 2000s, there has been clustering of Black residents directly west of Lee's Summit city limits and a low share of Black residents living within Lee's Summit. To the east of Lee's Summit, the population is predominantly white. These visualizations suggest a degree of racial segregation between the City of Lee's Summit and the Kansas City MO-KO MSA that is further supported by data in Table 4.

Table 3 also notes that the shares of Black and Hispanic residents in Lee's Summit have remained lower than the shares of the same racial/ethnic groups in the MSA since the 2006-2010 American Community Survey five-year estimates. The share of Black residents in Lee's Summit increased slightly from 8.2% in the 2006-2010 estimates to 8.8% in 2018-2022, while the share of Hispanic residents grew from 3.3% in the 2006-2010 estimates to 4.9% in 2018-2022. Comparatively, the share of Black residents in the Kansas City MSA has hovered around 12% since 2006. The share of Hispanic residents in the MSA increased from 7.7% to 9.6% over the same time period.

FIGURE 8. POPULATION BY RACE AND ETHNICITY IN LEE'S SUMMIT, 2000



Race/Ethnicity by Census Tract

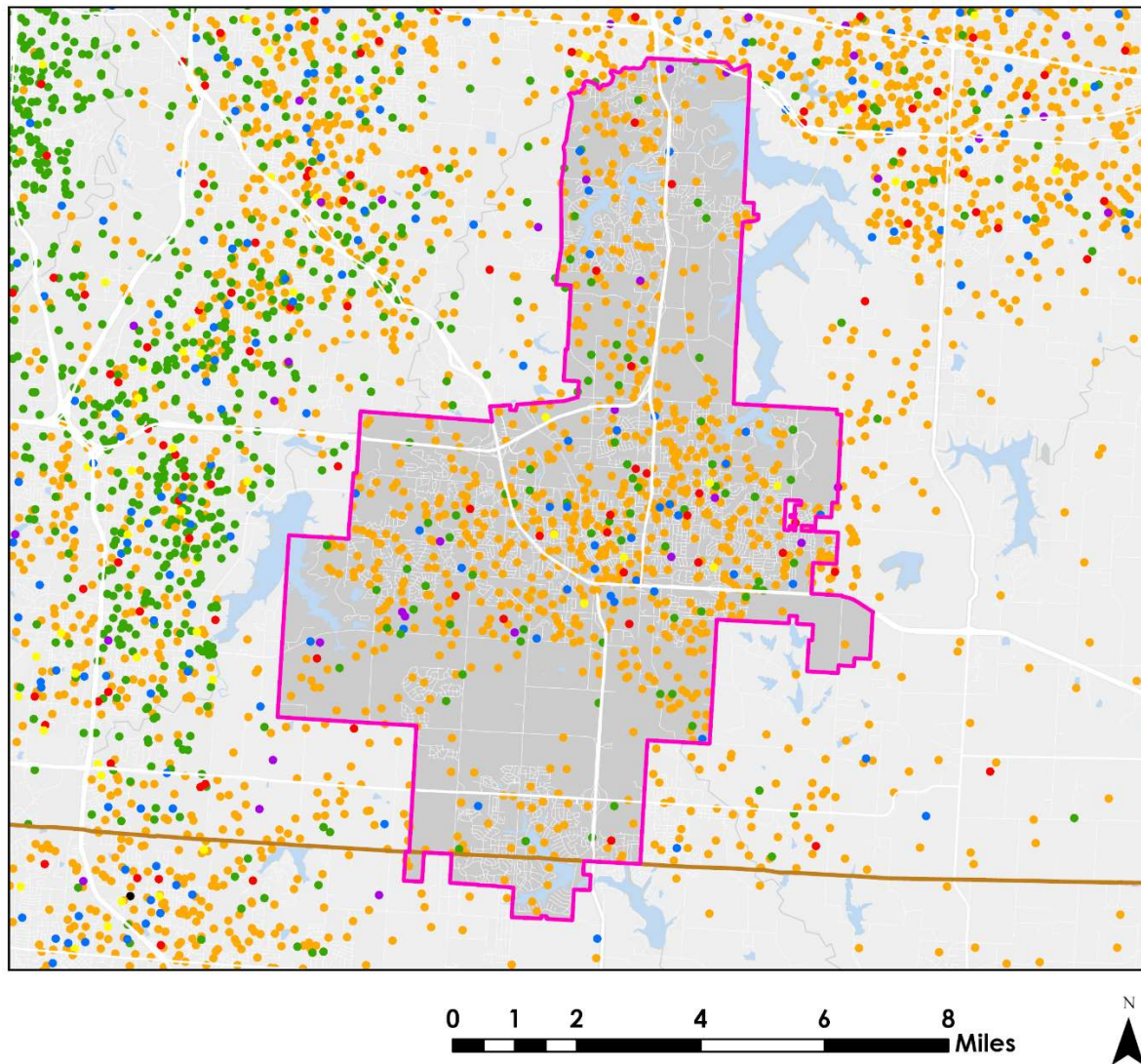
1 Dot = 100 People

- White
- Hispanic or Latino
- Black or African American
- Asian or Pacific Islander
- Native American
- Some Other Race
- Two or More Races

- Lee's Summit
- Jackson County

Source: 2000 U.S. Census

FIGURE 9. POPULATION BY RACE AND ETHNICITY IN LEE'S SUMMIT, 2010



Race/Ethnicity by Census Tract

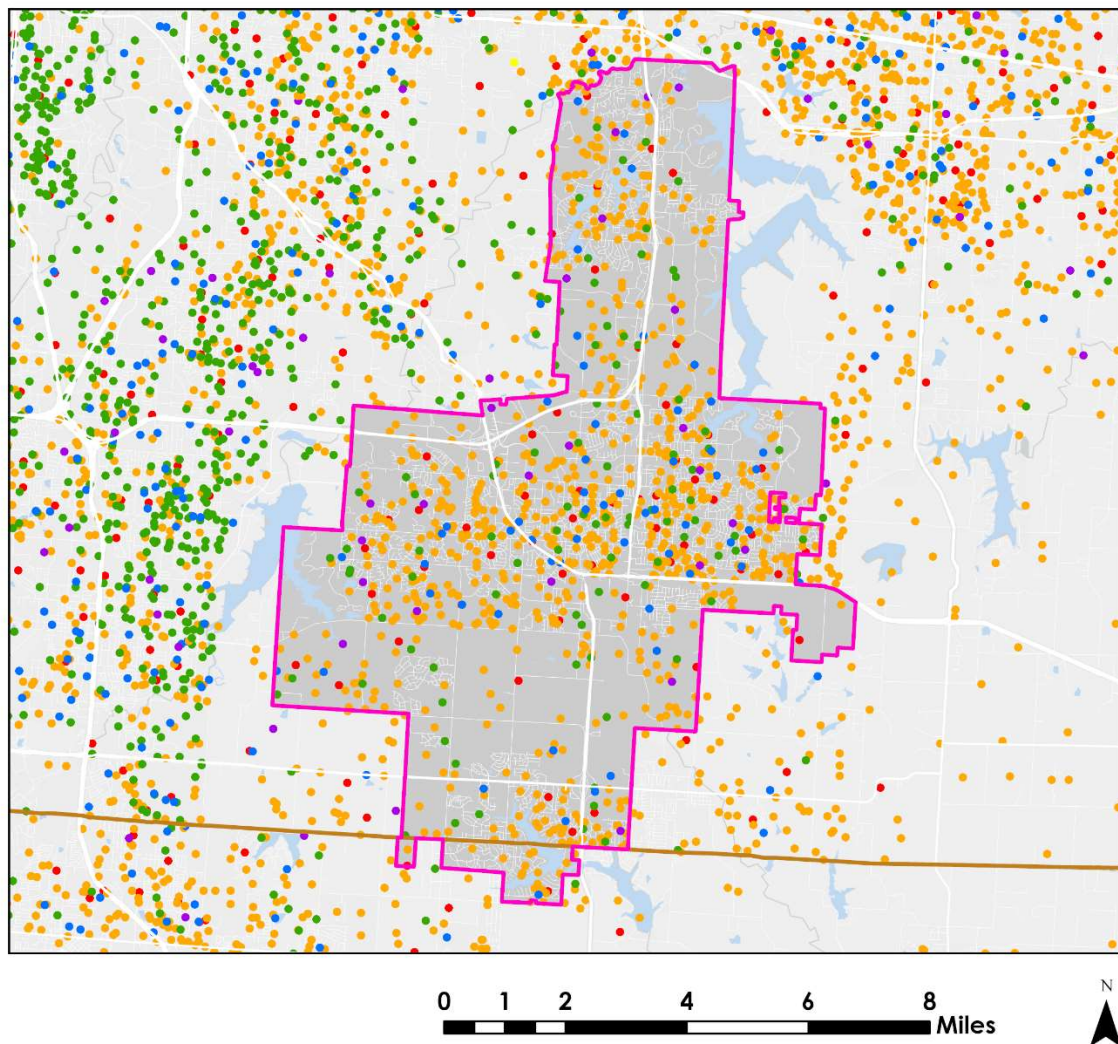
1 Dot = 100 People

- White
- Hispanic or Latino
- Black or African American
- Asian or Pacific Islander
- Native American
- Some Other Race
- Two or More Races

- Lee's Summit
- Jackson County

Source: 2010 U.S. Census

FIGURE 10. POPULATION BY RACE AND ETHNICITY IN LEE'S SUMMIT, 2020



Race/Ethnicity by Census Tract

1 Dot = 100 People

- White
- Hispanic or Latino
- Black or African American
- Asian or Pacific Islander
- Native American
- Some Other Race
- Two or More Races

- Lee's Summit
- Jackson County

Source: 2020 U.S. Census

SEGREGATION LEVELS

In addition to visualizing the racial and ethnic composition of the area with the preceding maps, this study also uses a type of statistical analysis—referred to as dissimilarity—to evaluate how residential patterns vary by race and ethnicity, and how these patterns have changed since 1990. The Dissimilarity Index (DI) indicates the degree to which two groups living in a region are similarly geographically distributed. Segregation is lowest when the geographic patterns of each group are the same. For example, segregation between two groups in a city or county is minimized when the population distribution by census tract of the first group matches that of the second. Segregation is highest when no members of the two groups occupy a common census tract. The proportion of the minority population group can be small and still not segregated if evenly spread among tracts or block groups.

Evenness is not measured in an absolute sense but is scaled relative to the other group. Dissimilarity Index values range from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 40 as low segregation, a value between 40 and 54 as moderate segregation, and a value of 55 or higher as high segregation. The DI represents the proportion of one group that would have to change their area of residence to match the distribution of the other.

The table below shares the dissimilarity indices for four pairings in Lee's Summit and the Kansas City MO-KS MSA. This table presents values for 1990, 2000, 2010, and current, all calculated using census tracts as the area of measurement.

TABLE 4. RACIAL AND ETHNIC DISSIMILARITY INDEX TRENDS

Race/Ethnicity	Lee's Summit				Kansas City, MO-KS MSA			
	1990	2000	2010	Current	1990	2000	2010	Current
Non-White/White	17.03	11.37	10.61	17.64	60.43	54.38	45.36	49.77
Black/White	21.84	17.47	13.96	23.28	72.72	69.18	58.57	63.20
Hispanic/White	13.64	10.76	13.53	14.17	39.75	45.69	44.42	46.61
Asian or Pacific Islander/White	20.28	14.82	16.89	24.45	34.41	35.09	34.14	41.09
Data Sources: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool, AFFHT0006, Released July 10, 2020, https://egis.hud.gov/affht/ .								

Though all Dissimilarity Indices calculated for each pairing in Lee's Summit are below 40 and considered low by HUD definitions, this may be attributed to the city's predominantly white population (approximately 77% of the city's total population is white). As Figure 10 shows, Lee's Summit non-white population is small and distributed

relatively evenly throughout the city. The same map also shows a high concentration of Black residents living directly outside of the city to the west and north of Longview Lake around Grandview, Raytown, and South Kansas City. These patterns of segregation between the greater Kansas City MSA and the City of Lee's Summit suggest that there are barriers to living within the City of Lee's Summit for Black residents in particular.

Additionally, current DI values are the highest they have been for all pairings, indicating that segregation may be increasing in the city. Segregation between Black and white residents decreased dramatically between 1990 to 2010, then increased between 2010 and now to levels higher than those found in 1990. Figures 8 through 10 demonstrate these changes, showing few Black residents in the city in 2000, an increased number in 2010, and slight clustering around the central area of the city in 2020.

Segregation levels between Hispanic and white residents have remained similar throughout this time period, decreasing slightly between 1990-2000 before increasing again between 2000 and 2010. Segregation between Asian or Pacific Islander and white residents follows a similar pattern, though overall values are slightly higher. The current DI value of 24.45 between Asian or Pacific Islander/white residents is the highest DI value found in Lee's Summit. Figure 10 shows that though overall numbers are low, there is slight clustering of Asian or Pacific Islander residents in the central area of the city in 2020.

The segregation levels in the Kansas City MO-KS MSA are notably higher than those found in Lee's Summit. Here, there are currently moderate segregation values for all racial/ethnic pairings with the exception of the Black/white pairing, which exhibits high segregation at 63.2. There has been high segregation between Black and white residents in the Kansas City MSA in every decade since 1990, though DI values have decreased from 72.72 to 63.2 between 1990 and now. These findings are supported by Figures 8 through 10, which show a large cluster of Black residents in the areas closer to Kansas City to the west of Lee's Summit, while the city itself is predominantly white.

Segregation between Hispanic and white residents in the MSA has remained moderate since 2000, and segregation between Asian or Pacific Islander and white residents has increased from low between 1990-2010 to moderate.

NATIONAL ORIGIN AND LIMITED ENGLISH PROFICIENCY POPULATION

Settlement patterns of immigrants significantly impact the composition and landscape of communities across the United States. Large central cities have the largest population of foreign-born residents, but suburban areas are experiencing rapid growth of foreign-born populations in recent years.⁸ Clusters of immigrants of the same ethnicity form for a variety of reasons. Social capital in the form of kinship ties, social network connections, and shared cultural experiences often draw new immigrants to existing communities. Settling in neighborhoods with an abundance of social capital is less financially burdensome for immigrants and provides opportunities to accumulate financial capital through employment and other resources that would otherwise be unattainable.⁹

Populations with limited English proficiency (LEP) are typically composed of foreign-born residents that originate from countries where English is not the primary language, however, a substantial portion (19%) of the national LEP population is born in the United States. Nationally, the LEP population has lower levels of education and is more likely to live in poverty compared to the English proficient population.¹⁰ Recent studies have also found that areas with high concentrations of LEP residents have lower rates of homeownership.¹¹

Communities of people sharing the same ethnicity and informal networks are able to provide some resources and opportunities, but numerous barriers and limited financial capital influence residential patterns of foreign-born and LEP populations.

The residential patterns of foreign-born populations in Lee's Summit are shown in Figure 11. The overall foreign-born population is relatively small (approximately 4.3% of Lee's Summit's total population). Residents from Mexico comprise the largest foreign-born population in Lee's Summit (0.5% of the total population) and the MSA

⁸ James, F., Romine, J., & Zwanzig, P. (1998). *The Effects of Immigration on Urban Communities*. *Cityscape*, 3(3), 171-192.

⁹ Massey, D. (1999). *Why Does Immigration Occur?: A Theoretical Synthesis*. In Hirschman C., Kasinitz P., & DeWind J. (Eds.), *Handbook of International Migration, The: The American Experience* (pp. 34-52). Russell Sage Foundation.

¹⁰ Zong, J. & Batalova, J. (2015). "The Limited English Proficient Population in the United States" *Migration Information Source*. Retrieved: <http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states>.

¹¹ Golding, E., Goodman, L., & Strochack, S. (2018). "Is Limited English Proficiency a Barrier to Homeownership?" *Urban Institute*. Retrieved: <https://www.urban.org/research/publication/limited-english-proficiency-barrier-homeownership>.

(1.9%) and are distributed mostly throughout the central portion of the city, with a small cluster in the central-east area. Directly outside of Lee's Summit city limits to the west, there is also a notable Mexican population.

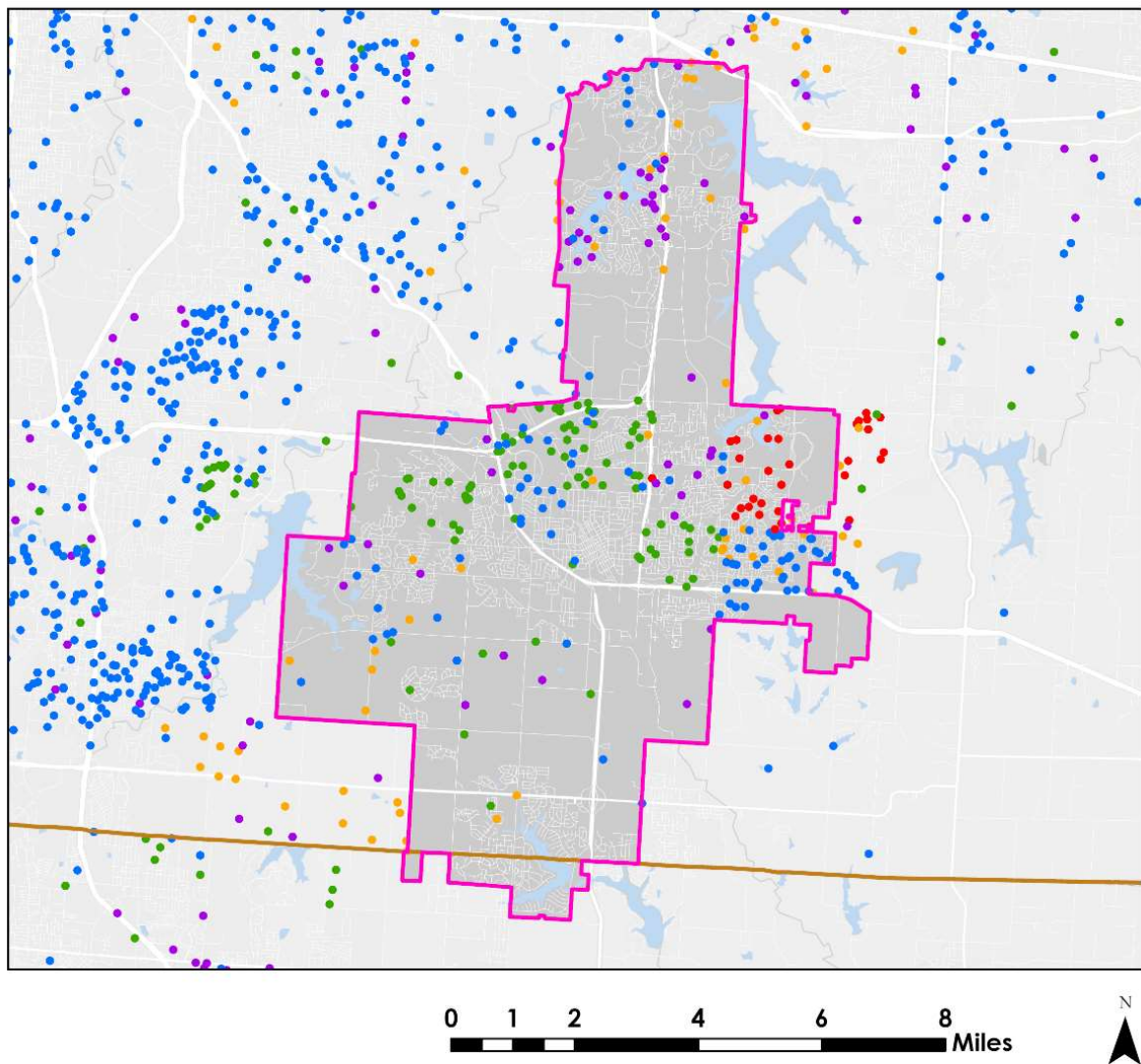
Residents from India comprise the second most populous foreign population in Lee's Summit and the MSA and are most concentrated in the central area of Lee's Summit. The remaining most populous countries of birth for the foreign-born population in Lee's Summit are residents from Vietnam, the Philippines, and Bosnia and Herzegovina, respectively. In the MSA, residents from Guatemala, China (excluding Hong Kong and Taiwan), and Honduras comprise the remaining most populous foreign-born populations.

Those with Limited English Proficiency, defined as not speaking English "very well", make up a small percentage of Lee's Summit (0.4% of the total population). The majority of the LEP population in Lee's Summit are Tagalog speakers, who are clustered in tract 138.03, which is bordered by NE Langsford Rd to the north, Route 291 to the west, SE Todd Geroge Pkwy to the east, and Route 50 to the south.

The rest of the LEP population in Lee's Summit make up a very small percentage of the total population (less than 0.1%).

The LEP population is slightly larger in the Kansas City MSA (0.8% of the total population), with Spanish LEP speakers as the most populous group (0.5%).

FIGURE 11. FOREIGN BORN POPULATION BY NATIONALITY IN LEE'S SUMMIT, 2018 TO 2022



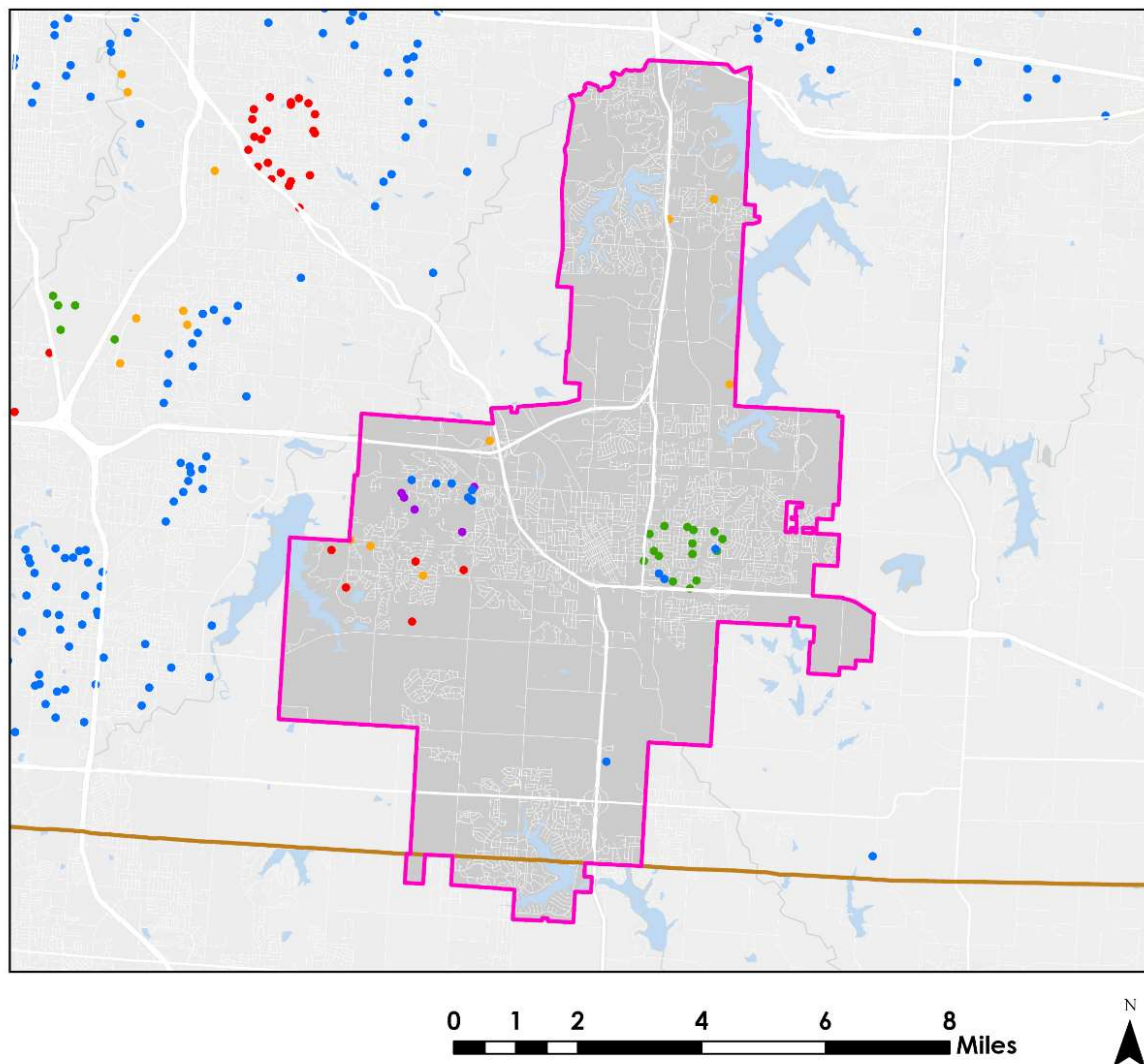
Foreign Born Population
(Top 5 Most Populous Countries of Origin)
1 Dot = 5 People

- Mexico
- India
- Philippines
- Vietnam
- Bosnia and Herzegovina

Lee's Summit
 Jackson County

Source: 2018-2022 ACS, Table B05006

FIGURE 12. POPULATION WITH LIMITED ENGLISH PROFICIENCY IN LEE'S SUMMIT, 2018 TO 2022



**Limited English Proficiency (LEP) Population
(Top 5 Most Popular Languages Spoken)**

1 Dot = 5 People

- Spanish
- Tagalog (incl. Filipino)
- Russian, Polish, or other Slavic languages
- Chinese (incl. Mandarin, Cantonese)
- Other and unspecified languages

■ Lee's Summit
■ Jackson County

Source: 2018-2022 ACS, Table S1610

Access to Opportunity

BACKGROUND

Where people live shapes prospects for economic mobility and access to resources and services such as high-quality education; affordable transportation; a healthy environment; fresh, affordable food; and healthcare. However, neighborhood or housing choices are often limited by discrimination in housing markets or public policies that result in concentrated poverty, disinvestment, and a lack of affordable housing in neighborhoods with access to high-performing schools and jobs that pay living wages. In this way, limited housing choices reduce access to opportunity for many protected classes.

In addition to proximity, access to opportunity is also shaped by economic, social, and cultural factors. For example, residents may live in locations with high numbers of jobs but may be unable to obtain them due to gaps in education or skills, a lack of reliable transportation, or childcare needs.

The strategy to improve access to opportunity through housing and community development programs has been two-pronged. Programs such as tenant-based housing vouchers provide recipients with mobility to locate in lower-poverty areas, while programs such as the Community Development Block Grant and Choice Neighborhoods Initiative provide funds to increase opportunities in low- or moderate-income neighborhoods. The following sections assess the opportunity in Lee's Summit, including employment and workforce development, education, transportation, environmental quality, fresh food, and healthcare.

EMPLOYMENT AND WORKFORCE DEVELOPMENT

Neighborhoods with high numbers of jobs nearby are often assumed to have good access to those jobs. However, other factors—transportation options, the types of jobs available in the area, or the education and training necessary to obtain them—may also shape residents' access to available jobs. For example, residents of a neighborhood in close proximity to a high number of living-wage jobs may not have the skills or education required for those jobs, and thus may continue to experience high levels of unemployment, work in low-wage positions, or need to commute long distances to access employment. Labor market engagement and jobs proximity, when considered together, often offer a better indication of how accessible jobs are for residents.

Labor Market Engagement

Educational attainment, labor force participation, and unemployment are indicators of residents' engagement with the labor market. In Lee's Summit, 48.7% of residents aged 25 and over hold a bachelor's degree or higher, a share significantly higher than that of Jackson County (33.0%) and of the state of Missouri overall (31.2%). Geographic disparities exist, with the percentage of residents with bachelor's degrees or higher ranging from 0% to 86% across the city's census tracts. Residents of north Lee's Summit tend to have the lowest levels of educational attainment, while educational attainment tends to be highest in southwest and east Lee's Summit (see Figure 13).

Disparities in educational attainment also exist by race and ethnicity in the city. Asian residents tend to have the highest levels of educational attainment (an estimated 64.0% of residents aged 25 and over have a bachelor's degree or higher), followed by white residents (50.3%). Residents who identify as some other race and Native Hawaiian/Other Pacific Islander residents are least likely to have higher levels of education (18.3% and 13.4% have a bachelor's degree or higher, respectively; see Figure 14).

FIGURE 13. EDUCATIONAL ATTAINMENT, CITY OF LEE'S SUMMIT, 2018-2022

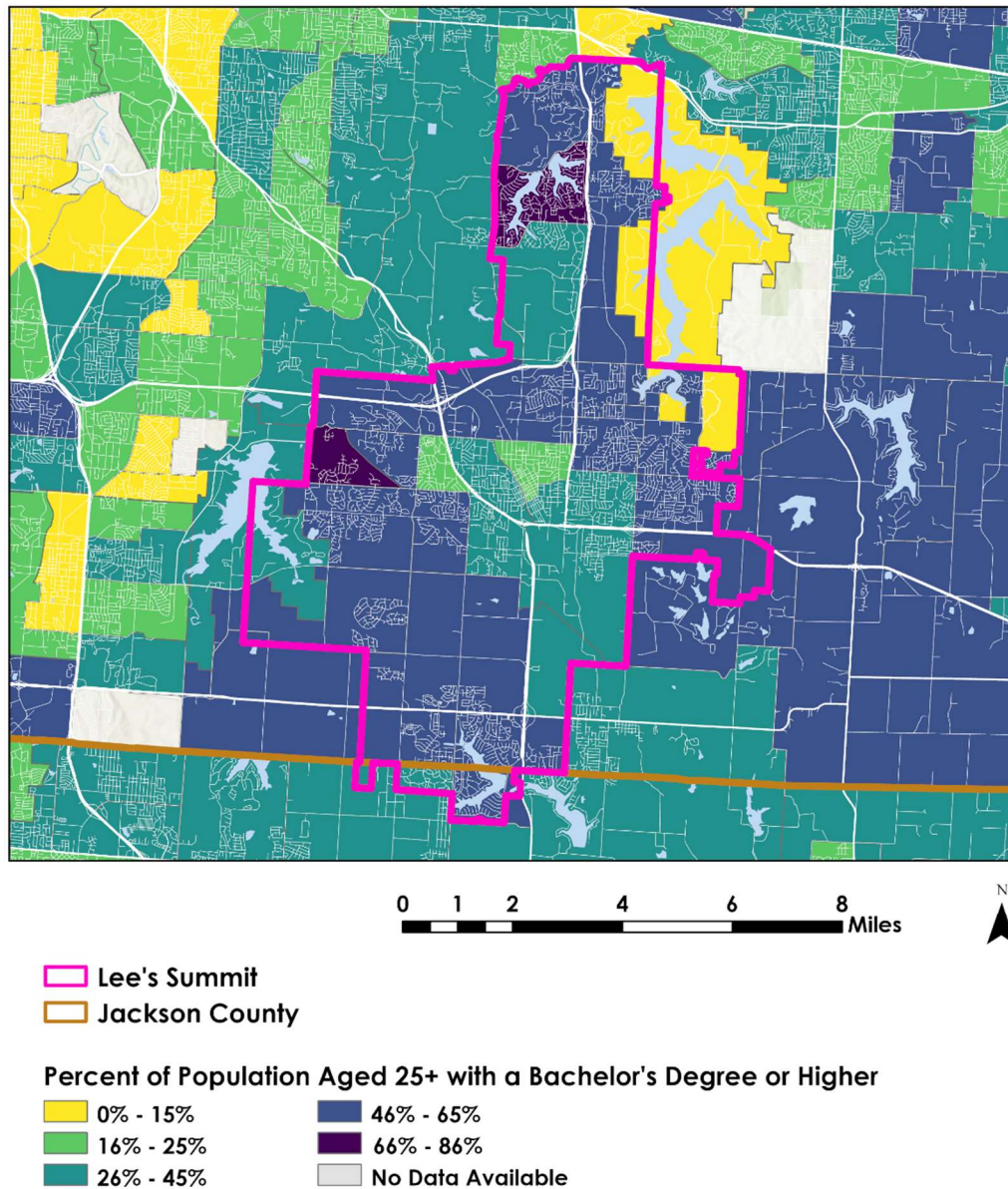
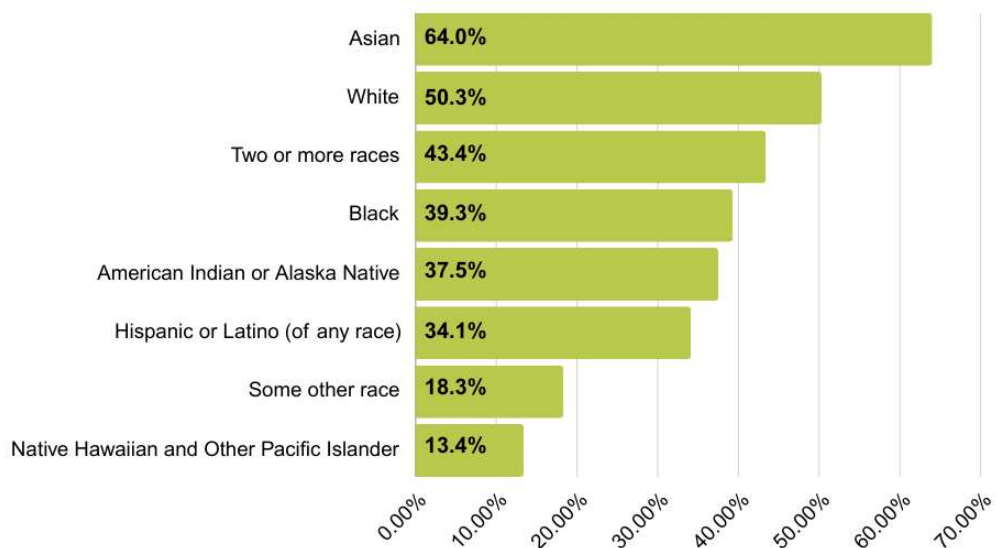


FIGURE 14. EDUCATIONAL ATTAINMENT BY RACE AND ETHNICITY, LEE'S SUMMIT, 2018-2022



Source: American Community Survey 5-Year Estimates, 2018-2022, Table S1501

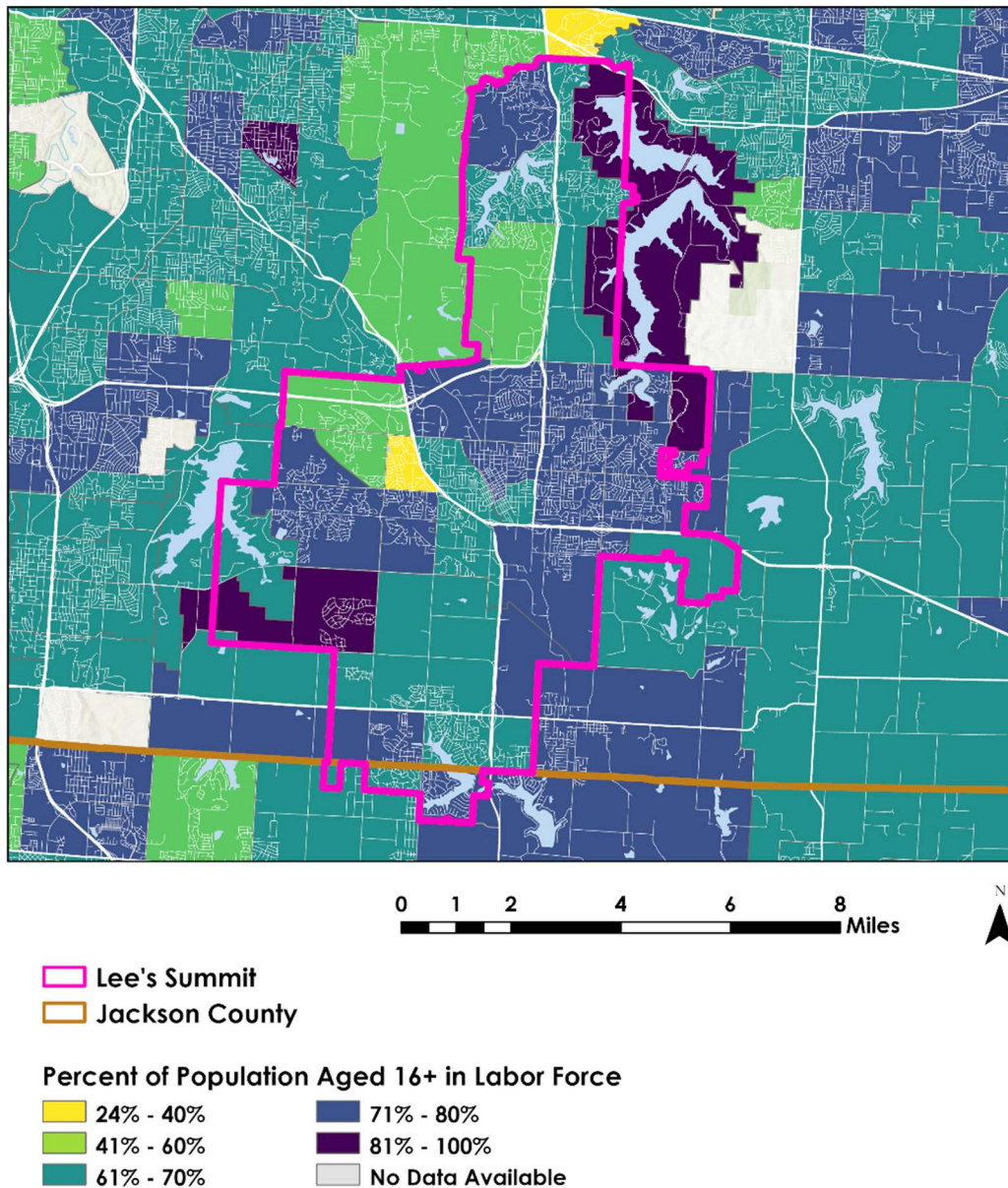
FIGURE 15. UNIVERSITY OF CENTRAL MISSOURI LEE'S SUMMIT



An estimated 70.4% of the population aged 16 and over in Lee's Summit participates in the labor force, a share slightly higher than that of Jackson County (67.9%) and of the state of Missouri overall (62.9%). As with educational attainment, geographic disparities exist, with labor force participation rates ranging from 24% to 100% in census tracts across the city. Residents of west-central Lee's Summit tend to participate in the

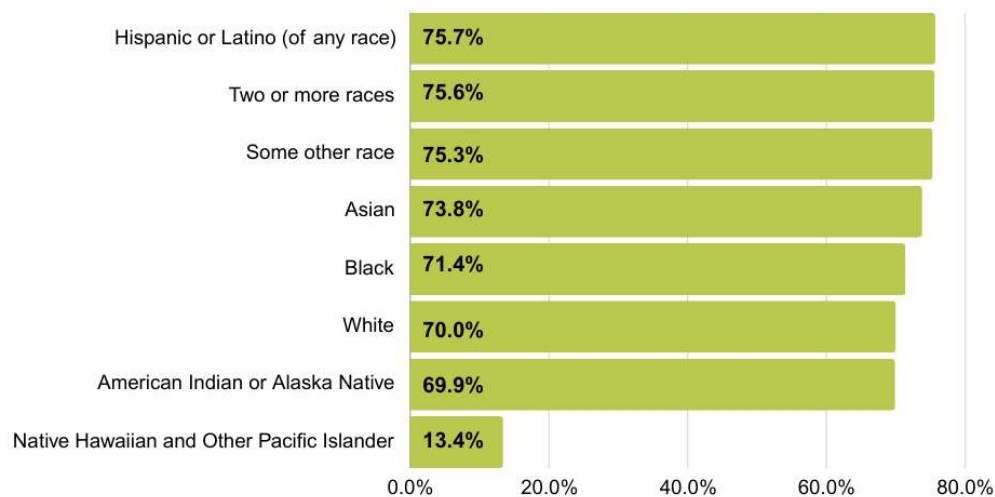
labor force at the lowest levels, while participation tends to be highest in northeast Lee's Summit (see Figure 16).

FIGURE 16. LABOR FORCE PARTICIPATION FOR POPULATION AGED 16+, CITY OF LEE'S SUMMIT, 2018-2022



Labor force participation is highest among Hispanic/Latino residents and residents of two or more races (an estimated 75.7% and 75.6% of whom participate in the labor force, respectively) and lowest among Native Hawaiian/Other Pacific Islander residents (13.4% of whom participate; see Figure 17).

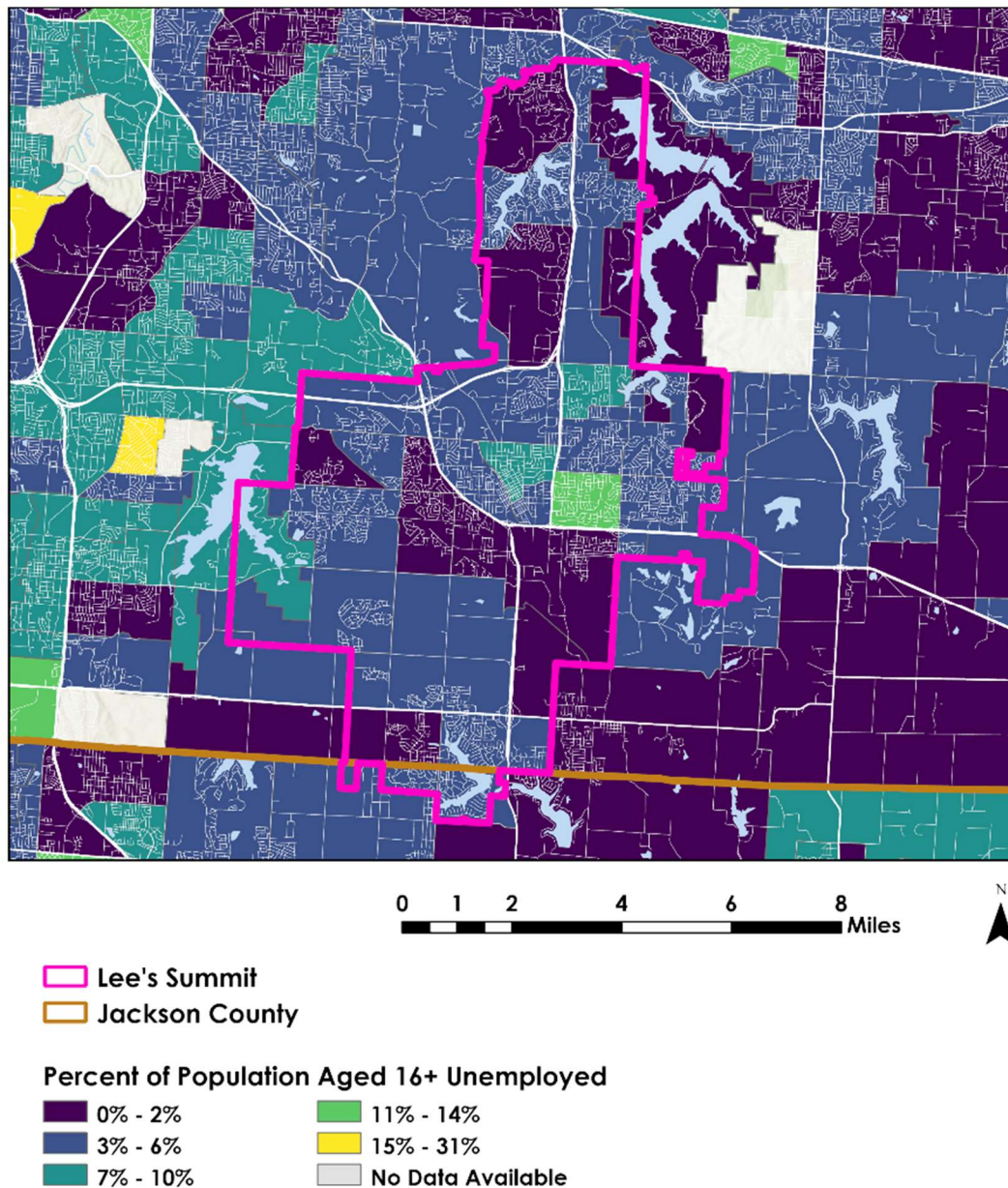
FIGURE 17. LABOR FORCE PARTICIPATION RATE FOR POPULATION AGED 16+ BY RACE/ETHNICITY, LEE'S SUMMIT, 2018-2022



Source: American Community Survey 5-Year Estimates, 2018-2022, Table S2301

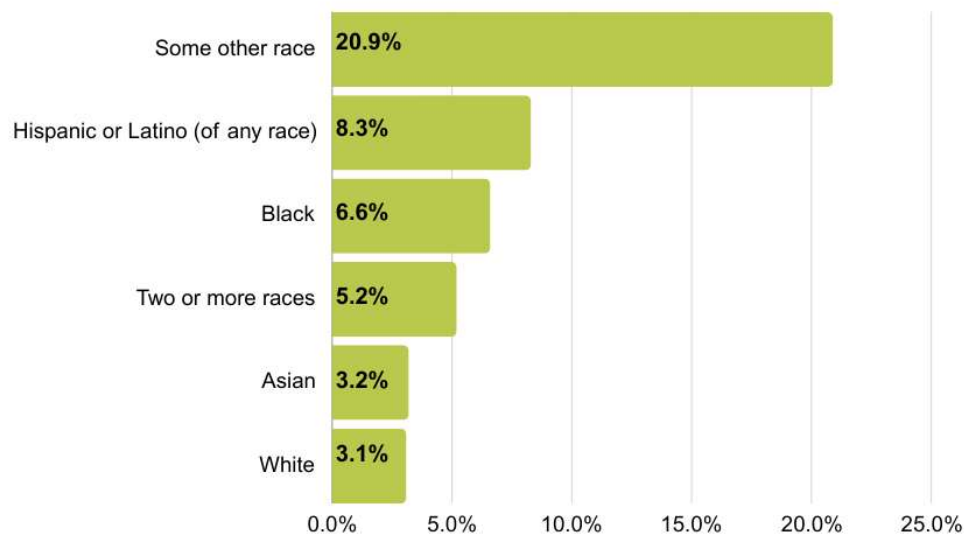
An estimated 3.8% of Lee's Summit's residents were unemployed as of the 2018 to 2022 ACS five-year estimates, a rate lower than that of Jackson County (4.9%) and of the state of Missouri overall (4.3%). As with educational attainment and labor force participation, unemployment varies across the city's census tracts, ranging from 0% to 15% of residents aged 16 and over. Unemployment is highest in central and southwest Lee's Summit (7% to 14%; see Figure 18).

FIGURE 18. UNEMPLOYMENT RATE, LEE'S SUMMIT, 2018-2022



Unemployment is highest among residents of some other race (20.9%), Hispanic or Latino residents (8.3%), and Black or African American residents (6.6%) and lowest among Asian residents and white residents (3.2% and 3.1%, respectively; see Figure 19).

FIGURE 19. UNEMPLOYMENT RATE BY RACE AND ETHNICITY, CITY OF LEE'S SUMMIT, 2018-2022



Source: American Community Survey 5-Year Estimates, 2018-2022, Table S2301
(excludes races/ethnicities for which data is unavailable)

Household income is another indicator of access to employment and jobs that pay living wages. The median household income in Lee's Summit was \$103,447 as of the 2018-2022 American Community Survey five-year estimates, slightly higher than the median household income for the Kansas City, MO-KS MSA, which was estimated at \$97,721 over the same time period. Median household incomes are lowest in central Lee's Summit and highest in parts of southwest, southeast, and north Lee's Summit (see Figure 20). Median household incomes are highest for Hispanic or Latino residents, (estimated at \$113,002) and lowest for residents of some other race (\$59,931; see Figure 21).

FIGURE 20. MEDIAN INCOME BY CENSUS TRACT, CITY OF LEE'S SUMMIT, 2018-2022

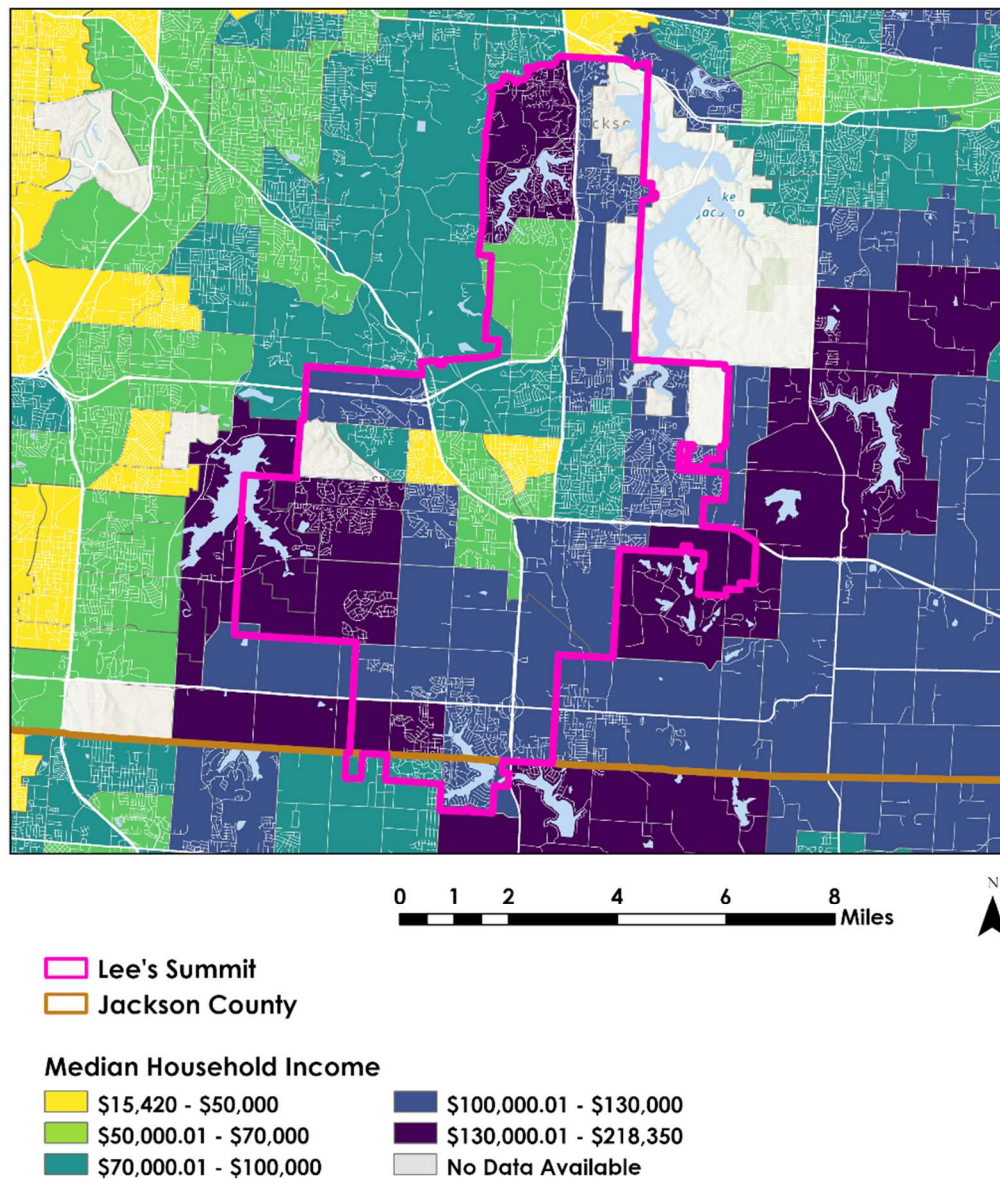


FIGURE 21. MEDIAN HOUSEHOLD INCOME BY RACE / ETHNICITY, CITY OF LEE'S SUMMIT, 2018-2022



Source: American Community Survey 5-Year Estimates, 2018-2022, Table S1903
(excludes races/ethnicities for which data is unavailable)

Low to moderate median household incomes in many of the city's census tracts highlight the fact that a high proportion of households do not have sufficient incomes to afford basic needs. The required annual income to afford costs for a family of two working adults and one child in Jackson County, including housing, childcare, healthcare, food, transportation, taxes, and other miscellaneous costs, is estimated at \$82,647 before taxes.¹² Yet, 14.4% of primary jobs held by residents of Lee's Summit pay \$1,250 per month or less (\$15,000 or less per year), and 23.5% of primary jobs pay between \$1,251 and \$3,333 (between \$15,000 and \$39,996 per year).¹³

Jobs Proximity

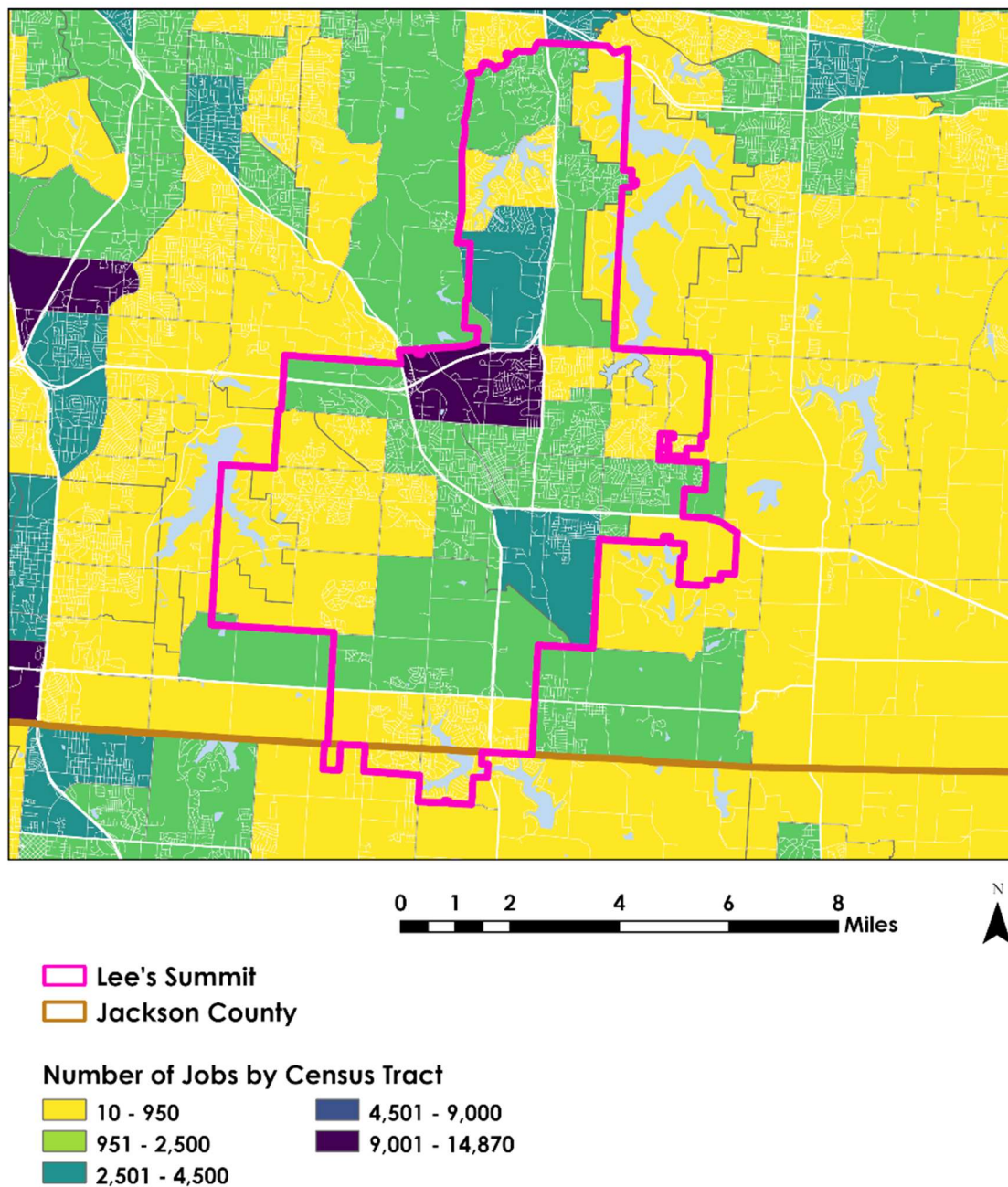
Jobs in Lee's Summit tend to be clustered in the city's downtown area, while jobs in the region are clustered west of Lee's Summit in Kansas City. Census tracts with the fewest jobs are clustered in areas that are primarily residential in south, southwest, east, and north Lee's Summit (see Figure 22).

Residents and stakeholders who participated in this planning process noted that limited public transportation and low frequency of service in the city are often barriers to accessing employment for residents who do not have vehicles, particularly in areas that are not well-served by bus routes.

¹² MIT Living Wage Calculator. (2024). Retrieved from: <https://livingwage.mit.edu/counties/29095>.

¹³ United States Census Bureau. OnTheMap. (2021). Retrieved from: <https://onthemap.ces.census.gov/>.

FIGURE 22. JOBS PROXIMITY, 2021



Longitudinal Employer-Household Dynamics data also indicates that a substantial share of workers living in Lee's Summit work outside of the city. Specifically, an estimated 47,213 employed residents live in Lee's Summit. These include 9,433 residents (20.0%) who both live and work in Lee's Summit and 37,780 residents who live in Lee's Summit but work outside of the city (80.0%). Similarly, of the 41,480 residents

employed in Lee's Summit, 30,416 (76.3%) live outside of the city. More than two-fifths of Jackson County residents are employed outside of the county (43.1%, see Table 5). The high level of commuting across jurisdictions indicates that large shares of residents live in Lee's Summit for reasons other than employment and commute to other regional job centers such as Kansas City.

TABLE 5. INFLOW AND OUTFLOW OF WORKERS (PRIMARY JOBS), CITY OF LEE'S SUMMIT AND JACKSON COUNTY, 2021

Inflow and Outflow of Workers	#	%
LIVING IN CITY OF LEE'S SUMMIT	47,213	100.0%
Living in Lee's Summit but Employed Outside of the City	37,780	80.0%
Living and Employed in Lee's Summit	9,433	20.0%
EMPLOYED IN CITY OF LEE'S SUMMIT	38,849	100.0%
Employed in Lee's Summit but Living Outside of the City	30,416	76.3%
Employed and Living in Lee's Summit	9,433	23.7%
LIVING IN JACKSON COUNTY	306,016	100.0%
Living in Jackson County but Employed Outside of the County	131,956	43.1%
Living and Employed in Jackson County	174,060	56.9%
EMPLOYED IN JACKSON COUNTY	353,523	100.0%
Employed in Jackson County but Living Outside of the County	179,463	50.8%
Employed and Living in Jackson County	174,060	49.2%
Data Sources: Longitudinal Employer-Household Dynamics (LODES) data, 2021.		

EDUCATION

High-quality education is a vital community resource that can improve quality of life and lead to additional opportunities, such as employment and increased earnings. The Lee's Summit R-7 School District serves more than 17,000 students in the communities of Lee's Summit, Greenwood, Lake Lotawana, and Lake Winnebago, unincorporated areas of eastern Jackson County, and small portions of Blue Springs and Kansas City. The district includes 18 elementary schools, four middle schools, three high schools, an alternative secondary school, a secondary technology academy, an early education center, and a special-education day-treatment center.

School proficiency levels and demographics vary across the district's schools (see Table 6):

- Shares of students scoring proficient or advanced in English Language Arts range from 39.4% at Meadow Lane Elementary to 79.1% at Lee's Summit West High. Similarly, shares of students scoring proficient or advanced in mathematics range from 31.3% at Meadow Lane Elementary to 70.2% at Longview Farm Elementary, indicating disparities in performance across schools.
- The share of students with free or reduced lunch, an indicator of low household income, varies widely among the district's schools, ranging from 5.9% at Hawthorn Hill Elementary to 58.7% at Lee's Summit Elementary. Notably, schools with lower shares of students with free or reduced lunch tend to have higher rates of proficient or advanced levels in English and mathematics, indicating a need for additional student supports in schools with large shares of economically disadvantaged students.
- The share of students who are English Learners ranges from 0.3% at Lee's Summit North High and Lee's Summit West High to 12.4% at Meadow Lane Elementary. Schools with lower shares of students who are English Learners tend to have higher shares of students scoring at grade level and above.
- The share of students in special education ranges from 6.1% at Longview Farm Elementary to 17.4% at Richardson Elementary, indicating a need to provide supportive services and infrastructure for students in special education across the district's schools.
- The percentage of students who are white—an indicator of racial and ethnic segregation among schools—ranges from 37.0% at Meadow Lane Elementary to 84.4% at Greenwood Elementary, indicating segregation by race and ethnicity across schools. Schools with lower shares of white students have some of the highest percentages of students with free or reduced lunch, indicating associations between race/ethnicity and income.

TABLE 6. LEE'S SUMMIT R-7 SCHOOL DISTRICT INFORMATION

District Name	K-12 Enrollment	PK Enrollment	Dropout Rate	ACT Composite Score	Students Attending at least 90% of the time	Free and Reduced Lunch (Pct)	Suspension of 10 or More Consecutive Days (Rate)	Student Performance Pct. for English Language Arts (Proficient)	Student Performance Pct. for Mathematics (Proficient)	Four-Year Graduation Rate
Lee's Summit R-7	17,469	311	1.1%	22.1	85.1%	19.7%	13.0%	32.5%	28.3%	93.0%

TABLE 7. DEMOGRAPHICS AND PERFORMANCE BY DISTRICT AND SCHOOL, 2023

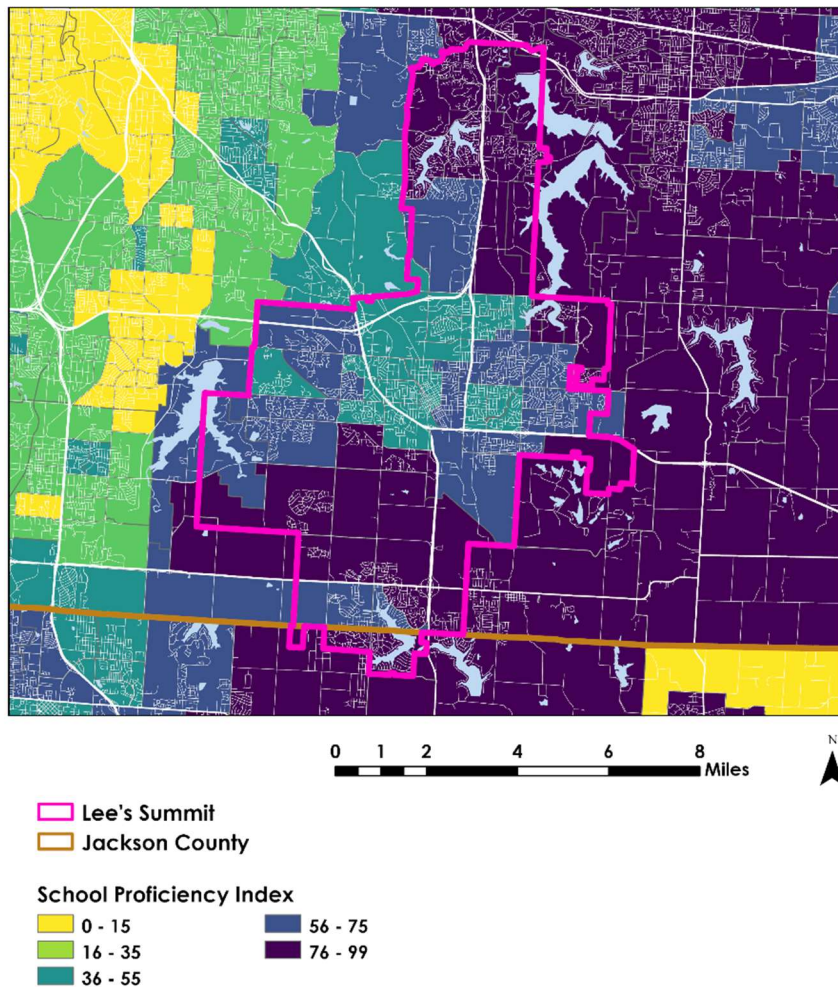
School Name	Grade Level	Number of Students Enrolled	White Students (Pct)	Hispanic Students (Pct)	Black Students (Pct)	Multi-Race (Pct)	Free and Reduced Lunch (Pct)	English Learner (Pct)	Special Education (Pct)	Suspension of 10 or More Consecutive Days (Rate)	Percent of Students Scoring Proficient or Advanced in English Language Arts	Percent of Students Scoring Proficient or Advanced Mathematics
Bernard C. Campbell Middle	Middle	1,067	59.5%	10.3%	18.8%	8.8%	25.2%	2.3%	13.4%	1.7	39.7%	42.8%
Cedar Creek Elem	Elementary	506	70.9%	6.5%	9.9%	9.3%	11.5%	3.6%	15.8%	-	64.0%	59.5%
East Trails Middle School	Middle	983	70.7%	7.5%	10.7%	9.3%	19.5%	0.7%	10.7%	1.9	50.0%	60.0%
Great Beginnings Early Ed. Ctr.	Preschool	311	-	-	-	-	-	-	-	-	-	-
Greenwood Elem	Elementary	333	84.4%	5.1%	3.3%	6.6%	17.0%	-	8.7%	-	50.0%	55.4%

School Name	Grade Level	Number of Students Enrolled	White Students (Pct)	Hispanic Students (Pct)	Black Students (Pct)	Multi-Race (Pct)	Free and Reduced Lunch (Pct)	English Learner (Pct)	Special Education (Pct)	Suspension of 10 or More Consecutive Days (Rate)	Percent of Students Scoring Proficient or Advanced in English Language Arts	Percent of Students Scoring Proficient or Advanced in Mathematics
Hawthorn Hill Elem	Elementary	405	69.4%	10.4%	11.4%	6.7%	5.9%	2.2%	7.2%	-	61.1%	62.1%
Hazel Grove Elem	Elementary	341	63.6%	5.0%	21.7%	7.9%	20.0%	1.5%	7.6%	-	53.4%	57.1%
Highland Park Elem	Elementary	463	80.1%	5.6%	5.4%	6.7%	6.9%	2.8%	11.5%	-	68.8%	68.5%
Hilltop School	Middle	19	42.1%	-	94.0%	-	-	-	-	-	-	-
Lee's Summit Elem	Elementary	222	52.7%	10.4%	23.4%	10.4%	58.7%	4.1%	10.4%	-	45.5%	32.0%
Lee's Summit North High	High	2,007	59.5%	9.6%	18.8%	9.6%	22.7%	0.3%	9.2%	2.8	66.1%	52.8%
Lee's Summit Sr. High	High	1,923	66.5%	9.5%	12.1%	8.7%	20.4%	0.8%	10.3%	3.2	65.4%	49.4%
Lee's Summit West High	High	1,995	71.9%	7.6%	11.3%	6.6%	8.5%	0.3%	7.4%	1.9	79.1%	61.6%
Longview Farm Elem	High	408	76.2%	5.6%	8.1%	7.8%	7.1%	1.5%	6.1%	-	60.0%	70.2%
Mason Elem	Elementary	485	79.0%	6.6%	7.8%	5.2%	9.7%	2.9%	7.4%	-	61.2%	60.8%
Meadow Lane Elem	Elementary	460	37.0%	17.4%	24.1%	16.1%	55.8%	12.4%	8.9%	-	39.4%	31.3%
Miller Park Center	Elementary	-	-	-	-	-	-	-	-	-	-	-
Peasant Lea Elem	Elementary	350	67.7%	10.0%	13.4%	8.0%	30.4%	3.4%	11.1%	-	47.2%	47.8%
Peasant Lea Middle	Middle	938	67.3%	10.1%	12.2%	7.4%	22.5%	1.9%	12.0%	1.7	41.3%	58.4%
Prairie View Elem	Elementary	572	64.7%	7.7%	14.0%	11.9%	35.2%	2.1%	9.6%	-	43.9%	37.0%
R-7 Online Academy	Elementary	6	100.0%	0.0%	0.0%	0.0%	-	-	-	-	-	-

School Name	Grade Level	Number of Students Enrolled	White Students (Pct)	Hispanic Students (Pct)	Black Students (Pct)	Multi-Race (Pct)	Free and Reduced Lunch (Pct)	English Learner (Pct)	Special Education (Pct)	Suspension of 10 or More Consecutive Days (Rate)	Percent of Students Scoring Proficient or Advanced in English Language Arts	Percent of Students Scoring Proficient or Advanced Mathematics
Richardson Elem	Elementary	442	68.1%	8.8%	11.8%	8.6%	15.7%	3.6%	17.4%	-	52.9%	49.2%
Summit Lakes Middle	Middle	1,012	69.8%	7.6%	13.9%	7.2%	10.2%	0.5%	10.1%	0.5	53.1%	62.9%
Summit Pointe Elem	Elementary	536	70.1%	7.3%	12.1%	8.2%	10.4%	2.9%	9.9%	-	62.9%	67.6%
Sunset Valley Elem	Elementary	305	66.2%	9.2%	13.1%	8.2%	18.5%	3.3%	9.2%	-	52.6%	49.0%
Trailridge Elem	Elementary	461	69.0%	8.9%	10.0%	9.8%	17.9%	1.3%	6.9%	-	59.9%	59.9%
Underwood Elem	Elementary	521	57.2%	10.0%	23.6%	8.4%	32.5%	1.7%	10.2%	-	44.4%	46.5%
Westview Elem	Elementary	294	64.3%	12.9%	9.9%	11.9%	45.2%	6.8%	7.1%	-	36.9%	44.4%
Woodland Elem	Elementary	416	80.3%	8.7%	2.9%	7.5%	15.2%	1.7%	8.4%	-	57.0%	55.7%

Scores on HUD's School Proficiency Index,¹⁴ which runs from 0 to 100, range from 36 to 99 across the city of Lee's Summit. Census block groups with the lowest scores on the index are clustered in central Lee's Summit, while block groups with the highest School Proficiency Index scores are clustered in in north and south Lee's Summit (see Figure 23).

FIGURE 23. SCHOOL PROFICIENCY INDEX BY BLOCK GROUP



¹⁴ The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The school proficiency index is a function of the percent of 4th grade students proficient in reading and math on state test scores for up to three schools (i=1,2,3) within 1.5 miles of the block-group centroid. Values are percentile ranked and range from 0 to 100. The higher the score, the higher the school system quality is in a neighborhood.

Stakeholders interviewed during this planning process emphasized a need to expand youth education and recreation programming. Only about 18.7% of survey respondents noted that schools are not equally provided throughout the city. Community engagement participants noted that schools in Lee's Summit are excellent overall and provide students with multiple opportunities to stay in the school system or to access job training at any school.

FIGURE 24. PRAIRIE VIEW ELEMENTARY SCHOOL, EAST LEE'S SUMMIT



While residents and stakeholders noted overall high levels of access to proficient schools in the city, several barriers contribute to disparities in access among protected classes. Barriers that may limit access to proficient schools in Lee's Summit include a lack of affordable housing and lower performance among some schools in the district. Policies, programs, and funding mechanisms to increase the development of affordable housing and to reduce discrimination based on use of Housing Choice Vouchers in the city's higher-performing school zones can help to reduce disparities in access to proficient schools by income level, which is correlated with race and ethnicity in service area.

In addition to the need for programs, policies, and funding to increase residents' ability to live in areas with proficient schools, there is a high level of need for strategies to meet the needs of students who attend the lower-performing schools in the district. The community schools model is an example of an approach to education that seeks to meet students' needs, in which families, communities, and schools partner to provide:

- Expanded and enriched learning time, including after-school programs, summer programs, and culturally relevant, real-world learning opportunities;
- Active family and community engagement, including service provision and meaningful partnership with students, families, and community members;
- Collaborative leadership and practices, including coordination of community school services; site-based, cross-stakeholder leadership teams; teacher learning communities; and the ongoing sharing and use of early warning data; and
- Integrated student support, mental and physical health care, nutrition support, and housing assistance, which are often provided through strategic community partnerships.¹⁵

Funding for programs that provide this collaborative, integrated support for students can help increase access to proficient schools for residents who may lack the opportunity to move to higher-performing school zones.

¹⁵ **Center for Universal Education at Brookings. (2021). Addressing education inequality with a next generation of community schools: A blueprint for mayors, states, and the federal government; Maier, Daniel, Oakes, and Lam. (2017). Community Schools as an Effective School Improvement Strategy: A Review of the Evidence. Learning Policy Institute and National Education Policy Center.**

TRANSPORTATION

Affordable, accessible transportation makes it easier for residents to access a range of opportunities—providing connections to employment, education, fresh food, healthcare, and other services. While low-cost public transit can facilitate access to these resources, a lack of access to affordable transportation poses barriers to meeting key needs, particularly in areas with low levels of walkability and a lack of access to vehicles.

Access to Affordable Transportation

The City of Lee's Summit contracts with Kansas City Area Transportation Authority (KCATA) and OATS to provide commute and demand response transit services, including RideKC Lee's Summit Express and RideKC Lee's Summit. Other transit services offered in the city include Amtrak, Park & Ride, and a regional carpool ride matching service.¹⁶

The Lee's Summit Express, RideKC Route 550, makes stops at Unity Village en route from downtown Kansas City, Missouri, to Lee's Summit. In Lee's Summit, pick-up and drop-off are situated in the Park & Ride commuter lot close to 50 Highway and Chipman Rd. The KCATA oversees this bus service, which runs Monday through Friday between the hours of 5:00 to 7:00 a.m. and 4:00 to 6:00 p.m. Additionally, there is a reverse commute that leaves Lee's Summit at approximately 4:30 p.m. and travels to downtown Kansas City, MO.

Additionally, RideKC Lee's Summit provides on-demand response trips within Lee's Summit. The City of Lee's Summit has a contract with OATS, a non-profit organization, to provide door-to-door bus service to its residents. To book a trip for this service, riders must call at least 24 hours in advance. Currently, a trip costs \$3.00 for bus fare. Service is offered Monday through Friday from 7:00 a.m. to 5:30 p.m. to and from any site inside the city limits and from Truman Medical Center Lakewood, which is situated along Lee's Summit Rd.

¹⁶ Lee's Summit, Public Works, Transit Services. Retrieved from <https://cityofls.net/public-works/traffic-transit/transit-services>:

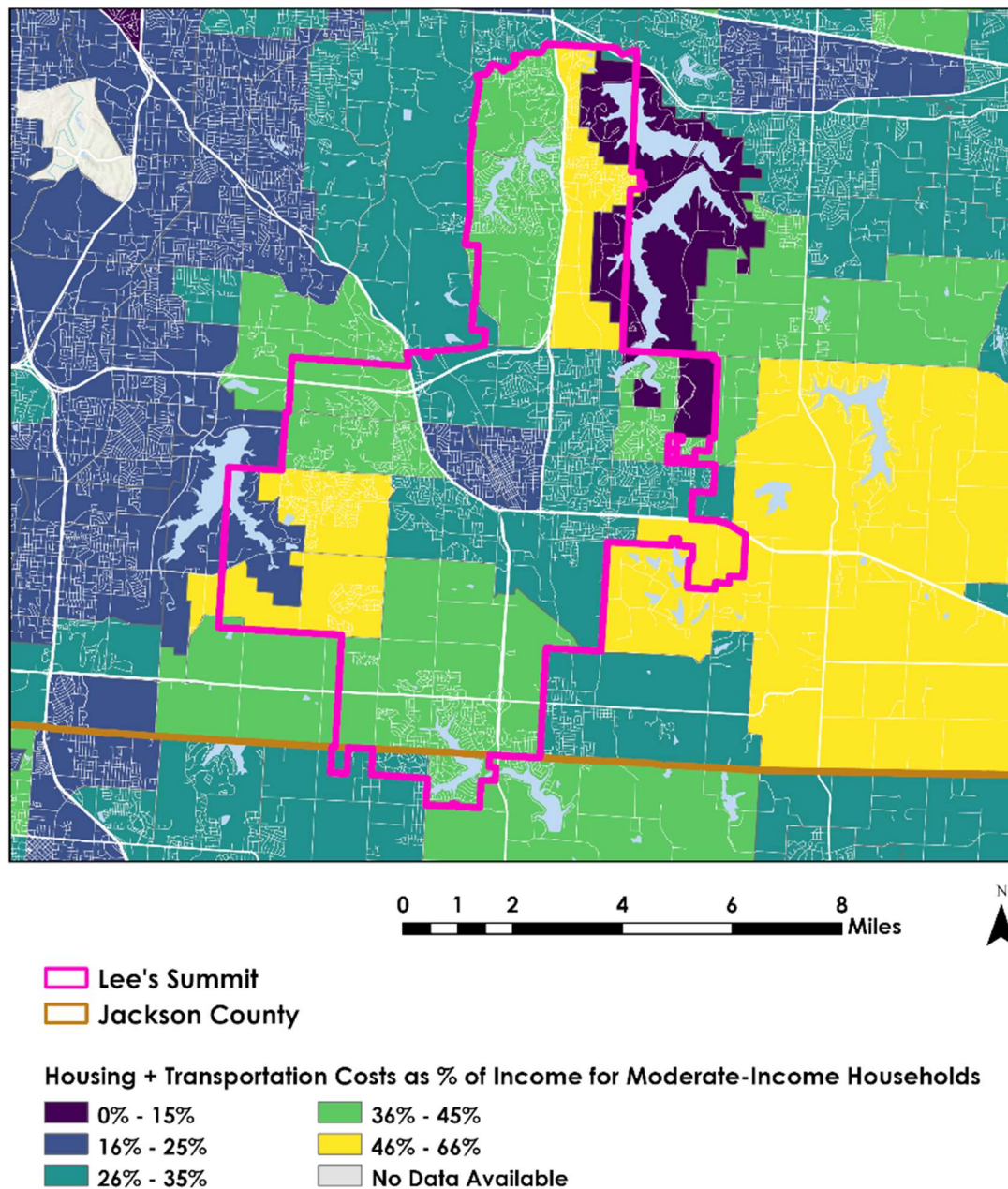
FIGURE 25. RIDEKC LEE'S SUMMIT EXPRESS, ROUTE 550



Source: RideKC, Kansas City Regional Transit

Households in central Lee's Summit, which have higher levels of access to the Kansas City Regional Transit bus routes, spend the lowest amount on housing and transportation costs relative to household income. Combined housing and transportation costs tend to make up a greater share of income in the far north, south, and southeast Lee's Summit, areas with lower levels of access to the city's transit routes (see Figure 26). In areas outside of downtown and central Lee's Summit, the combination of reduced proximity to jobs and high proportions of residents' incomes spent on transportation may present barriers to obtaining and maintaining employment and housing.

FIGURE 26. HOUSING AND TRANSPORTATION COSTS AS PERCENT OF INCOME FOR MODERATE-INCOME HOUSEHOLDS, LEE'S SUMMIT, 2019



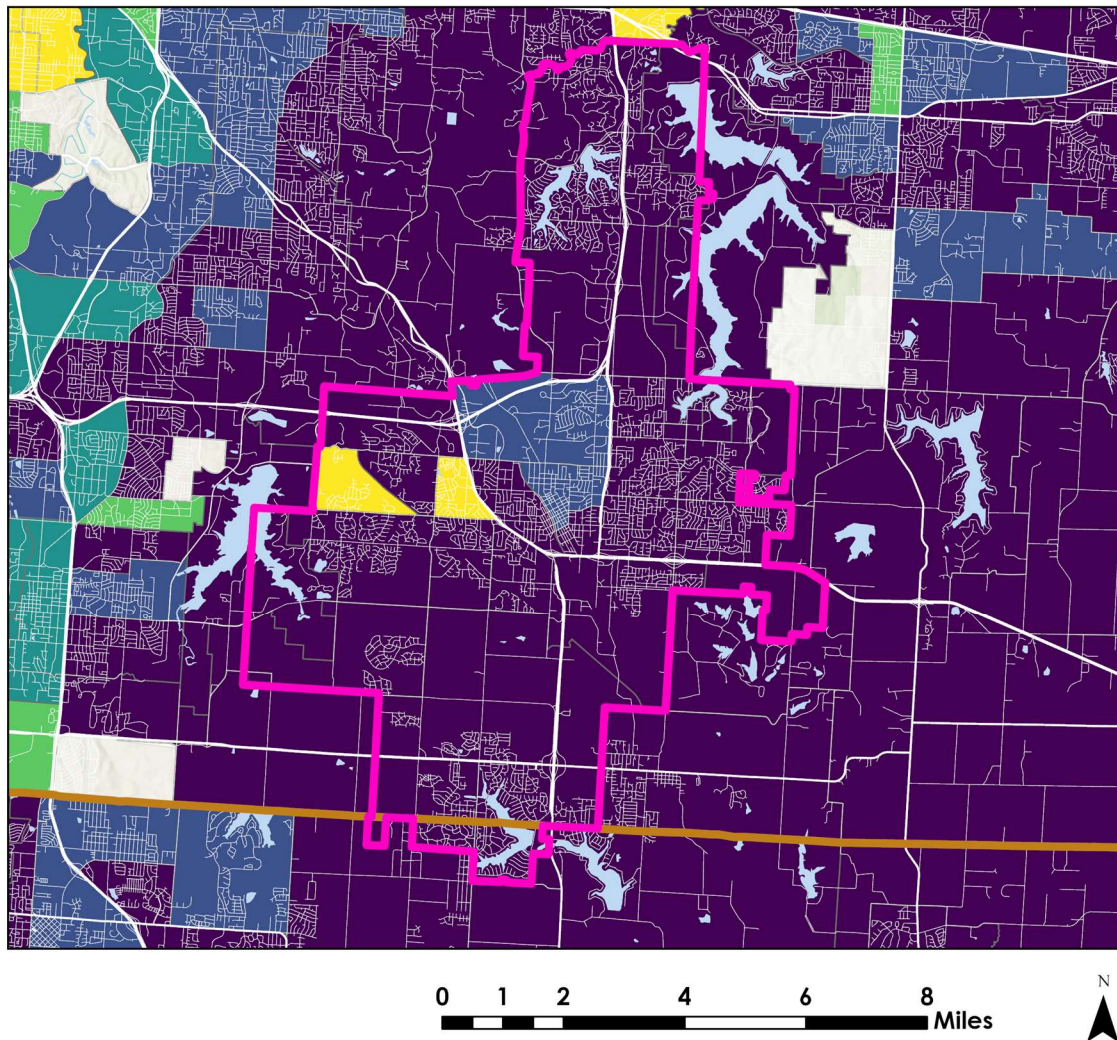
Source: Center for Neighborhood Technology H + T Index, 2019

Vehicle Access

Access to vehicles also shapes residents' ability to connect to employment and education opportunities, resources, and services, particularly in areas with limited access to public transit. An estimated 3.1% of households in Lee's Summit do not have access to a vehicle, according to American Community Survey five-year estimates for 2018 to 2022. While vehicle access is high overall, disparities exist by geography and reflect the need for access to public transit in the city. Residents of parts of central and east Lee's Summit tend to have lower access to vehicles (more than 26% of households do not have a vehicle). Outside of these areas of the city, fewer than 5% of households do not have a vehicle (see Figure 27).

Stakeholders who participated in this planning process emphasized that a lack of access to vehicles is often a barrier to employment for residents living in areas with low proximity to jobs and with limited access to public transportation. A lack of access to vehicles also creates barriers to accessing needed services in areas in which those services are not located within walking distance and transit access is limited. In this way, residents without access to vehicles often find their housing choices limited to locations where public transportation is available. The combination of high levels of vehicle ownership and high transportation costs as a percentage of household income in areas that are not well served by public transit reflects a need for transportation options that reduce household transportation costs in these areas of the city.

FIGURE 27. VEHICLE ACCESS



 Lee's Summit
 Jackson County

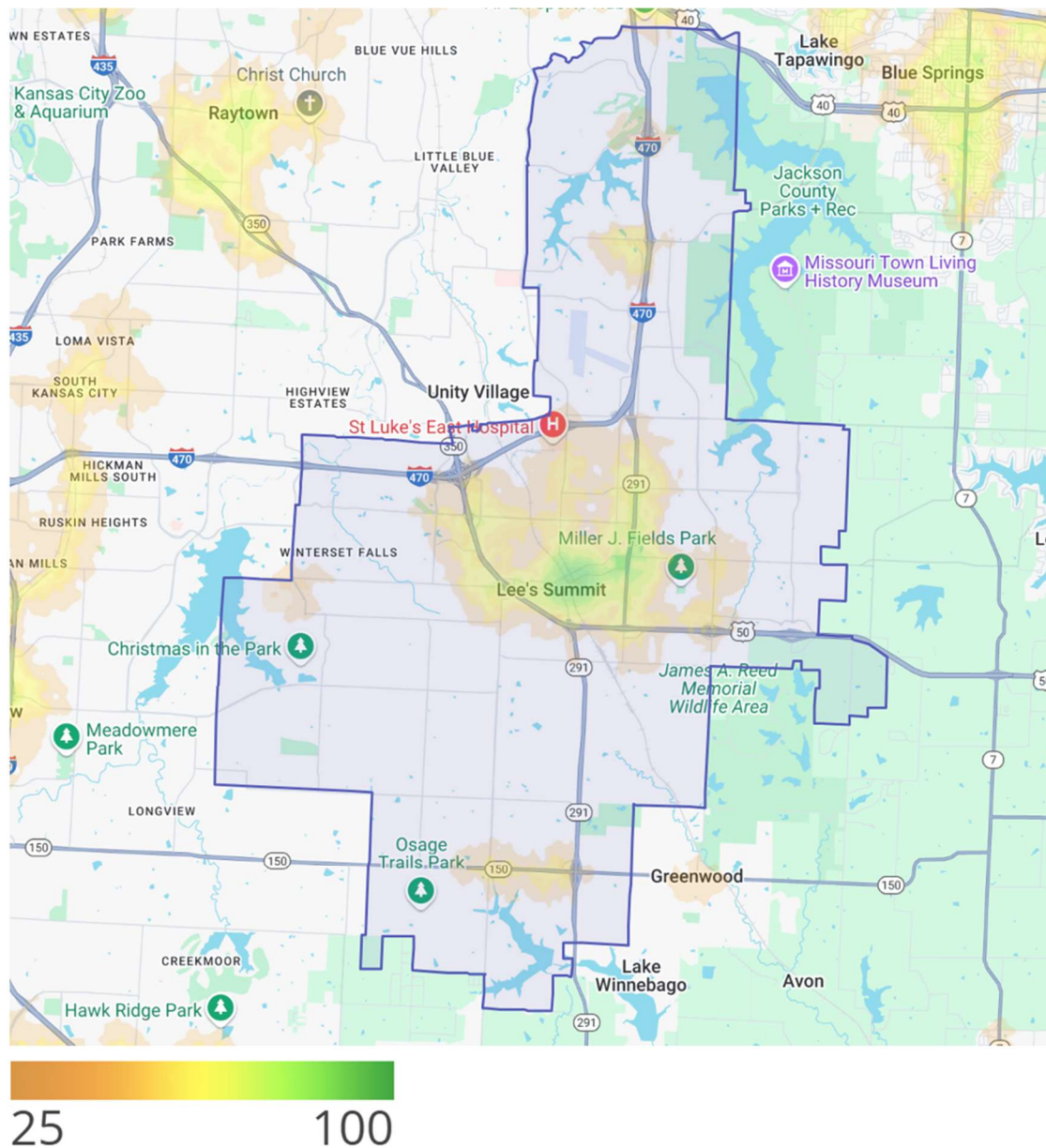
Percent of Households with No Vehicles Available

 0% - 5%	 16% - 25%
 6% - 10%	 26% - 65%
 11% - 15%	 No Data Available

Walkability

Along with access to transit, low-cost transportation, and vehicles, walkability shapes the extent to which residents are able to access employment, resources, and services. Overall, the city is generally very car-dependent, with a score of 20 out of 100, although parts of downtown and central Lee's Summit have slightly higher levels of walkability (shown in green and yellow in Figure 28).

FIGURE 28. WALKABILITY IN LEE'S SUMMIT



Source: Walkscore

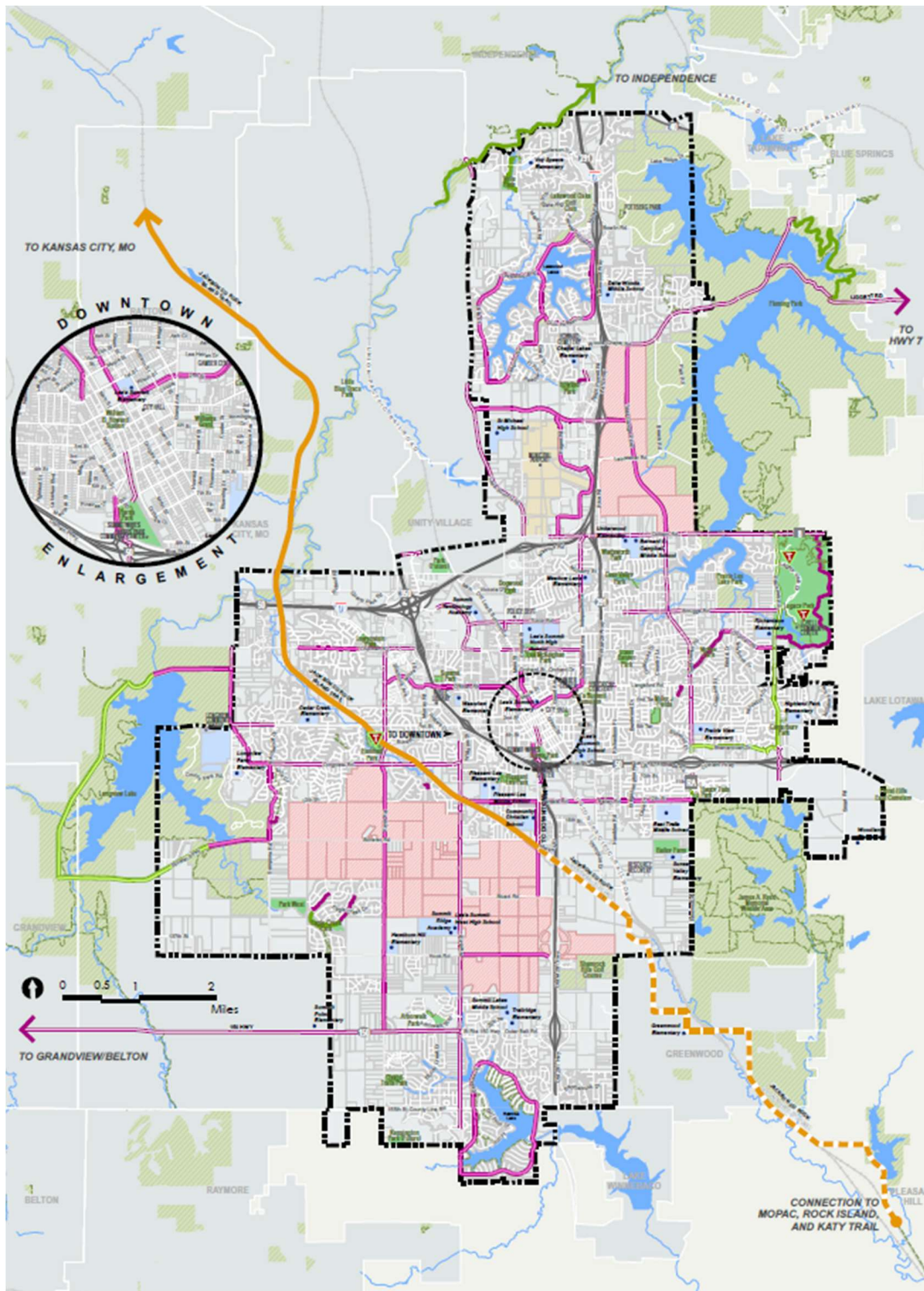
In this way, low levels of transit and vehicle access may pose a more significant barrier to accessing jobs and services for residents living in areas with low levels of walkability. 47.5% of survey respondents noted that roads and sidewalks are not equally provided throughout Lee's Summit. Overall low levels of walkability in the city combined with low levels of access to public transit in some areas point to challenges for residents without access to vehicles in connecting to employment, resources, and services.

A comprehensive city-wide greenway master plan was developed by the Lee's Summit Parks and Recreation Department in 1998 and approved by the city planning commission. The plan evolved out of a need for guidelines for trail and greenway development in a rapidly growing community. In addition to meeting the demands of recreational trail users like bicycles, hikers, walkers, and other non-motorized activities, the goal was to preserve and safeguard open space. Lee's Summit, Grandview, Kansas City, and other rural areas are included in the 38-mile planned loop. In order to connect to the intended 38-mile loop, more than 100 miles of neighborhood connector routes are planned beside parks, roads, stream corridors, and open space. Although a completion date the plan's implementation has been confirmed, the objective is to build 4–8 miles of trail connecting routes annually (see Figure 29)¹⁷.

Residents and stakeholders who participated in this planning process noted that Lee's Summit does not have a good transit system, making it difficult for residents without access to vehicles to get around the city. Survey respondents echoed these concerns, with 29.7% noting that bus service is not equally provided throughout the city. Residents with disabilities, in particular, may require housing units that are accessible to bus lines to access resources, services, and employment. Further, only one bus route connects Lee's Summit to Kansas City, and the lack of connections between the city and other communities creates challenges for local businesses in obtaining and maintaining employees, many of whom cannot afford housing in the city.

¹⁷ Lee's Summit Parks and Recreation, Greenway Trail System. Retrieved from: <https://cityofls.net/parks/parks/greenway-trail-system#:~:text=The%2038%2Dmile%20planned%20loop,the%20planned%2038%2Dmile%20loop.>

FIGURE 29. GREENWAY PLAN



Source: City of Lee's Summit

ENVIRONMENTAL QUALITY

Environmental quality and access to environmental amenities also shape the opportunities available to residents. Access to parks and other green infrastructure in cities and neighborhoods provides a range of environmental, social, and health benefits, including access to nature and recreation opportunities; cleaner air and water; alternative transportation options; improvements in physical and mental health and wellbeing; and opportunities for food production and other local economic development. At the same time, environmental hazards, such as poor air quality and toxic facilities, are associated with negative health effects including increased respiratory symptoms, hospitalization for heart or lung diseases, cancer and other serious health effects, and even premature death. Certain population groups, such as children, have a greater risk of adverse effects from exposure to pollution.¹⁸

Access to Parks

The city of Lee's Summit has 12.5 acres of parks per 1,000 population, a level of access above state and national averages. 72% of the city's population lives within ½ mile of a neighborhood park.¹⁹ Residents and stakeholders who participated in this planning process noted high levels of access to high-quality parks and recreation facilities, with 75% of survey respondents indicating that parks and trails are equally provided throughout Lee's Summit.

While parks are clustered near the city center, residents also have access to parks in the outer edges of Lee's Summit, including along Lake Jacomo in northeast Lee's Summit and Longview Lake in the western part of the city (see Figure 30). The James A. Reed Memorial Wildlife Area is located east of the city, further increasing accessibility for households in the area. The Lee's Summit Parks and Recreation Master Plan Update (2022) indicates that the greatest need for additional park acreage is in the Rock Island Urban Center within the South Property Reserve, an area that has the highest density of the City's Activity Centers.²⁰ Stakeholders who participated in the city's park master planning process indicated that completion of greenway trails and

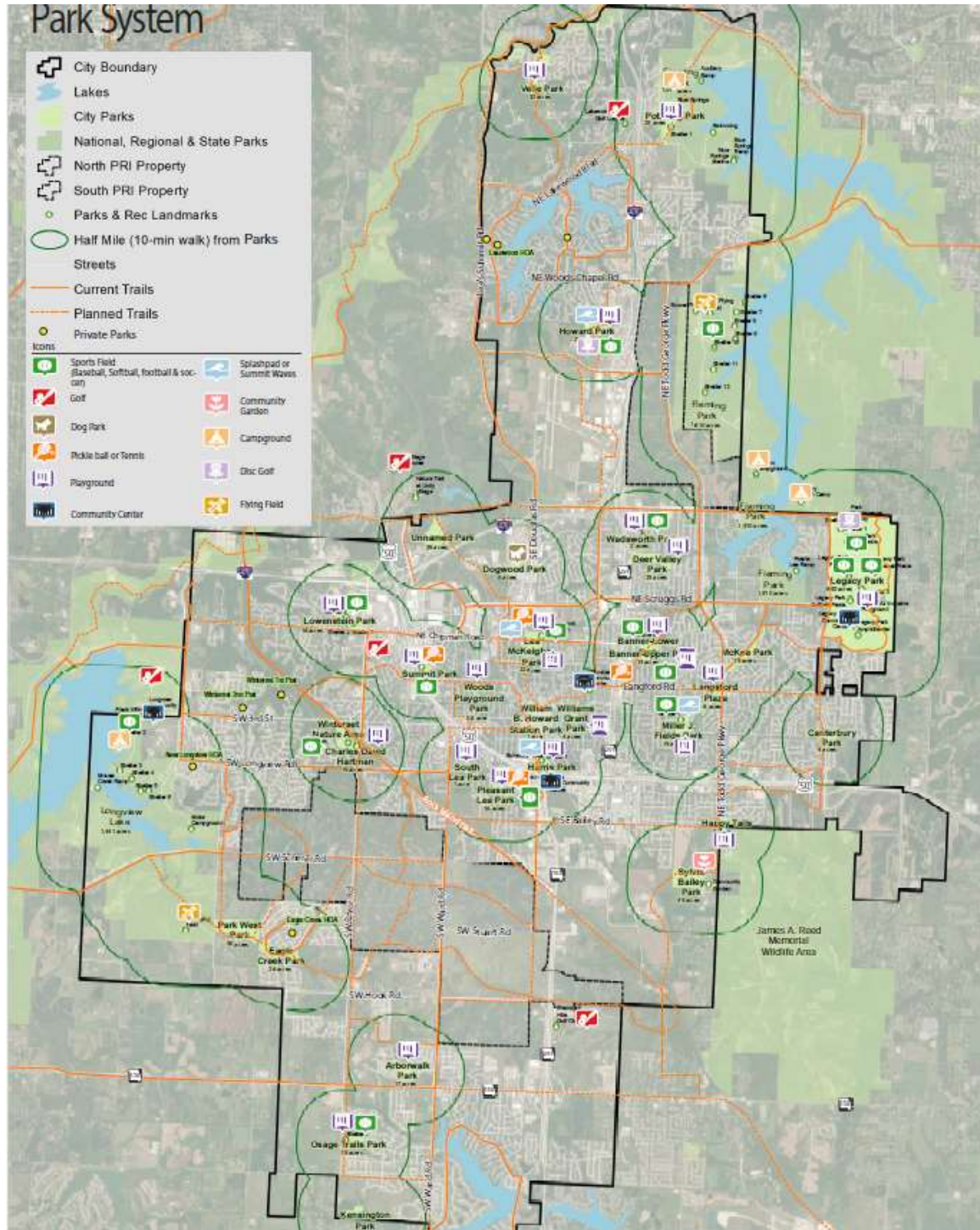
¹⁸ U.S. Environmental Protection Agency. (n.d.). Managing Air Quality - Human Health, Environmental and Economic Assessments. Retrieved from: <https://www.epa.gov/air-quality-management-process/managing-air-quality-human-health-environmental-and-economic>

¹⁹ Lee's Summit Parks and Recreation Master Plan Update. (2022). Retrieved from: https://cityofls.net/Portals/0/LeesSummitMO_ParksMasterPlanUpdate_Final_2022_0817.pdf?ver=2c_nGYoZkAYrpWHi8UCGrw%3D%3D

²⁰ Activity Centers are areas planned to host most of the development in Lee's Summit over the next two decades. For mor information, see: <https://cityofls.net/comprehensive-plan/development-guide/activity-centers>

regional trail connections are two of the city's greatest opportunities for improving parks and recreation.

FIGURE 30. PARK ACCESS



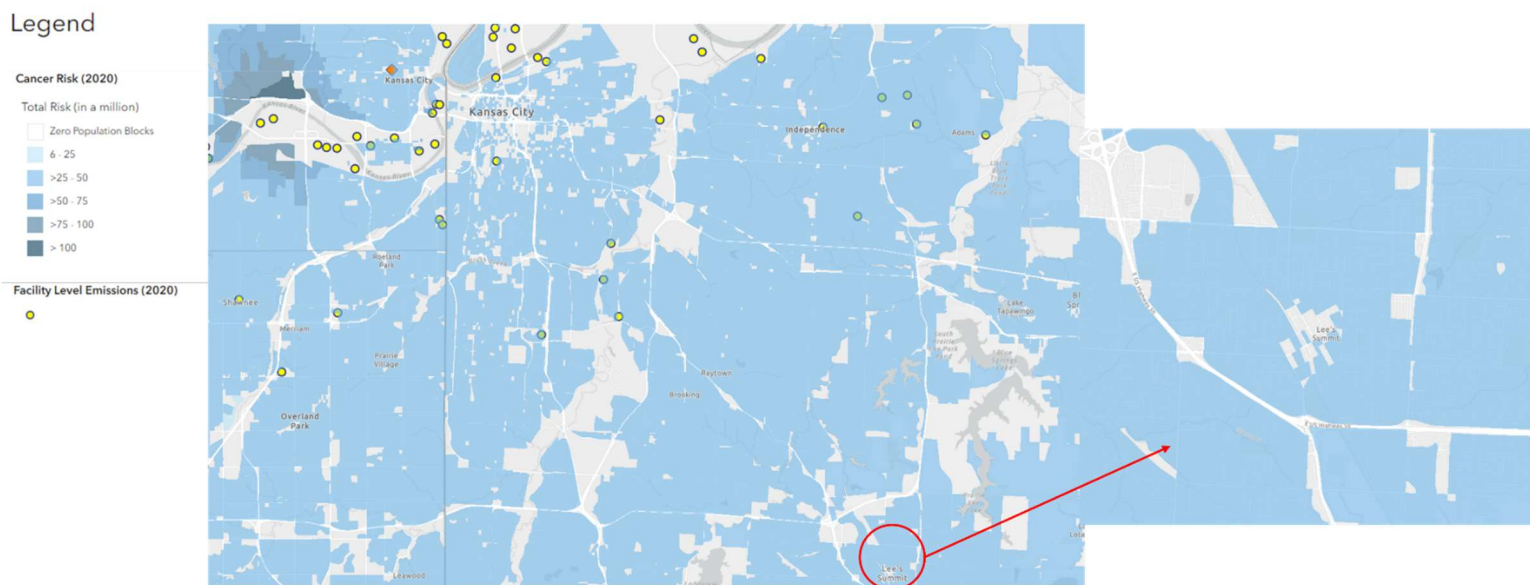
Source: Lee's Summit Park Master Plan, 2022.

Environmental Hazards

Toxic sites may pose risks to residents living nearby and thus may constitute fair housing concerns if they disproportionately impact protected classes. A Superfund site is any land in the United States that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and / or the environment. These sites are placed on the National Priorities List (NPL). There are no NPL sites in Lee's Summit.

The EPA's National Air Toxics Assessment (NATA) estimates health risks from air toxics. The most recent assessment uses data from 2020 to examine cancer risk from ambient concentrations of pollutants. No point sources of emissions are located within Lee's Summit. Point sources are clustered closer to Kansas City (see Figure 31).

FIGURE 31. NATIONAL AIR TOXICS ASSESSMENT



Source: United States Environmental Protection Agency Air Toxics Screening Assessment (2019).

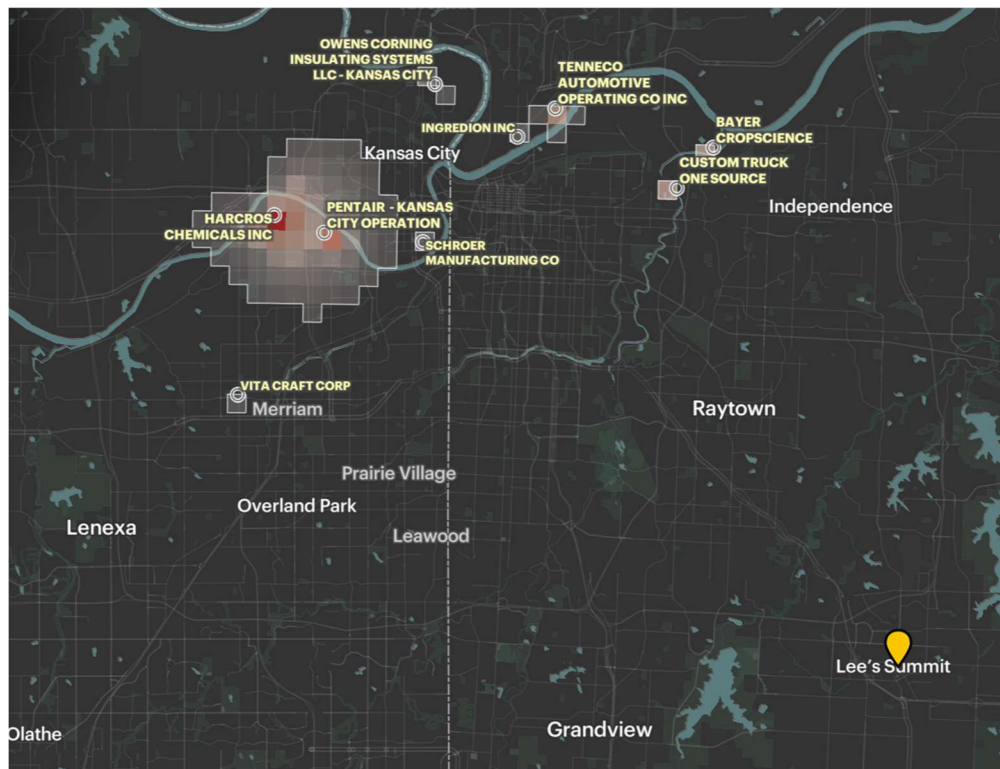
Note: Green dots in the map above indicate Toxic Release Inventory (TRI) facilities. A facility is required to report to the TRI program if it meets chemical activity thresholds and is either in a covered industry sector and exceeds the employee threshold or is specifically required to report based a determination by the Administrator under EPCRA 313(b)(2).

The Environmental Protection Agency's Toxics Release Inventory (TRI) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. The EPA's Risk-Screening Environmental Indicators (RSEI) Model analyzes TRI data on the amount of toxic chemicals released, together with risk factors such as the chemical's fate and transport through the environment, each chemical's relative toxicity, and the number of people potentially exposed, to calculate a numeric score designed to be compared to other RSEI scores.

While there are ten Toxic Release Inventory (TRI) Facilities located within 10 miles of Lee's Summit, only three TRI sites are located within the city. These include the Geiger Ready Mix facility (non-metallic mineral products), Billy Goat Industries (machinery), and Pavestone (non-metallic mineral products).

ProPublica's analysis of the EPA's Risk-Screening Environmental Indicators (RSEI) data indicates that areas of higher cancer risk in the region are clustered in Kansas City, KS, and that Lee's Summit has relatively low levels of industrial cancer risk (see Figure 32).

FIGURE 32. AREAS OF INDUSTRIAL CANCER RISK, KANSAS CITY, MO-KS REGION



Source: ProPublica, 2022. Retrieved from: <https://projects.propublica.org/toxmap/>

FOOD

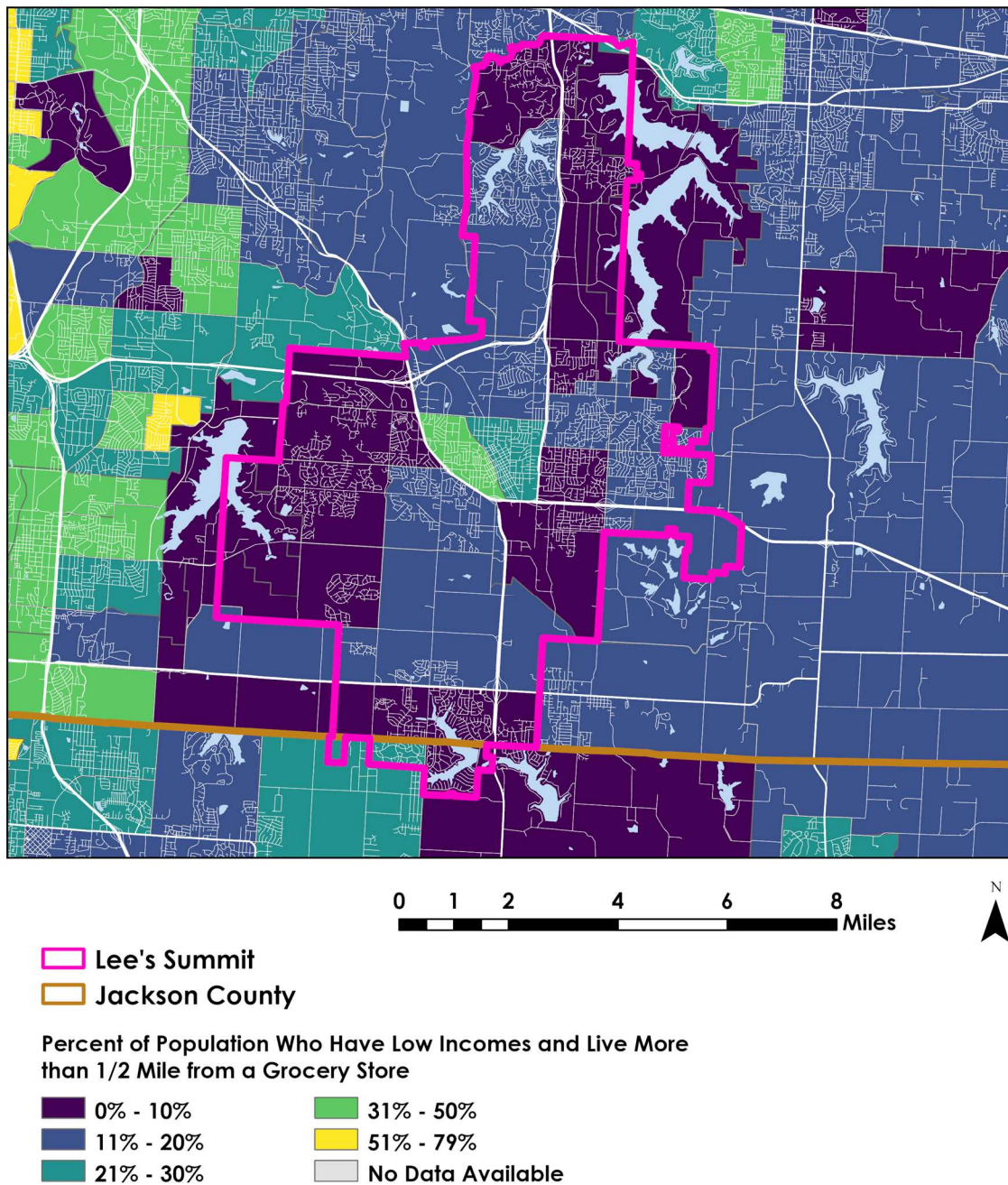
Many individuals and families face challenges in accessing food that is both healthy and affordable. In neighborhoods in which the nearest grocery store is many miles away, transportation costs and lack of access to vehicles may pose particular challenges for low-income households, who may be forced to rely on smaller stores that are often unaffordable and may not offer a full range of healthy food choices. Even in areas with fresh food retailers nearby, the higher cost of healthy foods such as produce often presents barriers to accessing healthy food.

USDA Food Research Atlas data indicates that the share of residents who have low incomes and live further than one-half mile from the nearest supermarket is highest in central Lee's Summit (about 24% to 33% of households in two census tracts; see Figure 33).

Both survey respondents and stakeholders interviewed noted that there are several grocery stores throughout the city, although some are more expensive. Some respondents noted concerns surrounding food access, with 16.4% noting that grocery stores and other shopping opportunities are not equally available in all neighborhoods. While residents and stakeholders generally noted that all neighborhoods of the city are accessible in a short drive by car, they emphasized that limited public transportation routes and frequency make accessing need resources such as grocery stores challenging for residents without access to vehicles. While just 3.1% of households in the city did not have a vehicle as of the 2018 to 2022 American Community Survey five-year estimates, accessing fresh food may be a particular challenge for these households, as well as for residents with disabilities.

Poverty and low incomes also contribute to issues of food access and insecurity in the city. An estimated 5.3% of Lee's Summit residents were living below the federal poverty level as of the 2018 to 2022 American Community Survey five-year estimates, indicating that low incomes are a barrier for some residents in accessing fresh food. Disparities in poverty rates exist by race: an estimated 15.3% of Black or African American residents, 6.0% of residents of two or more races, 5.7% of American Indian and Alaska Native residents, and 4.5% of Hispanic or Latino residents were living below the poverty level in the past 12 months from 2018 to 2022. In comparison, 4.3% of white residents were living below the poverty level during the same period. Further, 13.2% of households in the city have incomes below \$35,000, and 26.0% have incomes below \$50,000, indicating that income may be a barrier for a substantial share of the city's residents in accessing fresh food.

FIGURE 33. PERCENT OF POPULATION WHO HAVE LOW INCOMES AND LIVE MORE THAN ½ MILE FROM A GROCERY STORE, 2019



HEALTHCARE

Access to high-quality, affordable physical and mental healthcare shapes community health outcomes, including both length of life and quality of life. Sufficient availability of primary care physicians is essential for preventive and primary care, and for referrals to appropriate specialty care when needed. Residents of Jackson County have access to healthcare providers at a rate of one primary care physician per 1,180 residents, one dentist per 1,060 residents, and one mental health provider per 340 residents. These figures generally indicate greater availability of healthcare providers in the county than in the state of Missouri and United States overall (see Table 8).

TABLE 8. RATIO OF POPULATION TO HEALTHCARE PROVIDERS, JACKSON COUNTY, 2024

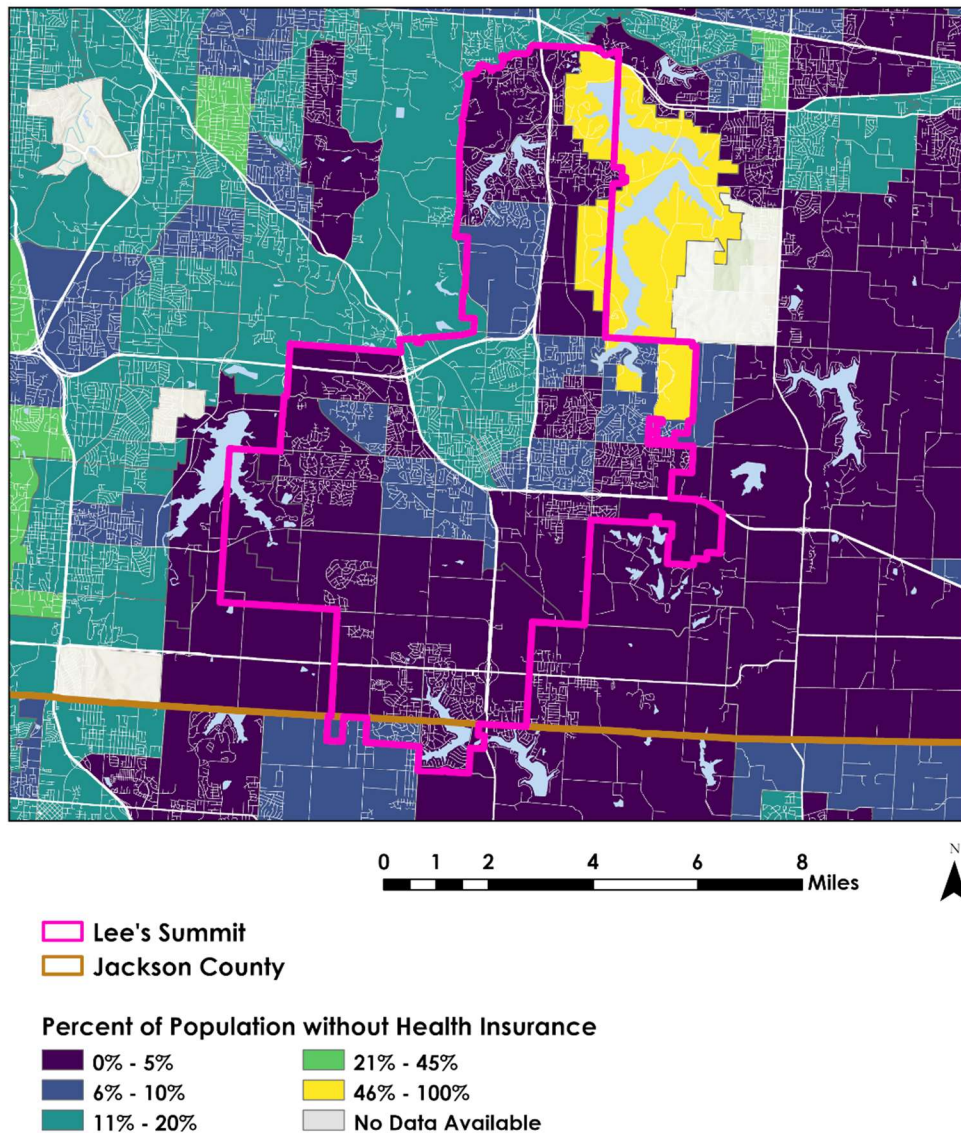
Care Provider	Jackson County	Missouri	United States
Primary Care Physicians	1,180:1	1,420:1	1,330:1
Dentists	1,060:1	1,600:1	1,360:1
Mental Health Providers	340:1	410:1	320:1
Data Sources: County Health Rankings, Area Health Resource File / American Medical Association, 2024.			

Lack of health insurance coverage is also a barrier to accessing needed healthcare—including preventive care—and to maintaining financial security. While the share of residents with health insurance in the city overall is 5.1% as of the 2018 to 2022 American Community Survey five-year estimates, shares of uninsured residents vary by location across the city. Residents of part of northeast and central Lee's Summit tend to be uninsured at the highest rates: in one tract in northeast Lee's Summit, 100% of residents are uninsured, and in four tracts in central Lee's Summit, 11% to 15% of residents are uninsured (see Figure 34). Residents of parts of north and south Lee's Summit are most likely to have health insurance (0% to 5% of residents in these tracts are uninsured; see Figure 34). Shares of uninsured residents are generally higher to the west of Lee's Summit in and around Kansas City.

Overall, healthcare access is shaped by multiple factors, including availability of providers, health insurance coverage, and access to vehicles or other transportation options. Investments in programs designed to increase access to healthcare may help increase access for underserved residents. Because of geographic disparities in health insurance coverage, efforts such as increasing enrollment in Medicaid and Marketplace health insurance plans and providing access to low-cost health services

may most effectively address goals of improving access to healthcare by focusing efforts on census tracts with high proportions of uninsured residents and of residents living below the poverty level.

FIGURE 34. ACCESS TO HEALTH INSURANCE



Housing Profile

BACKGROUND

The availability of quality affordable housing plays a vital role in ensuring housing opportunities are fairly accessible to all residents. On the surface, high housing costs in certain areas are exclusionary based solely on income. But the disproportionate representation of several protected class groups in low- and middle-income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce.

Beyond providing fair housing options, the social, economic, and health benefits of providing quality affordable housing are well-documented. National studies have shown affordable housing encourages diverse, mixed-income communities, which results in many social benefits. Affordable housing also increases job accessibility for low- and middle-income populations and attracts a diverse labor force critical for industries that provide basic services for the community. Affordable housing is also linked to improvements in mental health, reduction of stress, and decreased cases of illnesses caused by poor-quality housing.²¹ Developing affordable housing is also a strategy used to prevent displacement of existing residents when housing costs increase due to economic or migratory shifts.

Conversely, a lack of affordable housing eliminates many of these benefits and increases socioeconomic segregation. High housing costs are linked to displacement of low-income households and an increased risk of homelessness.²² Often lacking the capital to relocate to better neighborhoods, displaced residents tend to move to

²¹ Maqbool, Nabihah, et al. "The Impacts of Affordable Housing on Health: A Research Summary." *Insights from Housing Policy Research*, Center for Housing Policy, www.rupco.org/wp-content/uploads/pdfs/The-Impacts-of-Affordable-Housing-on-Health-CenterforHousingPolicy-Maqbool.etal.pdf.

²² "State of the Nation's Housing 2015." Joint Center for Housing Studies of Harvard University, <http://www.jchs.harvard.edu/sites/default/files/jchs-sonhr-2015-full.pdf>.

socioeconomically disadvantaged neighborhoods where housing costs are most affordable.²³

This section discusses the existing supply of housing in Lee's Summit. It also reviews housing costs in the city, county, and region, as well as housing condition, homeownership rates and access to lending for home purchases.

HOUSING SUPPLY SUMMARY

The Kansas City, MO-KS MSA has approximately 940,968 housing units, of which an estimated 330,584 are in Jackson County, and 40,716 are in the city of Lee's Summit. While all three areas have experienced growth in housing units in recent years, Lee's Summit's housing stock grew at the fastest rate (8.9%), followed by that of the MSA (5.2%) and Jackson County (3.9% increase) during the time period covered by the 2013-2017 American Community Survey five-year estimates (centered in 2015) to the 2018-2022 estimates (centered in 2020).

The American Community Survey's definition of vacancy includes housing that is available for sale or rent, housing that has been rented or sold but not yet occupied, seasonal housing, and other vacant units. Using this definition, the vacancy rate in Lee's Summit is estimated at 4.4% as of the 2018-2022 American Community Survey, down from 5.6% in 2013-2017. Vacancy rates in the county and MSA are higher at 9.6% and 7.5%, respectively. These rates are lower than that of the state of Missouri overall (12.0% as of the 2018-2022 ACS).

Shares of for-sale homeowner units are particularly low, pointing to tight housing markets and high demand for homeownership. The share of owner units that are vacant and for sale (homeowner vacancy rate) is just 1.0% in Lee's Summit, 0.9% in Jackson County, and 0.8% in the MSA. The share of renter units that are vacant and for rent (renter vacancy rate) is 5.1% in Lee's Summit, 4.7% in Jackson County, and 4.9% in the MSA, all slightly lower than the state average of 5.3%. About 1.9% of units in Lee's Summit, 5.9% of units in the county, and 4.0% of units in the MSA are vacant for reasons other than being available for sale or rent, being rented or sold but not yet occupied, or use as seasonal housing. These reasons include need for rehabilitation or repair, foreclosure, legal proceedings, abandonment, and other reasons. Despite differences in vacancy rates among the city, county, and MSA, all three areas have seen declines in vacant housing units, indicating high demand for housing and

²³ **Deirdre Oakley & Keri Burchfield (2009) Out of the Projects, Still in the Hood: The Spatial Constraints on Public-Housing Residents' Relocation in Chicago." *Journal of Urban Affairs*, 31:5, 589-614.**

increasingly tight housing markets. The following analysis examines several features of housing supply, including structure type, size, tenure, and age of housing.

TABLE 9. HOUSING UNITS BY OCCUPANCY STATUS

	2013-2017	2018-2022	% Change
LEE'S SUMMIT			
TOTAL HOUSING UNITS	37,389	40,716	8.9%
Occupied Housing Units	35,286	38,919	10.3%
Vacant Housing Units	2,103	1,797	-14.6%
Vacancy Rate	5.6%	4.4%	-21.5%
JACKSON COUNTY			
TOTAL HOUSING UNITS	318,178	330,584	3.9%
Occupied Housing Units	280,174	298,098	6.4%
Vacant Housing Units	38,004	31,676	-16.7%
Vacancy Rate	11.9%	9.6%	-19.8%
KANSAS CITY, MO-KS MSA			
TOTAL HOUSING UNITS	894,193	940,968	5.2%
Occupied Housing Units	815,314	869,964	6.7%
Vacant Housing Units	78,879	71,004	-10.0%
Vacancy Rate	8.8%	7.5%	-14.5%
Data Sources: 2013-2017 and 2018-2022 5-Year ACS, Tables B25002, B25004			

Housing Structure

Jurisdictions with a variety of housing structure types are better able to meet the needs of all residents, including different members of protected classes. Multifamily housing, including rental apartments, are often more affordable rental options than single-family homes for low- and moderate-income households, who are disproportionately likely to be non-white households. Multifamily units may also be the preference of some elderly and disabled householders who are unable or do not desire to maintain a single-family home.

Table 10 shows housing units by structure types in Lee's Summit, Jackson County, and the Kansas City, MO-KS MSA. Single family detached homes are the predominant housing type, making up about 67% to 73% of housing units across the three areas. In Lee's Summit, single-family attached units are the next most common (9.1%), followed by units in small multifamily buildings of five to 19 units (6.7%). Large multi-family developments with 20 or more units account for 5.6% of units, while units in duplexes, triplexes, and quadruplexes comprise 5.3% of units. Relative to the county and the region, the city has a larger share of single-family attached units (9.1% compared to 5.4% in the county and 6.2% in the MSA). Lee's Summit also has smaller shares of units in 'missing middle' housing types of two to 19 units (12.0% compared to 16.5% in the county and 15.3% in the MSA).

The most recent development in the city appears to be following a similar pattern of about two-thirds single-family units. Of the 405 certificates of occupancy issued by the City in 2024, slightly more than two-thirds (67.4%) were for single-family units (273 units), while slightly less than two-thirds (32.6%) were for other unit types (132 units, of which 48 were in quadruplexes, 30 were in duplexes, 24 were in horizontally attached structures of five or more units, 15 were single-family attached units, and 15 were in triplexes).

In Jackson County, units in large multifamily buildings of 20 or more units account for the second largest share of all housing units (10.5%), followed by units in small multifamily developments (9.7%) and units in duplexes, triplexes, and quadruplexes (6.9%). Single-family attached structures account for 5.4% of the county's units. Relative to the city and region, the county has larger shares of missing middle housing types of two to 19 units (16.5% of all units) and a smaller share of single-family detached units (66.7%).

Relative to the city and county, the region has a greater share of mobile homes (1.7% of units).

The high shares of single family-detached structures in all three areas may pose limitations on residents in obtaining housing in units of other housing types, including

'missing middle' housing, such as duplexes, triplexes, quadruplexes, units in small apartment buildings, or other housing types that may provide opportunities for increased affordability, variety in housing unit size, or specific amenities or opportunities for social connection. When neighborhoods contain a concentration of similar housing types, residents may find it difficult to obtain housing that meets their needs or to remain in their neighborhoods of choice as they experience life changes.

TABLE 10. HOUSING UNITS BY STRUCTURE TYPE

Units in Structure	LEE'S SUMMIT		JACKSON COUNTY		KANSAS CITY, MO-KS MSA	
	#	%	#	%	#	%
1, detached	29,837	73.3%	220,397	66.7%	651,628	69.3%
1, attached	3,692	9.1%	17,791	5.4%	58,290	6.2%
2 to 4	2,141	5.3%	22,653	6.9%	54,906	5.8%
5 to 19	2,736	6.7%	31,929	9.7%	89,405	9.5%
20 or more	2,276	5.6%	34,659	10.5%	70,260	7.5%
Mobile home	34	0.1%	2,954	0.9%	15,888	1.7%
Other (RV, boat, van, etc.)	0	0.0%	201	0.0%	591	0.0%
TOTAL	40,716	100%	330,584	100%	940,968	100%
Data Sources: 2018-2022 5-Year American Community Survey, Table B25024.						

Housing Tenure and Size (by Number of Bedrooms)

Availability of housing in a variety of sizes is important to meet the needs of different demographic groups. Neighborhoods with multi-bedroom detached, single-family homes typically attract larger families, whereas dense residential developments with smaller unit sizes and fewer bedrooms often accommodate single-person households or small families. However, market forces and affordability impact housing choice and the ability to obtain housing of a suitable size. Markets that do not offer a variety of housing sizes at different price points can lead to barriers for some groups. Rising housing costs can, for example, lead to overcrowding as large households with lower incomes are unable to afford pricier, larger homes and are forced to reside in smaller units. On the other hand, people with disabilities or seniors with fixed incomes may not require large units but can be limited by higher housing costs in densely populated areas where most studio or one-bedroom units are located.

Table 11 details housing units by the number of bedrooms and resident tenure (renters or homeowners). In Lee's Summit, Jackson County, and the Kansas City, MO-KS MSA, the vast majority (about 80% to 90%) of owner-occupied units have three or more bedrooms. Another 10% to 17% of owner-occupied units have two bedrooms. Studio and one-bedroom units are the least common owner-occupied units in all three areas, comprising just 0.5% to 2.2% of units. Relative to Jackson County and MSA, Lee's Summit has a larger share of owner-occupied housing units with four or more bedrooms (49.7%) and smaller shares of units with zero or one, two, and three bedrooms.

Compared to owner-occupied units, rental units tend to have fewer bedrooms. Two-bedroom units are the most common renter-occupied housing size, comprising about 37% to 39% of units in the city, county, and MSA. Zero or one-bedroom units are the next most common, comprising about 31% to 33% of renter-occupied units across the three areas. Units with three or more bedrooms make up about 29% to 30% of all rented units in the three areas.

The relatively low shares of owner-occupied units with zero to two bedrooms across the city, county, and MSA points to challenges for homebuyers seeking smaller housing units that may provide increased levels of affordability and have lower maintenance costs. Renter households with large families, to the contrary, may experience challenges securing housing with more than three bedrooms.

TABLE 11. HOUSING UNITS BY SIZE AND TENURE

Number of Bedrooms	LEE'S SUMMIT		JACKON COUNTY		KANSAS CITY, MO-KS MSA	
	#	%	#	%	#	%
OWNER-OCCUPIED HOUSING UNITS						
Zero or One	144	0.5%	3,933	2.2%	8,898	1.6%
Two	2,934	10.0%	28,878	16.5%	74,859	13.2%
Three	11,642	39.8%	90,569	51.8%	261,191	45.9%
Four +	14,524	49.7%	51,583	29.5%	223,968	39.4%
TOTAL	29,244	100%	174,963	100%	568,916	100%
RENTER-OCCUPIED HOUSING UNITS						
Zero or One	3,220	33.3%	39,060	31.5%	93,628	31.1%
Two	3,624	37.5%	48,176	38.9%	118,213	39.3%
Three	2,134	22.1%	30,089	24.3%	70,609	23.5%
Four +	697	7.2%	6,620	5.3%	18,598	6.2%
TOTAL	9,675	100%	123,945	100%	301,048	100%
Data Sources: 2018-2022 5-Year American Community Survey, Table B25042.						

NOTE: Total is the total number of occupied housing units in each geography. Unoccupied units are not included in this table because tenure data is not available for these units.

Age of Housing

An assessment of the region's housing conditions can provide a basis for developing policies and programs to maintain and preserve the quality of the housing stock. The age of housing can have a substantial impact on housing conditions and costs. As housing ages, maintenance costs rise, which can present significant affordability issues for low- and moderate-income homeowners. Aging rental stock can lead to rental rate increases to address physical issues or deteriorating conditions if building owners defer or ignore maintenance needs. Deteriorating housing can also depress neighboring property values, discourage reinvestment, and eventually impact the quality of life in a neighborhood. Homes built prior to 1950 have a high likelihood of

containing lead-based paint. However, the use of lead-based paint did not end until 1978 and may affect an even larger number of households in Lee's Summit.

Development of new market-rate and subsidized housing units can support housing affordability and reduce displacement of lower-income residents. In contrast, areas with growing populations in which few new housing units are built tend to experience housing shortages and reduced affordability. Subsidized units, such as those built with low-income housing tax credits and other federal and state subsidies, have been found to be particularly protective in reducing displacement.²⁴

Data on age of housing in Lee's Summit, Jackson County, and the Kansas City, MO-KS MSA points to a newer housing stock in the city relative to the county and region and a decline in construction of new units since 2010 in all three areas. An estimated 58.5% of units in Lee's Summit are in structures built in 1990 and later, compared to just 24.5% of units in the county and 35.8% of units in the region. Similarly, 11.9% of units in the city (4,841 units) were built in 2010 or later, compared to only about 6% to 9% of units in the county and region (19,437 units and 80,211 units, respectively). Just 6.4% of units in the city were built prior to 1960, while 37.2% of units in the county and 26.5% of units in the MSA were constructed in that period. While housing in Lee's Summit tends to be newer relative to that of the county and MSA, about one in four units (24.8%) were built prior to 1980, indicating greater need for rehabilitation and repair. This older housing stock in Lee's Summit may pose both economic and public health challenges, particularly for individuals and families living in older housing units.

²⁴ Zuk, M. and Chapple, K. (2016). Housing Production, Filtering and Displacement: Untangling the Relationships. Berkeley Institute of Governmental Studies. Retrieved from: https://www.urbandisplacement.org/wp-content/uploads/2021/08/udp_research_brief_052316.pdf

TABLE 12. NUMBER OF UNITS BY YEAR STRUCTURE BUILT

Year Structure Built	LEE'S SUMMIT		JACKSON COUNTY		KANSAS CITY, MO-KS MSA	
	#	%	#	%	#	%
2010 to 2022	4,841	11.9%	19,437	5.9%	80,211	8.5%
2000 to 2009	8,920	21.9%	28,321	8.6%	126,585	13.5%
1990 to 1999	10,062	24.7%	33,237	10.1%	129,994	13.8%
1980 to 1989	6,781	16.7%	32,234	9.8%	112,143	11.9%
1970 to 1979	5,006	12.3%	49,133	14.9%	133,794	14.2%
1960 to 1969	2,499	6.1%	45,190	13.7%	109,122	11.6%
1950 1959	1,159	2.8%	43,191	13.1%	101,993	10.8%
1949 or earlier	1,448	3.6%	79,841	24.2%	147,126	15.6%
TOTAL	40,716	100%	330,584	100%	940,968	100%
Data Sources: 2018-2022 5-Year American Community Survey, Table B25034.						

Other Housing Supply Needs

Residents and stakeholders who participated in this planning process noted a variety of housing needs in the city, including:

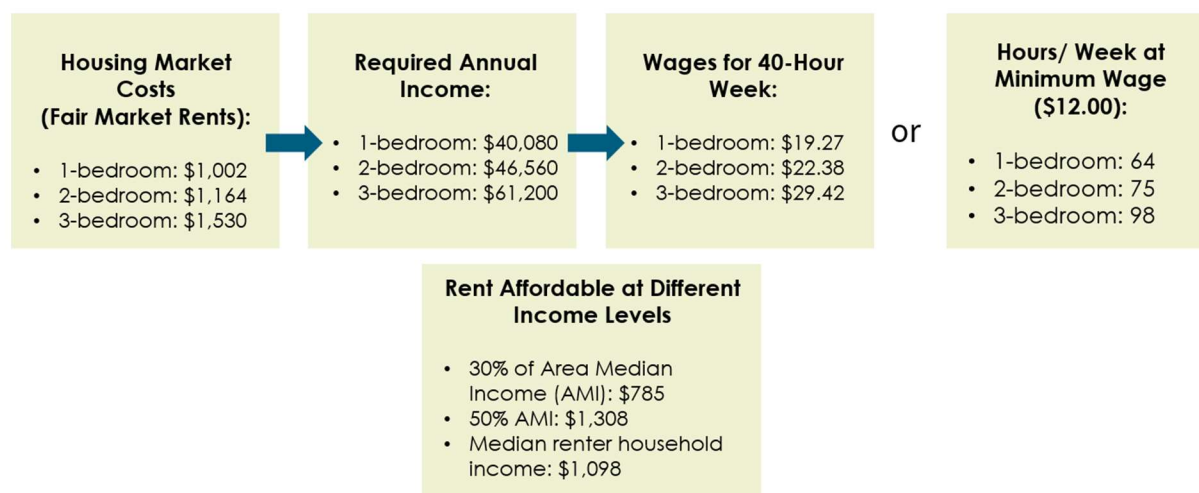
- Elderly or senior housing
- Family housing
- Housing for people with disabilities
- Affordable starter homes
- Housing affordable for low- and moderate-income households
- Workforce housing affordable for teachers, people working in the service industry, etc.
- Transitional housing for residents exiting homelessness

HOUSING COSTS AND AFFORDABILITY

The availability of housing that is both affordable and in good condition was a common need identified by stakeholders, particularly for low- and moderate-income households. The National Low Income Housing Coalition's annual Out of Reach report examines rental housing rates relative to income levels for counties throughout the U.S. The figure below shows annual household income and hourly wages needed to afford Fair Market Rents in Jackson County.

To afford a two-bedroom rental unit—the county's most common rental type—without being cost burdened, a renter household would need to earn an annual income of \$46,560, which translates to a 40-hour work week at an hourly wage of \$22.38. It would take a 75-hour work week at the minimum wage of \$12.00 to afford the same two-bedroom unit. According to the Out of Reach Report, the median renter household income is \$43,907, which is lower than the necessary annual income to afford a two-bedroom unit at fair market rent.

FIGURE 35. REQUIRED INCOME, WAGES, AND HOURS TO AFFORD FAIR MARKET RENTS, JACKSON COUNTY, 2023



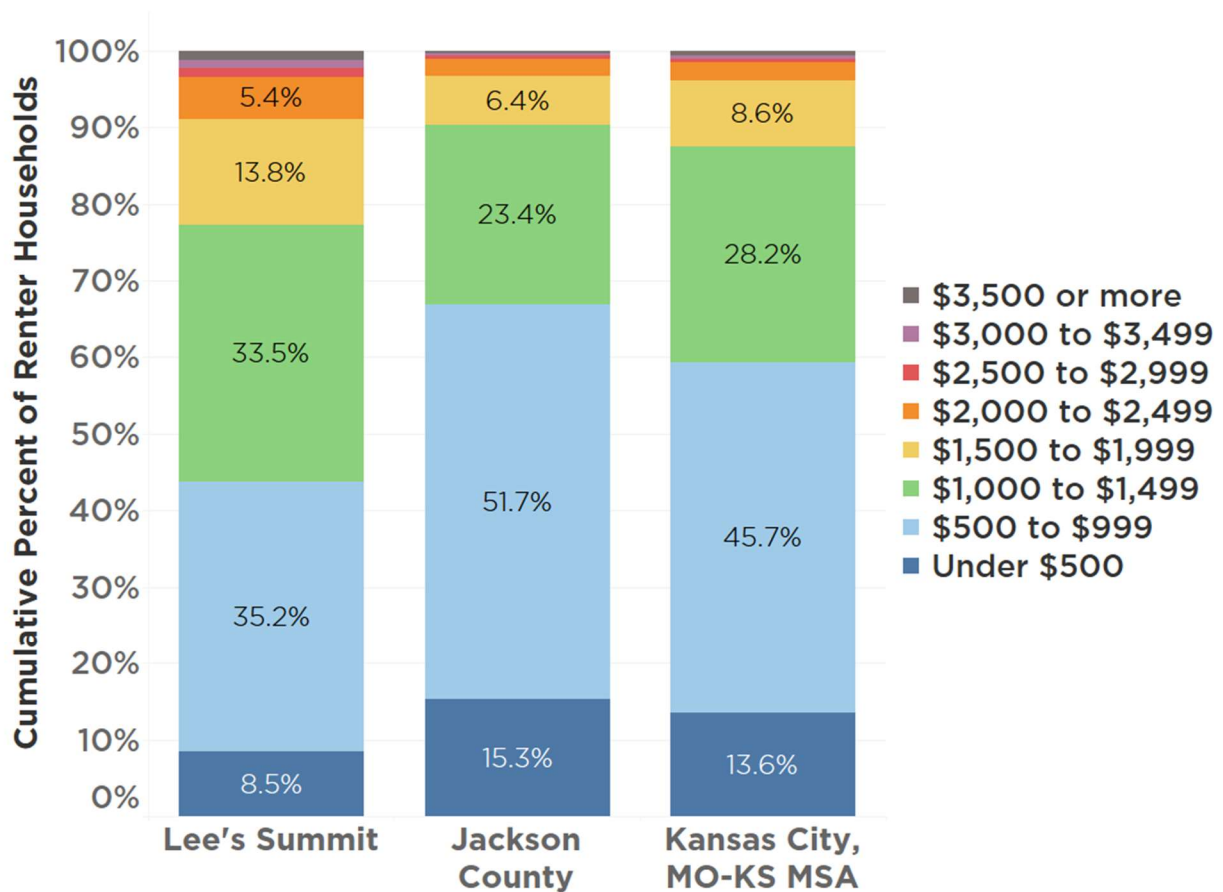
Source: National Low Income Housing Coalition Out of Reach 2023 (nlihc.org)

NOTE: Required income is the annual income needed to afford Fair Market Rents without spending more than 30% of household income on rent. The minimum wage in Jackson County is \$12.00/hour. Median renter household income in Jackson County is \$43,907. Data are for Jackson County including the city of Lee's Summit.

The American Community Survey also provides estimates on monthly renter and homeowner costs. This data indicates that housing in the city tends to be less affordable relative to that in the county and larger metro area. As of the 2018-2022 American Community Survey five-year estimates, 43.8% of renter households in Lee's

Summit spend less than \$1,000 per month on rent, compared to about 60% to 68% of renter households in the county and MSA. Households in the city are more likely than those in the county and MSA to spend between \$1,000 to \$1,999 on rent (47.3% of households, compared to about 29% to 36% in the county and MSA). Households in Lee's Summit are also more likely to spend \$2,000 or more on rent (8.9% of city households, compared to about 3% to 4% of households in the county and metro). More recent data from the Zumper database shows average rents in Lee's Summit at \$1,411 for a two-bedroom unit and \$1,843 for a three-bedroom unit as of June 2024, indicating sharp increases in rental costs in recent years. Renters earning the median renter household income may thus find it difficult to find housing in Lee's Summit at an affordable rate for their income level.

FIGURE 36. CONTRACT RENT, LEE'S SUMMIT, 2018-2022

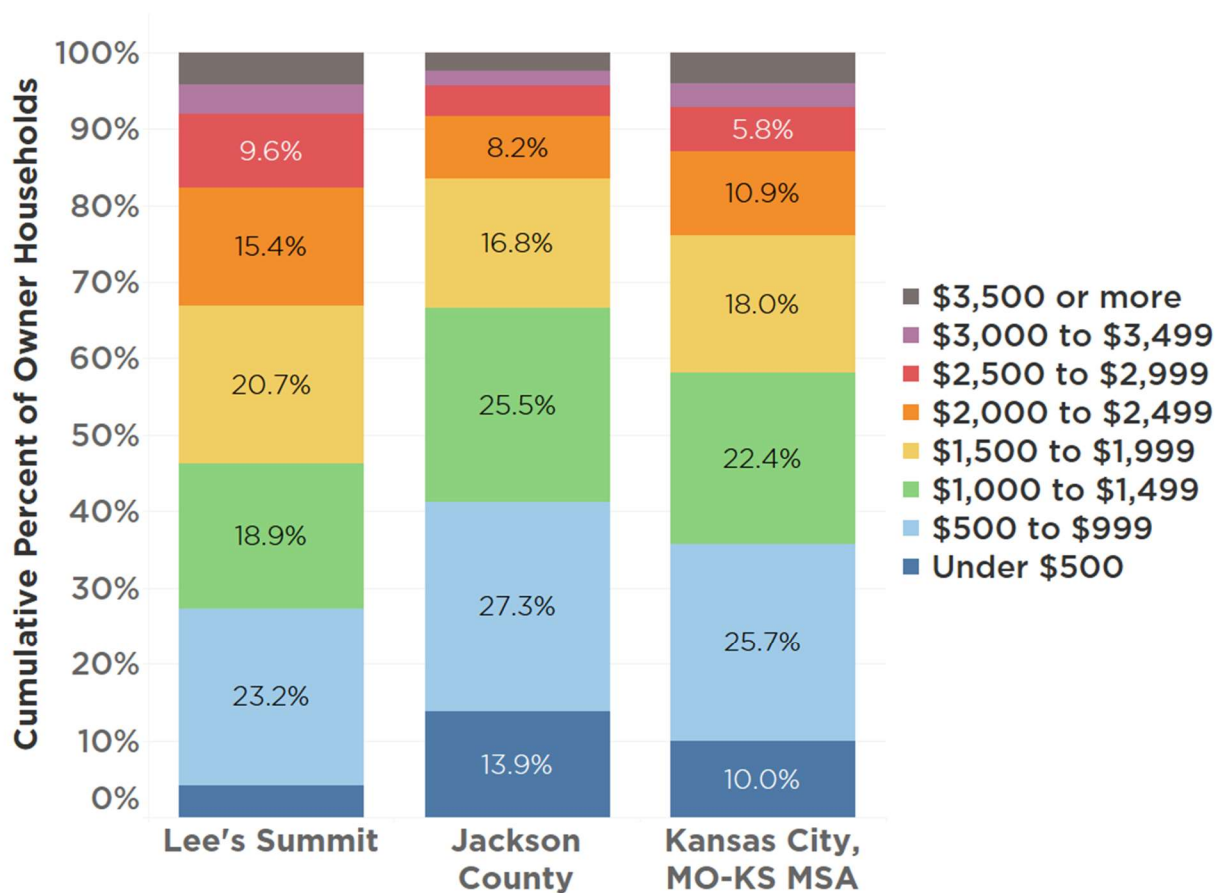


For many Lee's Summit households, homeownership is more expensive than renting. As of the American Community Survey five-year estimates for 2018-2022, an estimated 53.7% of homeowners in Lee's Summit spend \$1,500 or more per month on housing—a larger share than the estimated 22.7% of renter households spending within this same

range. Owner households in the city are also significantly more likely to spend \$2,000 or more per month on housing costs than renters (33.1% of homeowner households, compared to 8.9% of renter households). As with renter households, homeowners in Lee's Summit spend more on monthly housing costs than do households in the county and MSA.

More recent data from Zillow's Home Value Index (ZHVI) estimates the typical home value in Lee's Summit at \$377,808 as of May 2024, a 44.7% increase over the typical home value of \$261,110 in May 2019. These values indicate lower levels of affordability in the city relative to the metro area, where the typical home value was \$307,032 as of May 2024. They also indicate steep increases in home prices in recent years and barriers to homeownership for lower-income residents. As home values and interest rates have increased in recent years, renting is generally more accessible to low-to-moderate income families in Lee's Summit than homeownership.

FIGURE 37. MONTHLY OWNER COSTS, LEE'S SUMMIT, 2018-2022



HOUSING NEEDS

Housing cost and condition are key components to housing choice. Housing barriers may exist in a jurisdiction when some protected class groups have greater difficulty accessing housing in good condition and that they can afford.

To assess affordability and other types of housing needs, HUD defines four housing problems:

- A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
- A household is *overcrowded* if there are more than 1.0 people per room, not including kitchen or bathrooms.
- A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
- A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly housing income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U. S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, known as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combination of HUD-specified criteria, such as housing needs by race and ethnicity. CHAS data for Lee's Summit and Jackson County is provided in the tables that follow.

An estimated 21.3% of households in Lee's Summit (7,855 households) and 29.6% of Jackson County households (84,218 households) have at least one housing problem (see Table 13). An estimated 9.8% of city households (3,599 households) and 14.7% of county households (41,962 households) have a severe housing problem (see Table 14).

White, non-Hispanic households account for the majority of households in Lee's Summit and Jackson County (86.2% and 67.6%, respectively), followed by Black households (8.3% and 23.8%, respectively). Other races and ethnicities make up

smaller shares of households in both the city and county. Black and Native American households in Lee's Summit experience housing problems at disproportionate rates: 33.9% of Black households in the city have at least one of the four housing problems, and 77.8% of the 45 Native American households in the city have a housing problem. At the county level, Pacific Islander, Native American, and Black households experience housing problems at disproportionate rates: 49.5% of Pacific Islander households, 46.1% of Native American households, and 41.8% of Black households in Jackson County experience at least one housing problem.

Black and Native American households in Lee's Summit experience severe housing problems at disproportionate rates (23.7% and 77.8%, respectively, compared to 9.8% of all households in the city). At the county level, Pacific Islander and Native American households experience severe housing problems at the disproportionate rates (45.7% and 30.6%, respectively, compared to 14.7% of all households).

Table 14 also shows rates of housing problems based on the size of the household. Family sizes examined here include small families with fewer than five members, large families with five or more members, and non-family households which include single persons and unrelated adults living together. Non-family households experience housing problems at the highest rates in both the city and county (41.5% and 39.9%, respectively). In Lee's Summit, large family households with more than five members experience housing problems at the lowest rate (11.5% of households), while in Jackson County, small family households with fewer than five members experience the lowest rates of housing problems (20.9%). While non-family households experience housing problems at similar rates across the city and county, small- and large-family households in Lee's Summit experience housing problems at lower rates than those in the county as a whole.

Table 15 examines severe housing cost burden in Lee's Summit and Jackson County. An estimated 8.5% households in Lee's Summit and 12.7% of households in Jackson County spend more than half of their monthly income on housing costs. Black and Native American households in the city are disproportionately severely cost burdened (22.5% and 44.4% of households, respectively). Native American households in the county also experience severe cost burdens at a disproportionate rate (24.3%).

Table 15 also provides data on severe housing cost burden by household size. In both the city and county, non-family households have the highest rates of severe cost burden (19.1% and 18.7%, respectively). An estimated 5.5% of small family households in Lee's Summit experience severe cost burdens, while only 0.4% of large family households do. In the county as a whole, large- and small-family households are equally likely to experience severe cost burdens (8.5% to 8.6% of households).

These findings show that Black and Native American households in Lee's Summit are disproportionately likely to experience housing problems, severe housing problems, and severe housing cost burdens. Non-family households have higher rates of housing problems and severe cost burden in both the city and county than do large- and small-family households.

Local measures that address disparities for these groups may reduce the barriers they experience in accessing a range of housing options. Increasing the availability of smaller, more affordable housing types, for example, may reduce housing cost burdens for non-family households.

TABLE 13. DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS, 2016-2020

Households Experiencing any of the Four Housing Problems	LEE'S SUMMIT			JACKSON COUNTY		
	# with Problems	# of Households	% with Problems	# with Problems	# of Households	% with Problems
RACE AND ETHNICITY						
White, Non-Hispanic	6,345	31,725	20.0%	47,585	192,195	24.6%
Black, Non-Hispanic	1,030	3,040	33.9%	28,360	67,790	41.8%
Hispanic	295	1,395	21.1%	6,460	18,945	34.1%
Asian, Non-Hispanic	150	589	25.5%	1,210	4,285	28.2%
Pacific Islander, Non-Hispanic	0	10	0.0%	253	511	49.5%
Native American, Non-Hispanic	35	45	77.8%	350	759	46.1%
TOTAL	7,855	36,804	21.3%	84,218	284,485	29.6%

Households Experiencing any of the Four Housing Problems	LEE'S SUMMIT			JACKSON COUNTY		
	# with Problems	# of Households	% with Problems	# with Problems	# of Households	% with Problems
HOUSEHOLD TYPE AND SIZE						
Family Households, <5 People	3,365	23,495	14.3%	30,100	144,240	20.9%
Family Households, 5+ People	440	3,820	11.5%	6,975	22,940	30.4%
Non-Family Households	4,295	10,350	41.5%	49,585	124,355	39.9%
Data Sources: CHAS, Tables 1, 4.						

TABLE 14. HOUSEHOLDS WITH SEVERE HOUSING PROBLEMS

Households Experiencing any of the Four Severe Housing Problems	LEE'S SUMMIT			JACKSON COUNTY		
	# with Problems	# of Households	% with Problems	# with Problems	# of Households	% with Problems
RACE AND ETHNICITY						
White, Non-Hispanic	2,620	31,720	8.3%	22,390	192,200	11.6%
Black, Non-Hispanic	719	3,039	23.7%	14,935	67,800	22.0%
Hispanic	145	1,395	10.4%	3,380	18,945	17.8%
Asian, Non-Hispanic	80	589	13.6%	789	4,289	18.4%
Pacific Islander, Non-Hispanic	0	10	0.0%	234	512	45.7%
Native American, Non-Hispanic	35	45	77.8%	234	764	30.6%
TOTAL	3,599	36,798	9.8%	41,962	284,510	14.7%
Data Sources: CHAS, Tables 1, 2.						

TABLE 15. DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDENS

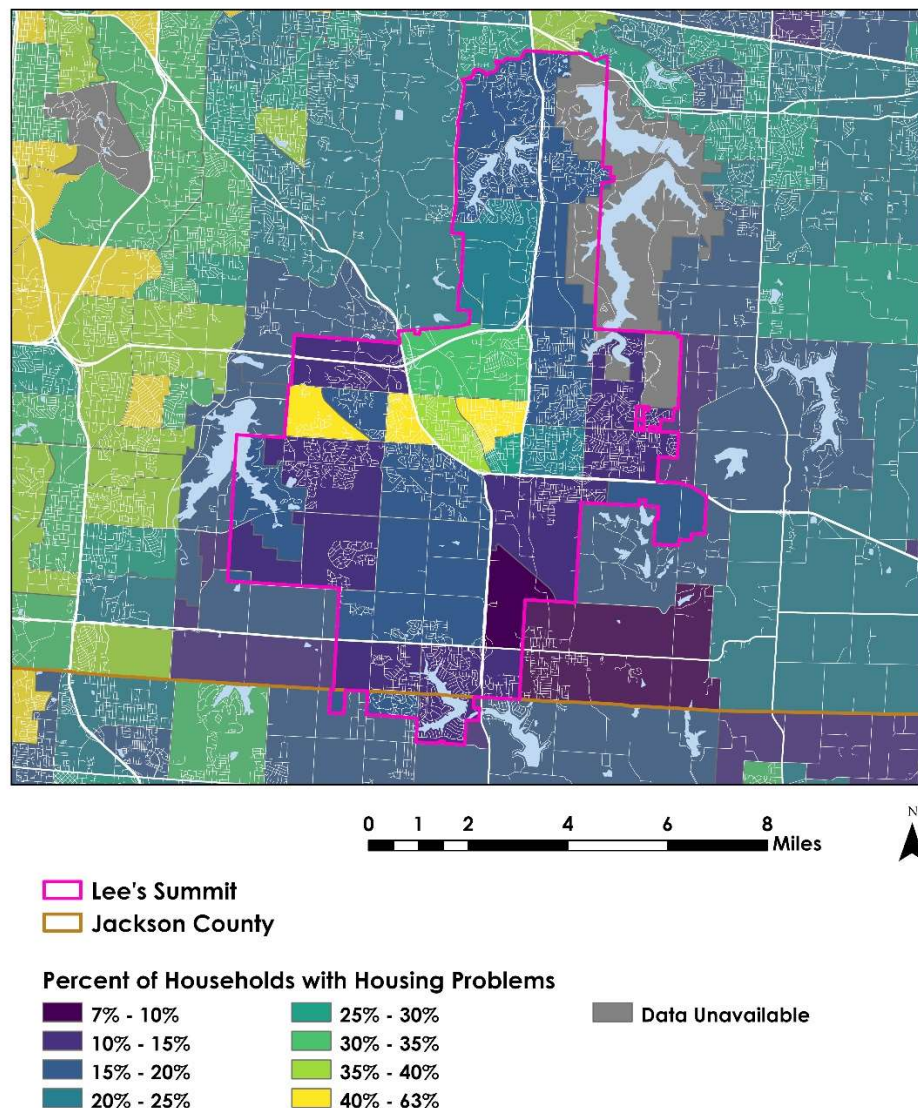
Severe Cost Burden	LEE'S SUMMIT			JACKSON COUNTY		
	# with Severe Cost Burden	# of Households	% with Severe Cost Burden	# with Severe Cost Burden	# of Households	% with Severe Cost Burden
RACE AND ETHNICITY						
White, Non-Hispanic	2,260	31,725	7.1%	19,210	192,205	10.0%
Black, Non-Hispanic	685	3,050	22.5%	13,775	67,795	20.3%
Hispanic	75	1,390	5.4%	2,150	18,945	11.3%
Asian, Non-Hispanic	80	600	13.3%	620	4,290	14.5%
Pacific Islander, Non-Hispanic	0	10	0.0%	79	515	15.3%
Native American, Non-Hispanic	20	45	44.4%	185	760	24.3%
TOTAL	3,120	36,820	8.5%	36,019	284,510	12.7%

Severe Cost Burden	LEE'S SUMMIT			JACKSON COUNTY		
	# with Severe Cost Burden	# of Households	% with Severe Cost Burden	# with Severe Cost Burden	# of Households	% with Severe Cost Burden
HOUSEHOLD TYPE AND SIZE						
Family Households, <5 People	1,250	22,730	5.5%	11,850	138,970	8.5%
Family Households, 5+ People	15	3,370	0.4%	1,755	20,470	8.6%
Non-Family Households	1,974	10,350	19.1%	23,275	124,360	18.7%
Data Sources: CHAS, Tables 1, 7, 9.						

NOTE: Severe housing cost burden is defined as greater than 50% of income.

The map that follows shows the prevalence of housing problems in Lee's Summit. Rates of housing problems are greatest in parts of central and west Lee's Summit, where in five census tracts, 33% to 56% of households experience at least one housing problem (most commonly housing cost burden or severe housing cost burden). In five additional census tracts in central and north Lee's Summit, 20% to 30% of households experience at least one housing problem. Problems such as cost burdens, overcrowding, or a lack of complete plumbing or kitchen facilities are most common among very low- and low-income households.

FIGURE 38. HOUSING PROBLEMS IN LEE'S SUMMIT



Source: CHAS, 2016-2020, Table 1

HOMEOWNERSHIP AND LENDING

Homeownership is vital to a community's economic well-being. It allows the opportunity to build wealth, is generally associated with higher levels of civic engagement,²⁵ and is correlated with positive cognitive and behavioral outcomes among children.²⁶

Federal housing policies and discriminatory mortgage lending practices prior to the Fair Housing Act of 1968, along with continuing impediments to access, have had significant impacts on the homeownership rates of racial and ethnic minorities, particularly Black and Hispanic populations. The gap between the white and Black homeownership rate is the largest among racial and ethnic groups. In 2022, the U.S. Census Bureau reported a 25.4 percentage point gap in homeownership rate between white and Black households, representing a slight widening of the gap since 2002 (24.3 percentage points). Over the same time period, the gap in the homeownership rate between white and Hispanic households narrowed from 24.7 to 21.8 percentage points.²⁷

Homeownership trends have changed in recent years because of significant events in the housing market and labor force. The homeownership rate for Millennials (the generation born between 1981 and 1997) is eight percentage points lower than the two previous generations, controlling for age. This discrepancy can be attributed to a multitude of factors ranging from preference to urban areas, cost of education and associated debt, changes in marriage and childbearing patterns, rising housing costs, and the current supply of affordable houses.²⁸

The map that follows shows the homeownership rate by census tract in Lee's Summit. The share of homeowners is lowest in parts of northeast and central Lee's Summit and highest in parts of east, south, and west Lee's Summit.

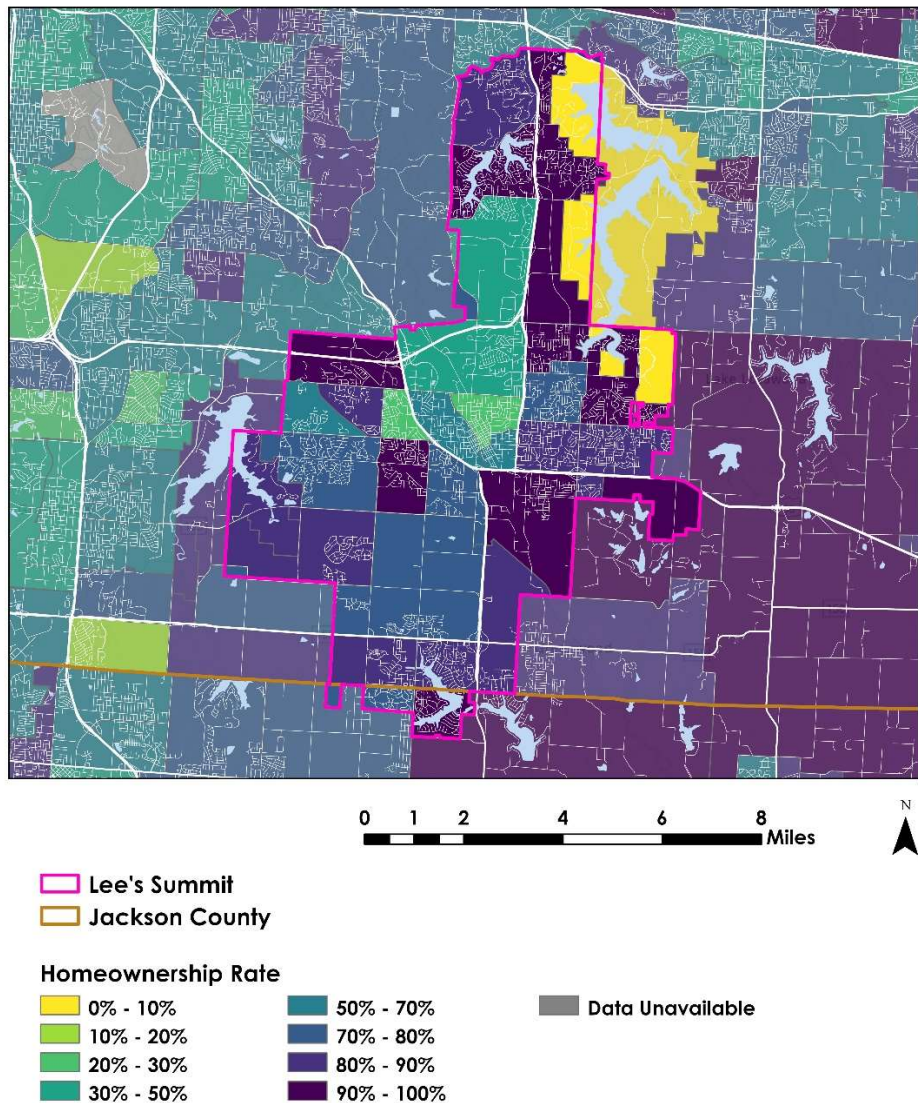
²⁵ Manturuk K, Lindblad M, Quercia R. "Homeownership and civic engagement in low-income urban neighborhoods: a longitudinal analysis." *Urban Affairs Review*. 2012;48(5):731–60.

²⁶ Haurin, Donald R. et al. "The Impact of Homeownership on Child Outcomes." *Low-Income Homeownership Working Paper Series*. Joint Center for Housing Studies of Harvard University. October 2001, <http://www.jchs.harvard.edu/sites/default/files/liho01-14.pdf>.

²⁷ U.S. Census Bureau. *Homeownership Rates by Race and Ethnicity of Householder: 1994 to 2022*.

²⁸ Choi, Jung et al. "Millennial Homeownership: Why Is It So Low, and How Can We Increase It?" *The Urban Institute*. July 2018. www.urban.org/sites/default/files/publication/98729/millennial_homeownership_0.pdf.

FIGURE 39. HOMEOWNERSHIP RATE, LEE'S SUMMIT, 2018-2022



The table that follows shows numbers of owner and renter households, as well as homeownership rates, by race and ethnicity for Lee's Summit, Jackson County, and the Kansas City, MO-KS MSA. Owner-occupied households make up 75.1% of all households in Lee's Summit, 58.5% of households in Jackson County, and 65.4% of households in the metro area. Homeownership rates are higher across all racial and ethnic groups in Lee's Summit relative to the county and MSA. White, Asian, and Pacific Islander households in the city own their homes at the highest rates (77.7%, 93.7%, and 100.0%, respectively). Homeownership rates are lowest among Black households across the city, county, and metro area (47.3%, 39.3%, and 38.3%, respectively).

TABLE 16. HOMEOWNERSHIP AND RENTAL RATES BY RACE AND ETHNICITY

Householder Race and Ethnicity	LEE'S SUMMIT			JACKSON COUNTY			KANSAS CITY, MO-KS MSA		
	Owner Households	Renter Households	Home- ownership Rate	Owner Households	Renter Households	Home- ownership Rate	Owner Households	Renter Households	Home- ownership Rate
White	25,473	7,304	77.7%	132,833	69,671	65.6%	477,563	198,787	70.6%
Black	1,487	1,659	47.3%	26,912	41,521	39.3%	41,419	66,806	38.3%
Hispanic	1,069	510	67.7%	11,379	8,761	56.5%	32,807	26,471	55.3%
Asian	688	46	93.7%	2,744	1,972	58.2%	13,874	7,883	63.8%
Pacific Islander	56	0	100.0%	314	250	55.7%	406	607	40.1%
Native American	26	15	63.4%	477	444	51.8%	1,630	1,493	52.2%
Some Other Race	329	146	69.3%	3,854	2,990	56.3%	11,090	8,638	56.2%
Two or More Races	1,185	505	70.1%	7,829	7,097	52.5%	22,934	16,834	57.7%
TOTAL	29,244	9,675	75.1%	174,963	123,945	58.5%	568,916	301,048	65.4%
Data Sources: 2018-2022 American Community Survey 5-Year Estimates, Table S2502									

NOTE: Data presented are number of households, not individuals.

Mortgage Lending

Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The proceeding data and analysis assesses the degree to which the housing needs of local residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2022 HMDA data consists of information for 14.3 million home loan applications reported by 4,460 home lenders including banks, savings associations, credit unions, and mortgage companies.²⁹ HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and information about loan applicants such as sex, race, ethnicity, and income. 328 financial institutions reported HMDA data for Lee's Summit census tracts in 2022.

Lee's Summit census tracts had a total of 3,617 home purchase loan application records in 2022. The following analysis looks at 2,374 applications in which mortgages were applied for as first liens for single-family homes, including conventional, FHA-insured, VA-guaranteed, and FSA / RHS-guaranteed loans. Within each record, some data variables are 100% reported— "Loan Type," "Loan Amount," and "Action Taken," for example—but other data fields are less complete. According to the HMDA data, these records represent applications taken entirely by mail, Internet, or phone in which the applicant may have declined to identify their sex, race and / or ethnicity. Records for applications with missing race and ethnicity data are included in a separate category entitled "No Race or Ethnicity Given."

Looking at first-lien applications completed in 2022, just over two-thirds of applications in Lee's Summit census tracts were completed by white, non-Hispanic applicants (1,587 applications, or 66.8%). Applicants who did not identify their race or ethnicity each made up 15.7% of all completed applications (372 applications). Black applicants submitted 6.9% of applications (164 applications), and Hispanic or Latino

²⁹ **Federal Financial Institutions Examination Council (FFIEC).** "Press Release: FFIEC Announces Availability of 2022 Data on Mortgage Lending." June 29, 2023. <https://www.ffiec.gov/press/pr062923.htm>

applicants submitted 5.5% of applications (130 applications). Smaller shares of applications were submitted by Asian or Pacific Islander applicants, jointly by applicants of different races, and by applicants of two or more minority races (59, 56, and 6 applications, respectively).

The tables that follow shows loan approval rates for completed loan applications by race and ethnicity at various income levels in Lee's Summit.³⁰ The Median Family Income in the Kansas City, MO-KS HUD Metro FMR Area is \$103,100, according to HUD's FY 2024 Income Limits. The income tiers in the table on the following page represent low-income applicants earning up to 80% AMI (\$82,480), middle income applicants earning between 80% to 120% AMI (\$82,480 to \$123,720), and high-income applicants earning more than 120% AMI (over \$123,720). In 2022, there were 104 applications for which income was not reported. These applications are included in the totals under "all income levels." Excluded from these figures are applications that were withdrawn or closed due to incompleteness such that no decision was made regarding approval or denial.

HMDA data indicates that 5.3% of first-lien mortgage applications for single-family homes in Lee's Summit census tracts were denied in 2022. 6.3% of all applications from low- and middle-income earners were denied, and 4.1% of applications from high-income earners were denied. Looking at these figures by race and ethnicity, Black, Asian or Pacific Islander, and Hispanic or Latino applicants were denied mortgages at higher rates (12.8%, 8.5%, and 8.5%, respectively) relative to the city's average rate of 5.3%. Applicants from residents of two or more minority groups were also more likely to be denied a loan (50.0%), although these applications made up a small share of the total number of loan applications (6 applications of 2,374). Overall, Black applicants in Lee's Summit were about 3.7 times as likely to be denied a loan as white applicants. Hispanic or Latino applicants and Asian or Pacific Islander applicants were about 2.4 times as likely to be denied as white applicants.

6.3% of low-income mortgage loan applicants were denied a mortgage loan. Low-income applicants of two or more minority groups, low-income Black applicants, and low-income applicants with no race or ethnicity given experienced the highest rates of mortgage denial (33.3%, 15.9%, and 15.9%, respectively). Applicants who submitted applications jointly and white applicants were denied a mortgage at the lowest rates (0.0% and 2.9%, respectively).

³⁰ **The low-income category includes applicants with a household income at or below 80% of area median family income (MFI). The middle-income range includes applicants with household incomes from 81% to 120% MFI, and the upper income category consists of applicants with a household income above 120% MFI.**

Middle-income applicants earning between 80% to 120% MFI were denied mortgages at a rate of 6.3%. At this income level, applications from Black applicants and applicants of multiple races were denied at significantly higher rates (100.0% and 18.2%). Applicants who submitted applications jointly, white applicants, and Asian or Pacific Islander applicants were denied mortgage loans at the lowest rates (0.0%, 4.0%, and 5.3%, respectively).

At high incomes, 4.1% of applicants were denied a mortgage loan. At this income level, Asian or Pacific Islander applicants experienced denial at the highest rate (14.3%). White applicants and applicants who submitted applications jointly were denied mortgage loans at the lowest rates (3.5% and 3.7%, respectively). Just one application was submitted by an applicant of two or more minority groups, and this application was not denied.

Reasons for denial are shown in Table 17. White and Black households and households with no race or ethnicity given experienced the largest numbers of denials. Black households and households of two or more minority groups were denied at the highest rates. The primary reasons for mortgage loan denial were 'other' reasons, debt-to-income ratio, and incomplete credit application.

These findings indicate disparities in access to mortgage loans in Lee's Summit, particularly for Black applicants and for applicants of multiple races. Denials based on high debt-to-income ratio and incomplete credit indicate that many applicants struggle with long-term financial instability, which creates additional barriers to accessing a mortgage. The data suggests that additional resources are needed to stabilize the path to homeownership, including support for homebuyer readiness classes or other pre-application assistance, down payment assistance programs, and wider ranging social supports for households to improve their chances of securing mortgage loans.

TABLE 17. HOME PURCHASE LOAN DENIAL RATES BY RACE AND ETHNICITY IN LEE'S SUMMIT, 2022

Applicant Income	APPLICANT RACE AND ETHNICITY								All Applicants
	NON-LATINO						Latino and Hispanic	No Race or Ethnicity Given	
	White	Black	Asian and Pacific Islander	Native American	Two or More Minority Groups	Joint			
LOW INCOME									
Completed Applications	444	63	26	--	3	9	41	69	655
Denied Applications	13	10	2	--	1	0	4	11	41
Denial Rate	2.9%	15.9%	7.7%	--	33.3%	0.0%	9.8%	15.9%	6.3%
MIDDLE INCOME									
Completed Applications	446	44	19	--	2	20	48	90	669
Denied Applications	18	8	1	--	2	0	3	10	42
Denial Rate	4.0%	18.2%	5.3%	--	100.0%	0.0%	6.3%	11.1%	6.3%
HIGH INCOME									
Completed Applications	684	56	14	--	1	27	40	124	946
Denied Applications	24	3	2	--	0	1	3	6	39
Denial Rate	3.5%	5.4%	14.3%	--	0.0%	3.7%	7.5%	4.8%	4.1%

Applicant Income	APPLICANT RACE AND ETHNICITY								All Applicants
	NON-LATINO						Latino and Hispanic	No Race or Ethnicity Given	
	White	Black	Asian and Pacific Islander	Native American	Two or More Minority Groups	Joint			
ALL INCOME LEVELS									
Completed Applications	1,587	164	59	--	6	56	130	372	2,374
Denied Applications	56	21	5	--	3	1	11	30	127
Denial Rate	3.5%	12.8%	8.5%	--	50.0%	1.8%	8.5%	8.1%	5.3%
Data Sources: FFIEC 2022 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda .									

NOTE: "Completed applications" includes applications that were denied and approved with a loan originated. It does not include applications that were approved but not accepted, applications withdrawn by the applicant, or applications closed for incompleteness.

TABLE 18. REASONS FOR DENIAL BY RACE AND ETHNICITY, LEE'S SUMMIT, 2022

	APPLICANT RACE AND ETHNICITY								All Applicants
	NON-LATINO						Latino and Hispanic	No Race or Ethnicity Given	
	White	Black	Asian/ Pacific Islander	Native American	Two or More	Joint			
REASONS FOR DENIAL									
1 - Debt-to-Income Ratio	14	3	1	0	2	0	4	6	30
2 - Employment History	1	1	1	0	0	0	0	0	3
3 - Credit History	4	4	1	0	0	0	2	2	13
4 - Collateral	4	1	0	0	0	0	0	4	9
5 - Insufficient Cash (down payment, closing costs)	4	4	1	0	0	0	0	1	10
6 - Unverifiable Information	0	1	0	0	0	0	0	4	5
7 - Credit Application Incomplete	13	2	0	0	0	1	1	7	24
8 - Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0
9 – Other	15	5	1	0	1	0	4	6	32
10 - Not Applicable	1	0	0	0	0	0	0	0	1
TOTAL DENIALS	56	21	5	0	3	1	11	30	127
Data Sources: FFIEC 2022 Home Mortgage Disclosure Act Data, Accessed via www.consumerfinance.gov/data-research/hmda .									

ZONING, AFFORDABILITY, AND HOUSING CHOICE

Comprehensive land use planning is a critical process by which communities address a myriad of public policy issues such as housing, transportation, health, recreation, environmental protection, commercial and retail services, and land values, and address how the interconnection and complexity of these issues can ultimately impact the entire municipality. Likewise, decisions regarding land use and zoning have a direct and profound impact on affordable housing and fair housing choice, shaping a community or region's potential diversity, growth, and opportunity for all. Zoning determines where housing can be built, the type of housing that is allowed, and the amount and density of housing that can be provided. Zoning also can directly or indirectly affect the cost of developing housing, making it harder or easier to accommodate affordable housing.

The following sections will explore (I) how Missouri state law impacts local land use and zoning authority and decision-making and (II) how the zoning and land use codes of the City of Lee's Summit impact housing affordability and fair housing choice within its municipal borders.

Intersection of Local Zoning with Federal and State Fair Housing Laws

One goal of zoning is to balance individual property rights with the power of government to promote and protect the health, safety, and general welfare of the overall community. Zoning codes regulate how a parcel of land in a community may be used and the density of development. Local governments may divide their jurisdiction into zoning districts by adopting a zoning map consistent with the comprehensive plan. They may also define categories of permitted and special/conditional uses for those districts and establish design or performance standards for those uses. Zoning may regulate the height, shape, and placement of structures and lot sizes or shapes. Jurisdictions also can expressly prohibit certain types of uses within zoning districts. In this way, local ordinances may define the type and density of housing resources available to residents, developers, and other organizations within certain areas, and as a result influence the availability and affordability of housing.

While local governments have the power to enact zoning and land use regulations, that power is limited by state and federal fair housing laws (e.g., the Missouri Human Rights Act, the federal Fair Housing Act, the Americans with Disabilities Act, constitutional due process and equal protection), which apply not only to private

individuals but also to government actions. In *Texas Department of Housing & Community Affairs v. Inclusive Communities Project*, a recent landmark disparate impact case under the Fair Housing Act, the Supreme Court affirmed that part of the FHA's central purpose is to eradicate discriminatory housing practices, including specifically unlawful zoning laws and other housing restrictions. Besides intentional discrimination and disparate treatment, discrimination under the FHA also includes "[A] refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling." This provision has been held to apply to zoning and land use decisions by local governments.

Fair housing laws do not preempt local zoning laws but do apply to municipalities and local government units, prohibiting them from making zoning or land use decisions or implementing land use policies that exclude or otherwise discriminate against protected persons. And even where a specific zoning decision does not violate a fair housing law, HUD entitlement communities must certify annually that they will set and implement standards and policies that protect and advance fair housing choice for all.

City of Lee's Summit Zoning Ordinance Review

Although comprehensive plans and zoning and land use codes play an important role in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact housing affordability and fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include:

- Restrictive forms of land use that exclude any specific form of housing, particularly multi-family housing, or that require large lot sizes or low-density that deter affordable housing development by limiting its economic feasibility;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit;
- Placing administrative and siting constraints on group homes for persons with disabilities;
- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing;
- Restrictions on occupancy of alternative sources of affordable housing such as accessory dwellings, mobile homes, and mixed-use structures.

The City's treatment of these types of issues, mainly through its Unified Development Ordinance, are explored and evaluated in the tables and narrative below.

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, the latest available zoning and land use ordinances of Lee's Summit were reviewed and evaluated against a list of ten common fair housing issues. Taken together, these issues give a picture of (a) the degree to which exclusionary zoning provisions may impact affordable housing opportunities within those jurisdictions and (b) the degree to which the zoning code may impact housing opportunities for persons with disabilities. The zoning ordinance was assigned a risk score of either 1, 2, or 3 for each of the ten issues and was then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

- 1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice, or is an affirmative action that intentionally promotes and/or protects affordable housing and fair housing choice;
- 2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;
- 3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice, or is an issue where the jurisdiction could take affirmative action to further affordable housing or fair housing choice but has not.

Research has shown that restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen in any number of ways and should be viewed on a continuum. The zoning analysis matrix developed for this report and the narrative below are not designed to assert whether Lee's Summit's code creates a per se violation of the FHA or HUD regulations, but are meant as a tool to highlight significant areas where zoning and land use ordinances may otherwise jeopardize the spirit and intent of fair housing protections and HUD's AFFH standards for its entitlement communities.

The issues chosen for discussion show where zoning ordinances and policies could go further to protect fair housing choice for protected and disadvantaged classes, and yet still fulfill the zoning objective of protecting the public's health, safety, and general welfare. Specifically, the issues highlighted by the matrix inform, first, the degree to which the zoning ordinance may be overly restrictive and exclusionary to the point of artificially limiting the affordable housing inventory and directly contributing to higher housing and rental costs. And secondly, the matrix helps inform the impact the City's regulations may have on housing opportunities for persons with disabilities, a protected class under state and federal fair housing law.

The following chart lists the ten issues reviewed and Lee's Summit's score for each issue.

TABLE 19. CITY OF LEE'S SUMMIT'S ZONING CODE RISK SCORES

Issue	Risk Score
<p>1a. Does the jurisdiction's definition of "family" have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?</p> <p>1b. Does the definition of "family" discriminate against or treat differently unrelated individuals with disabilities (or members of any other protected class)?</p>	2
<p>2a. Does the zoning code treat housing for individuals with disabilities (e.g. group homes, congregate living homes, supportive services housing, personal care homes, etc.) differently from other single family residential and multifamily residential uses? For example, is such housing only allowed in certain residential districts, must a special or conditional use permit be granted before siting such housing in certain residential districts, etc.?</p> <p>2b. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services? Or is housing for individuals with disabilities allowed in the same manner as other housing in residential districts?</p>	2
<p>3a. Do the jurisdiction's policies, regulations, and/or zoning ordinances provide a process for persons with disabilities to seek reasonable modifications or reasonable accommodations to zoning, land use, or other regulatory requirements?</p> <p>3b. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? If so, is the public hearing process only required for applicants seeking housing for persons with disabilities or required for all applicants?</p>	1
<p>4. Does the ordinance impose spacing or dispersion requirements on certain protected housing types?</p>	2

Issue	Risk Score
5. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	2
6a. Does the jurisdiction's zoning and land use rules constitute exclusionary zoning that precludes development of affordable or low-income housing by imposing unreasonable residential design regulations (such as high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage or large livable floor areas, restrictions on number of bedrooms per unit, and/or low maximum building heights)?	2
7. Does the zoning ordinance fail to provide residential districts where multi-family housing is permitted as of right? Are multifamily dwellings excluded from all single-family dwelling districts? 7b. Do multi-family districts restrict development only to low-density housing types?	2
8. Are unreasonable restrictions placed on the construction, rental, or occupancy of alternative types of affordable or low-income housing (for example, accessory dwellings or mobile/manufactured homes)?	2
9a. Are the jurisdiction's design and construction requirements (as contained in the zoning ordinance or building code) congruent with the Fair Housing Amendments Act's accessibility standards for design and construction? 9b. Is there any provision for monitoring compliance?	1
10. Does the zoning ordinance include an inclusionary zoning provision or provide any incentives for the development of affordable housing or housing for protected classes?	2
Average Risk Score	1.8

Lees Summit's average risk score (calculated by taking the average of the 10 individual scores) is 1.8, indicating that overall there is moderate risk of the zoning regulations contributing to discriminatory housing treatment or impeding fair housing choice.

Impact of Zoning Provisions of Affordable Housing

Missing Middle and Higher-Density Housing

Question 6 examines zoning and land use regulations that have the effect of limiting affordable housing. Large minimum lot sizes tend to increase the overall cost of housing, make it more difficult for residents to obtain housing, increase social segregation, and exacerbate sprawl.³¹ Large minimum living areas also tend to increase housing costs by prohibiting the development of smaller units, which tend to be more affordable.

The City has an agricultural district, a rural density residential district, a residential large lot district, two single family residential districts, a two-family residential district, a residential mixed-use district, a planned apartment residential district, three office districts, a transitional neighborhood zone, two commercial districts, a central business district, and a planned mixed use district, each of which allow some form of residential use. The single-family zoning districts have moderate to large minimum lot sizes (6,600 square feet to 8,400 square feet for single-family homes). The planned two-family residential district allows more moderate lot sizes for duplexes (4,500 square feet), while the planned residential mixed use and planned apartment residential districts allow moderate lot sizes for all units (4,000 and 3,500 square feet, respectively). In contrast, the transitional neighborhood zone does not have a minimum lot size and allows for up to 80% of lot coverage. However, this zone makes up a small share of the City's land area relative to the residential zones with larger minimum lot sizes. Similarly, zones that allow missing middle housing types, such as duplexes, triplexes, quadruplexes, and small multifamily buildings make up small areas of the city, while zones for larger-lot single-family homes take up the bulk of the city's land, reducing the potential for the development of smaller, more affordable housing types. Large minimum lot sizes and reduced densities in most of the City's zoning districts likely contribute to reduced housing supply and affordability in the city.

The City of Lee's Summit could address how zoning regulations limit missing middle and multifamily housing types by considering proactively upzoning lower density areas and acreage to zoning districts that allow parcels to be subdivided and allow

³¹ Paul Boudreaux, "Lotting Large: The Phenomenon of Minimum Lot Size Laws," *Maine Law Review* 68, no. 1 (2016): 1.

a greater diversity of housing types by right, such as duplexes, multiplexes, townhomes, and rowhomes, rather than waiting on developers to seek rezoning of specific parcels. For priority areas of the city, upzoning can allow nonconforming lots to meet dimensional standards without having to be consolidated or assembled to both protect existing housing and density and better accommodate redevelopment. Permitting or incentivizing conversion of large single-family dwellings in high-opportunity neighborhoods to two-family, three-family, or multifamily dwellings compatible with the character of surrounding homes also is a strategic way to address the need for more density and infill development in established neighborhoods. Neighborhood compatibility can be addressed with regulations focused on form and scale (such as floor area ratio and/or maximum width and depth) rather than density alone.

Rezoning is a discretionary review process, which makes more sense for large, complex developments, but is less efficient or economical for smaller-scale, less complex projects which often can be effectively reviewed by planning staff in accordance with objective criteria, lowering the risk and cost to developers and making these projects more feasible. Jurisdiction-wide upzoning that opens more neighborhoods to townhomes, duplexes, and small apartment buildings by-right could substantially increase the supply of housing, while also making those communities financially accessible to more families. Smaller lots and homes near transportation and services should take priority. The City of Lee's Summit could also upzone more acreage to medium and high density multifamily and mixed-use zones; adopt minimum density requirements (especially around transit nodes and commercial and public services); and rezone underutilized industrial and/or commercial areas for adaptive residential use. Implementing regulatory changes and incentives to increase missing middle and higher density multifamily housing can ease price pressure on existing home sales as more housing makes it to market.

Multifamily Uses

Questions 7a and 7b inquire if the zoning ordinance allows multifamily uses by right. Apartments are allowed by right in the City's planned apartment residential district and in the central business district. Some additional zones allow duplexes, triplexes, quadruplexes, townhomes, and lofts. While multifamily uses are allowed by right in these districts, their relatively small share of land coverage in the City's zoning map limits potential development of multifamily housing in Lee's Summit. Lower permitted densities in these districts may also have the effect of increasing housing costs and limiting the development of more affordable housing options.

Accessory Dwelling Units

Question 8 explores the City's restrictions on the construction, rental or occupancy of accessory dwelling units and mobile homes. The use of accessory structures as dwellings provides private market opportunities to incorporate smaller, more affordable housing units, with a very low-impact to the zoning district's infrastructure or traffic, in neighborhoods of opportunity that otherwise would be expensive places to live. The City of Lee's Summit's Unified Development Ordinance permits accessory dwelling units on all residential lots with preliminary development plan approval, or on ½ acre lots or larger with AG, RDR, RLL, R-1, or RP-1 zoning, or on single family lots located in Old Downtown Lee's Summit.

Several jurisdictions in Missouri and other locations have adopted ADU ordinances to further expand and encourage this alternative housing type.³² The City of Lee's Summit could follow suit and adopt an ordinance permitting accessory dwelling units by right on all lots in single-family residential areas to increase the availability of affordable rentals for low- and moderate-income residents. To protect the goal of providing affordable, stable housing, the Unified Development Ordinance already restricts ADUs from being rented as short-term vacation properties (e.g., Airbnb, VRBO rental). The City could also require that an application for a building permit to construct an accessory dwelling unit include an affidavit from the applicant which attests that the unit will be rented at an affordable rate to an income-eligible person or household. There is further opportunity to expand ADUs by incentivizing development with programs that offer construction grants or low interest/no interest loans; assistance with the design, construction, and permitting process; and fee waivers.

Design and Construction Requirements

Questions 9a and 9b ask about Lees Summit's design and construction requirements as they pertain to the Fair Housing Act. The City has adopted the International Building Code (2018 edition). HUD identifies the 2009, 2012, 2015 and 2018 editions of the International Building Code (IBC) as safe harbors under the Fair Housing Act, promoting the health, safety, and welfare of the public through building construction. Monitoring compliance with these codes is not required but is a good practice for ensuring safe and accessible housing products.

³² Local Housing Solutions. Accessory Dwelling Units. Retrieved from: <https://localhousingolutions.org/housing-policy-library/accessory-dwelling-units/>

Incentives for Affordable Housing

Question 10 explores the City's use of incentives to encourage affordable housing development or housing for protected classes. The City does not have development incentives related to affordability but has used Community Development Block Grant funding to support housing rehabilitation through Habitat for Humanity as well as improvements to Lee's Summit Housing Authority properties. The City does not have an inclusionary zoning ordinance.

The City of Lee's Summit's average risk score (calculated by taking the average of the 10 individual issue scores) is 1.8, indicating that overall there is moderate risk of the zoning regulations contributing to discriminatory housing treatment or impeding fair housing choice. In most cases, the zoning and other land use code sections are reasonably permissive and allow for flexibility as to the most common fair housing issues. Receiving a "3" (high score) means the local government could be subject to fair housing complaints and expensive litigation. In such cases, improvements to the rules and policies could be made to more fully protect the fair housing rights of all of Lee's Summit's residents and to better fulfill the mandate to affirmatively further fair housing.

Publicly Supported Housing

Publicly supported housing encompasses several strategies and programs developed since the 1930s by the federal government to ameliorate housing hardships that exist in neighborhoods throughout the country. The introduction and mass implementation of slum clearance to construct public housing projects during the mid-1900s signified the beginning of publicly supported housing programs. Government-owned and managed public housing was an attempt to alleviate problems found in low-income neighborhoods such as overcrowding, substandard housing, and unsanitary conditions. Once thought of as a solution, the intense concentration of poverty in public housing projects often exacerbated negative conditions that would have lasting and profound impact on their communities.

Improving on public housing's model of high-density, fixed-site dwellings for very low-income households, publicly supported housing programs have since evolved into a more multi-faceted approach overseen by local housing agencies. The Housing and Community Development Act of 1974 created Section 8 rental assistance programs. Section 8, also referred to as the Housing Choice Voucher (HCV) program, provides two types of housing vouchers to subsidize rent for low-income households: project-based and tenant-based. Project-based vouchers can be applied to fixed housing units in scattered site locations while tenant-based vouchers allow recipients the opportunity to find and help pay for available rental housing on the private market. Other HUD Programs including Section 811 and Section 202 also provide funding to develop multifamily rental housing specifically for disabled and elderly populations.

The Low-Income Housing Tax Credit (LIHTC) program is the primary source of subsidy for development of affordable housing by the private market. Created by the Federal Tax Reform Act of 1986, the LIHTC program offers indirect federal subsidies for investors in affordable rental housing. The value of the tax credits awarded to a project may be syndicated by the recipient to generate equity investment, offsetting a portion of the development cost. As a condition of the LIHTC subsidy received, the resulting housing must meet certain affordability conditions.

The now-defunct HOPE VI program was introduced in the early 1990s to revitalize and rebuild dilapidated public housing projects and create mixed-income communities. Although HOPE VI achieved some important successes, the Choice Neighborhoods Initiative program was developed to improve on the lessons learned from HOPE VI.

The scope of Choice Neighborhoods spans beyond housing and addresses employment access, education quality, public safety, health, and recreation.³³

Current publicly supported housing programs signify a general shift in ideology toward more comprehensive community investment and de-concentration of poverty. However, studies have shown a tendency for subsidized low-income housing and housing vouchers to cluster in disadvantaged, low-income neighborhoods. Programmatic rules and the point allocation systems for LIHTC are thought to play a role in this clustering and recent years have seen many states revising their allocation formulas to discourage this pattern in new developments.³⁴ The reasons for clustering of HCVs are more complicated since factors in decision-making vary greatly by individual household. However, there are indications that proximity to social networks, difficulties searching for housing, and perceived or actual discrimination contribute to clustering.³⁵ This section reviews the current supply and occupancy characteristics of publicly supported housing types and its geographic distribution within the City of Lee's Summit.

SUPPLY AND OCCUPANCY

Lee's Summit's Housing Authority administers public housing, Project-Based Section 8, and the Housing Choice Voucher programs for residents of Lee's Summit. These are included along with all other publicly supported housing units in the table below. Taken together, these programs account for 1.8% of all housing units in Lee's Summit and 3.7% of housing units in the Kansas City MO-KS, MSA.

Subsidized housing units are also available through the state's Low Income Housing Tax Credit (LIHTC) program. The LIHTC program provides housing units to renters earning no more than 60% AMI. The City of Lee's Summit has approximately 506 low-income LIHTC units, and the Kansas City MSA has an estimated 2,500. LIHTC units in the city are primarily two-bedroom units (57.5% of LIHTC units) or three-bedroom units (28.3%). One-bedroom units make up the remaining 14.5% of units.

³³ Department of Housing and Urban Development. *Evidence Matters: Transforming Knowledge Into Housing and Community Development Policy*. 2011. www.huduser.gov/portal/periodicals/em/EM-newsletter_FNL_web.pdf.

³⁴ Dawkins, Casey J. *Exploring the Spatial Distribution of Low-Income Housing Tax Credit Properties*. US Department of Housing and Urban Development, www.huduser.gov/publications/pdf/dawkins_exploringliht_assistedhousingrcr04.pdf.

³⁵ Galvez, Martha M. *What Do We Know About Housing Choice Voucher Program Location Outcomes? A Review of Recent Literature*. What Works Collaborative, 2010. www.urban.org/sites/default/files/publication/29176/412218-What-Do-We-Know-About-Housing-Choice-Voucher-Program-Location-Outcomes-.PDF.

TABLE 20. PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY

Housing Units	LEE'S SUMMIT		KANSAS CITY MO-KS MSA	
	#	%	#	%
TOTAL HOUSING UNITS	40,373		938,503	
Public Housing	116	0.3%	5139	0.5%
Project Based Section 8	327	0.8%	11,006	1.2%
HCV Program	276	0.7%	17,438	1.9%
Other Multifamily	-	-	1,328	0.1%
LIHTC Program	506	1.3%	2,500	0.3%
<i>Data Sources: 2023 APSh; HUD User LIHTC Database.</i>				

Table 21 shows the racial and ethnic composition of publicly supported housing units, as well as estimates for the numbers of low-to-moderate income households in the city and MSA. Data provided in the table portrays how closely the publicly supported housing residency rate of several racial and ethnic groups compares to their share of the general population.

To qualify for housing assistance from housing authorities, applicants must meet HUD established income limits that are determined annually. Extremely low-income households earning less than 30% of area median income (AMI) or the federal poverty level and very low-income households earning less than 50% of AMI automatically qualify for assistance, while low-income households earning less than 80% of AMI may qualify if they meet other eligibility criteria.

An estimated 84.2% of Lee's Summit households and 76.4% of households in the Kansas City MSA are white. Approximately 74.8% of households earning less than 50% of the AMI are white. Similarly, white households make up 75% of public housing residents. However, white households comprise only 51% of Project-Based Section 8 residents, and 27% of voucher households, indicating that there is underrepresentation of white residents participating in these programs. Underrepresentation of white households is similar in the Kansas City MSA, where they make up 66.6% of households earning 50% AMI or less, but only 34% of public housing residents and 30% of voucher holders.

Conversely, Black households are overrepresented in publicly supported housing within Lee's Summit and the MSA. Black households make up 15.4% of Lee Summit households earning less than 50% AMI, but comprise 21% of public housing residents,

27% of Project-Based Section 8 residents, and 70% of voucher holders. Similarly, in the MSA, Black households make up 18.5% of very low-income households, but 66% of HCV households, 58% of public housing residents, and 45% of Project-Based Section 8 households.

Rates of participation in publicly supported housing among other racial/ethnic groups, such as Asian or Pacific Islander residents and Hispanic residents are more similar to their share of the total population.

TABLE 21. PUBLICLY SUPPORTED HOUSING RESIDENTS BY RACE / ETHNICITY

Housing Type	RACE / ETHNICITY- LEE'S SUMMIT									
	White		Black		Hispanic		Asian or Pacific Islander		Native American	
	#	%	#	%	#	%	#	%	#	%
Public Housing	84	75.0%	24	21.0%	3	3.0%	2	2.0%	2	2.0%
Project-Based Section 8	153	51.0%	81	27.0%	51	17.0%	-	-	0	0.0%
Other Multifamily	-	-	-	-	-	-	-	-	-	-
HCV Program	63	27.0%	163	70.0%	5	2.0%	2	1.0%	9	3.0%
Total Households	31,725	84.2%	3,050	8.1%	1,390	3.7%	610	1.6%	45	0.1%
0-30% AMI	2,100	72.7%	610	21.1%	140	4.8%	10	0.3%	10	0.3%
0-50% AMI	4,400	74.8%	905	15.4%	250	4.2%	145	2.5%	10	0.2%
0-80% AMI	8,640	78.0%	1,275	11.5%	535	4.8%	205	1.9%	10	0.1%
Data Sources: 2016-2020 CHAS, Tables 1 and 9; 2023 APSh.										

NOTE: Data presented are number of households, not individuals.

Housing Type	RACE / ETHNICITY- KANSAS CITY MSA									
	White		Black		Hispanic		Asian or Pacific Islander		Native American	
	#	%	#	%	#	%	#	%	#	%
Public Housing	1,544	34.0%	2633	58.0%	227	5.0%	136	3.0%	45	1.0%
Project-Based Section 8	3,699	39.0%	4,268	45.0%	664	7.0%	95	1.0%	95	1.0%
Other Multifamily	589	52.0%	432	38.1%	34	3.0%	16	2.0%	0	0.0%
HCV Program	4,215	30.0%	9,273	66.0%	422	3.0%	141	1.0%	141	1.0%
Total Households	689,150	76.4%	107,510	11.9%	56,805	6.3%	23,999	2.7%	3,272	0.4%
0-30% AMI	53,438	62.7%	19,347	22.7%	7,370	8.7%	3,266	3.8%	705	0.8%
0-50% AMI	99,827	66.6%	27,785	18.5%	13,435	9.0%	6,226	4.2%	936	0.6%
0-80% AMI	173,969	70.8%	37,073	15.1%	21,316	8.7%	10,078	4.1%	1,337	0.5%
Data Sources: 2016-2020 CHAS, Tables 1 and 9; 2023 APSH.										

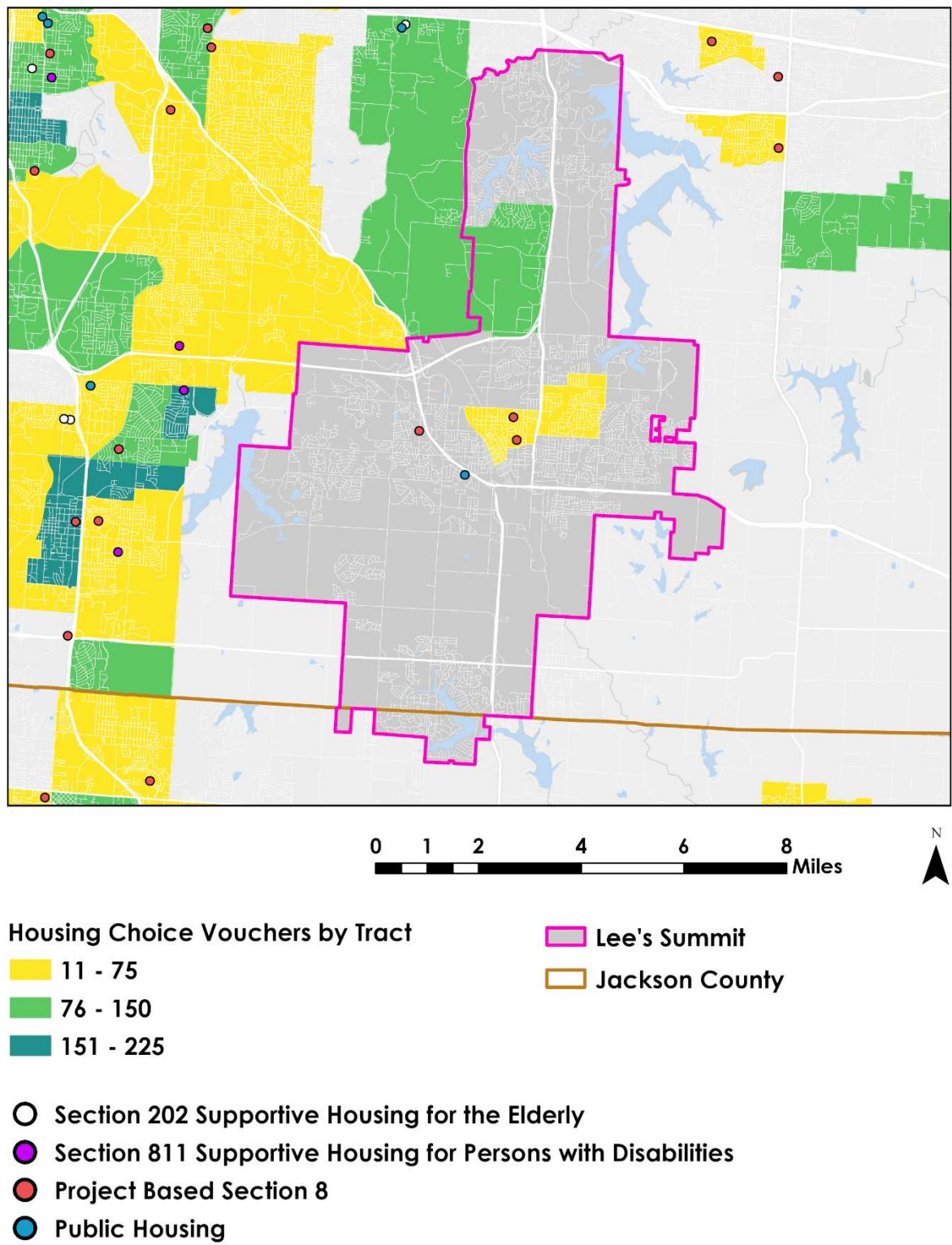
GEOGRAPHY OF SUPPORTED HOUSING

Using HUD's 2023 A Picture of Subsidized Housing (APSH) dataset, the locations of publicly supported housing by program are mapped in Figure 40. The number of housing choice vouchers (HCVs) within a census tract is indicated by the yellow-teal gradient, while the locations of Project-Based Section 8 developments are marked by orange dots and the locations of public housing developments are marked by blue dots.

The map shows three Project-Based Section 8 developments in the City of Lee's Summit: Sage Crossing Apartments, Ashbrooke Apartments, and John Calvin Manor. There is one public housing development known as Duncan Estates. There are three census tracts in the city that report HCV usage – 16 vouchers in tract 137.06, 28 vouchers in 138.01, and 122 vouchers in tract 142.05. Tract 137.06 and 138.01 are located in the central/downtown region of the city, while tract 142.05 is located to the north.

In the greater MSA, publicly supported housing options are more robust. There are several Section 811 Housing for Persons with Disabilities developments to the west of the city, four Project-Based Section 8 developments, and two Section 202 Housing for the Elderly developments. Several census tracts also report HCV usage of 150 or more. The lack of publicly supported housing options in Lee's Summit, especially with regards to voucher usage, points to the severe lack of affordable housing and subsidized options within the city.

FIGURE 40. PUBLICLY SUPPORTED HOUSING IN LEE'S SUMMIT



Source: 2023 A Picture of Subsidized Housing

Housing for People with Disabilities

BACKGROUND

An estimated 13% of the U.S. population had a disability as of the American Community Survey Five-Year Estimates for 2018 to 2022. Research has found an inadequate supply of housing that meets the needs of people with disabilities and allows for independent living. The U.S. Department of Housing and Urban Development identified that approximately one third of the nation's housing stock can be modified to accommodate people with disabilities, but less than 1% is currently accessible by wheelchair users.³⁶

Identifying and quantifying existing accessible housing for all disabilities is a difficult task because of varying needs associated with each disability type. Unique housing requirements for people with an ambulatory difficulty may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. People with hearing difficulty require modifications to auditory notifications like fire alarms and telecommunication systems while visually impaired individuals require tactile components in design and elimination of trip hazards. Housing for people that have difficulty with cognitive functions, self-care, and independent living often require assisted living facilities, services, and staff to be accessible. For low- and moderate-income households, the costs of these types of home modifications can be prohibitive, and renters may face particular hardships, as they could be required to pay the costs not just of the modifications, but also the costs of removing or reversing the modifications if they later choose to move.

Modifications and assisted living arrangements tend to pose significant costs for people with disabilities, who already experience more difficulty affording housing compared to populations with no disability. Studies have found that 55% of renter

³⁶ Chan, S., Boshier, L., Ellen, I., Karfunkel, B., & Liao, H. . L. (2015). *Accessibility of America's Housing Stock: Analysis of the 2011 American Housing Survey*. U.S. Department of Housing and Urban Development: Office of Policy Development and Research.

households that have a member with a disability have housing cost burdens, compared with 45% of those with no disabilities.³⁷

An estimated 8,951 people in Lee's Summit have a disability, representing 8.9% of the total population (100,792). Seniors (age 65 and older) have the highest disability rate at 26.6%. In comparison, the rate for working age adults is 6.9%, and just 3.1% of children under age 18 have a disability. In Jackson County, the share of residents with a disability is higher among all three age groups.

TABLE 22. DISABILITY BY AGE GROUP

Age of People with Disabilities	LEE'S SUMMIT		JACKSON COUNTY	
	#	%	#	%
Age 0 to 17 with Disabilities	807	3.1%	6,633	3.9%
Age 18 to 64 with Disabilities	4,140	6.9%	48,171	11.1%
Age 65+ with Disabilities	4,004	26.6%	35,500	33.3%
Data Sources: 2018-2022 5-Year American Community Survey, Table S1810				

NOTE: All % represent a share of the total population within the jurisdiction or region within each age group.

Ambulatory disabilities are the most common type in both the city and the county, affecting 3.8% and 6.6% of the population, respectively. Cognitive and independent living difficulties are the next most common disabilities, impacting 3.1% and 2.9% of the population in the city, respectively. Self-care difficulties are the least common disability type, affecting 1.1% of the city's population.

³⁷ America's Rental Housing 2017. (2017). Joint Center for Housing Studies of Harvard University.

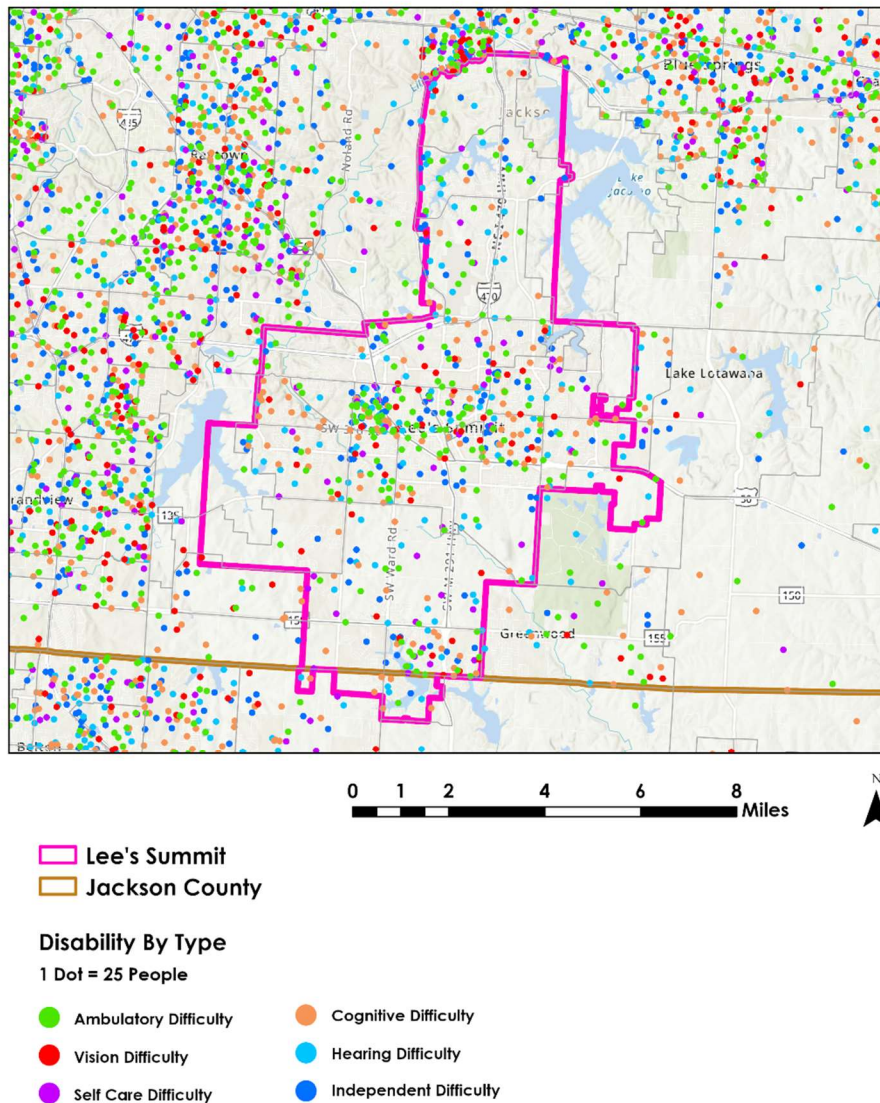
TABLE 23. DISABILITY BY TYPE

Disability Type	LEE'S SUMMIT		JACKSON COUNTY	
	#	%	#	%
Ambulatory Difficulty	3,838	3.8%	47,071	6.6%
Cognitive Difficulty	3,147	3.1%	35,740	5.0%
Independent Living Difficulty	2,886	2.9%	33,398	4.7%
Hearing Difficulty	2,810	2.8%	22,675	3.2%
Vision Difficulty	1,322	1.3%	18,092	2.6%
Self-Care Difficulty	1,142	1.1%	15,672	2.2%
Total Population with a Disability	8,951	8.9%	91,304	12.9%
Data Sources: 2018-2022 5-Year American Community Survey, Table S1810				

NOTE: All % represent a share of the total population within the jurisdiction or region.

The spatial distribution of residents with disabilities is similar to that of the city's total population. Although there is slight clustering notable within the central portion of the City, this may be explained by the fact that overall residential density is highest in this area.

FIGURE 41. DISABILITY BY TYPE, LEE'S SUMMIT, 2018-2022



Source: 2018-2022 ACS Table S1810

ACCESSIBLE HOUSING SUPPLY AND AFFORDABILITY

Any new multifamily housing with five or more units constructed after 1988 using federal subsidies must include a minimum of 5% of units accessible to persons with mobility impairments and an additional 2% of units accessible to persons with vision / hearing impairments (or one unit of each type, whichever is greater). Additionally, HUD provides support for accessible housing through its Section 202 Supportive Housing for the Elderly and Section 811 Supportive Housing for Persons with Disabilities programs.

A search for affordable elderly and special needs housing using HUD's Resource Locator tool was conducted to identify affordable rental properties in Lee's Summit designed to serve the elderly or people with disabilities. The search returned three multifamily properties in Lee's Summit that offer affordable housing for low-income residents; however, all of these units are project-based only and are not reserved for elderly or disabled residents through the Section 811 or Section 202 programs.

According to the Social Security Administration, the standard Supplemental Security Income (SSI) payment for the year 2024 is \$943.00 per month. Affordable rent for an individual receiving this monthly income would be \$282.90. It is highly likely that people with disabilities who are unable to work and rely on SSI as their sole source of income face substantial cost burdens and difficulty locating affordable housing. Publicly supported housing, therefore, is often a key source of accessible and affordable housing for people with disabilities.

The share of residents with a disability residing in publicly subsidized housing in Lee's Summit and in Jackson County are shown below. All units in Lee's Summit are project-based only and are not reserved for elderly or disabled residents through Section 811 or Section 202. In Jackson County, Section 811 Housing residents show a disproportionately high disability rate, however, as Section 811 housing is reserved for disabled residents, a high disability rate is expected here. Higher than average disability rates in other categories may indicate that disabled residents are more likely to need low-income housing assistance than non-disabled residents. The disability rate for Section 202 housing, which is reserved for the elderly, is markedly lower than the average disability rate for this age group, indicating that disabled elderly individuals are likely residing either with family or in non-HUD care facilities.

TABLE 24. DISABILITY BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

Housing Type	SHARE OF RESIDENTS WITH A DISABILITY	
	Lee's Summit	Jackson County
Public Housing	43%	22%
Project-Based Section 8	15%	18%
Section 811 Housing	N/A	92%
Section 202 Housing	N/A	3%
HCV Program	16%	22%
Data Sources: HUD A Picture of Subsidized Housing data, 2022 based off 2020 Census.		

ZONING AND ACCESSIBILITY

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes, in concurrence with comprehensive plans. Local zoning authority is directed by the state enabling laws as part of the local government's police power but limited by superseding state laws related to specific land use, for example the regulation of public property, flood plains, utilities, natural resources, airports, housing regulated by a state licensing authority for persons with disabilities, higher education institutions, etc. Conditions of Lee's Summit's zoning code affecting accessibility are assessed in this section. Several elements of the following analysis refer back to the zoning code review presented in Chapter 6 (Housing Profile).

The Definition of “Family”

Questions 1a and 1b in the zoning code matrix (Table 18 in Chapter 6) cover the City of Lee's Summit's definition of “family.” It is common for local governments to use their zoning code's definition of “family” to limit the number of unrelated persons who may live together in a single dwelling as a means of preserving the stable, traditional, and residential character of their neighborhoods. However, unreasonably restrictive definitions may limit housing for nontraditional families, who in every sense but a biological one, share the characteristics of a traditional family related by blood or

marriage. Restrictive definitions of family also may have the effect of limiting fair housing choice for persons with disabilities who reside together in supportive or congregate living situations. Lee's Summit's zoning code limits the definition of "family" to not more than four unrelated persons:

Family shall mean two or more persons related by blood or marriage, including not more than two lodgers or boarders, living together and occupying a single housekeeping unit with common kitchen facilities, or a group of not more than four persons (excluding servants), who need not be related by blood or marriage living together by joint agreement and occupying a single housekeeping unit with common kitchen facilities.³⁸

A more contemporary and equitable approach is to define a single family or household not in terms of blood, marriage, or adoption or an arbitrary number of unrelated persons but in terms of a 'functional family' or common household sharing common space, meals, and household responsibilities. Better still, a more progressive land use and housing planning strategy is to leave maximum occupancy per dwelling as a matter of health and safety regulated by the building code rather than the zoning regulations just as the zoning code does not limit the number of related household members residing together.

Amending the definition of family to make it more inclusive of nontraditional living arrangements also allows for lower-cost co-housing opportunities, where individuals may rent individual rooms while sharing common spaces and household responsibilities with other tenants. Another option is to allow an administrative process for rebutting the presumption that a group exceeding the permitted maximum number of unrelated persons is not otherwise residing together as a single housekeeping unit and functional family. Limiting a family to no more than four unrelated individuals may fail to treat nontraditional, but functionally equivalent, household relationships equal with those related by blood or marriage and may violate fair housing, privacy, and due process protections if challenged.

Housing for People with Disabilities

Questions 2a and 2b focus on Lee's Summit's treatment of housing for persons with disabilities. Housing that is restricted by zoning district regulations, spacing requirements, and special use permits has the effect of limiting the amount and type of housing available to persons with disabilities.

³⁸ Lee's Summit Unified Development Ordinance. Sec15-1160. Family.

The City defines 'group home for the disabled' as "a residential facility for the care of individuals who, upon completion of a course of treatment in a facility that provides an extensive treatment program for individuals with disabling emotional disturbances, are in need of an interim structured living situation to allow for their resocialization and reintegration into community living, or for permanent housing of developmentally disabled individuals." The maximum number of persons in a facility cannot exceed ten individuals and two resident staff members. The ordinance notes that this definition does not include homes with fewer than eight unrelated residents with disabilities.

The City defines 'group home for persons with disabilities, including hospice and/or other special care needs' as a residential facility where meals, lodging, supervision and training are provided. The ordinance does not include limits on the number of persons per home under this definition.

The ordinance's permitted, conditional and special use tables do not offer guidance regarding in which zones a 'group home for the disabled' would be permitted or require a Special Use Permit. However, these group homes are listed under 'Specified Special Uses,' indicating that they would require a Special Use Permit in zones where allowed. Group homes with fewer than eight unrelated residents with disabilities are also not included in the table, making it unclear whether they are allowed by right or require a Special Use Permit in the City's zoning districts.

While 'group home for persons with disabilities, including hospice and/or other special care needs' is included in the permitted, conditional, and special use tables, none of the City's zoning districts allow these homes by right. They are permitted in the AG, RDR, RP-3, RP-4, CP-1, and CP-2 districts only with a Special Use Permit and in the PMIX districts per approved plan. As these homes generally require Special Use Permits, property owners are required to go through an application and public hearing process and pay a \$1,075 fee plus legal notice publishing charge to be approved.

Reasonable Accommodations

Questions 3a and 3b explore the City's reasonable accommodations policies for persons with disabilities seeking relief from zoning or other regulations. For persons with disabilities desiring to live alone or in a community setting, a reasonable accommodations ordinance can help the resident(s) make alterations to their unit without acquiring an approved variance or undergoing a public hearing.

Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices, and procedures or even waive certain requirements, when it is reasonable and necessary to eliminate barriers to housing opportunities, or "to afford persons with a disability the

equal opportunity to use and enjoy a dwelling." (The requirements for reasonable accommodation under the Americans with Disabilities Act (ADA) are the same as those under the FHA. 42 U.S.C. 12131(2).) However, the FHA does not set forth a specific process that must be used to request, review, and decide on reasonable accommodation. Examples of a reasonable accommodation request may be simple, such as a modification of the setback or lot coverage requirements to allow an external mobility ramp; modifying existing indoor space for accessible design features; parking changes; or more complicated like allowing supportive housing for persons with disabilities that does not meet the definition of "family care home" or "family;" or approval to allow the construction of a group care home or nursing home in an area zoned primarily for single-family use without subjecting the applicant to the costly, time-consuming, and unpredictable special use or variance process.

Although the FHA does not require a specific process for receiving and deciding requests for reasonable accommodation, as a matter of equity, transparency, and uniformity, it is advisable that local jurisdictions adopt a standardized, administrative process as part of their zoning or nondiscrimination ordinances. Lee's Summit's Unified Development Ordinance lays out a process by which residents can request a reasonable accommodation variance related to a disability. A Staff Committee comprised of Development Services, Public Works and the Fire Department Directors or their designees (Staff Committee) has the authority to consider and act on requests for reasonable accommodation. When a request for reasonable accommodation is filed with Development Services, it is referred to the Staff Committee for review and consideration. The Staff Committee issues a written determination within 30 days of the date of receipt of a completed application and may grant or deny the accommodation request, in accordance with federal or state law. This process lets residents with disabilities avoid the public hearing process, with its costs and delays, and the potential that community opposition based on stereotypes about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety may impact the outcome.

Protected Housing Types

Question 4 explores the City's spacing or dispersion requirements for protected housing types – specifically housing types serving persons with disabilities. The City's zoning ordinance requires a spacing of 1,000 feet between each 'group home for the disabled' and another such facility or of a halfway house, convalescent home, nursing home, retirement home, children's nursery or day care home. The Governing Body has the authority to waive this requirement, provided that the facilities are separated by a major thoroughfare, railroad track, major waterway or other comparable man-made or natural barrier.

While there are no state standards for site selection of group homes for residents with disabilities, the Department of Justice and HUD take the position— and federal courts that have addressed the issue mostly agree— that spacing and density restrictions are generally inconsistent with the Fair Housing Act unless the jurisdiction could make a showing that the ordinance was passed to protect a compelling governmental interest (e.g. over-concentration of residential treatment homes could adversely affect individuals with disabilities and would be inconsistent with the goal of integrating persons with disabilities into the wider community) and that the spacing requirement is the least restrictive means of protecting that interest.

Lee's Summit's intent for the spacing requirement may be to protect persons with disabilities from being concentrated and segregated in limited areas of the city, but it places a burden on persons with disabilities seeking supportive housing to rebut the presumption of overconcentration and may limit the overall aggregate capacity of housing for persons with disabilities if the need in the community or region is greater than the thresholds permit. A valid government justification may be that over-concentration of group homes would be inconsistent with the objective of integrating persons with disabilities into the community. However, this should never justify separations that have the effect of foreclosing entire neighborhoods to group housing for persons with disabilities. To address concerns about concentrating community homes for residents with disabilities, Lee's Summit could offer incentives to providers to locate future homes in different neighborhoods.

Question 5 explores the restriction of protected housing types, such as residential substance abuse treatment facilities, from residential zoning districts. The City's permitted, conditional and special use tables do not include substance abuse treatment facilities among facilities permitted by right or with special use permits in its zoning districts. However, it does include 'hospital, substance abuse treatment facility or mental health facility' under 'Specified Special Uses,' indicating that they would require a Special Use Permit in zones where allowed. To improve fair access to protected housing types, the City could provide increased clarity in the Unified Development Ordinance regarding where substance abuse treatment facilities are permitted with a Special Use Permit.

Fair Housing Activities

FAIR HOUSING RIGHTS AND RESOURCES

Fair housing laws may be enacted and enforced at the local, state, and federal level. Missouri's counterpart to the text of the Federal Fair Housing Act—Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq. (the "FHA" or "FHAA")—is codified within the Missouri Human Rights Act (MISSOURI REVISED STATUTES § 213.001 et seq., as amended). Both the federal FHA and the Missouri Human Rights Act (MHRA) prohibit discrimination in the sale, rental, and financing of dwellings, or to deny or otherwise make unavailable a dwelling, because of a person's race, color, religion, national origin, ancestry, sex, disability, or familial status. Unlawful actions include discriminatory terms, conditions, privileges, notices or advertising. Unlawful actions also could include refusal to permit reasonable modifications of existing premises occupied or to be occupied by persons with disabilities if such modifications may be necessary to afford such person full enjoyment of the premises, A refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford a person with disabilities equal opportunity to use and enjoy a dwelling also is unlawful under both the FHA and MHRA.

The state and federal acts contain similar exemptions for certain single family home sales by owner, religious and private clubs, and qualifying age-restricted housing for older persons. As with the FHA, the MHRA requires "covered multifamily housing" (generally meaning ground floor units in buildings with four or more units or all units in buildings of four or more units serviced by an elevator and constructed after March 13, 1991) to meet minimum standards of accessible design and construction for persons with disabilities.

Although federal law sets the minimum standards for fair housing enforcement, it does not preclude local and state laws from expanding protected classes and fair housing rights. The MHRA does not extend protections to any other class of persons outside of those protected by the FHA. Under the MHRA, the Missouri Commission on Human Rights, under the Department of Labor and Industrial Relations, has the authority and responsibility to administer and enforce state fair housing rights, including investigating, conciliating, and litigating discrimination complaints and providing education, training, and technical assistance to the public.

Lee's Summit adopted an antidiscrimination ordinance affirming its support for the MHRA's provisions regarding unlawful discrimination practices in housing (as well as

commercial real estate loans, employment, public accommodations or other practices) as detailed in MISSOURI REVISED STATUTES § 213.040 through 213.070. The ordinance states the city's policy to protect against discrimination by reasons, "including but not limited to, race, sex, sexual preference or orientation, familial status, disability, religion, age, color, national origin or ancestry" but does not otherwise explicitly expand fair housing rights or remedies beyond what the FHA and MHRA. A human relations commission, with consent of the City Council, is tasked with promoting the City's human rights policies and advising the City Council regarding nondiscriminatory policies and ordinances.

State and local fair housing laws deemed substantially equivalent to the FHA—with parallel provisions regarding rights, procedures, remedies, and judicial review and enforcement—may qualify the state or local agency for HUD-subsidized enforcement activities through HUD's Fair Housing Assistance Program (FHAP). Missouri's Human Rights Act had been deemed "substantially equivalent" to the FHA since November 1992, and the state's Commission on Human Rights a FHAP certified agency, until the state legislature passed SB 43 in 2017 (effective August 28, 2017) amending key provisions of the MHRA. Changes to the MHRA resulted in a finding by HUD that Missouri's law is now fundamentally inconsistent with the FHA and no longer meets the substantial equivalence standard.³⁹ For example, disparate impact and mixed-motive discriminatory intent are no longer viable theories of proving discrimination under the state law. (Discriminatory intent as the motivating factor is much harder to prove than discriminatory impact or a mixed-motive case creating a significant obstacle for victims of housing discrimination to seek redress under state law.) The amended act also places caps on the total award available under actual and punitive damages, limiting the remedies available to victims of housing discrimination in a manner inconsistent with the FHA. The revised statute also removes protections against retaliation and protections from having associated with a person protected under fair housing laws are no longer available to aggrieved persons of housing discrimination. And finally, SB 43 changed the MHRA to require aggrieved persons to first exhaust potential administrative remedies by filing a complaint with the state Commission before being allowed to access civil enforcement rights through the court. By contrast, under the FHA, victims of housing discrimination may file an administrative complaint with the FHEO/FHAP, file a civil lawsuit in an appropriate state or federal court, or do both simultaneously. After the effective date of the amended MHRA, the Human Rights Commission lost FHAP certification and enforcement funding, training

³⁹ General Deputy Assistant Secretary for FHEO letter to Missouri Commission on Human Rights regarding Amendments to the Missouri Human Rights Act, dated July 14, 2017, available at <https://media.kansascity.com/livegraphics/2017/pdf/HUD-Letters-SB43.pdf>.

funding, administrative cost funding, and partnership funding. HUD no longer refers housing discrimination complaints to the state Commission for investigation and resolution.

Under its Fair Housing Initiatives Program (FHIP), HUD administers several grant categories to award money to local fair housing advocacy organizations who assist persons believed to have been harmed by discriminatory housing practices; to help people identify government agencies that handle complaints of housing discrimination; to conduct preliminary investigation of claims; to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices; and to educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws. Unfortunately, no FHIP grantees currently provide services in Lee's Summit.

FAIR HOUSING COMPLAINTS

The U.S. Office of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity (FHEO) administers federal laws and establishes national policies that ensure that all Americans have equal access to the housing of their choice. An individual in Missouri who believes he or she has been the victim of an illegal housing practice may file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. Typically, when a complaint is filed with FHEO, a case is opened and an investigation of the allegations of housing discrimination is initiated. During the investigation period, the agency will attempt through mediation to reach conciliation between the parties. If no conciliation agreement can be reached, the FHEO must prepare a final "Determination" report finding either that there is "reasonable cause" to believe that a discriminatory act has occurred or that there is no reasonable cause. If the agency finds "reasonable cause," HUD must issue a "Charge of Discrimination." If the investigator determines that there is no "reasonable cause," the case is dismissed. If a charge is issued, a hearing/trial will be scheduled before an administrative law judge (ALJ). The ALJ may award the aggrieved party injunctive relief, actual damages, and impose civil penalties; but unlike federal district court, the ALJ may not impose punitive damages. Administrative proceedings are generally more expedited than the federal court trial process. The advantages of seeking redress through the administrative complaint process are that the DFEH/FHEO takes on the duty, time, and cost of investigating the matter for the complainant and conciliation may result in a binding settlement. However, the complainant also gives up control of the investigation and ultimate findings.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers to protect the housing rights and

interests of aggrieved individuals and families impacted by discrimination. Local civil rights advocacy groups and the State of Missouri, through the Missouri Human Rights Commission, may also receive and investigate complaints of housing discrimination on behalf of protected classes.

The remainder of this section presents data on and analysis of housing discrimination complaint filings received by HUD's FHEO. In evaluating the data that follows, the number of complaint filings alone should not be interpreted as a measure of the extent of housing discrimination in Lee's Summit. Some communities may have large numbers of filings because of a healthy fair housing climate where residents are educated about their rights and know where to seek help and where strong advocates with a history of success in resolving fair housing issues are available to assist. A second caveat to consider is that a significant number of filed complaints are found not to have cause. Of the 14 housing discrimination complaints reported by HUD (and further described below), six (42.9%) were found to have no cause. Therefore, while a complaint filing typically does suggest a perceived violation, recent HUD data indicates that nearly two in every five complaints does not meet the legal standard for charging a party with having committed housing discrimination.

Complaints Filed with HUD

Region VII of the FHEO receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Missouri and Iowa, Kansas, and Nebraska. The mission of the FHEO is to protect individuals from employment, housing and public accommodation discrimination, and hate violence. To achieve this mission, the FHEO maintains databases of and investigates complaints of discrimination and hate violence.

For the purpose of this report, the Regional FHEO Office in Kansas City provided fair housing complaint data for Lee's Summit. The Missouri Human Rights Commission did not record any housing complaints filed against the City of Lee's Summit during the 2019 through 2023 time period. The following table displays the bases of complaints received by FHEO by year for 2019 through 2023. A single complaint can allege housing discrimination on multiple bases, so the numbers in these tables are not representative of the numbers of complaints received but only the number of times each basis was cited in the complaints filed in a given year. The full complaint data as supplied by the FHEO is found in the Appendix.

From January 1, 2019 to December 31, 2023, HUD reported the filing of 14 complaints alleging housing discrimination. Race (sometimes in combination with another protected characteristic) was a factor in 10 of the 14 complaints. Disability was a basis in four cases, and familial status in one. The issues identified included: discrimination in terms/conditions/privileges relating to rental; discriminatory refusal to rent;

otherwise deny or make housing unavailable; discriminatory terms, conditions, privileges, or services and facilities; discriminatory acts under Section 818 (coercion, etc.); failure to make reasonable accommodation; failure to permit reasonable modification; discrimination in terms/conditions/privileges relating to sale; discrimination in the appraising of residential real property; and steering.

Six of the 14 cases had no cause determination, meaning that the investigator assigned to the claim did not find any evidence that unlawful discrimination occurred. Conciliation or settlement was successful in two of the 14 cases. In one of those cases, the complainant received a relief amount of \$1,138. One case was dismissed for lack of jurisdiction; one case was withdrawn by the complainant without resolution; and in one case the complainant failed to cooperate.

TABLE 25. COMPLAINTS RECEIVED BY HUD BY BASIS / PROTECTED CLASS STATUS

Basis	2019	2020	2021	2022	2023	Total
Race	1	4	5	0	0	10
National Origin	0	0	0	0	0	0
Religion	0	0	0	0	0	0
Sex	0	0	0	0	0	0
Disability	2	1	0	0	1	4
Familial Status	0	0	1	0	0	1
Retaliation	0	0	0	0	0	0
TOTAL NUMBER OF CASES FILED PER YEAR (WHICH MAY INCLUDE MORE THAN ONE BASIS OF DISCRIMINATION PER COMPLAINT)	3	5	5	0	1	14

FAIR HOUSING ENFORCEMENT THROUGH CIVIL LITIGATION

Following the 2017 amendments to the Missouri Human Rights Act, aggrieved persons must first file an administrative complaint with the state's Human Rights Commission and exhaust the administrative process before having the right to file a civil complaint in state

circuit court. However, under federal law, victims of discrimination have the option to file a lawsuit in federal court without first pursuing administrative remedies through HUD/FHEO's complaint process. Under the FHA, in addition to or as an alternative to filing an administrative complaint, an aggrieved person may commence a civil action in an appropriate United States district court not later than two years after the occurrence or the termination of an alleged discriminatory housing practice, thus maintaining control of the case and the potential to collect punitive damages. If an administrative action has already commenced, the parties may still elect to move the case to an appropriate court for adjudication as long as the parties have not already entered into a conciliation agreement to resolve the alleged discriminatory housing practices or, following a charge of discrimination, an administrative hearing has not already commenced.

Under the FHA, a plaintiff may hire a private attorney or request a court-appointed attorney for assistance with litigating the case and may seek to prove actual or compensatory damages and request injunctive relief and punitive damages. Settlement amounts or jury awards often are much larger for cases prosecuted in court than victim compensation awards through the administrative process. In an election case, the Department of Justice may prosecute the case on behalf of the aggrieved party. Additionally, the DOJ may bring suit on behalf of individuals based on referrals from HUD in the case of a "pattern or practice" of discriminatory actions, a case of particular importance to the public interest, or when there has been a breach of a conciliation agreement. In a pattern or practice case, the court may award preventative relief (permanent or temporary injunction, restraining order, or other order) and/or a civil penalty up to \$50,000 for a first violation and up to \$100,000 for a second or subsequent violation. An aggrieved party may intervene in any action filed by the DOJ.

For the recent five-year period—January 1, 2019, through December 31, 2023—no significant lawsuits or precedential decisions were found regarding allegations of unlawful housing discrimination occurring in Lee's Summit that resulted in federal litigation, a published HUD ALJ decision/settlement, or a published state court opinion.

Fair Housing Activities

PAST FAIR HOUSING GOALS AND RELATED ACTIVITIES

The City of Lee's Summit completed an Analysis of Impediments to Fair Housing Choice in 2019, which identified five impediments to fair housing choice. The impediments and recommended activities from the 2019 AI are shown in Table 26, along with progress made toward addressing them over the past five years.

Impact of Past Fair Housing Activities on Goal Setting

As of 2024, the City has made progress on several goals from the previous AI. However, there are a few areas where continued improvement is needed, including expanding affordable housing opportunities, increasing units for disabled and elderly residents, and improving public transit accessibility for residents throughout the

TABLE 26. ACTIONS TAKEN TO ADDRESS PREVIOUSLY IDENTIFIED FAIR HOUSING ISSUES

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Lee's Summit since 2020
#1: Strive for a healthy housing inventory that is inclusive, accommodating, and sustainable.	Lack of affordable housing	<ul style="list-style-type: none">• Explore new or strengthen existing policies to encourage development of affordable housing while protecting the values of existing areas and neighborhoods.• Initiate UDO amendments to improve inclusion of housing varieties• Strengthen coordination between the City, Lee's Summit Housing	The City has continued the Habitat Home Preservation Program which is funded through CDBG; this program provides funding for the maintenance and sustainability of existing affordable housing. The City has also made multiple changes regarding the ability to bring more affordable housing to Lee's Summit with multiple ordinance changes regarding both house size and lot size.

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Lee's Summit since 2020
		<p>Authority and other housing agencies in planning, implementation, and financing for affordable housing in a responsible way.</p> <ul style="list-style-type: none"> • Expand sustained public education and awareness of fair housing issues in support of effort to achieve housing equality • Explore funding sources as incentives to encourage inclusionary housing development. • Continue to fund the Minor Home Repair program and First Time Homebuyer program in support of good maintenance of existing affordable housing and occupancy • Participate in regional effort to address housing affordability and availability 	

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Lee's Summit since 2020
#2: Comprehensive policy framework in support of inclusionary community and neighborhoods.	Lack of inclusionary zoning and policies to promote affordable housing.	<ul style="list-style-type: none"> Continue to evaluate the local codes, regulations, controls and standards and their impact on housing development Pursue a comprehensive approach towards an inclusionary policy and compatible zoning regulation Increase public awareness of fair housing law, local and regional fair housing choice issues, and the need for improvement of housing choice 	Passed a new ordinance which expanded housing choice for small lot and affordable housing option—smaller single-family homes in RP-4 district, cluster development option on small lots. Also allows for narrow lot residential development. Accessory Dwelling Units (ADU) updates –this allows aging in place and increases affordability. We also doubled multi-family density allowance (12 to 25)
	Lack of public information and awareness on fair housing choice and service availabilities.	<ul style="list-style-type: none"> Increase public awareness of fair housing law, local and regional fair housing choice issues, and the need for improvement of housing choice Explore for a comprehensive strategy to expand information to the public on availability of housing options, services, assistance programs and government initiatives. Collaborate with other regional and local public agencies and not-for-profit and charity organizations for better sharing and dissemination of public information. 	

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Lee's Summit since 2020
#3: Create a favorable business climate for economic stability, diversified employment base and job opportunities	Stagnant financial status of low-to moderate income households	<ul style="list-style-type: none"> • Continue the City's incentive program to encourage redevelopment and infill development in the existing business and employment area. • Strengthen and diversify the local economy by collaborating with LSEDC, Chamber of Commerce and employers. • Increase employment opportunities for low-to-moderate income workers by supporting programs that provide needed job training. 	Small business assistance program- Project Managers (City) help facilitate and support small business owner through all steps to open or relocate a business in LS. Tailored to small business and start-ups but open to any business owners within the community.
#4: Minimize the impact of rising cost of maintenance and rehab of housing on LMI residents	Rising cost for maintenance and rehab of existing housing.	<ul style="list-style-type: none"> • Continue to fund the City's Minor Home Repair program. • Continue to support Lee's Summit Housing Authority through the CDBG program for needed maintenance and rehab of public housing. • Support local and regional agencies, such as Habitat for Humanity, to provide repairs and rehab to LMI housing residents • Encourage rental housing landlords to provide regular and timely maintenance to their housing establishments. 	The City has continued to support the Lee's Summit Housing Authority in their interior and exterior rehab projects. The City has also continued to fund Habitat's Home Preservation Program which provides repairs to existing housing stock.

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Lee's Summit since 2020
#5: Diversify employment opportunities and promote job training programs benefiting the low skilled workers.	Limited low skill jobs for persons with limited education and job skills.	<ul style="list-style-type: none"> • Provide financial support through CDBG to qualified job training programs targeting LMI workers with limited job skills. • Increase employment opportunities for low-to-moderate income workers by supporting programs that provide needed job training 	N/A
#6: Strive to end homelessness and improve capacity for local shelters	Lack of emergency and temporary shelters	<ul style="list-style-type: none"> • Collaborate and support the work of the regional CoC in their effort to end homelessness in the metro area • Work closely with and provide grant support through CDBG as needed to local transitional housing and domestic violence shelter agencies in meeting the needs for temporary shelters. • Explore opportunities and collaboration through local faith-based and charity organizations for added shelters locally. 	The City continues to work with regional efforts through the Mid America Regional Council to help end homelessness in our area. Through the CDBG funds, the City supports Hillcrest Transitional Housing and Hope House. These agencies both provide emergency shelter and help end the homelessness cycle.

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Lee's Summit since 2020
#7: Increased connection between workers and jobs from the current level	Lack of public transportation connecting workers to jobs	<ul style="list-style-type: none"> • Continue to work with MARC, regional and local public transportation providers to identify needs and gaps. • Continue to expand partnerships to improve connection. • Strengthen coordination among the City, LSEDC, Chamber of Commerce and employers to improve local employment base and diversify employment opportunities • Encourage institutions, businesses, and employers to provide affordable job training and skill development. • Explore resources to support agencies and programs benefiting low income or low skill job seekers • Continue to improve local facilities for non-motorized work commute 	<p>The City has approved and developed numerous multi-family housing projects along major corridors and activity centers. In the last year there have been five large scale multi-family developments along the City's most highly traveled corridors, with two of these being restricted to 65+ residents. Two of these are multi-use projects which will allow residents to have the opportunity to both live and work within the same activity center.</p>
#8: Improved connection between special needs service seekers and services	Lack of public transportation connecting people with special needs and special need services	<ul style="list-style-type: none"> • Encourage service agencies and volunteer organizations to coordinate efforts to identify gaps and provide needed transportation for services 	N/A

Fair Housing Goal	Related Contributing Factor Addressed	Recommended Actions	Actions taken by the City of Lee's Summit since 2020
		<ul style="list-style-type: none"> • Explore funding options for a long-term cross-agency transportation solution • Continue to provide CDBG and other Federal or State grants to special needs agencies to expand services locally • Expand access to public information regarding service availability and transportation options 	
#9: Minimize the financial burdens of receiving needed services for low- to moderate-income persons	Lack of affordable services such as childcare, legal service, healthy food, medical care, etc.	<ul style="list-style-type: none"> • Continue the effort to expand the availability of information for public consumption regarding affordable services • Explore financing resources and incentive strategies for the expansion of low-cost services 	The City has applied for funding to provide Lee's Summit Parks and Recreation memberships to qualifying elderly citizens. We are continuing to look for further funding to help alleviate other financial burdens. The CDBG program continues to support local public service agencies that address access to basic needs and emergency payment assistance programs as well.

Identification of Impediments

Described below are the fair housing impediments identified in this Analysis of Impediments, along with associated contributing factors. Contributing factors are issues leading to an impediment that are likely to limit or deny fair housing choice or access to opportunity. Recommended activities to address the contributing factors are provided in Table 27, along with implementation timeframes and responsible parties.

IMPEDIMENT #1: LIMITED SUPPLY OF AFFORDABLE HOUSING FOR LOW- AND MODERATE-INCOME HOUSEHOLDS

A general lack of housing options affordable to low- and moderate-income households was one of the most frequently cited issues identified in our conversations with community members and stakeholders in Lee's Summit. This shortage has become increasingly dire over the past few years as housing costs in the area have increased drastically and wages have remained comparatively stagnant. Additionally, public housing assistance is limited, with existing resources often coupled with waitlist periods of one year or more, source of income discrimination by area landlords, and housing quality issues. There is a great need for increased numbers of affordable rental units, more diverse and accessible housing types, and assistance for low- to moderate-income homebuyers.

Housing affordability is a problem affecting both owner and renter households in Lee's Summit. Data from the American Community Survey five-year estimates and other sources indicates that housing in the city tends to be less affordable relative to that in the county and larger metro area. As of the 2018-2022 American Community Survey five-year estimates, households in the city are more likely than those in the county and MSA to spend between \$1,000 to \$1,999 on rent (47.3% of households, compared to about 29% to 36% in the county and MSA). Households in Lee's Summit are also more likely to spend \$2,000 or more on rent (8.9% of city households, compared to about 3% to 4% of households in the county and metro). More recent data from the Zumper database shows average rents in Lee's Summit at \$1,411 for a two-bedroom unit and

\$1,843 for a three-bedroom unit as of June 2024, indicating sharp increases in rental costs in recent years. Renters earning the median renter household income may thus find it difficult to find housing in Lee's Summit at rates affordable for their incomes.

For many Lee's Summit households, homeownership is more expensive than renting. As of the American Community Survey five-year estimates for 2018-2022, an estimated 53.7% of homeowners in Lee's Summit spend \$1,500 or more per month on housing—a larger share than the estimated 22.7% of renter households spending within this same range. As with renter households, homeowners in Lee's Summit spend more on monthly housing costs than do households in the county and MSA.

More recent data from Zillow's Home Value Index (ZHVI) estimates the typical home value in Lee's Summit at \$377,808 as of May 2024, a 44.7% increase over the typical home value of \$261,110 in May 2019. These values indicate lower levels of affordability in the city relative to the metro area, where the typical home value was \$307,032 as of May 2024. They also indicate steep increases in home prices in recent years and barriers to homeownership for lower-income residents. As home values and interest rates have increased in recent years, renting is generally more accessible to low-to-moderate income families in Lee's Summit than homeownership; yet the city's high homeownership rate and relatively low share of rental units makes finding an attainable rental unit challenging for many households.

An estimated 21.3% of households in Lee's Summit (7,855 households) have at least one housing problem, most often relating to housing cost burden, defined as spending more than 30% of household income on housing costs. An estimated 8.5% households in Lee's Summit are severely cost burdened, spending more than 50% of monthly income on housing costs. Black and Native American households in the city are disproportionately severely cost burdened (22.5% and 44.4% of households, respectively).

Housing in Lee's Summit is predominantly made up single-family detached structures (73.3% of units). Lack of diversity in housing types decreases the availability of housing affordable for low- to moderate-income households, who may be unable to afford single-family homes. Apartments and smaller, more affordable housing units are also essential for many seniors and residents with disabilities.

A similar impediment was identified in the City of Lee's Summit's 2019-2023 Analysis of Impediments to Fair Housing Choice, and the City has made efforts to address this issue through increasing density allowances, reducing minimum lot and unit sizes in some of its zoning districts, and updating its Accessory Dwelling Unit ordinance. However, this challenge remains and is directly tied to impediments related to homelessness and a lack of housing options for residents with disabilities. Efforts to

implement strategies to increase housing affordability, such as those contained in this analysis, will be vital to increasing housing affordability in the city.

IMPEDIMENT #2: LACK OF HOUSING AND SERVICES TO ADDRESS HOMELESSNESS

Residents and stakeholders who participated in this planning process consistently identified homelessness as a prominent issue in the MSA, with a particular lack of resources and services in Lee's Summit. Stakeholders noted that a lack of understanding about homelessness and homeless needs in the area is a major barrier to addressing the issue. Lee's Summit is a part of the Greater Kansas City Coalition to End Homelessness, which serves as the lead agency for the Independence, Lee's Summit/Jackson, and Wyandotte Counties Continuum of Care (CoC). The CoC's 2023 Point in Time (PIT) Count identified a total of 1,986 persons experiencing homelessness and 1,633 homeless households. Of these households, 766 were unsheltered, 394 were in emergency shelter, and 473 were in transitional housing.

Currently, Hillcrest Transitional Housing provides the only dedicated homeless shelter in the city. Supply is highly limited, with 17 transitional housing units in total. Participation in the Hillcrest Transitional Housing program is also contingent on certain qualifications, such as working 35-40 hours per week, attending 4-5 weekly sessions on life skills, case management, and budgeting, and being drug- and alcohol-free. The typical waiting list time for Hillcrest Transitional Housing is 8-12 weeks. Additionally, emergency shelter and rapid re-housing services are available for victims of domestic violence through Hope House. However, these are also limited in scope, offering a total of 42 rapid-rehousing beds and 40 emergency shelter beds, according to the CoC's 2023 Housing Inventory Count. As such, the availability of housing assistance to persons experiencing homelessness in Lee's Summit is insufficient to address current levels of need.

A lack of housing and services for residents experiencing or at-risk of homelessness presents a barrier to fair housing, as people of color, residents with disabilities, and members of the LGBTQ+ community experience homelessness at disproportionate rates. The Greater Kansas City Coalition to End Homelessness' 2020 Needs Assessment noted that Black and African American residents experience homelessness in the Kansas City MSA at a disproportionately higher rate compared to their white counterparts – comprising 38% of the PIT count population, yet only 11.8% of the MSA's total population. Because homelessness disproportionately impacts these protected classes, a lack of housing and services to address homelessness constitutes a barrier to fair housing in the city.

IMPEDIMENT #3: LIMITED SUPPLY OF ACCESSIBLE HOUSING FOR PEOPLE WITH DISABILITIES

An estimated 8.9% of residents in Lee's Summit have a disability, and the city's population is aging. Residents with disabilities frequently have specialized housing needs, and research into the availability of suitable housing in Lee's Summit indicates that these needs are frequently going unmet. The following factors contribute to a lack of housing choice for residents with disabilities in Lee's Summit.

A high disability rate coupled with insufficient accessible and affordable housing

The city's supply of disability-accessible units is insufficient to address the needs of the city's population with disabilities: ACS data for 2022 estimates that 744 residents with disabilities are living below poverty level in Lee's Summit, while HUD's resource allocator tool shows that the city does not have any units for elderly or disabled residents through the Section 811 or Section 202 programs. This means that there is a lack of disability-friendly housing to meet the existing need, and as the population continues to age, the need will only grow.

Residents of Lee's Summit who participated in the community engagement process echoed these concerns, with 54.8% and 29.8% of respondents noting that a lack of housing for seniors a lack of housing for residents with disabilities, respectively, are barriers to fair housing in the city. 52.5% of survey respondents said that the city has a moderate or high need for more disability accessible housing, and 67.9% said the same of senior housing. Residents and stakeholders noted a particular need for affordable family housing accessible to residents with disabilities.

Additionally, available unit sizes are a significant barrier for some residents in accessing housing, as many disabled individuals require the assistance of a live-in caregiver. As disability status is a federally protected class, this lack of accessible housing presents a barrier to fair housing choice.

Restrictive definition of “family” in the City’s zoning code

One of the most often scrutinized provisions of a municipality's zoning code is its definition of “family.” Local governments use this provision to limit the number of unrelated persons who may live together in a single dwelling. Unreasonably restrictive definitions may have the unintended or intended (depending on the motivations

behind the drafting of the jurisdiction's definition) consequence of limiting housing for nontraditional families and for persons with disabilities who reside together in congregate living situations.

The City of Lee's Summit's definition of family is fairly moderate, designating two or more persons related by blood or marriage, or up to four persons unrelated but living as a single household. Under this definition, foster care and other guardianship relationships are not treated as equally related as relationships by blood, marriage, or adoption, which is problematic under due process scrutiny. However, the definition does allow for a household consisting of a disabled person with a live-in aide or caregiver to be considered family.

IMPEDIMENT #4: LIMITED INCOMES AND LACK OF ACCESS TO RESOURCES RESTRICT HOUSING CHOICE AMONG PROTECTED CLASSES

Disparities in labor market engagement and access to resources exist by geography, race, and ethnicity in Lee's Summit. Educational attainment, labor market participation, median household incomes, and school proficiency tend to be lowest and unemployment is highest in parts of central Lee's Summit. Access to transportation and living-wage jobs, in particular, shape residents' housing choices and ability to afford necessities, such as fresh food.

Place-based strategies allow for the targeting of resources and outreach efforts to areas with high proportions of residents whose housing choices may be limited by low earnings or unemployment. These strategies can be combined with other approaches focused on closing skills gaps and developing career pathways, increasing job creation and quality standards, and raising the wage floor. Examples of place-based strategies to increase labor market engagement include increasing awareness of high-growth jobs that pay family-sustaining wages and connections to the training necessary to obtain them, and targeting neighborhoods with high proportions of low-earning workers as priorities for interventions that increase awareness of available subsidies and resources⁴⁰.

⁴⁰ Nelson, M., Wolf-Powers, L., & Fisch, J. (2015). Persistent low wages in New Orleans' economic resurgence: policies for improving earnings for the working poor. In The Data Center. (2015). New Orleans Index at 10.

In addition to investing in workforce development, the City can continue to use CDBG, bond referendum, or other funding to collaborate on projects that develop, expand, or improve community spaces and programming, increase access to affordable food retailers, provide access to health and wellness resources and services, and improve housing condition in census tracts with lower levels of income, labor market engagement, and educational attainment.

IMPEDIMENT #5: LACK OF RESOURCES AND COORDINATION FOR FAIR HOUSING OUTREACH, EDUCATION, AND ENFORCEMENT ACTIVITIES LIMITS RESIDENTS' ACCESS TO FAIR HOUSING SERVICES

While a majority (75%) of respondents to the community survey indicated that they are aware of or somewhat aware of their rights under the Fair Housing Act, more than one third (40.5%) noted that they did not know where to file a housing discrimination complaint. Existing fair housing organizations, while competent and effective, serve the metro- or state-wide area and are not able to provide much specific focus on addressing fair housing needs in Lee's Summit. By setting aside a portion of its annual CDBG funds as a subgrant available to one of these fair housing organizations, the City can condition the subgrant on the receiving organization providing outreach, education, and enforcement activities within Lee's Summit.

Outreach should include programs providing information to landlords and tenants on rights, responsibilities, and best practices for maintaining a positive relationship. Ideally, such events would be offered in conjunction with or as a complement to existing community events to encourage greater attendance. Legal Aid of Western Missouri maintains a self-help guide for tenants that could be a helpful planning and curriculum resource.

Given that vulnerable households, including protected classes, in Lee's Summit have disproportionate housing problems, the need for information regarding assisted housing, Housing Choice Vouchers, housing rehabilitation programs, and fair housing in accessible, user-friendly formats is crucial. To expand the availability of such information, the City should translate relevant material into Spanish and work with partner organizations to promote affordable housing opportunities and fair housing resources to residents, including Spanish speakers with limited English proficiency. Additionally, specific information relating to the process of evictions, what constitutes

as discrimination by a landlord, and what protections exist to tenants is crucial to disseminate through easily accessible manuals online, hotlines, or workshops. The development of a one-stop-shop housing resource center or webpage can also support improved access to fair housing resources for residents.

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TABLE 27. FAIR HOUSING GOALS AND ACTIVITIES

Contributing Factors	Recommended Activities and Goals (2025-2029)	City Partners
IMPEDIMENT #1: Limited Supply of Affordable Housing for Low- and Moderate-Income Households		
Limited development of missing middle and affordable housing types	<ul style="list-style-type: none"> Consider addressing limitations in missing middle and multifamily housing types by making changes to the Comprehensive Plan and land use map to open more neighborhoods to townhomes, duplexes, and small apartment buildings by-right; further reduce minimum lot sizes; create more medium and high density multifamily and mixed-use acreage; adopt minimum density requirements (especially around transit nodes and commercial and public services); and use underutilized industrial and/or commercial areas for adaptive residential use. Investigate the potential for adopting a mandatory or voluntary inclusionary zoning ordinance, including what has worked for other Missouri jurisdictions (e.g., Kansas City) within the framework of state law. Approval could include agreement on a specified percentage or number of units of affordable housing or commitments to make payments to an Affordable Housing Trust Fund in exchange for development concessions and incentives that lower the developer's costs of production. 	<ul style="list-style-type: none"> Community-based organizations Residents and stakeholders
Need for additional funding to support affordable housing development	<ul style="list-style-type: none"> Develop an Affordable Housing Trust Fund to support development of affordable housing, including making loans and providing other kinds of financing to help affordable housing projects become reality (e.g., providing gap financing for Low Income Housing Tax Credit (LIHTC) multifamily rental communities). 	<ul style="list-style-type: none"> Affordable housing developers Low-Income Housing Tax Credit developers

Contributing Factors	Recommended Activities and Goals (2025-2029)	City Partners
	<ul style="list-style-type: none"> Consider ways to provide funding to promote housing affordability, such as implementing an Affordable Housing Bond to fund affordable housing development and other programs, including homeownership, repair and rehabilitation, rental assistance, land acquisition, and/or seed money for a community land trust (e.g., Kansas City affordable housing bond to support its Housing Trust Fund; Lawrence, KS affordable housing trust fund funded by local sales tax and federal funds). 	<ul style="list-style-type: none"> Residents and stakeholders
High land costs present a barrier to affordable housing development	<ul style="list-style-type: none"> Consider making affordable housing a priority when disposing of public land. Consider deploying City-owned land in partnership with affordable housing developers and community-based organizations to support affordable housing development. Consider partnering with large property owners to provide information and resources related to affordable housing development. Consider meeting with affordable housing developers to understand barriers to housing development, and develop strategies to address those barriers. 	<ul style="list-style-type: none"> Affordable housing developers Large property owners Community-based organizations
Need for permanently affordable housing options	<ul style="list-style-type: none"> Consider meeting with other Missouri cities that have implemented Community Land Trusts to understand the role the City might take in supporting the development of a CLT, including facilitating the process of forming a CLT and providing financing through funding and land resources to help get it started. Work with affordable housing and owners of large properties to facilitate affordable housing development, including diverse 	<ul style="list-style-type: none"> Affordable housing developers Large property owners Residents and community stakeholders

Contributing Factors	Recommended Activities and Goals (2025-2029)	City Partners
	housing types and housing accessible to residents with disabilities.	
Lack of knowledge of and access to housing programs and resources	<ul style="list-style-type: none"> • Develop a Housing Resource Center or webpage to be a one-stop-shop for housing-related resources such as housing counseling/ referrals, rental assistance, resource navigation, homeless services, eviction diversion, legal assistance, landlord-tenant mediation, and healthy homes programs (2025). • Consider funding City- and community-based housing initiatives, including homebuyer assistance, homeownership education, fair housing training, and other programs. 	<ul style="list-style-type: none"> • Fair housing organizations • Continuum of Care • Community-based organizations • Residents and stakeholders
IMPEDIMENT #2: Lack of Housing and Services to Address Homelessness		
Need for additional emergency shelter and transitional housing, wraparound services, homelessness prevention/diversion services, and permanently affordable housing	<ul style="list-style-type: none"> • Work with partners to implement recommendations in the Greater Kansas City Coalition to End Homelessness 2020 Needs Assessment, which include: <ul style="list-style-type: none"> ◦ Establish a housing trust fund dedicated to the creation and/or preservation of affordable housing. Funding can be sourced through taxes, fees, bonds, general funds, and/or private investments. ◦ Incorporate mental health initiatives in housing programs. ◦ Increase funding for homelessness prevention, looking at examples such as the Santa Clara County Homelessness Prevention System that provides temporary financial assistance, legal support, employment services, and other emergency assistance to low-income families at risk of becoming homeless. 	<ul style="list-style-type: none"> • Greater Kansas City Coalition to End Homelessness • Hillcrest Transitional Housing • Jackson County • Cass County • Lee's Summit CARES • Hope House

Contributing Factors	Recommended Activities and Goals (2025-2029)	City Partners
	<ul style="list-style-type: none"> Use HOME-ARP and other funding sources to develop emergency, transitional, and permanent housing options with wraparound services for residents experiencing homelessness. Consider co-housing, shared housing, or tiny home models to increase affordability, social interaction, and development of community. 	
Decrease barriers to accessing existing resources in the area	<ul style="list-style-type: none"> Produce a comprehensive resource guide for persons experiencing or at risk of homelessness. The guide should include information on how to access all relevant resources available in the City of Lee's Summit and should be published on the City's official website. 	<ul style="list-style-type: none"> Greater Kansas City Coalition to End Homelessness Hillcrest Transitional Housing Jackson County Cass County Lee's Summit CARES Lee's Summit R-7 School District
IMPEDIMENT #3: Limited Supply of Accessible Housing for People with Disabilities		
Insufficient accessible and affordable housing for elderly and/or disabled residents.	<ul style="list-style-type: none"> Implement housing strategies contained in the Community for All Ages Plan, including facilitating the development of a diversity of housing types and small-lot development to increase affordability for residents with fixed incomes, requiring developers to include Universal Design features, and including housing information on the City's website. 	<ul style="list-style-type: none"> Affordable housing developers Community partners

Contributing Factors	Recommended Activities and Goals (2025-2029)	City Partners
	<ul style="list-style-type: none"> • Use funding from the Missouri Housing Trust Fund to support development of affordable housing accessible to elderly and/or disabled residents. • Require units developed with the Missouri Housing Trust Fund, or other City funds to meet Universal Design requirements, such as such as no-step entryways, one-story living, open floor plans, ramps, wider doorways and hallways, varied counter heights, soft-closing drawers and cabinets, automated lighting, lever-style handles, rocker panel switches, and non-slip surfaces. • Work with affordable housing developers and community partners to support the development of Section 202, Section 811, or other dedicated senior or disability housing. • Expand programs to assist with ADA upgrades to existing units, such as wheelchair ramps, shower bars, and Universal Design features. • Develop incentives for affordable housing and market rate developments to set aside larger shares of units as disability accessible. • Using poverty rates for residents with disabilities, designate a goal and plan for the development and maintenance of low-income disability-accessible housing sufficient to meet the needs of Lee's Summit's poverty-level population with disabilities. 	
Restrictive definition of "family" in the City's zoning code	<ul style="list-style-type: none"> • Expand the definition of "family" within the zoning code to account for foster or guardianship relationships, which may disproportionately impact disabled individuals. 	

Contributing Factors	Recommended Activities and Goals (2025-2029)	City Partners
IMPEDIMENT #4: Limited Incomes and Lack of Access to Resources Restrict Housing Choice Among Protected Classes		
<p>Continued need for neighborhood investment in areas with lower median incomes and low levels of access to resources and services.</p>	<ul style="list-style-type: none"> • Increase transportation access and multi-modal transportation options (biking and walking trails, sidewalks) in areas of the city with low vehicle access and transportation burdens, such as central Lee's Summit. • Continue to use CDBG, bond referendum, or other funding to collaborate on projects that develop, expand, or improve community spaces and programming, increase access to fresh food retailers, address blight, and support development of needed retail and services in low- and moderate-income census tracts to address needs and opportunities identified in the Lee's Summit 2021 Ignite! Fuel Our Future Comprehensive Plan and other local plans. Partner with community organizations and residents to further understand neighborhood funding needs and opportunities. • Partner with school district stakeholders, and others to provide facilities, resources, and services to students attending lower-performing schools. These may include basic school resources and supplies, school readiness, mentoring and tutoring, family engagement and literacy, health services, behavioral and social supports, enrichment programs, programs to increase food security and access, support for ESL students and students with disabilities, resources for students experiencing homelessness, and other resources and services. • Continue to collaborate with City leadership in investigating additional potential funding sources to support investments in 	<ul style="list-style-type: none"> • School districts • City leadership • Community partners

Contributing Factors	Recommended Activities and Goals (2025-2029)	City Partners
	<p>public infrastructure, improvements, facilities, and services in low- and moderate-income census tracts.</p> <ul style="list-style-type: none"> Consider using the Community Land Trust model to support neighborhood retail and services along with the development of permanently affordable housing. 	
<p>Connect residents with low labor market engagement with minimum wage jobs and workforce development opportunities.</p>	<ul style="list-style-type: none"> Continue to collaborate with key stakeholders in implementing workforce and economic development strategies contained in the Lee's Summit 2021 Ignite! Fuel Our Future Comprehensive Plan, including working with local educational facilities to expand current workforce development efforts to accommodate those who are unemployed and underemployed. Implement expanded public transportation options, such as rideshare or small buses/vans with extended hours, to address the transportation system's limitations in routes and hours of operation. Ensure these options are accessible to residents with disabilities. Explore ways to partner with and fund community organizations that have implemented workforce development and employment programs in areas of the city with the lowest levels of educational attainment and labor force participation and the highest levels of unemployment. Continue to build relationships with employers and workforce development programs to provide workforce development opportunities and career pathways. Marketing for workforce development programs should be targeted to areas of the city 	<ul style="list-style-type: none"> Community partners Workforce development programs Community stakeholders

Contributing Factors	Recommended Activities and Goals (2025-2029)	City Partners
	<p>with the lowest levels of educational attainment and labor force participation and the highest levels of unemployment.</p> <ul style="list-style-type: none"> • Collaborate with residents to understand barriers to accessing workforce development, employment, and education programs, and develop strategies to address these barriers. • Develop affordable housing in high-opportunity neighborhoods with access to jobs and public transportation. • Include residents, business owners, industry representatives, and representatives from neighborhood groups in planning processes for workforce development programs. 	

Contributing Factors	Recommended Activities and Goals (2025-2029)	City Partners
IMPEDIMENT #5: Lack of Resources and Coordination for Fair Housing Outreach, Education, and Enforcement Activities Limits Residents' Access to Fair Housing Services		
<p>Stakeholder input and survey responses indicate that more fair housing education is needed for the general public and housing industry professionals.</p>	<ul style="list-style-type: none"> • Develop a Housing Resource Center or webpage to be a one-stop-shop for housing-related resources such as housing counseling, housing referrals, rental assistance, resource navigation, homeless services, healthy homes programs, and others. • Design and coordinate delivery of a fair housing education program that reaches members of the public who are most vulnerable for housing discrimination, including racial and ethnic minorities, low-income populations, people with limited English proficiency, and people with disabilities. In addition to providing fair housing education through the Housing Resource Center, focus efforts on incorporating education components into other scheduled events (e.g., a fair housing booth at a community or school event) or working through existing organizations with ties to various community groups. 	<ul style="list-style-type: none"> • Mid-America Regional Council • Eastern Jackson County Department of Health • Social service organizations • Community stakeholders

Contributing Factors	Recommended Activities and Goals (2025-2029)	City Partners
<p>Lack of Spanish language materials and services makes fair housing resources unavailable to residents with limited English proficiency.</p>	<ul style="list-style-type: none"> • Raise awareness of fair housing programs by continuing to distribute posters, brochures, and other materials. Provide material in English and Spanish, with translation to other languages as needed. 	<ul style="list-style-type: none"> • Lee's Summit Housing Authority