

# 2017 WASHTENAW URBAN COUNTY ASSESSMENT OF FAIR HOUSING

September 29, 2017



OFFICE OF COMMUNITY &  
ECONOMIC DEVELOPMENT

*Collaborative solutions for a promising future*



ANN ARBOR HOUSING COMMISSION

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## Acronyms

AAATA: Ann Arbor Area Transportation Authority, branded as The Ride  
AAHC: Ann Arbor Housing Commission  
AAPS: Ann Arbor Public Schools District  
ACS: American Community Survey  
AFFH: Affirmatively Furthering Fair Housing  
AFH Plan: Assessment of Fair Housing Plan  
AI: Assessment of Impediments  
AMI: Annual Median Income  
CAN: Community Action Network  
CDBG: Community Development Block Grant  
CIL: Ann Arbor Center for Independent Living  
CRA: Community Reinvestment Act  
EMU: Eastern Michigan University  
ESG: Emergency Solutions Grants Program  
FHC: Fair Housing Center of Southeast and Mid Michigan  
FMR: Fair Market Rents  
FY: Fiscal Year  
HAWC: Housing Access of Washtenaw County  
HCV: Housing Choice Voucher Program/Housing Choice Vouchers  
HUD: US Department of Housing and Urban Development  
LIHTC: Low Income Housing Tax Credit  
MAP: Michigan Ability Partners  
MDEQ: Michigan Department of Environmental Quality  
MDOT: Michigan Department of Transportation  
MSHDA: Michigan State Housing Development Authority  
NEZ: Neighborhood Enterprise Zone  
OCED: Washtenaw County Office of Community and Economic Development  
PILOT: Payment in Lieu of Taxes  
PUD: Planned Unit Development  
QAP: Qualified Allocation Plan  
RAD: Rental Assistance Demonstration  
R/ECAPs: Racially or Ethnically Concentrated Areas of Poverty  
RTA: Regional Transportation Authority  
U of M: University of Michigan  
UCEC: Urban County Executive Committee  
VA: US Department of Veteran Affairs  
VAWA: Violence Against Women Reauthorization Act of 2013  
WISD: Washtenaw Intermediate School District  
YCS: Ypsilanti Community Schools District

## Definitions

- **Affordable Housing:** Affordable housing is housing for an individual or family that costs less than 30% of their gross annual income. If housing costs, such as mortgage payment, taxes, insurance, utilities or rent exceeds 30%, it is considered a cost burden. Households facing this burden are challenged to afford food, clothing, transportation, child care, education, medical costs, and other needs. To learn more about housing affordability, use this link to view [Frequently Asked Questions about Affordable Housing](#). Also see [www.ewashtenaw.org/affordablehousing](http://www.ewashtenaw.org/affordablehousing)
- **Committed Affordable Housing Units:** Physical housing units available to households at or below 60% AMI. These units have both rent and income limits to maintain affordability over time. These limits are due to use of one or more incentive including use of local, state or federal subsidy, such as LIHTC, grants, public land, and so on.
- **Disability:** Under Federal law, the term disability means, with respect to an individual: A physical or mental impairment that substantially limits one or more major life activities of such individual; a record of such impairment; or being regarded as having an impairment. AFFH, as well as the American Community Survey (US Census Bureau) categorizes six disability types:
  - **Hearing difficulty:** deaf or having serious difficulty hearing (DEAR).
  - **Vision difficulty:** blind or having serious difficulty seeing, even when wearing glasses (DEYE).
  - **Cognitive difficulty:** Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions (DREM).
  - **Ambulatory difficulty:** Having serious difficulty walking or climbing stairs (DPHY).
  - **Self-care difficulty:** Having difficulty bathing or dressing (DDRS).
  - **Independent living difficulty:** Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping (DOUT).
- **[Housing Affordability and Economic Equity Analysis](#)** - This 2015 Washtenaw County report was adopted by the following jurisdictions: Washtenaw County, City of Ann Arbor, City of Ypsilanti, Pittsfield Township, Ypsilanti Township, and the Ann Arbor Downtown Development Authority (DDA).

The crux of this Analysis is that within the relatively small Washtenaw County, there are two distinct housing markets in play. One in the Ann Arbor area featuring high rents and high incomes, and a second in Ypsilanti and Ypsilanti township with lower rents and even lower

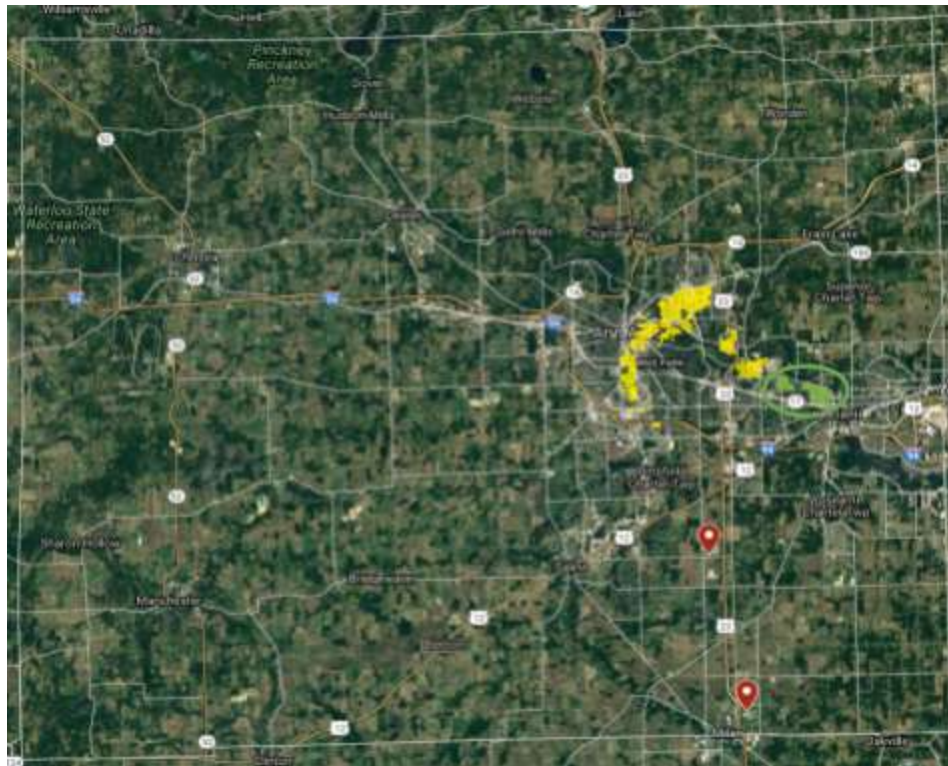


incomes. The high demand of Ann Arbor, with numerous amenities, well-respected schools districts and access to job centers, has only become more exclusive in recent years, pushing out lower-income households. Those households then live further away from job and education centers, and often find housing in Ypsilanti and Ypsilanti Township. There is a racial component to consider as well, as a larger African American population is also located in Ypsilanti and Ypsilanti Township.

The Analysis discussed further throughout the plan. The report provides a series of recommendations in order to reach targeted goals for communities in the urbanized area by 2035 (20 years). Those goals include:

- Add 140 units per year in City of Ann Arbor
  - Add 17 units per year in Pittsfield Township
  - Add/grow 69 College-educated residents per year in City of Ypsilanti
  - Add/grow 140 College-educated residents per year in Ypsilanti Township
- **Opportunity Areas:** The Washtenaw Opportunity Index was developed in 2015 in partnership with Kirwan Institute on Race and Ethnicity. The Index categorizes census tracts in Washtenaw County are organized by quartiles. The areas in the top quartile are considered areas of high opportunity, whereas the areas in the bottom quartile are considered areas of low opportunity. Rankings are based on five categories: education and training, health, job access, neighborhood safety, and stability and economic well-being. For more information about the Opportunity Index, visit: <http://www.opportunitywashtenaw.org/>.
  - **Protected Classes:** With a few exceptions, Federal and State law prohibits discrimination when based on the following classes:
    - Race
    - Color
    - Religion
    - Sex (including sexual harassment and pregnancy)
    - National origin (including [immigration status](#))
    - Familial status (the presence of children under the age of 18)
    - Disability
    - Age
    - Marital status
  - **R/ECAPs:** The US Department of Housing and Urban Development (HUD) defines a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as a census tract where:
    - 1) the non-white population comprises 50 percent or more of the total population and

- 2) the percentage of individuals living in households with incomes below the poverty rate is either
- a) 40 percent or above or
  - b) three times the average poverty rate for the metropolitan area, whichever is lower.
- **Redlining:** The practice of denying services, either directly or through selectively raising prices, to residents of certain areas based on the racial or ethnic composition of those areas.
  - **Urbanized Area** - the 2015 Housing Affordability and Economic Equity Report references the Urbanized area of Washtenaw County. These areas are City of Ann Arbor, City of Ypsilanti, Pittsfield Township and Ypsilanti Township. Together these four areas make up 64% of the County's population and 66% of the County's housing stock.
  - **Washtenaw County Reference Map** - below is a screenshot of key locations that skew demographics reflected in the AFH Plan, including the University of Michigan (yellow area), Eastern Michigan University (green circle), and two major correction facilities, the Federal Correctional Institution (FCI) in Milan and the Women's Huron Valley Correctional Facility, in the county (red pins). See link for more information.



- **Washtenaw Urban County** - The Washtenaw Urban County is a partnership between the Washtenaw County Board of Commissioners and the cities, townships, and villages who have agreed to jointly participate in federally funded programs. Its governing body named the Washtenaw Urban County Executive Committee (UCEC) consists of 18 jurisdictions, including Ann Arbor Township, Augusta Township, Bridgewater Township, City of Ann Arbor, City of Saline, City of Ypsilanti, Dexter Township, Manchester Township, Lima Township, Northfield Township, Pittsfield Township, Salem Township, Saline Township, Scio Township, Superior Township, Webster Township, York Township, and Ypsilanti Township. City of Dexter and Sylvan Township. As of 2018, the City of Dexter and Sylvan Township will join and increase the number of participating jurisdictions to 20.

## Acknowledgements

On behalf of the Washtenaw Urban County, the preparation of this report was made in partnership with the Washtenaw County Office of Community and Economic Development (OCED) the Ann Arbor Housing Commission (AAHC). OCED was supported by the following partners:

### AFFH Sub-Committee

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- Beth Ernat, City of Ypsilanti
- Jennifer Hall, Ann Arbor Housing Commission
- Karen Lovejoy Roe, Ypsilanti Township
- Chuck Warpehoski, Ann Arbor City Council

### Interviews, outreach support and data assistance

- Ann Arbor Center for Independent Living (CIL)
- Avalon Housing
- Barrier Busters Network
- Bryant Community Center
- City of Ypsilanti
- Community Action Network of Ann Arbor (CAN)
- Foster Grandparent Program
- Habitat for Humanity of Huron Valley
- Housing Access of Washtenaw County
- Mentor2Youth
- Northfield Township
- Offender Success Program, Catholic Social Services of Washtenaw County
- Parkridge Community Center
- Senior Cafes (Senior Meals sites)
- UMHS Housing Bureau for Seniors
- United Way of Washtenaw County
- Washtenaw County Continuum of Care (CoC)
- Washtenaw County Public Health Department
- Washtenaw Housing Alliance
- Washtenaw Intermediate School District
- Urban County Executive Committee
- West Willow Neighborhood Association
- Ypsilanti Charter Township
- Ypsilanti Housing Commission
- Ypsilanti Library

Focus Group Support

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Washtenaw County Urban County Executive Committee

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Ann Arbor Township	Randy Perry	Trustee
Augusta Township	Brian Shelby	Supervisor
Augusta Township	Cath Howard	Trustee
Bridgewater Township	Laurie Fromhart	Supervisor

Bridgewater Township	Michelle McQueer	Treasurer*
City of Ann Arbor	Jason Frenzel	City Council member*
City of Ann Arbor	Chuck Warpehowski	City Council member*
City of Saline	Brian Marl	Mayor
City of Saline	Linda Terhaar	City Council member*
City of Ypsilanti	Amanda Edmonds	Mayor
City of Ypsilanti	Beth Ernat	Director of Economic Development*
Dexter Township	Harley Rider	Supervisor
Dexter Township	James Drolett	Trustee*
Lima Township	Craig Maier	Supervisor
Manchester Township	Gene DeRossett	Supervisor
Manchester Township	Lisa Moutinho	Trustee*
Northfield Township	Marlene Chockley	Supervisor
Pittsfield Township	Mandy Grewal	Supervisor
Pittsfield Township	Craig Lyon	Director of Utilities & Municipal Services*
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Saline Township	Jim Marion	Supervisor
Scio Township	Bryce Kelley	Township Manager*
Scio Township	Christine Green	Trustee*
Scio Township	Jack Knowles	Supervisor
Superior Township	Ken Schwartz	Supervisor
Superior Township	Brenda McKinney	Treasurer*
Webster Township	John Kingsley	Supervisor
Washtenaw County	Andy LaBarre	Commissioner/BOC Chair & UCEC Meeting Chair

Washtenaw County	Felicia Brabec	Commissioner (UCEC Meeting Chair alternate)
York Township	Charles Tellas	Supervisor
Ypsilanti Township	Brenda Stumbo	Supervisor
Ypsilanti Township	Karen Lovejoy Roe	Clerk*
*UCEC Designee		

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## I. Cover Sheet

1. Submission date: September 28, 2017
2. Submitter name: Washtenaw Urban County, Office of Community and Economic Development
3. Type of submission: Joint submission
4. Type of program participant(s) (e.g., consolidated plan participant, PHA):  
Urban County Entitlement Grantee (Lead Administrator) and PHA
5. For PHAs, Jurisdiction in which the program participant is located: City of Ann Arbor
6. Submitter members (if applicable):
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  - e. City: Ypsilanti
  - f. State: Michigan
  - g. Zip code: 48197
8. Period covered by this assessment: July 1, 2018 - June 30, 2023
9. Initial, amended, or renewal AFH: Initial
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

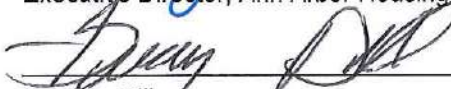
All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH

  
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Gregory Dill  
County Administrator, Washtenaw County

12. Departmental acceptance or non-acceptance:  
\_\_\_\_\_(Signature) \_\_\_\_\_(Date) Comments:



*Technical note: We are utilizing LG2015 (the first Assessment of Fair Housing Tool for Local Governments) with the most recent data tables and maps available (AFFHT0003). HUD has granted us an exception to their policy that program participants using LG2015 must use the AFFHT0001 data tables/maps.*

## Summary

On behalf of the Washtenaw Urban County, the Washtenaw County Office of Community and Economic Development (OCED) the Ann Arbor Housing Commission (AAHC) has engaged local elected officials, community partners and residents to develop the 2017 Washtenaw County Assessment of Fair Housing. Mandated by the Department of Housing and Urban Development (HUD), this effort is comprised of extensive quantitative and qualitative analysis, with data provided by HUD and local knowledge, including primary data collection through surveys and focus groups conducted over the summer of 2017.

The Affirmatively Furthering Fair Housing (AFFH) effort is a locally-driven assessment of access to fair housing and community assets. It is also a tool for local governments to address and reduce residential segregation and areas of concentrated poverty. Over the course of summer 2017, OCED and AAHC worked to define and strategize in the following areas:

- Understand the history of segregation: How have historical discriminatory and exclusionary policies shaped our communities? How do these past policies still impact our communities today?
- Increase access to opportunity: What disparities in access to opportunity, such as schools, public transportation, jobs, housing, child care, and so on, exist in our communities? What strategies are needed to improve opportunity?
- Address displacement pressure: How can communities stabilize neighborhoods, without displacing current residents? What tools can communities use to reinvest in neighborhoods and support existing residents?
- Expand affordable housing inventory: What is the current status of committed affordable housing in Washtenaw County, and where is it located? What actions are needed to maintain and increase the current housing stock, especially in costly housing markets?

The AFFH Subcommittee was formed, consisting of staff from the two lead agencies, along with three (3) representatives from the Washtenaw Urban County Executive Committee. The AFFH Subcommittee in turn provided critical input on geographic areas of focus, survey and focus group strategies, as well as final goals and implementation strategies.

The foundation of the Assessment of Fair Housing (AFH) Plan comes from a wealth of data on housing, employment, transportation, education, and other issues. HUD provided data in maps and tables, local experts provided additional data, and staff identified relevant external research and mapping. Input from focus group participants and survey respondents helped ground the data and provided a more nuanced understanding of issues both broadly and specific to particular populations and/or geographies. This input helped guide the goals and strategies in this report.

To gain a better understanding of the needs and opportunities throughout the county, OCED and AAHC connected with communities and neighborhood residents through surveys and focus groups. Nine (9) focus groups were conducted, and nearly 800 Washtenaw County residents responded to the Housing and Neighborhood Survey.

With the input from residents and extensive data analysis, staff examined:

- Segregation and Integration
- Racially or Ethnically Concentrated Areas of Poverty (R/ECAPS)
- Disparities in Access to Opportunities, such as:
  - Education
  - Employment
  - Transportation
  - Poverty
  - Environmental Health
- Disproportionate Housing Needs
- Publicly Supported Housing
- Disability and Access
- Fair Housing Enforcement

Staff and the AFFH subcommittee members considered contributing factors, such as community opposition, displacement, public and private investment, discrimination, zoning, location and type of affordable housing, and the accessibility to transportation and employment opportunities and others. Based on feedback, staff identified ten (10) broad, umbrella goals with 45 strategies to accomplish those goals.

Overall the goals are intended to address historic segregation and exclusion, some of the core causes of the disparities in access to opportunity. For such a small county, Washtenaw County maintains a striking geographic disparity in race, income, educational attainment, employment and overall opportunity. Whether it's disparity and segregation in schools districts, racial and economic disparity related to income and education, the same pattern repeats.

The contributing factors and goals listed below and again in the chapter on Fair Housing Goals and Priorities are targets for action over a 1 to 5 year period. If implemented, these efforts will not solve all the issues identified, but they are intended to both raise awareness and focus energy, on working toward solutions rather than accepting the status quo.

## Contributing Factors

Below is a list of the Fair Housing Priorities categorized by each a chapter with the summarized list of contributing factors. These factors are included in the chapters with more detail, with the exception of the prioritization - which represents the level of need for each factor.

### Identifying and Prioritizing Contributing Factors to Segregation

Contributing Factor	Prioritization and Justification
<p><b>Community Opposition</b> Community Opposition is common when there are proposals for specific developments looking to add affordable housing or when there are proposed zoning changes to add residential density. While these changes in high opportunity could help offset some of the push of lower income (often African American) households to the east side, they continue to be difficult to implement. In continuation of this vicious cycle, lower income households are then pushed out of the east side as more people relocate to the east side, potentially raising cost of living and rents throughout the east side. It is also important to note that the community opposition is not exclusive to high-opportunity markets and is in play throughout the county.</p> <p>The opposition to affordable housing sometime takes the form of “green or environmental” concerns. When pressed, the conversation usually sources concerns related to safety, the increase in low-income households, and concerns about different races moving into the neighborhood.</p> <p>A smaller, but persistent, way this opposition also plays out is in the location of group group housing that provides support and treatment for persons with disabilities and/or substance abuse issues.</p>	<p><b>High</b> - While support is broad for affordable housing in theory, individual projects at specific locations continue to face opposition, as do efforts to increase residential density.</p> <p>Ongoing education, outreach and development of advocates to support, rather than oppose these developments, will be essential to success.</p>
<p><b>Displacement of residents due to economic pressures</b> A few factors are at play with concerns about displacement. As frequently discussed in the <a href="#">2015 Housing Affordability and Economic Equity Analysis</a>, high housing prices in the Ann Arbor area are pushing many households out of Ann Arbor, often to the east side of the county, specifically in Ypsilanti and Ypsilanti Township. The high cost of housing, due in large part to the presence and dominance of the U of M and its hospital system, impacts renters and homeowners alike.</p> <p>In some cases, loss of committed affordable units has also caused displacement. Of current concern is the Cross Street</p>	<p><b>High</b> - As noted in the Housing Affordability and Economic Equity report (2015) there are two markets in play - a high cost/high income market in Ann Arbor and a lower rent/much lower income problem in both the City of Ypsilanti and Ypsilanti Township.</p> <p>To prevent displacement, an emphasis on raising incomes and decreasing the unemployment rate is the goal for both R/ECAPs and other low opportunity areas and areas with high percentages of residents of color in the county.</p>

<p>Village in the City of Ypsilanti. Cross Street Village is an affordable senior living facility where the property owners have completed the 15-year mandatory affordability period, but are opting out of the 99-year extended affordability period by using the IRS Qualified Contract exemption that allows them to “list” the property for sale. Based on the calculation involved, the property is listed for sale at \$12,050,000, significantly higher than its appraisal of \$4 million. While the affordability period will extend 3 years, current tenants are seeing rent increases and are concerned about how long they will be able to stay. Many are already looking to relocate and are finding few affordable options.</p> <p>The Ypsilanti Housing Commission’s Rental Assistance Demonstration (RAD) conversion is having a positive impact on neighborhoods due to the renovation of all units, including demolition and redevelopment in some cases. These properties moved out of public ownership to a public/private partnership to allow the use of Low-Income Housing Tax Credits to fund renovation and redevelopment. The total affordability period for these properties is 45 years once construction is complete.</p> <p>The Ann Arbor Housing Authority is also in the middle of a full RAD conversion, but the AAHA/City of Ann Arbor are maintaining ownership of the land to control long-term affordability for those properties. The City of Ann Arbor provided a 99 year ground lease to the entity developing the property. In both cases, long-term planning will be needed to maintain affordability at either the 45 or 99 year point.</p>	
<p><b>Lack of community revitalization strategies</b></p> <p>The foreclosure crisis had a particularly negative impact on Ypsilanti Township. In response, the township partnered with Habitat for Humanity of Huron Valley and provided resources to launch revitalization strategies in three neighborhoods: West Willow, Gault Village, and Sugarbrook. The partnership includes funding for acquisition and rehab of foreclosure of lower-quality houses for rehabilitation and ownership for low-income households. In addition, Habitat has provided community development support through neighborhood organization, capacity building and development, and supportive programs, including exterior cleanups, park improvements and more.</p> <p>The City of Ypsilanti has created a disposition policy for vacant lots deeded to the city through tax foreclosure and has success putting them into private ownership. That policy is supported by the creation of a Neighborhood Enterprise Zone</p>	<p><b>Low</b> - There are some community revitalization strategies in play in both the City of Ypsilanti and Ypsilanti Township, However, there is a lack of focus on development of neighborhood commercial districts in R/ECAPs and other lower opportunity areas on the east side of the county.</p>

<p>(NEZ), which uses tax abatement and encourages infill on the southside of the city.</p> <p>Areas lacking any revitalization strategy include the MacArthur Boulevard area of Superior Township and the LeForge Road area, which straddles both Ypsilanti City and Township.</p>	
<p><b>Lack of private investments in specific neighborhoods</b> The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. That said, there has been great improvements through RAD conversion of Ypsilanti Housing Commission properties, and residential investments in rehabilitation of post-foreclosure properties. There are several new prospects in the planning stages, but still limited investment, particularly in the south and southeast neighborhoods.</p> <p>Private investments in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development often with new ownership. Additionally, there is interest in investment along several corridors (i.e. Whittaker Road); however, the Gault Village shopping area- previously a neighborhood center with a grocery and related convenience shopping- is still in transition and is experiencing high degree of vacancy.</p>	<p><b>Medium</b> - Increasing private investment in low-opportunity areas is difficult, as the return on investment is lower.</p> <p>However, coordinating investment with local banks through Community Reinvestment Act plans and priorities can provide support for homeownership, infill, commercial development and other economic development efforts. This could apply to low-opportunity areas throughout the county.</p>
<p><b>Lack of public investments in specific neighborhoods, including services or amenities</b> Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to it's age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.</p> <p>The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.</p>	<p><b>High</b> - With many east side communities not yet recovered from the Great Recession, the limited funding available is in demand. Identifying and applying additional public support and directing it to low-opportunity areas will be important to making sure low-income areas receive public investment in coordination with community needs and interest.</p> <p>One means is to review the use of CDBG priority funds as part of the Urban County's 5 year consolidated plan preparation to encourage its use for placemaking and/or community infrastructure needs in low-opportunity areas.</p> <p>This will allow additional public support for these efforts, that are often underfunded due to the imbalanced local government revenues.</p>

<p>Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.</p> <p>Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.</p>	
<p><b>Lack of regional cooperation</b> Positive regional cooperation include the Urban County, the Continuum of Care for homelessness services, and the expansion of the Ann Arbor Transportation Authority to the Ann Arbor Area Transportation Authority, now including the City of Ypsilanti and Ypsilanti Township, While five jurisdictions have adopted the 2015 Housing Affordability and Economic Equity Analysis, there is some tension around implementation of regional goals for the effort. In some cases that includes some communities interest in gentrification more than revitalization, and in other cases, limited investment and engagement in removing exclusionary policies.</p> <p>Areas where regional cooperation could benefit are efforts involving a countywide public education district, coordinated hiring efforts from anchor institutions, and ongoing coordination on affordable housing for the urbanized area. The 2016 failure of the Regional Transit Authority (RTA) Millage presents some broader regional coordination needs. The effort looks to connect 4 counties with transit services that will expand employment opportunities and improve access overall.</p>	<p><b>High</b> - Affordable housing, inequitable educational systems, local-government revenue, transportation - all of these are regional issues that cannot be addressed through actions by single units of government. Coordination and shared values and goals will be essential for progress in some of the areas where institutional racism has been, and continues to be a barrier to success.</p>
<p><b>Land use and zoning laws</b> Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	<p><b>High</b> - Exclusionary zoning practices including large acre lot sizes, large single-family zoning districts potential over-utilization of Planned Projects (or PUD) and layers of regulation make development more expensive and more exclusive, especially in the Ann Arbor area.</p>
<p><b>Lending discrimination</b></p>	<p><b>Medium</b> - HMDA data provides a look</p>

<p>The recent history of mortgage lending in Washtenaw County as reported through Home Mortgage Disclosure Act (HMDA). African Americans are denied mortgages for single family, duplex, triplex and quad buildings at a rate often 2-3 times that of whites or Asians. Hispanics are also denied at a much higher rate, than whites or Asians. The smaller number of loan originations does show more fluctuation in the information for Hispanics/Latinos.</p> <p>Anecdotally, there have been numerous stories of EMU professors looking for housing that are immediately directed to the Ann Arbor Housing market by realtors and others, rather than neighborhoods with quality and affordable housing stock within walking or shorter commuting distances in the City of Ypsilanti and Ypsilanti Township. Anecdotal reports from realtors indicate that steering occurs related to school districts, with school district boundaries serving as the modern era “redline” districts.</p>	<p>into loan origination and approval by race and ethnicity. African Americans be turned down more frequently than whites.</p>
<p><b>Location and type of affordable housing</b> The City of Ypsilanti and Ypsilanti township host the vast majority of committed affordable housing units for the county, creating areas of disproportionate housing needs and areas of concentrated poverty. For example, in the City of Ypsilanti, more than 95% of the committed affordable units in the city are located South of Michigan Avenue - this includes the 632 units located in the Southside R/ECAP</p>	<p><b>High</b> - When you remove the affordable senior housing units being lost at Cross Street village in the City of Ypsilanti, 95% of the City of Ypsilanti’s affordable units are located south of Michigan Avenue. In the county-wide context, both the City of Ypsilanti and Ypsilanti Township each have a comparable number of committed affordable units to the City of Ann Arbor, However Ypsilanti Township contains not quite half the population of the City of Ann Arbor, and the City of Ypsilanti is one-sixth the size. Combining Ypsilanti City and Ypsilanti Township make up almost 50% of the county’s committed affordable units, but only 20% of the population.</p>
<p><b>Private discrimination</b> Through both surveys and focus groups, it was affirmed that discrimination is still an issue in particular for people of color and persons with disabilities. In the Ypsilanti Renters focus group, it was posited that one reason for this ongoing discrimination is a lack of diversity among property managers and landlords. This could minimize cultural misunderstandings that can lead to applications being denied and, in some cases, eviction.</p>	<p><b>Medium-</b> The tight housing market amplifies the role discrimination plays in where and how individuals find housing. This is likely to increase in the urbanized area in particular.</p>

## Identifying and Prioritizing Contributing Factors to R/ECAP areas

Contributing Factor	Prioritization and Justification
<p><b>Deteriorated and abandoned properties</b> In the case of the Southside R/ECAP, there is concern, post housing crisis, about an increase in rental properties by non-local landlords. Based on local assessor data, 51% of residential units are owner-occupied and 50% rental. The loss of home ownership also impacts the creation of long-term wealth for African American residents. Focus group participants in areas with high renter occupation spoke to their concern of property value and quality of neighborhood, and hoped to see more owner-occupied homes in their neighborhood. Lower-incomes in the Southside R/ECAP have been problematic for ongoing care and maintenance of properties as well. Recommendations related to supporting home ownership, property upkeep and investment will be included for both R/ECAPS, but the Southside R/ECAP in particular.</p> <p>In comparing in the county, the United States Postal service vacancy data for 2016, the two R/ECAPs are in the top 10% for vacancy rates at the 3 month and 36 month ranges (Table 26). The City of Ypsilanti was able to demolish a number of vacant and condemned houses in the southside R/ECAP in the last 10 years, including a number of condemned and vacant single-family units, as well as a large number of Ypsilanti Housing Commission properties (Parkridge and others) as part of the RAD conversion.</p>	<p><b>High</b> - Lower-income homeowners will need support to maintain their homes over time. As well, maintaining African-American homeownership is important to creation of wealth and intergenerational wealth transfer.</p>
<p><b>Displacement of residents due to economic pressures</b> Lower-incomes overall make the risk of displacement high in both R/ECAPS. Focusing on increasing wages, providing ongoing (re)training, and support for youth will be essential in the long-term, with the goal to support existing residents to own and invest in their neighborhoods, rather than be pressed out.</p>	<p><b>High</b> - R/ECAP residents are some of the most vulnerable to economic pressures in the county. In the southside R/ECAP in particular, there is a great sense of pride and heritage that are important as well. Finding employment, training, education and other supports are essential to help residents keep their current housing..</p>
<p><b>Lack of community revitalization strategies</b> Participants from the Parkridge focus group were very open and transparent about the support they receive from neighbors and the sense of community they have in their neighborhood. With multiple churches, non-profit agencies, and the Parkridge Community Center, the Southside area has a plethora of community initiatives, support, and activities. Coordination among these efforts is often inconsistent, and can suffer from both overlap and gaps in service. While individual partners may have goals and a vision for their work in the area, there is not a coordinated revitalization strategy.</p>	<p><b>Medium</b> - The Southside R/ECAP benefits from a strong social-service network in the area if not a coordinated strategy.</p> <p>Leforge is lacking engagement, service provision, and a plan to assist residents and further connect it's neighbor Eastern Michigan University, as well as the adjacent community.</p>



<p>In the Leforge R/ECAP there are less resources. The area is predominantly multi-family housing, with no nonprofit agencies, churches, schools, businesses or other institutions to provide support. No revitalization strategy exists for the area.</p> <p>There is a need for investment and continued engagement with Southside and Leforge residents and local stakeholders to determine the most appropriate strategies as well as an overall community revitalization strategy.</p>	
<p><b>Lack of private investments in specific neighborhoods</b> Today, there is a lack of public investment in the Leforge R/ECAP, but in the Southside R/ECAP, there is room to grow. Both Peninsular Park and Parkridge Park would benefit from ongoing maintenance and additional amenities. Also, pedestrian improvements are in need at Huron River Drive and Leforge intersections. As mentioned above, increasing communication and engagement with stakeholders and residents is an ongoing goal, and could help push forward the need and desire for investment. To support investment one recommendation will be to dedicate CDBG program income to projects in R/ECAPs.</p>	<p><b>Medium</b> - The combination of community investment strategies as well as encouragement of public and private investment will help support and strengthen the neighborhood.</p>
<p><b>Lack of public investments in specific neighborhoods, including services or amenities</b> Today, there is a lack of public investment in the Leforge area, and in the Southside R/ECAP, there is room to grow. Both Peninsular Park and Parkridge Park would benefit from ongoing maintenance and additional amenities. Also, pedestrian improvements are in need at Huron River Drive and Leforge intersections. As mentioned above, increasing communication and engagement with stakeholders and residents is an ongoing goal, and could help push forward the need and desire for investment. To support investment one recommendation will be to dedicate CDBG program income to projects in R/ECAPS.</p>	<p><b>Medium</b> - The combination of community investment strategies as well as encouragement of public and private investment will help support and strengthen the neighborhood.</p>
<p><b>Land use and zoning laws</b> The Southside R/ECAP was recently down-zoned to a single-family district. While this is a common strategy to try and provide more stability for property owners, it does create problems for those who own a duplex, or who may benefit from additional income of a second unit. Allowing duplexes could also help support infill development, allowing for both owner-occupancy and rental income in some cases. The Leforge R/ECAP is zoned primarily for multi-family housing. This is not necessarily problematic, but flexibility in zoning to allow for some commercial uses (i.e. stores, childcare and other supportive uses) can assist with the lack of nearby services in the area.</p>	<p><b>Medium</b> - While these changes may be worthwhile, more engagement with both neighborhoods will be necessary to determine the right next steps.</p>

<p><b>Location and type of affordable housing</b> OCED created an inventory of committed affordable units. These are affordable units that have rent and income restrictions through various subsidies, deed restrictions, zoning or other mechanisms. There are 4,220 committed affordable units in Washtenaw County. Committed affordable units in the City of Ypsilanti and Ypsilanti Township make up almost 50% of these units. More specifically, 15% of the county's committed affordable units are located in Southside and 2.8% are located in Leforge. Even more specific, of all the committed affordable units in the City of Ypsilanti, 95% of them are located south of Michigan Avenue. The concentration of committed affordable housing in these census tracts is problematic, and is likely contributing to the R/ECAP status in both areas.</p>	<p><b>High</b> - Concentrating much of the committed affordable housing in Ypsilanti in and around the R/ECAPs is one of the key contributing factors to the R/ECAP status. In the county-wide context, both the City of Ypsilanti and Ypsilanti Township each have a comparable number of committed affordable units to the City of Ann Arbor, However Ypsilanti Township contains not quite half the population of the City of Ann Arbor, and the City of Ypsilanti is one-sixth the size. Combining Ypsilanti City and Ypsilanti Township make up almost 50% of the county's committed affordable units, but only 20% of the population.</p>
<p><b>Private discrimination</b> In several focus groups, it was affirmed that discrimination still occurs, especially related to race and disability. The Fair Housing Center of Southeast and Mid Michigan (FHC) reports an uptick in discrimination complaints from landlords in 2016 as well as in 2017. In 2016, complaints in Washtenaw County were at the highest since 1995. In August of 2017, complaints are already 2 weeks ahead of total complaints the same time in 2016. In focus groups, participants commented on private discrimination related to disability, race, income and sexual orientation. In Washtenaw County, the top two complaints are race and disability discrimination.</p>	<p><b>Medium-</b> The tight housing market amplifies the role discrimination plays in where and how individuals find housing. The ongoing trend of African-Americans being denied mortgages at a higher rate impacts long-term wealth creation in African-American families and communities.</p>
<p><b>Lack of regional cooperation</b> As noted, both R/ECAPs have significant number of youth, but provide minimal services. This has been identified in City of Ypsilanti and county plans, but there has been minimal cooperation to address the need for youth programming in the form of recreation, education, and mentoring. Parkridge Center does benefit from the ongoing partnership with Washtenaw Community College, but often the Center is not well utilized by neighborhood residents. A regional partnership with a focus on service provision and supporting youth is a worthy regional effort.</p>	<p><b>High</b> - As noted, both R/ECAPs have significant number of youth, but minimal services. This has been identified in City and county plans, but there has been minimal cooperation to address the need for youth programming in the form of recreation, education and mentoring. Parkridge Center does benefit from the ongoing partnership with WAShtenaw Community College, but in some cases the utilization by adjacent residents is minimal. A regional partnership and focus on service provision and supporting youth is a worthy regional effort.</p>

## Identifying and Prioritizing Contributing Factors to Disparities in Access to Opportunity

<p><b>Access to financial services</b></p>	<p><b>Medium</b> - Lower-income communities have less banking options than</p>
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<p>Recently, the United Way of Washtenaw County convened a working group on financial services and financial literacy related to low income Washtenaw County residents. The number of check cashing locations (red pins) are clustered around the east side of the county, in lower income areas. In Ann Arbor, the jurisdiction with the largest population, there are only two locations.</p>	<p>high-income communities. As a result lower-income communities rely on check-cashing or other services, which can total up to \$20,000 in fees over the course of a lifetime.</p>
<p><b>The availability, type, frequency, and reliability of public transportation</b></p> <p>As mentioned previously, the AAATA largely expanded transit services in 2016. As a result, wait times were reduced from 1 hour to 30 minutes, and in regard to routes in Ypsilanti and Ypsilanti Township, most routes now travel in both directions rather than a one-way loop. While greatly improved, travel times from the following locations to U of M Hospital (for example) usually hover about 1 hour one way:</p> <ul style="list-style-type: none"> <li>● West Willow Neighborhood - minimum of one hour, one way</li> <li>● Southside R/ECAP - between 55 and 60 minutes one way</li> <li>● Leforge R/ECAP - 47-57 minutes depending on route</li> </ul> <p>Two hours of travel time, at minimum, puts a burden on residents with other needs such as running errands, getting to and from childcare and schools, spending time with family, and so on.</p> <p>As to reliability and on-time performance, FY 2016 data provided by The Ride indicates that 90% of trips were on-time at route endpoints. That number decreased to 84% for on-time performance at all timepoints along the route. Currently on fixed-routes, 43% of bus stops have accessibility enhancements, but 100% of the bus fleet contain accessibility features.</p> <p>The A-Ride service from Ann Arbor Area Transportation Authority also provides shared-ride transportation service for persons with disabilities. This service is available for individuals within ¼ mile of fixed route service and available. Additionally, A-Ride is available for ADA eligible residents of Ypsilanti, Pittsfield and Superior Townships who reside beyond the Base Service Area. These riders may request trips to locations within their township on weekdays between 6:30 a.m. and 6:30 p.m. Additional funding permits:</p> <ul style="list-style-type: none"> <li>● Eligible Pittsfield Township riders to travel within the Ann Arbor City limits</li> <li>● Eligible Ypsilanti Township riders to travel within the Ypsilanti City limits.</li> </ul>	<p><b>High</b> - An analysis of 2016 survey of Michigan Works! Job seekers determined that access to a vehicle was more important for obtaining and keeping a job, even over educational attainment. In cases where access to a car is improbably, transit or other reliable options are essential.</p>

<p>Outside of AAATA’s service area, People’s Express serves residents of Saline; Dial a ride is available to residents of Manchester (including accessible transportation); Western-Washtenaw Area Value Express (WAVE), provides affordable transportation to older adults, persons with disabilities and other transit-dependent individuals. The WAVE’s service area includes Chelsea, Dexter and provides an inter-urban express route along Jackson Road. With that said, many rural areas are not covered by dial-a-ride or other paratransit services.</p> <p>As mentioned previously there are no connections east of Washtenaw County to Dearborn, Canton, and the Detroit Area. A four-county Regional Transit Authority (RTA) has been formed, but a 2016 millage effort to fund service to link all four counties (including the links from Washtenaw east to other employment opportunities) failed. Another attempt is expected, although not yet announced.</p>	
<p><b>Lack of private investments in specific neighborhoods</b> The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. However, there has been great improvements in existing single and multi-family commercial stock, including the RAD conversion of Ypsilanti Housing Commission properties and investment in rehabilitation of a variety of properties post foreclosure. There are several new residential developments in the planning stages, but still limit investment, particularly in the southside and southeast neighborhoods.</p> <p>Private investment in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development and boosted new homeownership. Additionally there is interest in investment along several corridors, including Whittaker Road. However, the Gault Village shopping area, previously a neighborhood center with a grocery and related convenience shopping, is still in transition and experiencing a high degree of vacancy.</p>	<p><b>Medium</b> - Increasing private investment in low-market areas is difficult, as the return on investment will be lower.</p> <p>However, coordinating investment with local bank Community Reinvestment Act plans and priorities can provide support for homeownership, infill, commercial development and other economic development efforts. This could apply to low-opportunity areas throughout the county.</p>
<p><b>Lack of public investments in specific neighborhoods, including services or amenities</b> Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to it’s age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.</p>	<p><b>High</b> - Review use of CDBG priority funds as part of 5-year consolidated plan preparation to emphasize use for placemaking and/or community infrastructure needs in low-opportunity areas.</p> <p>This will allow additional public support for these efforts, that are often underfunded due to the imbalanced local</p>

<p>The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.</p> <p>Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.</p> <p>Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.</p>	<p>government revenues.</p>
<p><b>Lack of regional cooperation</b> Positive regional cooperation include the Urban County, the Continuum of Care for homelessness services, and the expansion of the Ann Arbor Transportation Authority to the Ann Arbor Area Transportation Authority, now including the City of Ypsilanti and Ypsilanti Township, While five jurisdictions have adopted the 2015 Housing Affordability and Economic Equity Analysis, there is some tension around implementation of regional goals for the effort. In some cases that includes some communities interest in gentrification more than revitalization, and in other cases, limited investment and engagement in removing exclusionary policies.</p> <p>Areas where regional cooperation could benefit are efforts involving a countywide public education district, coordinated hiring efforts from anchor institutions, and ongoing coordination on affordable housing for the urbanized area. The 2016 failure of the RTA Millage presents some broader regional coordination needs. The effort looks to connect 4 counties with transit services that will expand employment opportunities and improve access overall.</p>	<p><b>High</b> - Affordable housing, unequal educational systems, local-government revenue, transportation - all of these are regional issues that cannot be addressed through actions by single units of government. Coordination, shared values and goals will be essential for progress in some of the areas where institutional racism has been and continues to be a barrier to success.</p>

<p><b>Land use and zoning laws</b> Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment in lieu of taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.</p> <p>Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	<p><b>High</b> - Exclusionary zoning practices including large acre lot sizes, large single-family zoning districts potential over-utilization of Planned Projects (or PUD) and layers of regulation make development more expensive and more exclusive, especially in the Ann Arbor area.</p>
<p><b>Lending Discrimination</b> The recent history of mortgage lending in Washtenaw County as reported through Home Mortgage Disclosure Act (HMDA). African Americans are denied mortgages for single family, duplex, triplex and quad buildings at a rate often 2-3 times that of whites or Asians. Hispanics are also denied at a much higher rate, than whites or Asians. The smaller number of loan originations does show more fluctuation in the information for Hispanics/Latinos.</p> <p>Anecdotally, there have been numerous stories of EMU professors looking for housing that are immediately directed to the Ann Arbor Housing market by realtors and others, rather than neighborhoods with quality and affordable housing stock within walking or shorter commuting distances in the City of Ypsilanti and Ypsilanti Township. Anecdotal reports from realtors indicate that steering occurs related to school districts, with school district boundaries serving as the modern era “redline” districts.</p>	<p><b>Medium</b> - HMDA data provides a look into loan origination and approval by race and ethnicity. African Americans be turned down more frequently than whites.</p>
<p><b>Location of employers</b> The majority of employers in the county are located in the Ann Arbor and Pittsfield area. The University of Michigan and University of Michigan Hospital employ more people than almost all the other top 20 employers in the county combined. Transit service does link much of the urbanized area to these major employers; however, in several cases in eastside neighborhoods, the commute is one hour one way.</p>	<p><b>Low</b> - Small businesses are the backbone of the economy. The days of large manufacturing firms taking over old plants and hiring thousands of workers are past. Even the American Center for Mobility will be primarily a leased space with smaller scale business offshoots expected. As such connections to major employers are more essential than trying</p>

<p>The other large job center is in the City of Detroit and its metropolitan region. There is no transit access from Washtenaw County east. Plans for those connections as part of the RTA are on hold until the RTA determines how to move forward after the failed 2016 millage effort.</p>	<p>to attract large-scale employers to the east side.</p>
<p><b>Location of proficient schools and school assignment policies</b> The less proficient school systems on the eastern side of the county (YCS and Lincoln Schools) are a frequent deterrent for homebuyers with the income and flexibility to purchase or even rent throughout the region. The AAPS are the primary draw, and further contribute to the high cost of housing in Ann Arbor and surrounding areas. School district lines have become a modern equivalent of redlining, with more African American and students of color attending YCS and Lincoln Schools than other county school districts. The result is a vicious cycle of individuals with higher incomes and education adding to the expense and exclusivity of Ann Arbor, while households with lower incomes find themselves in an underperforming and underfunded school district.</p>	<p><b>High-</b> School district boundaries have become the new “redlining” with realtors emphasizing more successful school districts, and property values matching up clearly with those lines.</p>
<p><b>Location and type of affordable housing</b> The City of Ypsilanti and Ypsilanti township host the vast majority of committed affordable housing units for the county, creating areas of disproportionate housing needs and areas of concentrated poverty. For example, in the City of Ypsilanti, more than 95% of the committed affordable units in the city are located South of Michigan Avenue - this includes the 632 units located in the Southside R/ECAP.</p>	<p><b>High -</b> When you count in the loss of Cross Street Village, 95% of the City of Ypsilanti’s units are located south of Michigan Avenue. In the county-wide context, both the City of Ypsilanti and Ypsilanti Township each have a comparable number of committed affordable units to the City of Ann Arbor, However Ypsilanti Township contains not quite half the population of the City of Ann Arbor, and the City of Ypsilanti is one-sixth the size. Combining Ypsilanti City and Ypsilanti Township make up almost 50% of the county’s committed affordable units, but only 20% of the population.</p>
<p><b>Private discrimination</b> Through both surveys and focus groups, it was affirmed that discrimination is still an issue in particular for people of color and persons with disabilities. In the Ypsilanti Renters focus group, it was posited that one reason for this ongoing discrimination is a lack of diversity among property managers and landlords. This could minimize cultural misunderstandings that can lead to applications being denied and, in some cases, eviction.</p>	<p><b>Medium-</b> The tight housing market amplifies the role discrimination plays in where and how individuals find housing.</p>

## Identifying and Prioritizing Contributing Factors to Factors for Disproportionate Housing Needs

Contributing Factor	Prioritization and Justification
<p><b>Displacement of residents due to economic pressures</b> A few factors are at play with concerns about displacement. As frequently discussed in the <a href="#">2015 Housing Affordability and Economic Equity Analysis</a>, high housing prices in the Ann Arbor area are pushing many households out of Ann Arbor, often to the east side of the county, specifically in Ypsilanti and Ypsilanti Township. The high cost of housing, due in large part to the presence and dominance of the U of M and its hospital system, impacts renters and homeowners alike.</p> <p>In some cases, loss of committed affordable units has also caused displacement. Of current concern is the Cross Street Village in the City of Ypsilanti. Cross Street Village is an affordable senior living facility where the property owners have completed the 15-year mandatory affordability period, but are opting out of the 99-year extended affordability period by using the IRS Qualified Contract exemption that allows them to “list” the property for sale. Based on the calculation involved, the property is listed for sale at \$12,050,000, significantly higher than its appraisal of \$4 million. While the affordability period will extend 3 years, current tenants are seeing rent increases and are concerned about how long they will be able to stay. Many are already looking to relocate and are finding few affordable options.</p> <p>The Ypsilanti Housing Commission’s Rental Assistance Demonstration (RAD) conversion is having a positive impact on neighborhoods due to the renovation of all units, including demolition and redevelopment in some cases. These properties moved out of public ownership to a public/private partnership to allow the use of Low-Income Housing Tax Credits to fund renovation and redevelopment. The total affordability period for these properties is 45 years once construction is complete.</p> <p>The Ann Arbor Housing Authority is also in the middle of a full RAD conversion, but the AAHA/City of Ann Arbor are maintaining ownership of the land to control long-term affordability for those properties. The City of Ann Arbor provided a 99 year ground lease to the entity developing the property. In both cases, long-term planning will be needed to maintain affordability at either the 45 or 99 year point.</p>	<p><b>High</b> - As noted in the Housing Affordability and Economic Equity report (2015) there are two markets in play - a high cost/high income market in Ann Arbor and a lower rent/much lower income problem in both the City of Ypsilanti and Ypsilanti Township. To prevent displacement, an emphasis on raising incomes and decreasing the unemployment rate is the goal for both R/ECAPs and other low opportunity areas and areas with high percentages of residents of color in the county.</p>
<p><b>Lack of private investments in specific neighborhoods</b></p>	<p><b>Medium</b> - Increasing private investment in low-market areas is</p>



<p>The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. That said, there has been great improvements through RAD conversion of Ypsilanti Housing Commission properties, and residential investments in rehabilitation of post-foreclosure properties. There are several new prospects in the planning stages, but still limited investment, particularly in the south and southeast neighborhoods.</p> <p>Private investments in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development often with new ownership. Additionally, there is interest in investment along several corridors (i.e. Whittaker Road); however, the Gault Village shopping area- previously a neighborhood center with a grocery and related convenience shopping- is still in transition and is experiencing high degree of vacancy.</p>	<p>difficult, as the return on investment will be lower.</p> <p>However, coordinating investment with local bank Community Reinvestment Act plans and priorities can provide support for homeownership, infill, commercial development and other economic development efforts. This could apply to low-opportunity areas throughout the county.</p>
<p><b>Lack of public investments in specific neighborhoods, including services or amenities</b></p> <p>Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to it's age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.</p> <p>The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.</p> <p>Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.</p>	<p><b>High</b> - Review use of CDBG priority funds as part of 5 year consolidated plan preparation to emphasize use for placemaking and/or community infrastructure needs in low-opportunity areas.</p> <p>This will allow additional public support for these efforts, that are often underfunded due to the imbalanced local government revenues.</p>

<p>Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.</p>	
<p><b>Land use and zoning laws</b> Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment in lieu of taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.</p> <p>Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	<p><b>High</b> - exclusionary zoning practices including large acre lot sizes, large single-family zoning districts potential over-utilization of Planned Projects (or PUD) and layers of regulation make development more expensive and more exclusive, especially in the Ann Arbor area.</p>
<p><b>Lending Discrimination</b> The recent history of mortgage lending in Washtenaw County as reported through Home Mortgage Disclosure Act (HMDA). African Americans are denied mortgages for single family, duplex, triplex and quad buildings at a rate often 2-3 times that of whites or Asians. Hispanics are also denied at a much higher rate, than whites or Asians. The smaller number of loan originations does show more fluctuation in the information for Hispanics/Latinos.</p> <p>Anecdotally, there have been numerous stories of EMU professors looking for housing that are immediately directed to the Ann Arbor Housing market by realtors and others, rather than neighborhoods with quality and affordable housing stock within walking or shorter commuting distances in the City of Ypsilanti and Ypsilanti Township. Anecdotal reports from realtors indicate that steering occurs related to school districts, with school district boundaries serving as the modern era “redline” districts.</p>	<p><b>Medium</b> - HMDA data provides a look into loan origination and approval by race and ethnicity. African Americans are turned down more frequently than whites.</p> <p>Middle and upper income families (often white) are often steered or request to be look for housing in the Ann Arbor School District.</p>

## Identifying and Prioritizing Contributing Factors to Factors for Publicly Supported Housing

Contributing Factor	Prioritization and Justification
<p><b>Land use and zoning laws</b></p> <p>Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment in lieu of taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.</p> <p>Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	<p><b>High</b> - Exclusionary zoning practices including large acre lot sizes, large single-family zoning districts potential over-utilization of Planned Projects (or PUD) and layers of regulation make development more expensive and more exclusive, especially in the Ann Arbor area.</p>
<p><b>Community Opposition</b></p> <p>Community opposition is common when there are proposals for specific developments looking to add affordable housing or when there are proposed zoning changes to add residential density. While these changes in high opportunity could help offset some of the push of lower income (often African American) households to the east side, they continue to be difficult to implement. In continuation of this vicious cycle, lower income households are then pushed out of the east side as more people relocate to the east side, potentially raising cost of living and rents throughout the east side. It is also important to note that the community opposition is not exclusive to high-opportunity markets and is in play throughout the county.</p> <p>The opposition to affordable housing sometime takes the form of “green or environmental” concerns. When pressed, the conversation usually sources concerns related to safety, the increase in low-income households, and concerns about different races moving into the neighborhood.</p> <p>A smaller, but persistent, way this opposition also plays out is in the location of group group housing that provides support and</p>	<p><b>High</b> - While support is broad for affordable housing in theory, individual projects at specific locations continue to face opposition, as do efforts to increase residential density.</p> <p>Ongoing education, outreach and development of advocates to support, rather than oppose these developments, will be essential to success.</p>

<p>treatment for persons with disabilities and/or substance abuse issues.</p>	
<p><b>Impediments to mobility</b> Households using Housing Choice Vouchers (HCV) in the area find that market rents limit where they can find rental housing. Fair Market Rent (FMR) rates do not cover the cost of most rentals in Ann Arbor (even when increased to 110% of value), and also create a detrimental situation on the east side single family communities with a large number of voucher rentals. The FMR covers much more than the mortgage payment, creating an artificial market situation in neighborhoods, such as West Willow. Discrimination continues to be reported as a setback for voucher holders in finding rental housing as well.</p>	<p><b>High</b> - Many voucher-holding households are being priced out of Ann Arbor simply due to rents exceeding fair market value of the voucher. As a result, many are pushed east, and concentrated in specific neighborhoods with less access to employment, education and services.</p>
<p><b>Lack of private investments in specific neighborhoods</b> The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. That said, there has been great improvements through RAD conversion of Ypsilanti Housing Commission properties, and residential investments in rehabilitation of post-foreclosure properties. There are several new prospects in the planning stages, but still limited investment, particularly in the south and southeast neighborhoods.</p> <p>Private investments in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development often with new ownership. Additionally, there is interest in investment along several corridors (i.e. Whittaker Road); however, the Gault Village shopping area- previously a neighborhood center with a grocery and related convenience shopping- is still in transition and is experiencing high degree of vacancy.</p>	<p><b>Medium</b> - Increasing private investment in low-market areas is difficult, as the return on investment will be lower.</p> <p>However, coordinating investment with local bank Community Reinvestment Act plans and priorities can provide support for homeownership, infill, commercial development and other economic development efforts. This could apply to low-opportunity areas throughout the county.</p>
<p><b>Lack of public investment in specific neighborhoods, including services and amenities</b> Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to it's age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.</p> <p>The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation</p>	<p><b>High</b> - Review use of CDBG priority funds as part of 5 year consolidated plan preparation to emphasize use for placemaking and/or community infrastructure needs in low-opportunity areas.</p> <p>This will allow additional public support for these efforts, that are often underfunded due to the imbalanced local government revenues.</p>

<p>and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.</p> <p>Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.</p> <p>Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.</p>	
<p><b>Lack of regional cooperation</b> Positive regional cooperation include the Urban County, the Continuum of Care for homelessness services, and the expansion of the Ann Arbor Transportation Authority to the Ann Arbor Area Transportation Authority, now including the City of Ypsilanti and Ypsilanti Township, While five jurisdictions have adopted the 2015 Housing Affordability and Economic Equity Analysis, there is some tension around implementation of regional goals for the effort. In some cases that includes some communities interest in gentrification more than revitalization, and in other cases, limited investment and engagement in removing exclusionary policies.</p> <p>Areas where regional cooperation could benefit are efforts involving a countywide public education district, coordinated hiring efforts from anchor institutions, and ongoing coordination on affordable housing for the urbanized area. The 2016 failure of the Regional Transit Authority (RTA) Millage presents some broader regional coordination needs. The effort looks to connect 4 counties with transit services that will expand employment opportunities and improve access overall.</p>	<p><b>High</b> - Affordable housing, unequal educational systems, local-government revenue, transportation - all of these are regional issues that cannot be addressed through actions by single units of government. Coordination, shared values and goals will be essential for progress in some of the areas where institutional racism has been and continues to be a barrier to success.</p>
<p><b>Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs</b></p>	<p><b>Medium</b> - QAP criteria has been problematic for infill locations. Regulations in Ann Arbor make development costly.</p>

<p>QAP parking requirements often exceed those of local zoning and do not defer to them, creating problems in urban locations, as well as increasing the cost of development. The QAP also has a section that awards points for proposals meeting a community's neighborhood strategic plan, however applicants have frequently noted that it's not clear how to meet this standard.</p>	
<p><b>Source of income discrimination</b> The Fair Housing Center of Southeast and Mid Michigan (FHC) notes that some housing providers and banks do not appropriately consider income, including SSI, Social Security, retirement and other incomes.</p>	<p><b>Medium</b> - FHC has noted that this is a fairly common occurrence, sometimes due to misinformation but other times done more deliberately.</p>

## Identifying and Prioritizing Contributing Factors of Disability and Access Issues

<b>Contributing Factor</b>	<b>Prioritization and Justification</b>
<p><b>Access to proficient schools for persons with disabilities</b> While there is a broader question about access to proficient schools (less available to low-income families of color), all school districts in the county provide special education classes and supports.</p>	<p><b>High</b>- Connects to broader disparity issue in school districts in the county.</p>
<p><b>Access to publicly supported housing for persons with disabilities</b> 30% of HCV are utilized by households with disabilities, and 20% of public housing is used by accessible housing.</p>	<p><b>Medium</b> - Current practice among public and nonprofit affordable housing provides has included addition of barrier free and accessible units with new development or rehabilitation.</p>
<p><b>Access to transportation for persons with disabilities</b> There are gaps in service and availability in some rural areas and on the edges of the AAATA service area.</p>	<p><b>Medium</b> - Current transit and transportation providers are reviewing service</p>
<p><b>Inaccessible sidewalks, pedestrian crossings, or other infrastructure</b> The CIL's litigation against various local jurisdictions around ADA sidewalks and curb cuts has resulted in improved attention to detail and improved accessibility.</p> <p>Most of the urbanized areas of Washtenaw County have been working to implement traffic calming, including road diets, improved crosswalks, midblock crossings and other supports to improve the pedestrian network. However, the prevalence of MDOT roads cutting through what would be walkable communities, often increase speeds to dangerous levels, and does not allow for smaller-scale pedestrian improvements. For example, Washtenaw Avenue passes through four jurisdictions in the County, and has the most heavily used transit route</p>	<p><b>Medium</b> - Ongoing efforts like Reimagine Washtenaw and the CDBG infrastructure program continue to support pedestrian infrastructure on a project by project basis.</p>

<p>(AAATA Route 4) in the County. MDOT has dedicated minimal resources towards adding in sidewalk gaps, installing mid-block crossings or even crosswalks through long sections of the road. This has been inadequate and sometimes dangerous for pedestrians, and particularly people with disabilities who may need to cross the road to get to services, a residence, bus stop, etc.</p>	
<p><b>Lack of affordable in-home or community-based supportive services</b> The AAHC and other housing providers have documented the need for additional in-home supportive services (up to 24 hours). As well, the demand for supportive services is ongoing and particularly paired with the homelessness work in the community.</p>	<p><b>Medium</b> - There is a strong connection between providing supportive housing for individuals and families experiencing homelessness who also have disabilities. However, more support is needed for individuals who need 24 hour assistance.</p>
<p><b>Lack of affordable, integrated housing for individuals who need supportive services</b> Based on focus group responses, it is not common where an individual alone can provide for their housing and support services needs, even when receiving SSI, Medicaid and other government supports. Most families indicated that they provide additional financial support, and assistance with procuring and maintaining supportive services. Families also noted discrimination of apartment managers, providing examples when managers said no to disabled applicants who were looking to live in what would be an integrated setting. This indicates both a supply and a discrimination issue.</p>	<p><b>Medium</b> - As mentioned above, more support services are needed to allow for integrated, and independent living.</p>
<p><b>Lack of assistance for housing accessibility modifications</b> Modifications for tenants of properties in federally subsidized units is more common, in particular those managed by one of the housing commissions and/or Avalon Housing, MAP and other non-profit developers. Focus group participations have noted varying responses in the private sector. The Fair Housing Center of Southeast and Mid Michigan (FHC) noted that in their experience with many local building departments are not enforcing federal fair housing requirements as part of multifamily development, citing a lack of jurisdiction.</p>	<p><b>High</b> - Reinstating the County ADA ramp program and investigating additional supports for modifications for both renters and buyers is needed.</p>
<p><b>Lack of assistance for transitioning from institutional settings to integrated housing</b> Washtenaw County Community Mental Health staff report lack of resources for transition, and are looking to participate in broader discussions on providing additional supports.</p>	<p><b>Medium</b> - Several categories of support listed are connected and would benefit from a coordinated approach to planning and service delivery.</p>
<p><b>Land use and zoning laws</b> The prevalence of single-family zoning districts makes up the bulk of zoning districts throughout the region and limits the housing choices, price point and availability to populations most in need of housing. In some cases, there have been efforts to</p>	<p><b>Medium</b> - Working with providers to identify limitations on location can help support recommendations to local jurisdictions. Education and advocacy can help</p>

<p>limit the number of affordable units or use of HCV through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p> <p>As part of the prevalence of single family districts, there are limitations on group home placement. There are often negative associations with group housing and similar housing types, making it difficult to have them approved even as a conditional or special use.</p>	<p>residents understand the need for group homes and other similar supportive housing types.</p>
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### Identifying and Prioritizing Contributing Factors of Fair Housing Enforcement, Outreach Capacity and Resources Contributing Factors

Contributing Factor	Prioritization and Justification
<p><b>Lack of resources for fair housing agencies and organizations</b></p> <p>Currently the FHC’s funding for outreach and enforcement is limited to that of the federal government, specifically HUD. In a stakeholder interview, key staff noted that more resources are always needed, but uncertainty rises due to the current federal political climate. The number of complaints recorded in 2016 was at the highest level in 20 years. And as of August, the rate of complaints coming into FHC is at a rate 2 weeks ahead of 2016.</p>	<p><b>High</b> - The number of complaints recorded in 2016 was at the highest level in 20 years. And as of August, the rate of complaints coming into FHC is at a rate 2 weeks ahead of 2016.</p> <p>The ability to investigate and enforce is limited by resources.</p>

In light of the contributing factors above, as well as the priorities listed, the goals were developed as a means to directly address the core issues. Implementation or work toward the goals is intended to be a collaborative effort including all Urban County local jurisdiction members, other local units, county departments, non-profit partners, the Ann Arbor and Ypsilanti Housing Commissions, and other partner agencies and neighborhood and community groups. The collaborative approach is essential when tackling difficult and long-standing community problems, especially in an era of uncertain funding and changing priorities.

The goals defined in the AFH Plan represent a critical step toward increased fair housing opportunities. The AFH Plan will inform the County’s next Five-Year Consolidated Plan for Fiscal Years 2018 - 2022. Throughout this process, OCED and AAHC remain committed to community participation. The AFFH rule envisions an ongoing dialogue between the public and recipients of HUD funds. Staff looks forward to continuing the AFFH conversation with Washtenaw County residents over the next five years and beyond.



## Fair Housing Goals

Guided by the contributing factors and prioritization of these factors, the following includes the Fair Housing Goals, which will be incorporated into OCED's 5-year consolidated plan. Each goal identifies strategies, its priority, a timeframe and measurement of achievement, as well as the contributing factors and fair housing issues. Responsible Program Participants are also included for each goal, as OCED and AAHC plans to work with the existing network of local units, agencies, and partnerships to reach the goals below.

For prioritization, the subcommittee determined high priority goals being important and attainable within 5 years. Goals prioritized as a low priority address more complex issues, which may require more preparation and time to truly address the fair housing issue it addresses.

<b>Goal 1: Align development practices and policies to encourage more affordable housing development in high market areas</b>		
<b>Discussion:</b> Policy and regulation decisions can either ease or make more difficult the ability to develop affordable housing. These strategies are intended to improve the process throughout zoning, policy, and other regulatory changes.		
<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
Zoning:		
1.1 Encourage accessible affordable housing units near transit or other key services at activity centers through zoning changes e.g. Transit-oriented developments (TOD)	<b>Medium/High Priority</b> 1-2 years	Review of ordinances and/or draft ordinances. City of Ann Arbor expecting to draft ordinance changes by spring 2018
1.2 Support local units to implement zoning strategies to develop housing products (i.e. duplexes, accessory dwelling units) in single-family neighborhoods	Low Priority 1-5 years	Issue discussed by relevant governing bodies (board and/or commissions) and/or drafted ordinance changes
Policy:		
1.3 Encourage the use of publicly owned land in high opportunity markets for affordable housing or proceeds go toward affordable housing development	Medium Priority 1-5 years	Review of locations and ownership of public land (could include school, university or other public agencies). Could include identification of parcels for disposition
1.4 Prioritize public subsidies/incentives (i.e. brownfield development) for affordable housing developments in high opportunity markets	Medium Priority 1-5 years	Review and/or changes to policies related to incentives or subsidies.
1.5 For publicly supported housing, coordinate rental inspection process between HUD, MSHDA, and local regulations to avoid duplicative administrative burden	Low Priority 1-5 years	Review requirements and potential overlap between inspecting agencies. Potentially change inspection policy in relevant local units.
<b>Contributing Factors:</b> Lack of affordable, accessible housing in a range of unit sizes; Location and type of affordable housing; Land use and zoning laws; Community opposition		
<b>Fair Housing Issues:</b> Disproportionate Housing Needs; Segregation/Integration		
<b>Responsible Program Participants:</b> Reimagine Washtenaw, City of Ann Arbor, City of Ypsilanti, local units, OCED, WCRBA		

**Goal 2: Coordinate public and private investments in low opportunity areas**

**Discussion:** Low opportunity areas have not received the same public and private investment to provide support and amenities to residents. Strategies below are intended to encourage revitalization without gentrification.

Strategies	Priority/Timeframe of Action	Measure of Achievement
2.1 Prioritize and incentivize infill development for home ownership in lower opportunity markets (City of Ypsilanti Neighborhood Enterprise Zone (NEZ), Youthbuild in YTown)	Medium Priority 1-5 years	Inquiries and/or new infill single-family or duplex development in lower opportunity areas.
2.2 Engage with Community Reinvestment Act Committee in Washtenaw County to align efforts with County housing and economic development priorities	Medium priority Annual	Regular participation by OCED and partner agencies and communities on local Reinvestment Act Committee
2.3 Support and prioritize CDBG funds as follows: <ul style="list-style-type: none"> <li>● Placemaking and community infrastructure improvements</li> <li>● Commit program income to projects in RECAP areas</li> </ul>	<b>High Priority</b> Year 1; Ongoing	As part of upcoming 5 year consolidated planning process: 1- Review CDBG priority project funding, potentially providing points for placemaking projects in low-opportunity areas 2- CDBG program income annually committed to projects in R/ECAP areas
2.4 Provide resources such as technical assistance, volunteer services, and possible grants that low-income older adult homeowners can use to avoid property code violations (i.e West Willow and Sheriff's Office).	Medium 1-5 years	Track use of sheriff department snow removal service; track number of participants in West Willow senior support program;
2.5 Provide and share models (promising practices) for addressing blight and/or neighborhood stabilization practices in low opportunity areas	Low Priority 1-5 years	Summary document of strategies prepared and available including contact info to relevant local experts.

**Contributing Factors:** Lack of private investment in specific neighborhoods; Lack of public investment in specific neighborhoods, including services or amenities; Access to financial services; Deteriorated and abandoned properties; Lack of community revitalization strategies

**Fair Housing Issues:** Disproportionate Housing Needs; Disparities in Access to Opportunity; RECAPs; Segregation/Integration

**Responsible Program Participants:** Housing Bureau for Seniors, Urban County Executive Committee, Local units, City of Ypsilanti, Ypsilanti Township, OCED, Sheriff's Office, Habitat for Humanity of Huron Valley

**Goal 3: Improve options for housing voucher holders to move to opportunity**

**Discussion:** A concentration of housing choice voucher use on the east side of the county is a result of lower rents coupled with availability of single family houses for rent. These strategies are intended to provide balance in usage while aiding individual households to have a broader choice in where to find housing.

Strategies	Priority/Timeframe of Action	Measure of Achievement
3.1 Support for HUD rule implementation (i.e. administrative fees) to help MSHDA fund a voucher counselor for Washtenaw County and create a Counselor position at the Ann Arbor Housing Commission	<b>High Priority</b> 1-2 years	Local units contact federal representatives (and others to encourage implementation of rule change.
3.2 Review small-market area rule to see if adjustments would benefit voucher-holders	Low Priority 1-2 years	Options developed and considered by local units and Ann Arbor Housing Commission.
3.3 Review local housing authorities' process for administering Rent Reasonable Tests	Medium Priority 1-2 years	Options for tests reviewed, and potential changes considered and/or adopted.
3.4 Advocate changes in HUD rules to allow increase in voucher amounts in lower poverty areas (payment standards with 110% limit)	Medium Priority 1-5 years	Local units contact federal representatives and/or MSHDA about increasing voucher percentage applied in high opportunity markets. .
3.5 Outreach of "Voucher to Home-Ownership" program in single-family neighborhoods with high concentration of voucher use	Medium Priority 1-5 years	Update to marketing materials. Contact with landlords in single-family neighborhoods to see if they will consider selling; Marketing to voucher holders in same single family neighborhoods

**Contributing Factors:** Land use and zoning laws; Impediments to mobility; Quality of affordable housing information programs; Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

**Fair Housing Issues:** Disproportionate Housing Needs; Publicly Supported Housing; RECAPs; Segregation/Integration

**Responsible Program Participants:** Ann Arbor Housing Commission, Ypsilanti Housing Commission, HUD, MSHDA, OCED, local units

<b>Goal 4: Add and preserve affordable housing stock</b>		
<b>Discussion:</b> The need to add and preserve affordable housing stock is universally agreed upon among local units. Strategies below support the goals developed from the 2015 Housing Affordability and Economic Equity Analysis.		
<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
4.1 Develop strategy to maintain affordability for rental housing that is reaching the end of their affordability period (LIHTC)	<b>High Priority</b> 1-5 years	Inventory completed. Plan developed for intervening when possible..
4.2 Track inventory of committed affordable units in Ann Arbor, Pittsfield Township, City of Ypsilanti and Ypsilanti Township	<b>High Priority</b> Ongoing	Make additions and subtractions annually, and making net changes public.
4.3 Explore strategies to preserve affordability (e.g. community land trusts)	Medium Priority 1-5 years	Explore strategies like community land trusts (specifically Baltimore and other low market areas).
4.4 Explore strategies to create regular funding stream for affordable housing fund(s)	<b>High Priority</b> 1-5 years	Determine options, explore implementation of each with both City of Ann Arbor, Washtenaw County and others.
4.5 Track progress of goals from Housing Affordability and Economic Equity Analysis Report, specifically to: <ul style="list-style-type: none"> <li>● Add 140 units per year in City of Ann Arbor</li> <li>● Add 17 units per year in Pittsfield Township</li> <li>● Add/grow 69 College-educated residents per year in City of Ypsilanti</li> <li>● Add/grow 140 College-educated residents per year in Ypsilanti Township</li> </ul>	<b>High Priority</b> 1-5 years (20 year goal)	Affordable Hourdable/Equity Leadership team creates annual reports for implementation of plan <ul style="list-style-type: none"> <li>● Continue creation of annual work plan</li> <li>● Track successes and challenges</li> <li>● Track overall progress with broad goal as well</li> </ul>
4.6 Encourage local units to request affordable units in new residential developments.	Low priority 1-5 years	Connect with development leads at local units in the urbanized area to support their work to include affordable units in residential development.
<b>Contributing Factors:</b> The availability of affordable units in a range of sizes; Lack of affordable, accessible housing in a range of unit sizes; Location and type of affordable housing; Displacement of residents due to economic pressures; Community opposition		
<b>Fair Housing Issues:</b> Disproportionate Housing Needs; Publicly Supported Housing; Segregation/Integration; RECAPs		
<b>Responsible Program Participants:</b> OCED; City of Ann Arbor; Pittsfield Township; City of Ypsilanti; Ypsilanti Township		

<b>Goal 5: Provide ongoing education and advocacy around fair housing</b>		
<b>Discussion:</b> Frequent turnover of staff and elected officials makes fair housing education and advocacy an ongoing need.		
<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
5.1 Educate and advocate on the benefits of integrated and mixed-income communities	<b>High Priority</b> 1-5 years	Connect local units and interested parties to Washtenaw Alliance newsletter which provides advocacy and education on Affordable housing.
5.2 Amplify Fair Housing Center outreach and education efforts through government and nonprofit partners	Low Priority Annually	<ul style="list-style-type: none"> <li>● Provide local units through Urban County Executive Committee information to include on their website regarding Fair Housing</li> <li>● Assist jurisdictions that are new to the Urban County to collect baseline data regarding fair housing issues.</li> <li>● Choose and provide fair housing education each year to UCEC</li> </ul>
5.3 Provide Fair Housing information to new jurisdictions in Urban County Executive Committee, and include in new member orientation	Low Priority Annually	Update orientation materials to include fair housing information.
5.4 Update Urban County Fair Housing policy to reflect needs and goals	<b>High Priority</b> Annually	Review, edit and adopt updated policy.
5.5 Develop guidebook for local units about legal resources for tenants with criminal background	Medium Priority Annually	Research and develop guidebook, and make it available for local units use.
5.6 Provide annual education and training to local government officials about the needs for more affordable housing	Low Priority Annually	Maintain and update county affordable housing website, and make resources available to local units annually.
<b>Contributing Factors:</b> Lack of resources for fair housing agencies and organizations; Quality of affordable housing information programs; Community opposition		
<b>Fair Housing Issues:</b> RECAPs; Access to Opportunity; Segregation/Integration; Disproportionate Housing Needs; Fair Housing Enforcement, Outreach Capacity, and Resources Analysis		
<b>Responsible Program Participants:</b> OCED, The Fair Housing Center for Southeast and Mid Michigan, Urban County Executive Committee, Local units, WHA		

**Goal 6: Work to increase employment opportunities in low opportunity areas**

**Discussion:** While Washtenaw County performs well on many levels as a great place to live, there is a great disparity between those who prosper and those who don't. Addressing the pockets of high unemployment will help address this disparity.

Strategies	Priority/Timeframe of Action	Measure of Achievement
6.1 Partner with relevant agencies to identify skills gap in the labor market's hiring pipeline and connect residents to training and employment opportunities, particularly in RECAPs and areas with high unemployment rates.	<b>High Priority</b> 1-5 years	Assessment of skills gap completed for county, and for census tracts/neighborhoods with high unemployment.
6.2 Explore targeted hiring and/or training programs from anchor institutions to recruit and train residents in RECAPs and areas with high unemployment rates	<b>High Priority</b> 1-5 years	Connect with local anchor institutions to determine if pilot hiring and training program can be developed to hire from target neighborhoods.
6.3 Explore hiring policies to not exclude individuals with criminal backgrounds <ul style="list-style-type: none"> <li>● Assess hiring process in HR (going beyond Ban the Box)</li> </ul>	<b>High Priority</b> 1-5 years	Follow up with relevant HR departments to determine options and/or find ways to implement changes.
6.4 Local governments and agencies work to hire and train staff that reflects racial and ethnic makeup the communities they serve, including bilingual speakers	Medium Priority 1-5 years	Review racial makeup of employees and board/commission members. Identify strategies to market to diverse populations for both hiring and board and committee appointments.

**Contributing Factors:** Location of employers; Community revitalization strategies

**Fair Housing Issues:** Access to Opportunity; RECAPs; Segregation/Integration

**Responsible Program Participants:** Local units, Michigan Works!, Anchor institutions

**Goal 7: Support educational and personal growth of youth in low opportunity areas**

**Discussion:** There is significant disparity between the various school districts in the county. R/ECAPs and other low opportunity areas have high child poverty, and lack recreational and other opportunities of higher opportunity neighborhoods.

Strategies	Priority/Timeframe of Action	Measure of Achievement
7.1 Coordinate services and programs including recreation activities, mentoring, and experiential learning for youth	Medium Priority 1-5 years	Increase youth programming in R/ECAPs and low opportunity areas
7.2 Support efforts to create equitable county-wide public education system	Low Priority 1-5 years	Explore options and long-range strategy for creating an equitable public education system.
7.3 Increase access to quality child care options for lower opportunity residents	1-5 years	Measurements to be established in upcoming Coordinated Funding grant cycle.

**Contributing Factors:** Location of proficient schools and school assignment policies; Access to proficient schools for persons with disabilities; Lack of private investment in specific neighborhoods; Lack of public investment in specific neighborhoods, including services or amenities; Land use and zoning

**Fair Housing Issues:** RECAPs; Segregation/Integration; Disparities in Access to Opportunity

**Responsible Program Participants:** OCED, WISD, YMCA (and agencies with youth programming), Coordinated Funders, Success by 6, County Parks, City of Ypsilanti, Ypsilanti Township



**Goal 8: Boost existing services to improve accessibility and affordability for persons with disabilities**

**Discussion:** These strategies address the need for accessible, affordable housing for persons with disabilities. In order to focus our efforts on the most vulnerable individuals, certain strategies are focused on people with disabilities who are also experiencing homelessness.

Strategies	Priority/Timeframe of Action	Measure of Achievement
8.1 Restart County Accessibility Ramp Program for owner occupants	<b>High Priority</b> 1 year/ maintain 1-5 years	Review program. Number of accessible ramp applications and number of ramps installed.
8.2 Continue to prioritize resources to develop permanent supportive housing for persons experiencing homelessness	<b>High Priority</b> Annually	Continuum of Care prioritizes permanent supportive housing in funding cycles.
8.3 Review HOME RFP prioritization to encourage affordable homeownership and rental housing preservation and development for persons with disabilities	<b>High Priority</b> 1-5 years	HOME RFP is reviewed and recommendations presented/adopted by Urban County Executive Committee
8.4 Integrate fair housing regulations for multi-family development into review process by working with local building departments to develop a checklist	Medium Priority 1-2 years	Checklist developed and shared with relevant departments.

**Contributing Factors:** Lack of assistance of housing accessibility modifications; Access to publicly supported housing for persons with disabilities; Regulatory barriers to providing housing and supportive services for persons with disabilities; Lack of affordable in-home or community based supportive services; Lack of affordable, integrated housing for individuals who need supportive services; Lack of affordable, accessible housing in a range of unit sizes

**Fair Housing Issues:** Segregation/Integration; Publicly Supported Housing; Disability and Access; Disparities in Access to Opportunity

**Responsible Program Participants:** Continuum of Care, WHA, AAHC, YHC, OCED, Washtenaw County, CIL, Local units

<b>Goal 9: Improve transportation options in low opportunity areas</b>		
<b>Discussion:</b> Transportation is essential to employment and education opportunities as well as quality of life. Strategies below capitalize on existing partnerships with local units and organizations, as well as the Ann Arbor Area Transportation Authority (AAATA), in efforts to improve access to transportation.		
<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
9.1 Support partnerships between local governments, private employers, anchor institutions, and neighborhood organizations to develop transportation options that connect low income and protected populations living in concentrated areas of poverty with job opportunities	Medium Priority 1-5 years	Exploration of other options is considered through both formal and information means. Additional transportation options provided.
9.2 Collaborate with The Ride service to evaluate how transit meets needs for residents in low opportunity areas	<b>High Priority</b> 1-5 years	Review of recent changes completed by The Ride and adjustments made. The Ride develops operational interpretations and metrics for their recent goal change “People throughout the Area have equitable access to opportunity through AAATA services”
9.3 Encourage planning and implementation for multi-modal transportation with emphasis on non-motorized linkages	Medium Priority 1-5 years	Regional non-motorized plans receive regular updates. County supports grant applications for multi-modal transportation and non-motorized linkages.
<b>Contributing Factors:</b> Access to transportation for persons with disabilities; The availability, type, frequency, and reliability of public transportation; Inaccessible buildings, sidewalks, pedestrian crossings, and other infrastructure; Location of accessible housing; Location and type of affordable housing		
<b>Fair Housing Issues:</b> Disparities in Access to Opportunity; Segregation/Integration; RECAPs		
<b>Responsible Program Participants:</b> AAATA, WATS, RTA, Anchor institutions, Local units, Neighborhood Associations		

<b>Goal 10: Create and maintain ongoing resident engagement in R/ECAPs and low opportunity areas</b>		
<b>Discussion:</b> Outreach for AFH helped engage key segments of the county, but ongoing engagement is essential to fair housing and equity.		
<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
10.1 Expand role of Community Action Board resident members to increase two-way flow of communication	<b>High Priority</b> Annually	CAB board members regularly provide updates to community. CAB board members share neighborhood efforts with peers on CAB and Board of Commissioners.
10.2 Connect with residents and stakeholders in areas where outreach was limited, including: Leforge, MacArthur, and Whitmore Lake	Medium Priority 1-5 years	Events held in each community; ongoing communications through Urban County members and neighborhood leaders/ambassadors.
10.3 Support and utilize Washtenaw Public Health neighborhood liaisons	Medium Priority Ongoing	Ensure regular updates from Public Health Neighborhood liaisons are shared with OCED to help inform outreach and program/policy efforts.
10.4 Explore translation services related to outreach for Hispanic/Latino communities, Chinese communities, and other LEP populations	Low Priority 1-5 years	Assess local units' capacity to provide services and materials in languages for our top LEP populations, starting with City of Ann Arbor and Washtenaw County.
<b>Contributing Factors:</b> Lack of community revitalization strategies; Lack of public investment in specific neighborhoods, including services or amenities		
<b>Fair Housing Issues:</b> RECAPs; Segregation/Integration; Disparities in Access to Opportunity; Outreach Capacity and Resources Analysis		
<b>Responsible Program Participants:</b> Community Action Board, Washtenaw County Public Health, OCED, Local units, Neighborhood Association, WICIR		

## COMMUNITY PARTICIPATION PROCESS

As a joint planning process, the Washtenaw County Office of Community and Economic Development (OCED) worked, on behalf of the the Washtenaw Urban County and the City of Ann Arbor Housing Commission (AAHC), to help coordinate and execute the community participation elements of the Affirmatively Furthering Fair Housing Plan.

Staff developed a general timeline and requested that the Urban County and Ann Arbor Housing Commission designate and populate the AFFH subcommittee. Next, staff utilized the HUD AFFH dataset to provide context for the subcommittee as well as subject areas to focus on and potential neighborhoods to explore further. The subcommittee then guided staff to look into additional data for particular areas (see Neighborhood Profiles in the Demographics Chapter) and seek local knowledge through stakeholder interviews, focus groups, and a neighborhood and housing survey.

### Outreach Strategy

Approved by the AFFH Subcommittee and reviewed by the Urban County Executive Committee, staff strategized ways to reach out to both target populations and target neighborhoods in efforts to reach a broad range of audiences through stakeholder interviews, focus groups and surveys. Survey outreach was the most frequent strategy. By population, staff reached out to and partnered with various organizations and local stakeholders serving residents' target groups including older adults, people with disabilities, low-income families, people of color and the Latino community broadly. Additional outreach was done geographically. While the survey was open to all Washtenaw County residents, outreach was specifically targeted in the following neighborhoods:

- City of Ann Arbor: Bryant neighborhood
- City of Ypsilanti: Southside, Leforge, Eastside, Ecorse
- Ypsilanti Township: Gault Village, Sugarbrook, West Willow, Clark Road/Holmes Neighborhood, Ecorse
- Northfield Township: Whitmore Lake
- Superior Township: MacArthur, Clark Road

### Plugging into the Network

Pursuing this outreach strategy, staff collaborated with the following partners in distributing surveys and hosting focus groups:

- **Housing Agencies:** Ann Arbor Housing Commission, Avalon Housing, Fair Housing Center of Southeast and Mid Michigan, Habitat for Humanity of Huron Valley, Housing Access of Washtenaw County, Ozone House, Washtenaw Housing Alliance, Ypsilanti Housing Commission

- **OCED Programs:** Barrier Busters network agencies, Community Action Board (CAB), Community Housing Prioritization (CHP), Continuum of Care (CoC), Foster Grandparent Program, Housing Rehabilitation Program, Senior Nutrition Program, Urban County Executive Committee
- **Community Centers/Networks:** Bryant Community Center, Gault Village Neighborhood Watch Association, Peace Neighborhood Center, Parkridge Community Center, Sugarbrook Neighborhood Watch Association, and the New West Willow Neighborhood Association
- **Youth/Schools:** Mentor2Youth, Washtenaw Community College, Washtenaw Intermediate School District, Ypsilanti Community Schools
- **Persons with Disability:** Ann Arbor Center for Independent Living (CIL), Michigan Ability Partners
- **Older Adults:** Dexter Senior Community Center, University of Michigan Health System (UMHS) Housing Bureau for Seniors, Ypsilanti Meals on Wheels
- **Miscellaneous:** Financial Literacy Program at United Way of Washtenaw County, Offender Success Program at Catholic Social Services of Washtenaw County, Washtenaw County Public Health, Ypsilanti District Library Michigan Branch
- **Local Units of Government:** Urban County members were encouraged to share through their email lists, social media and newsletters.

### Communications

Early on, OCED staff posted a news item on the Washtenaw County ([www.ewashtenaw.org](http://www.ewashtenaw.org)) and the Office of Community and Economic Development ([www.ewashtenaw.org/oced](http://www.ewashtenaw.org/oced)) websites about the AFFH efforts:

## Process underway to develop Affirmatively Furthering Fair Housing Plan

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**The HUD mandated process challenges communities to understand historic racial and economic segregation and find ways to combat it in the future.**

Washtenaw County Office of Community and Economic Development, on behalf of the Washtenaw Urban County, is in the midst of work to develop a local plan to Affirmatively Further Fair Housing.

This exciting effort will push our community to look at historic patterns of segregation and poverty, and further challenge us to work collaboratively to undo some of the policies that have created economic and racial segregation, while focusing on strategies to support residents and work on improving housing and neighborhoods overall. [Click here for a short explanation of the project.](#)

The effort is using census and local data as well as local voices in the form of surveys and focus groups, to source both challenges and strategies to improve the lives of county residents. There are

several ways residents can engage including a survey in English and Spanish. Additionally, the county is looking to host focus groups and community dialogues in target geographies.

This summer the Affirmatively Furthering Fair Housing web page will be the place to check in on progress: [www.ewashtenaw.org/affh](http://www.ewashtenaw.org/affh). Data will be posted as available, meeting notifications and focus area profiles will be posted as they are completed throughout the month of July. Draft plans will start appearing in August, with weekly updates. Please check back frequently.

For more information or to help us host a focus group in your community, contact Sam Olson at [olson@ewashtenaw.org](mailto:olson@ewashtenaw.org) or (734) 544 - 6714.

As previously mentioned, staff worked with existing programs and networks to spread the word of their AFFH progress by posting on social media, asking partners to post on their social media platforms and to include in newsletters, and updating the County's central AFFH webpage: [www.ewashtenaw.org/affh](http://www.ewashtenaw.org/affh). When reaching out to community partners and agencies, staff provided packets containing a one-page summary of AFFH, survey instructions, and 10 hard copies of the Washtenaw County Neighborhood and Housing Survey (see Appendix A).

To promote the survey, staff provided and encouraged partners to utilize social media, websites, and newsletters, using the following blurbs provided by OCED:

Housing and neighborhood stability are central to a successful community. Tell us about your experiences with housing in your neighborhood. Follow our [link to the Washtenaw County Housing and Neighborhood Survey](#). All who complete the survey will have a chance at a \$10 Kroger gift card.

The survey is part of Washtenaw County's work on a plan to Affirmatively Further Fair Housing. To find out more, check out our webpage at [www.ewashtenaw.org/affh](http://www.ewashtenaw.org/affh). If you'd like to engage more, we'd love your help setting up a focus group to talk to residents in your neighborhood. Contact Sam Olson at [olson@ewashtenaw.org](mailto:olson@ewashtenaw.org) or (734) 544-6714.

La vivienda y la estabilidad de un vecindario son fundamentales para una comunidad exitosa. Cuéntenos sus experiencias con la vivienda en su vecindario. Siga nuestro enlace para la [Encuesta de Vivienda y Vecindario del Condado de Washtenaw](#). Todos los que completen la encuesta serán inscritos en un sorteo para ganar tarjetas de regalo de \$10 de Kroger.

Esta encuesta forma parte del trabajo del Condado de Washtenaw para realizar un plan que afirmativamente procure más vivienda justa (AFFH). Para obtener más información, visite nuestra página web: [www.ewashtenaw.org/affh](http://www.ewashtenaw.org/affh). Si desea participar más, apreciaríamos su ayuda creando un grupo de enfoque para hablar

con los residentes de su vecindario. Póngase en contacto con Sam Olson, escriba a [allinteractioolsons@ewashtenaw.org](mailto:allinteractioolsons@ewashtenaw.org) o llame al (734) 544 - 6714.

For focus groups, staff designed flyers for each meeting and advertised them on the AFFH website. Facebook Events were also created in most cases as staff relied on community partners to refer best strategies to outreach to residents. For samples of the outreach materials, see Appendix B.

All meetings, with the exception of the Offender Success Program, were posted on the AFFH website ([www.ewashtenaw.org/affh](http://www.ewashtenaw.org/affh)). The following table lists additional methods in which staff and community partners advertised focus groups:

TABLE 1\_OUTREACH FOR FOCUS GROUPS

	Date	Methods
Bryant	July 19	<ul style="list-style-type: none"> <li>• Postcard mailings</li> <li>• Hard copies posted at Bryant Community Center</li> </ul>
Ann Arbor Center for Independent Living (CIL)	August 1	<ul style="list-style-type: none"> <li>• Community partner shared event internally with staff and program participants</li> <li>• Hard copies posted at CIL</li> </ul>
Parkridge	August 3	<ul style="list-style-type: none"> <li>• Staff created and shared Facebook Event</li> <li>• Hard copies posted at Parkridge Community Center</li> </ul>
Ypsilanti Renters	August 7	<ul style="list-style-type: none"> <li>• Staff created and shared Facebook Event with target group</li> </ul>
West Willow	August 8	<ul style="list-style-type: none"> <li>• Posted hard copies at Community Resource Center</li> <li>• Community Resource Center staff posted on Facebook and Nextdoor.com</li> </ul>
Offender Success Program	August 9	<ul style="list-style-type: none"> <li>• Program staff recruited program participants</li> </ul>
Whitmore Lake ( <i>cancelled</i> )	August 14	<ul style="list-style-type: none"> <li>• Community partner shared flyer with local organizations</li> <li>• Township Supervisor posted hard copies in Town Hall</li> </ul>

Meals were provided at focus groups to value past residents' time and encourage participation. The exception was the Ypsilanti renters, which was added later in the process. Neighborhood liaisons also received a stipend for their time recruiting and facilitating focus groups (Southside and West Willow).

### Assessment of Community Participation Process

There was an overwhelming level of response and support through existing and peripheral networks with survey distribution and focus group coordination. Staff initially planned to conduct

two or three focus groups and use more energy towards distributing surveys. However, after receiving more than anticipated support by sub-committee members and community partners, staff refocused their energy to prepare for nine (9) focus groups.

**Outreach in Leforge:** The Leforge area is almost exclusively multi-family housing. It lacks a neighborhood association or organized tenant group. There are also no social service agencies, churches, businesses, or other assets in place to help coordinate a focus group. All point to a need for organizing and outreach to better serve the residents in the Leforge area.

**Outreach to the Latino Population:** Several county departments including OCED, have developed relationships with Latino community partners. While timing is always a concern, it was especially challenging to outreach to the local Hispanic and Latino populations as political tensions rose in Washtenaw County (and country). With the current political stance on immigration at the national level and ICE raids conducted locally, the climate was not a great for local leaders to focus energy on a housing survey when there were more immediate concerns about deportation, and lack of comfort with government agencies in general. This document lacks the perspective of the Latino community and that there is a real need to hear from Latino residents about their housing experiences. This will be a focus for future engagement as well.

**Outreach in Whitmore Lake:** The focus group in Whitmore Lake ultimately was cancelled due to a lack of RSVP's from residents. More time was needed for the meeting. Whitmore Lake area will be a future focus for outreach and engagement.

**Focus Groups for Residents Only:** There were a few ways in which staff promoted focus groups, including posting on the AFFH webpage, creating Facebook page events, and working with local leaders to hand out fliers and personally invite residents. Staff followed the lead of each community liaison in determining the most appropriate style for inviting participants. One lesson learned related to focus groups is that with broad promotion, people from surrounding areas (or with a vested interest in a particular neighborhood) chose to attend the meetings intended for residents only. As a result, in two occasions, two focus groups were conducted at the same time, with one focused on residents and facilitated by the community liaison and the second for non-residents with a staff facilitator. The resident-only focus groups were important to create an environment conducive for residents to provide honest reflections in the company of neighbors rather than staff or elected officials, for example.

**Opportunity Knocks:** While there are many existing partnerships in the community, staff was able to identify potential partnerships for further development, including organizations and local stakeholders serving resident target groups, such as low-income families, people of color, the Latino community broadly, foreign-born residents, and residents with limited English proficiency (LEP).



## Summary of Focus Groups

A total of nine (9) focus groups were conducted with a total of 68 participants. Of the 68 participants, just over half (53%) were homeowners, 40% were renters, and the remaining 7% were in temporary housing provided by the Offender Success Program, which assists people coming out of prison with re-entry to the community.

A breakdown of the focus group participants by target neighborhood and target population is shown below (Table 2). It should be noted that four (4) of the West Willow and five (5) of the Parkridge focus group participants were not residents of those specific neighborhoods. To the extent possible, these individuals were moved to a “non-resident” focus group so that residents could speak amongst themselves in their own focus group.

TABLE 2\_BREAKDOWN OF FOCUS GROUP PARTICIPANTS

Target Neighborhood/ Population	Number of Participants	Number of Owners	Number of Renters	Program Participants
Bryant	15	10	5	-
West Willow	16	16	0	-
Ypsilanti Renters	9	0	9	-
Parkridge	17	9	8	-
CIL	6	1	5	-
Offender Success	5	0	0	5
Total	68	36	27	5

### How Residents Learn About Resources in Their Neighborhoods

(i.e. childcare, jobs, bus routes, events, etc.)

Most groups noted that they learn about resources through word of mouth, news (online, print, and/or TV news), community newsletters, and online/social media (i.e. Facebook, Nextdoor, Instagram, email, blogs). Four of the nine groups mentioned public radio as a source of information they rely on, and in a few cases residents mentioned that they learn useful information from bulletin boards in local establishments such as public libraries or grocery stores or from marquees at the local public school. In four of the nine groups, some residents also rely on a local non-profit to keep informed.

### Renting vs. Owning and Perspectives on Affordability

- The majority of homeowners felt that their home was affordable (including mortgage, property taxes, home insurance).
- Nearly a quarter of the homeowners (8 out of 36 people) noted having already paid off their mortgage. This subset was among the owners who felt their housing was affordable.
- Approximately 55% (20 out of 36) of the homeowners had owned their homes for more than 10 years, while only 22% (or 8 people) were new homeowners having owned for 5 years or less.
- Not all of the focus groups consisting of renters were asked if they feel their rental housing is affordable to them, but some observations about affordability for renters include:
  - Renters living in the Parkridge neighborhood all felt that their rent was affordable.
  - Renters with disabilities generally felt that their rent was *not* affordable, regardless of where they lived within the County.
  - In the Ypsilanti renters focus group - affordability was the #1 concern, with several participants noting annual rent increases since the end of the recession. Many were concerned about being pushed out of the Ypsilanti area due to increased rents, and most desired to continue living in the area.
  - The Ypsilanti renters group also noted, when pressed, that income is a connected issue to affordable housing with examples of nonprofit and retail/service jobs paying below a living-wage.

### Biggest Expenses Beyond Housing

With the exception of the focus group with formerly incarcerated individuals, all the groups were asked the question, “After housing, what is your next biggest expense?” Response categories below (Table 3) are not mutually exclusive, as several respondents named more than one expense category.

Utilities, food and dining, transportation costs (primarily car payments and auto insurance premiums), and student debt were the most commonly cited expenses that pose the biggest burden to residents aside from housing.

TABLE 3\_BIGGEST EXPENSE BEYOND HOUSING (FOCUS GROUP RESPONSE)

<b>Biggest Expense Category (Beyond Housing)</b>	<b>Count</b>
Utilities (including basic utilities, plus cable/phone/internet)	10
Food/groceries/dining	8
Auto expenses (insurance, car payments)/Transportation	7

Student debt/tuition	7
Children (i.e. child care, child support, tuition)	5
Medical (Healthcare)/Premiums/Hospital bills	4
Insurance	3
Home maintenance	3
Travel/Entertainment	2
Financial support for grown children	1
Clothing	1
Purchase of land	1
Business Expenses	1

### Limitations or Challenges Faced When Looking for Housing

The phrasing of questions related to limitations or challenges experienced when last looking for housing (whether to rent or own) varied from group to group depending on the flow of the discussion; however, the responses were primarily negative across all groups. With regard to limitations, not surprisingly, the most frequently mentioned issue was lack of income to afford a place that they wanted to rent or buy. Within this theme, some noted inability to afford the down payment or deposit. In some groups, the participants were also asked if they felt they had ever been treated differently than other applicants. Factors mentioned with regard to different or discriminatory treatment and/or other limitations while looking for housing in the past included the following:

- Credit scores (mentioned in 3 groups)
- Level of Diversity (or lack of), i.e. feeling uncomfortable by being one of very few people of color in neighborhood (mentioned in 2 groups)
- Sexual Orientation/Lack of LGBTQ friendliness (mentioned in 2 groups)
- Lack of accessibility for people with disabilities (i.e. no walk in shower, no curb cuts, broken elevator, etc.)
- Family status, i.e. renting with kids
- Race
- Age
- Stigma of Section 8 vouchers

For more details about the focus groups, see Appendix D.

## Summary of Survey Results

The Washtenaw County Housing and Neighborhood survey was open from July 5 through August 14, 2017. The Ann Arbor Housing Commission mailed hard copies of the survey to 600 voucher households while staff attended OCED program meetings and training sessions to present on AFFH and request assistance with distributing surveys. Additionally, staff and community partners posted the survey on Facebook, Twitter, agency websites, and newsletters. The survey was also mentioned in news outlets, including MLive on July 25 and Washtenaw NPR Public Radio on July 17 (See Appendix E).

Staff received a total of 788 survey responses. The online version of the survey, made accessible via surveymonkey.com, received 484 (61.4%) responses. Staff received 304 paper surveys (27.9%), which included 84 (10.7%) from Ann Arbor Housing Commission's voucher household population, and the remaining 220 from distribution by community partners and OCED programs.

### Demographics of Survey Participants

The majority of survey participants live in zip codes 48197, 48198, and 48103, representing the City of Ypsilanti, Ypsilanti Township, Superior Township, Pittsfield Township, City of Ann Arbor, Scio Township, and parts of Freedom Township and Augusta Township.

Below are responses to questions regarding age, gender, race, ethnicity, education attainment, employment status, disability status, etc.:

How old are you?

Under 18	1	0%
18 to 24	16	4%
25 to 34	99	22%
35 to 44	115	26%
45 to 54	74	17%
55 to 64	68	15%
65 to 74	58	13%
75 to 84	9	2%
85 and older	3	1%

What gender do you identify with?

Male	134	25%
Female	371	70%
Transgender	3	1%
Prefer not to answer	25	5%

What race do you identify with?

American Indian or Alaskan Native	51	4%
Asian	21	2%
Black or African American	239	19%
Native Hawaiian or Pacific Islander	7	1%
White	860	70%
Other	50	4%

Do you consider yourself as Hispanic, Latino, Latina, or of Spanish origin?

Yes, Hispanic/Latino/Latina/Spanish origin	32	5%
No, not Hispanic/Latino/Latina/Spanish origin	679	95%

Which of the following is your highest level of education?

Some or no high school	33	4%
High school graduate or GED	92	12%
Vocational/technical school after high school	20	3%
Some college	187	25%
College Graduate	408	55%

Which of the following best describes your current employment status?

Full time	301	41%
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Part time	82	11%
Looking for work	33	5%
Unable to work due to a disability	73	10%
Stay-at-home caregiver or parent	26	4%
Retired	193	26%
Student	11	2%
Other	10	1%

Including you, how many people 18 years of age or older live in your household?

Median	2
Minimum	0
Maximum	8

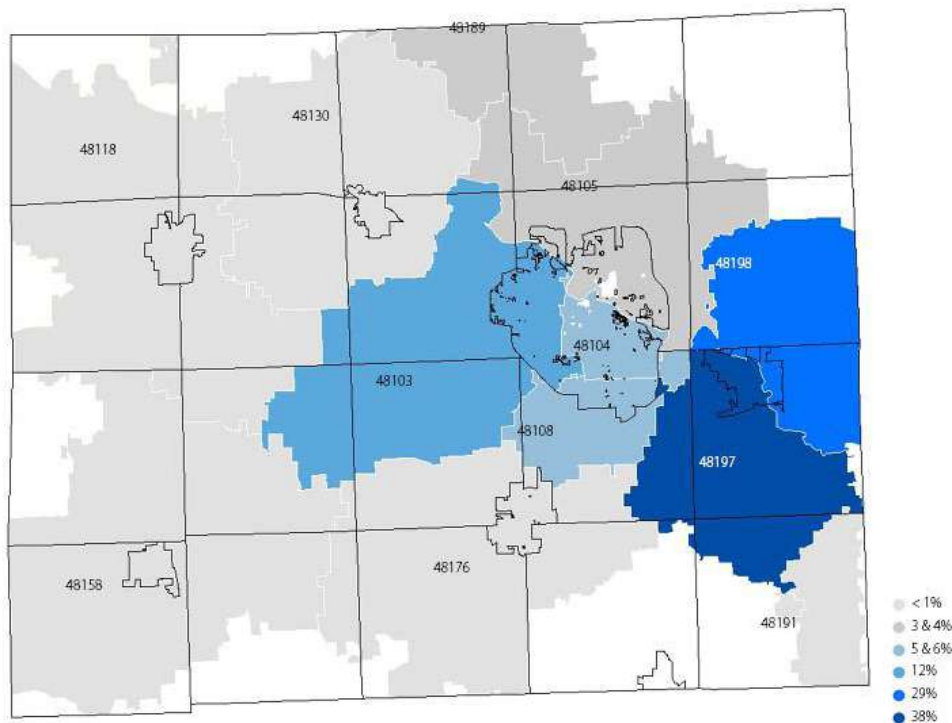
How many children under 18 years of age live in your household?

Median	0
Minimum	0
Maximum	9

Are you, or is someone in your household, living with a disability?

Yes	241	33%
No	486	67%

In what zip code do you currently live?



For more survey results, see Appendix F.

### Public Hearings on Draft Assessment of Fair Housing

Staff held two public hearings: one at the Washtenaw Urban County Executive Committee meeting on Wednesday, August 2, 2017 and the other at the City of Ann Arbor Housing and Human Services Advisory Board meeting on Thursday, August 10. No comments were made at the Urban County Executive Committee.

At the Housing and Human Services Advisory Board meeting on August 10th, the following questions and comments were received:

- This (AFH Plan) is mandated from HUD, right?  
Staff response: Yes, from the Obama-era HUD.
- What do you think you'll use this data for later on?  
Staff response: We will use this data for neighborhood profiles and for studies on gentrification. We'll hopefully have good benchmarks to use when people want to focus on these sort of problems.
- Are you breaking down (survey) results by sub populations?

Staff response: Yes, we are. We plan on sharing back with communities or groups where there was a large response rate, for example the Ann Arbor Housing Commission respondents.

- Do you have any community profile reports?

Staff response: Yes, some are posted on [www.ewashtenaw.org/affh](http://www.ewashtenaw.org/affh). We have about four profiles that are final, and they have the census information going as far back as the 1960s for race, differences in unemployment, and income. In addition, there are information on changes in housing value and rentals, how neighborhoods changing and transitioning, and more. All will be posted online when completed.

- In regards to the area above Plymouth Rd:

Staff response: The new housing is very different (upper-middle class) from the neighborhoods there and is seemingly taking over the neighborhood. It didn't seem like much planning was done about that and could have negative consequences. The north side used to be a lot of minorities, but new areas don't seem like that at all.

- Is zoning in Ann Arbor listed as barrier?

Staff Response: Yes, as well as development fees as we have discussed previously here.



## Assessment of Past Goals and Actions

Washtenaw Urban County completed its last Analysis of Impediments (AI) in November 2011. The list of recommendations in the AI was extensive, and in many ways presented a portrait of the ideal scenario for Fair Housing education, communication, advocacy, enforcement and action.

Many recommendations were taken, and completed either partially or in full. Others were not taken up for a variety of reasons, including a change to department structure, a loss of county planning function. Some recommendations were considered low priority and others yet may have been lost sight of due to significant staff turnover in the primary Urban County staffing positions. Below details the complete list of recommendations outlined in the 2011 AI report, including actions taken for each recommendation. Note: a recent survey was sent to current Urban County members to gather further information regarding what actions were taken in each respective jurisdiction.

TABLE 4\_PAST RECOMMENDATIONS FROM ASSESSMENT OF IMPEDIMENTS (AI), 2011

Recommendation	Actions Taken
<p><b>1. Baseline Data:</b> New jurisdictions should conduct a baseline “audit” of their status related to fair housing, including looking at their ordinances, web site, publications, and master plan.</p>	<p>Inconsistent application. Reviewed for urban areas as part of 2015 Housing Affordability and Economic Equity. This goal is to be carried over for new communities joining in 2018, and potentially create a template.</p>
<p><b>2. Awareness:</b> Every jurisdiction should prominently display—both in their offices and on their web sites—information about fair housing, and about how to access fair housing services.</p>	<p>Recent survey indicated that local jurisdictions are aware of Fair housing and how to find more information, but are not consistently sharing information in print and online.</p>
<p><b>3. Diversity:</b> Every governmental unit in the county should be working to make itself accessible to all residents, regardless of their race, ethnicity, color, religion, family status, disability, national origin, or sex.</p>	<p>Aside from barrier-free buildings noted in #4 below, staff does not currently have a reliable measure for this recommendation. Needless to say, much work is still needed on improving accessibility across these protected classes.</p>
<p><b>4. Accessibility:</b> Every governmental unit in the county should work to make itself user-friendly to people with disabilities.</p>	<p>Recent survey indicated that most government buildings are barrier free. Other “user-friendly” features vary.</p>

<p><b>5. Curb Cuts and More:</b> New sidewalk construction needs to meet the ADA requirements. Curb cuts are an excellent example of how planning for persons with disabilities enhances the livability of a community and sets a welcoming tone- not just for people with disabilities but also for people pushing strollers.</p>	<p>The Ann Arbor Center for Independent Living has received judgements in a series of cases in local communities, resulting in renovation or addition of ADA curb cuts. OCED is working with several of these communities to use CDBG funds to complete or improve pedestrian facilities such as sidewalk, ADA ramps, and non-motorized path additions.</p>
<p><b>6. Definitions of Family:</b> Family definitions in zoning ordinances should include functional families and relationships such as adoption and foster care.</p>	<p>Staff reviewed zoning ordinances and 17 out of 18 jurisdictions provided definitions that include functional family. Seventeen out of 18 were also clear that adoption is part of a family; however, only three (3) of 18 jurisdictions explicitly included foster care.</p>
<p><b>7. Zoning Definitions:</b> Zoning definitions that address the kind of facilities in which senior citizens and persons with disabilities live should be reviewed and revised, as necessary, to ensure that:</p> <ul style="list-style-type: none"> <li>1) they are compatible with civil rights laws (including FHAA and the Elliott-Larsen Civil Rights Act), state law, and the Americans with Disabilities Act; and</li> <li>2) they are respectful of the people or citizens served.</li> </ul>	<p>No review has been conducted to date.</p>
<p><b>8. Planning Process:</b> Staff and elected officials must work to ensure that the planning process is free of bias.</p>	<p>Previously, the County Planning Advisory Board provided input and oversight into master planning for communities across the county. However, the board, and the department that provided staffing and support, has been defunded by the county.</p>
<p><b>9. Master Plans:</b> All jurisdictions should include information about the community's racial and ethnic makeup, as well as thoughts and plans regarding affordable housing and housing for older adults, in the master plans.</p>	<p>As a standard practice for master plan and master plan updates, the 2015 Housing Affordability and Economic Equity Analysis was adopted by the City of Ann Arbor, City of Ypsilanti, Ypsilanti Township, Pittsfield Township Ann Arbor DDA and Washtenaw County.</p>

<p><b>10. Promoting Accessibility through Building Codes:</b> Federal Fair Housing Amendments Act Accessibility Guidelines for new construction of multi-family dwellings should be made available from local building departments. In addition, while localities are not currently responsible for enforcement, they should consider ways to make the law clearer to those going through the multi-family building process.</p>	<p>Previous conversations indicated that several local building departments do not feel they have the authority to enforce federal fair housing rules, outside of Michigan Building Code.</p> <p>Several tools such as checklists could be developed (as a future goal) to provide clear information to officials and developers about legal requirements.</p>
<p><b>11. Public Parks, Private Parks:</b> Localities should have as their goal, the provision of access to all residents to park land.</p>	<p>Larger local units have a separate parks master plan, updated every 5 years. County parks also develop a parks plan every 5 years. Most plans are looking to add, expand and/or connect parks to communities.</p>
<p><b>12. Fair and Open Housing Ordinances:</b> All jurisdictions should consider adding Fair and Open Housing ordinances if they do not already have them on their books. These ordinances should include a reference to federal and state law, and in addition, should protect source of income and sexual orientation.</p>	<p>Recent survey indicated that the majority of jurisdictions do not currently have a local Fair and Open Housing ordinance in effect.</p>
<p><b>13. Diversity on Commissions:</b> In recruiting for these commissions, and in appointing members of commissions, those who make the appointments should look for a set of members that represents the diversity of the communities, including an awareness of race/ethnicity, gender, and disability. In addition, members of these boards and commissions should receive training on fair housing and civil rights annually.</p>	<p>Washtenaw County is undergoing an equity initiative which includes reviewing hiring practices, agency cultures and requirements for both staff and boards and commissions. While this work is ongoing, the county has committed to training through the Government Alliance on Race and Equity and is looking to adopt a countywide equity ordinance in 2018, which will require many of these elements in its implementation.</p>
<p><b>14. Jurisdictional Banking Choices:</b> Jurisdictions should investigate their institutions' banking practices, and either choose financial institutions based on their community-mindedness, or encourage their current bank to invest significantly in their community.</p>	<p>This goal was not completed, and has been identified as a recommendation by the AFFH subcommittee to continue, especially in regard to the Community Reinvestment Act (CRA).</p>

<p><b>15. Rural Housing Investment:</b> The Urban County as a whole, and/or specific jurisdictions that qualify for Rural Housing Service programs, should investigate their applicability to their local areas. In some cases, they may help allow current residents to stay in that jurisdiction (i.e. Northfield, Salem, Scio, and York Townships).</p>	<p>OCED is a member of Washtenaw Housing Education Partners (WHEP). This group provides homebuyer and education support throughout the county, and utilizes USDA rural loans when appropriate.</p>
<p><b>16. Transportation:</b> The Urban County Consortium should investigate ways to ease transportation problems for people in their home jurisdictions, whether through participation in the county-wide transit planning process or with specific actions targeted at particular jurisdictions.</p>	<p>Since the 2011 AI, the Ann Arbor Area Transportation Authority (The Ride) has greatly expanded its funding base, board and transit service. In particular, service has been expanded and redesigned for the east side of the county, which is lower-income and more dependent on mass transit than other areas.</p>
<p><b>17. Prayer at Public Meetings:</b> Although it is not illegal to do so, if prayers are offered at public meetings, care should be taken to ensure that they are non-denominational and do not refer to any particular religion.</p>	<p>Not applicable.</p>
<p><b>18. Funding:</b> The City of Ann Arbor should continue to fund fair housing enforcement.</p>	<p>Washtenaw County OCED is now the Community Development arm of the City of Ann Arbor. Any funding would likely come through OCED.</p>
<p><b>19. Human Rights/Relations Commission Websites:</b> The Human Rights Commission/Human Relations Commission web sites should be maintained, and a more adequate referral system should be set in place.</p>	<p>At least two (2) communities (out of 18) have a Rights Commission/Human Relations Commission and both have up-to-date websites, but only one includes clear referral information.</p>
<p><b>20. Housing Commission Training and Websites:</b> All Housing Commission employees at both housing commissions should be fully trained, annually, in fair housing law. Web sites should be fully maintained with up-to-date information and meeting minutes.</p>	<p>Ann Arbor Housing Commission trains all employees annually in fair housing law and their website is current with a link to meeting minutes.</p> <p>Ypsilanti Housing Commission (YHC) uses private property managers instead of its own employees to administer housing programs. All of the property managers are trained annually in fair housing law by their regional manager who is a qualified fair housing trainer. The YHC website</p>

	is current with a link to meeting minutes.
<b>21. Updating Zoning Ordinances:</b> As zoning ordinances are updated and overhauled, the involved parties should be careful to ensure that they pay attention to Fair Housing Law.	The County has no jurisdiction over individual communities' zoning ordinance changes.
<b>22. Student Housing:</b> Although the intent of the ordinance is not a problem, it is critical that Ypsilanti remain vigilant to ensure that landlords in the student overlay district do not believe that this allows them to exclude non-students of any age, or students with children, from the area.	The City of Ypsilanti removed the zoning overlay district from their zoning ordinance in 2015.
<b>23. Supportive Housing Ordinance:</b> Section 122-811 of the City of Ypsilanti Zoning Ordinance is a barrier to equal housing opportunity for people with disabilities, or for others who might otherwise be helped by a supportive housing environment. The Fair Housing Center of Southeast and Mid Michigan (FHC) strongly recommends that the City of Ypsilanti rescind this ordinance.	Previously, supportive housing was allowed as only a special use permit. Changes in 2015 expand where supportive housing is allowed as a special use, but also include it as a permitted use in the housing and human services zoning district.

TABLE 5\_RECOMMENDATIONS FOR WASHTENAW COUNTY/URBAN COUNTY GOVERNANCE, 2011

Recommendation	Actions Taken
1 Assist jurisdictions that are new to the Urban County to collect baseline data regarding fair housing issues.	This is not consistently applied- to continue this goal for new jurisdictions.
2 Provide training for local officials on Fair Housing Law as it pertains to building codes, zoning, planning and land use.	The county does not currently provide training for practitioners, but does ongoing training for Urban County Executive Committee members.
3 Create materials for all building departments to aid builders/developers in compliance with Fair Housing Amendments Act accessibility requirements.	The county does not currently provide training for practitioners, but does provide ongoing training for Urban County Executive Committee members.
4 Conduct a periodic review of all local regulations pertaining to building codes,	Washtenaw County no longer funds a planning department, so there is no longer staff nor

<p>zoning, planning and land use.</p>	<p>resources available for such a review at this time.</p>
<p>5 Provide basic training for Building, Planning, and Zoning staff on the accessibility requirements written into the Fair Housing Amendments Act.</p>	<p>Washtenaw County no longer funds a planning department, so there is not staff and resources available for such a review at this time.</p>
<p>6 Encourage local jurisdictions to involve members of the disability rights community in building, planning and zoning decisions/issues.</p>	<p>Since the Center for Independent Living (CIL) lawsuits, the CIL is involved in more transportation decisions, at a minimum.</p>
<p>7 Have a list of fair housing experts available to consult with the County on zoning, planning, and land use issues.</p>	<p>The County relies on the FHC for expert advice and referrals.</p>
<p>8 Washtenaw County and local jurisdictions can include community education around fair housing laws in seminars related to building and development, through inserts in newsletters published by the various jurisdictions, and by placing relevant links on their web sites.</p>	<p>OCED will be working with FHC on supporting education and outreach with local units including building and planning departments. This will include making information available in print and online for local units to share with their constituents and stakeholders.</p>
<p>9 Washtenaw County and local jurisdictions can work to educate planning and zoning staff so that they are trained to give clear and consistent information to all citizens, without discrimination.</p>	<p>Washtenaw County no longer funds a planning department, so there is not staff and resources available for such a review at this time.</p>
<p>10 As the county becomes more diverse, Washtenaw County should investigate ways to assist local jurisdictions with translation-related needs.</p>	<p>All public meetings offer translation services on request. For larger events, sign language interpreters are often available.</p>
<p>11 Washtenaw County should continue its pursuit of public, county-owned parkland.</p>	<p>Most jurisdictions and the County are park-rich. This is a goal; however, the use of public land for affordable housing is another identified (and potentially competing) need.</p>
<p>12 Washtenaw County should continue to contract with a private fair housing organization to support fair housing investigation and testing activities within the county.</p>	<p>The FHC provides investigation and testing. They are not currently funded by the Urban County.</p>

13 Washtenaw County should consider doing testing, or mystery shopping, of planning and building departments within the Urban County. This would identify any potential problems in the treatment of protected classes. For instance, if a white person and a black person both request information on building a new home, are they given the same information?	Washtenaw County cannot test per federal rules. However, the FHC provides investigation and testing throughout the county.
14 Washtenaw County should encourage the banks (in which it invests) to invest in Washtenaw County.	Washtenaw County convened a group to examine local investing and has encouraged the County Treasurer (who is responsible for county investing) to pursue. No local investments have been made to date.
15 Washtenaw County should ensure that any banks in which it invests have minimal CRA ratings of Satisfactory, and preferably of Outstanding.	AFFH subcommittee has expanded this goal around CRA investment.

In addition to individual actions noted in the table above, in Fiscal Year 2013-14, the Urban County completed a number of administrative actions including:

- Adding a Fair Housing web page for Washtenaw County<sup>1</sup>
- Providing fair housing training to the Urban County Executive Committee;
- Engaging staff in ongoing fair housing training at the Building Communities Conference;
- Supporting the FHC through attendance and sponsorship of their annual meeting (ongoing).

Overall, a fair number of recommendations were implemented as part of ongoing work after the AI was completed six years ago. Many are ongoing tasks around education, outreach and review that would need to be maintained over the long-term as elected officials and local government staff frequently change. These goals would need to be carried on as part of future AFH Plans.

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<sup>1</sup> Fair Housing in Washtenaw County

[http://www.ewashtenaw.org/government/departments/community-and-economic-development/housing-and-community-infrastructure/urban\\_county/fair-housing/](http://www.ewashtenaw.org/government/departments/community-and-economic-development/housing-and-community-infrastructure/urban_county/fair-housing/)

However, some elements recommended in 2011 are more difficult to address due to structural changes to County departments. In 2011, Washtenaw County still maintained a planning division to assist local units with master plan and zoning review, as well as regional planning and governance efforts. This department has since been eliminated and, as a result, the county no longer has the function of (or capacity for) providing formal planning and zoning support to local communities.

For recommendations around education to local units, OCED has engaged the FHC for some education and support, but this funding has not been consistent and projects have tended to be short-term rather than ongoing. At this point, OCED would like to work in closer ongoing collaboration with the FHC to amplify their education and support, particularly among local jurisdictions that meet regularly as part of the Urban County Executive Committee (UCEC).

With respect to physical improvements, OCED works to improve public accessibility for persons with disabilities through the funding of ADA curb cut projects and by requiring compliance with ADA regulations in all construction Requests for Proposals (RFPs). Further, OCED supports housing nonprofits that work to add and to preserve affordable housing the community and support agencies providing services to low-income households. This work is also ongoing and will be included as part of the ongoing work addressed in this and future AFH Plans.

Based on the ongoing nature of many of these recommendations, below are several broad categories that will be carried forward in the current AFH Plan to direct activities over the course of the next five years:

- Ongoing education, outreach and support for local jurisdictions through the Urban County Executive Committee;
- Support for transportation improvements that increase access to opportunity;
- Support for county goals around equity and inclusion including diversifying staff and boards and committees; and
- Implementation of goals of 2015 Housing Affordability and Economic Equity Analysis.



## Demographic Summary

### Key Findings

- Washtenaw County is fairly segregated in that populations of color tend to be concentrated in particular areas and neighborhoods. Many east side neighborhoods, for example are predominantly African American or predominantly white. This is further explored in the chapter on segregation/integration.
- Like the State of Michigan, overall the population is aging and planning will need to accommodate growing housing needs for older adults and persons with disabilities.
- However, unlike other parts of Michigan several communities skew younger due to the location of the University of Michigan and Eastern Michigan University, which puts additional pressure on the existing housing stock.
- Families in poverty are primarily located in east side neighborhoods.
- Overall populations of color are growing, most noticeably Asian, Black and Hispanic. Related, Limited English Proficiency (LEP) is a factor for some Chinese, Spanish and Korean speakers.

## Demographic Summary

The Washtenaw Urban County (Map 1) is a partnership between the Washtenaw County Board of Commissioners and the cities, townships, and villages who have agreed to jointly participate in federally funded programs. Its governing body named the Washtenaw Urban County Executive Committee (UCEC) consists of 18 jurisdictions, including Ann Arbor Township, Augusta Township, Bridgewater Township, City of Ann Arbor, City of Saline, City of Ypsilanti, Dexter Township, Manchester Township, Lima Township, Northfield Township, Pittsfield Township, Salem Township, Saline Township, Scio Township, Superior Township, Webster Township, York Township, and Ypsilanti Township. City of Dexter and Sylvan Township will join in Fiscal Year 2018.

The UCEC prioritizes needs, reviews projects, and makes funding recommendations to the Washtenaw Board of Commissioners and policies that facilitate Washtenaw County's administration of the Community Development Block Grant (CDBG), HOME Investment Partnership (HOME), and Emergency Solutions Grant (ESG) programs.

MAP 1\_PARTICIPATING JURISDICTIONS IN THE URBAN COUNTY EXECUTIVE COMMITTEE, 2015 - 2018

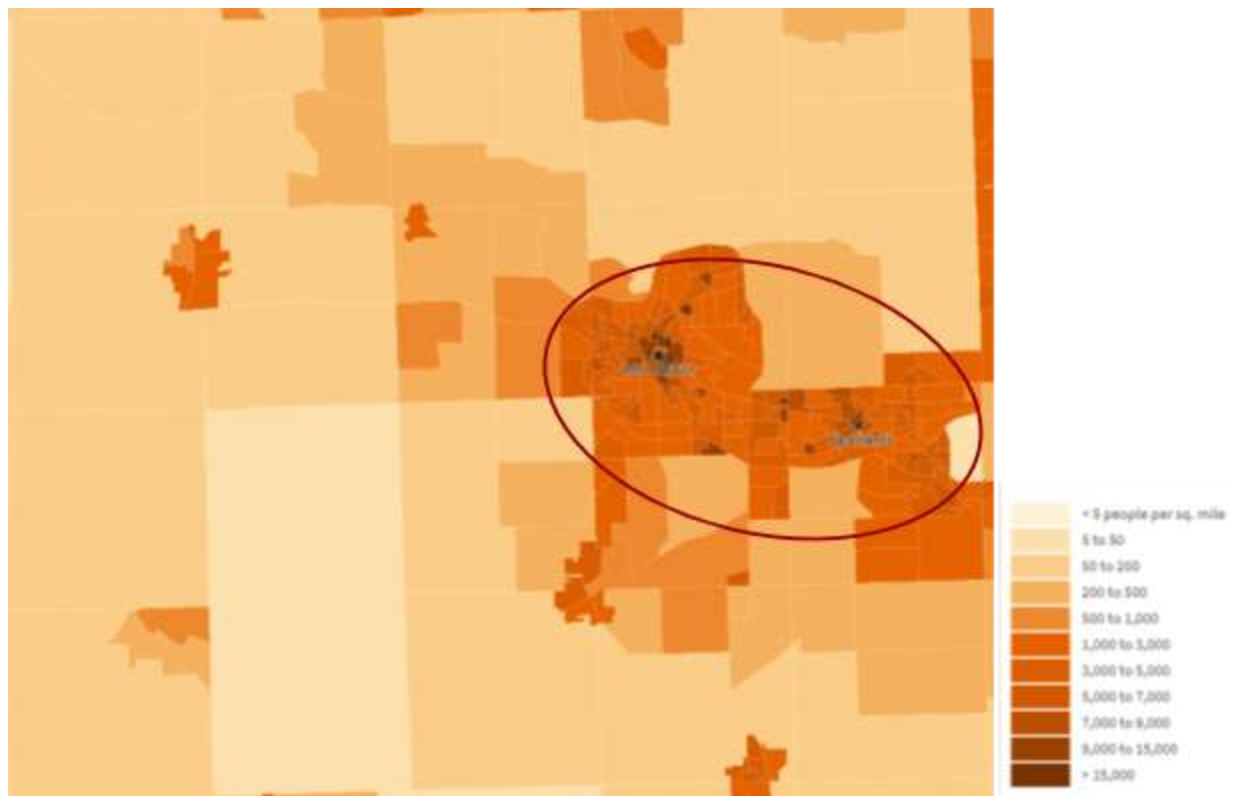


### Population Data

With 304,485 residents, the Urban County makes up 91% of the entire county's population (333,786 total). The Urban County experienced almost an 18% increase in population from 1990 to 2013. Because there are very little disparities between Urban County and Washtenaw County data (provided by HUD), this Plan focuses specifically on the Washtenaw Urban County.

Additionally, this plan naturally focuses more on urbanized areas of Washtenaw County. These areas include the City of Ann Arbor, Pittsfield Township, Superior Township, City of Ypsilanti, and Ypsilanti Township. Due to Ann Arbor's strength as an employment center, there is additional growth in adjacent townships such as Scio, Ann Arbor Townships, Superior Township, and others. These urbanized areas are the oldest areas in Washtenaw County, with development mainly beginning in the City of Ypsilanti and City of Ann Arbor. Surrounding areas (Pittsfield Township, Superior Township and Ypsilanti Township) developed next due to population growth.

### MAP 2\_POPULATION DENSITY



Source: 2015 American Community Survey 5-year Estimates, map provided by Social Explorer

## Race & Ethnicity

The Washtenaw Urban County has experienced dramatic changes when looking at the race and ethnicity breakdown from 1990 to 2010 (Table 7). With the largest increase during this period, Asian and/or Pacific Islanders are the third largest race in the Washtenaw Urban County, making up 8.4% of the current population (Table 6). Similarly, the Urban County experienced a significant rise in the Hispanic and Native American populations, but represent a smaller number in the current population (4.11% for Hispanic, 0.28% Native Americans). The African American population has also risen (by 53% from 1990 to 2010) and makes up almost 14% of the current Urban County population as shown in Table 6 below. While the Urban County has experienced changes throughout the last 20+ years, its majority is white (70%). This is comparable to the white population (71%) in Washtenaw County.

TABLE 6\_RACE AND ETHNICITY (CURRENT)

Race/Ethnicity	#	%
White, Non-Hispanic	221,320	70.3%
Black, Non-Hispanic	42,689	13.6%
Hispanic	12,943	4.2%
Asian or Pacific Islander, Non-Hispanic	26,645	8.5%
Native American, Non-Hispanic	888	0.3%
Two or More Races, Non-Hispanic	9,637	3.1%
Other, Non-Hispanic	802	0.3%

Source: HUD-Provided Table 1, Demographics

There is growth in populations of color. In particular, the Asian population almost doubled between 1990 and 2000 and continues to grow quickly. Growth in the Hispanic/Latino population is also significant in the last 20 years. The African American population, with a long history in the community, continues to grow at a faster pace than the majority white population.

TABLE 7\_RACE AND ETHNICITY TRENDS FROM 1990, 2000 AND 2010

Race/Ethnicity	1990 Trend	2000 Trend	2010 Trend	Percent Change, 1990-2010	Percent Change, 2000-2010
White, Non-Hispanic	209,920	219,733	221,320	5.4%	0.7%
Black, Non-Hispanic	31,034	41,938	47,577	53.3%	13.5%
Hispanic	5,407	8,295	12,943	139.4%	56%
Asian or Pacific Islander, Non-Hispanic	11,402	22,048	30,010	163.2%	36.1%
Native American, Non-Hispanic	870	1,968	2,110	142.5%	7.2%

Source: HUD-Provided Table 2, Demographic Trends

## Age

Likewise, the Urban County has experienced an increase in population across all age ranges (Under 18, 18-64, and 65 and older). While residents 65 years and older make up almost 10%

of the current Urban County Population- the smallest compared to other age ranges (Table 8)- this age group experienced the largest increase from 1990 to 2010 with a 65% increase (Table 9). In Washtenaw County, residents 65 years and older make up a larger portion of the population (11.55). This increase is notable as jurisdictions and agencies address the reality of the aging Baby Boomers and aging in place needs.

TABLE 8\_AGE (CURRENT)

	<b>Washtenaw County</b>	
Under 18	70,500	20%
18-64	242,821	68.5%
65+	40,771	11.5%

Source: HUD-Provided Table 1, Demographics

TABLE 9\_AGE TRENDS FROM 1990, 2000, AND 2010

<b>Age</b>	<b>1990 Trend</b>	<b>2000 Trend</b>	<b>2010 Trend</b>	<b>Percent Change, 1990-2010</b>
Under 18	54,523	66,796	64,821	18.89%
18-64	186,098	206,630	219,415	17.90%
65+	18,556	22,630	30,687	65.38%

Source: HUD-Provided Table 2, Demographic Trends

### Families with Children

There are 32,840 (46.5%) families with children in the Urban County, almost a 14% increase from 1990 to 2010.

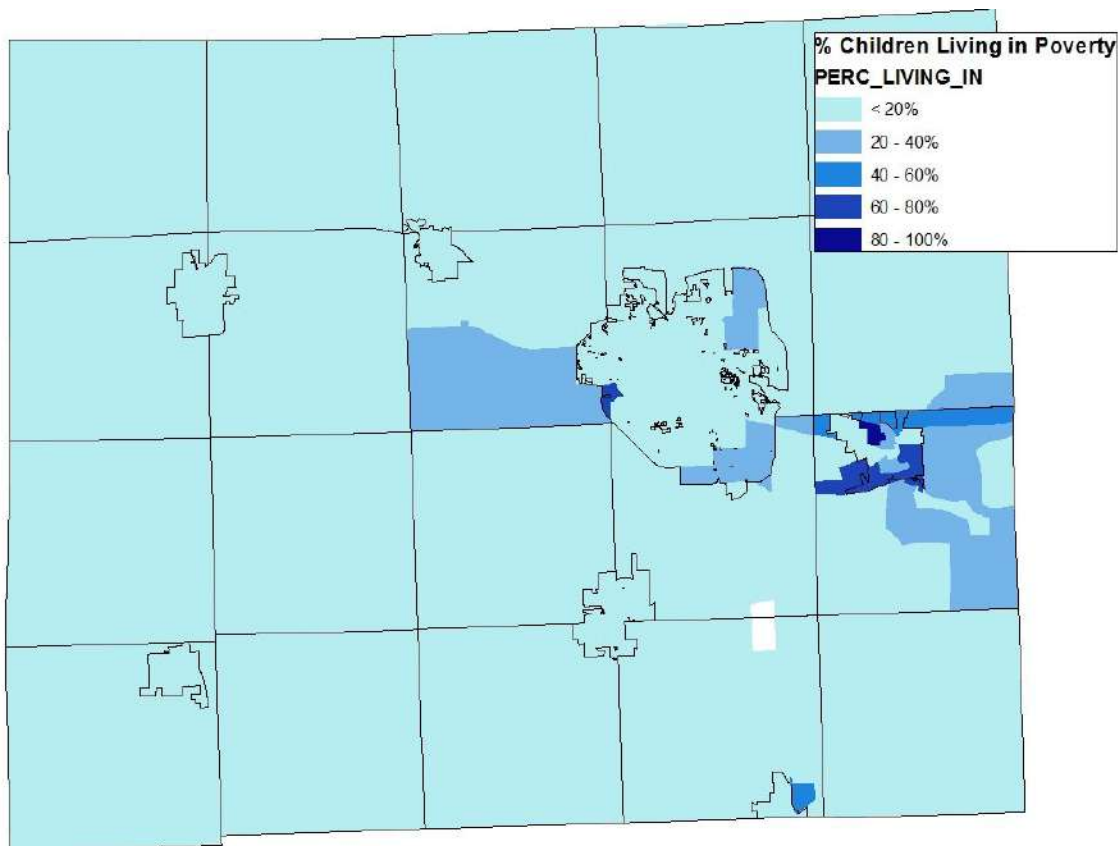
TABLE 10\_FAMILY STATUS

	1990 Trend	2000 Trend	2010 Trend	Percent Change, 1990-2010
Families with children	28,852	26,917	32,840	13.82%

Source: HUD-Provided Table 1, Demographics

Certain areas in the county have a higher concentration of children and families, and families living in poverty. Map 3 shows the percentages of families with income that is below the poverty level. It is notable that the east side of the county has higher percentages of families in poverty, especially in the R/ECAPs, which are located in the City of Ypsilanti and Ypsilanti Township. Over half (52.8%) of the families in one in the Southside R/ECAP have incomes below the poverty level; and nearly half (43.8%) of families in the Leforge R/ECAP have incomes below the poverty level.

MAP 3\_FAMILIES WITH INCOME BELOW POVERTY LEVEL, 2015



Source: 2015 American Community Survey 5-year Estimates

### Sex

As for the sex breakdown in the Urban County, 49.4% identify as male and 50.6% identify as female.

### National Origin

The ten most populous national origins in the Urban County are China (excluding Hong Kong and Taiwan), India, Korea, Canada, Japan, Mexico, Taiwan, Germany, and the Philippines (Table 11). Although the number of residents from these 10 national origins may seem small, the Washtenaw Urban County has experienced a 98% increase of residents who are foreign-born from 1990 to 2010 (Table 12).

TABLE 11\_NATIONAL ORIGIN (CURRENT)

#1 country of origin	China excl. Hong Kong & Taiwan	4,933	1.64%
#2 country of origin	India	4,154	1.38%
#3 country of origin	Korea	3,252	1.08%
#4 country of origin	Canada	1,739	0.58%
#5 country of origin	Japan	1,644	0.55%
#6 country of origin	Mexico	1,477	0.49%
#7 country of origin	Taiwan	1,391	0.46%
#8 country of origin	Germany	1,288	0.43%
#9 country of origin	Philippines	967	0.32%
#10 country of origin	Romania	866	0.3%

Source: HUD-Provided Table 1, Demographics

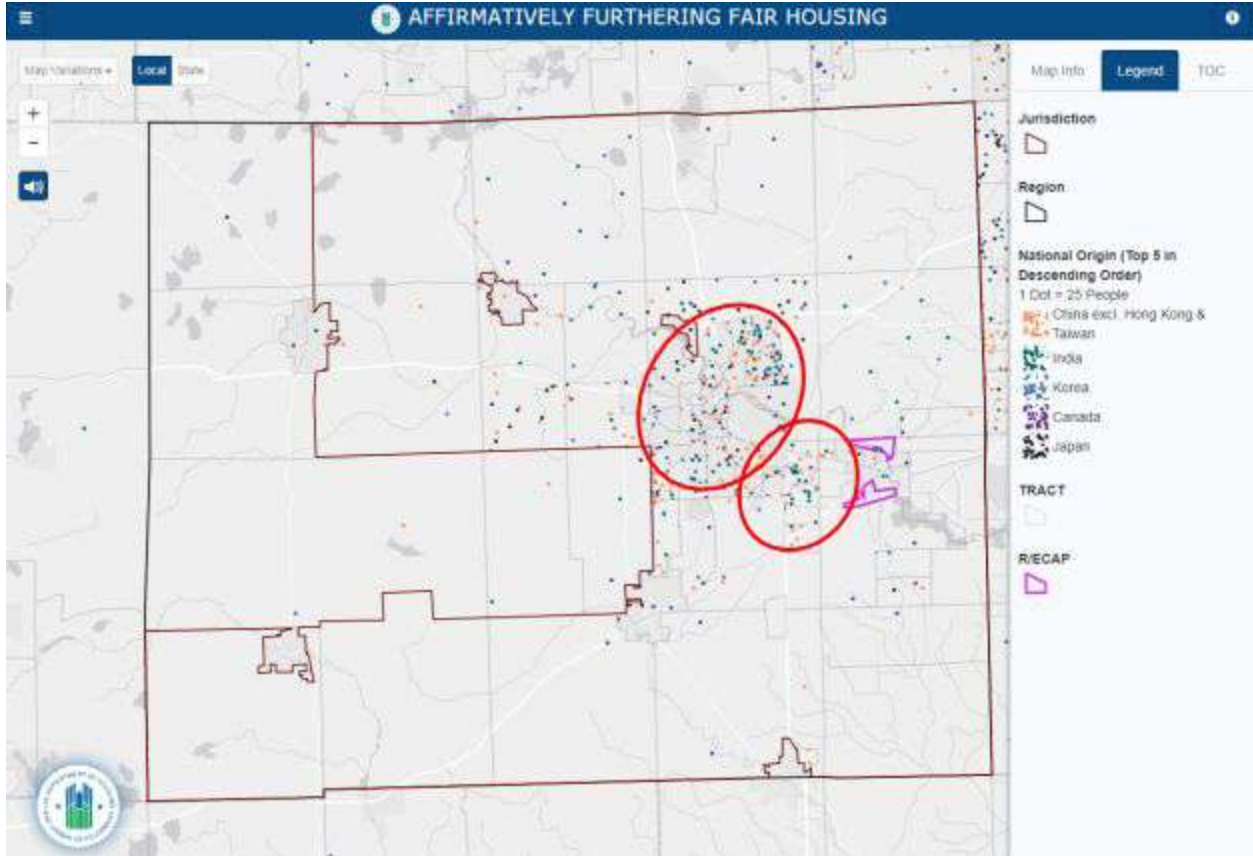
TABLE 12\_NATIONAL ORIGIN TRENDS FROM 1990, 2000 AND 2010

	1990 Trend	2000 Trend	2010 Trend	Percent Change, 1990-2010
Foreign-born	18,815	32,337	37,269	98.08%

Source: HUD-Provided Table 2, Demographic Trends

When looking at areas of higher concentrations of Foreign-Born residents (Map 4), there are clusterings in Ann Arbor and Pittsfield Township (circled in red).

### MAP 4\_FIVE MOST POPULOUS NATIONAL ORIGINS





**Limited English Proficiency (LEP)**

The top three languages that are within the LEP are Chinese, Spanish, and Korean (Table 13). The Limited English Proficiency (LEP) rate increased by 84% from 1990 to 2010 (Table 14). In response to this data, the OCED initially looked to Chinese churches in the Ann Arbor area to reach out to about the AFFH efforts, and also translated the Washtenaw County Housing and Neighborhood Survey into Spanish.

TABLE 13\_LIMITED ENGLISH PROFICIENCY (LEP) LANGUAGES (CURRENT)

#1 LEP Language	Chinese	3,332	1.11%
#2 LEP Language	Spanish	2,473	0.82%
#3 LEP Language	Korean	1,714	0.57%
#4 LEP Language	Arabic	987	0.33%
#5 LEP Language	Japanese	925	0.31%
#6 LEP Language	African	561	0.19%
#7 LEP Language	Other Indo-European Language	557	0.19%
#8 LEP Language	French	443	0.15%
#9 LEP Language	Other Asian Language	396	0.13%
#10 LEP Language	Hindi	298	0.10%

Source: HUD-Provided Table 1, Demographics

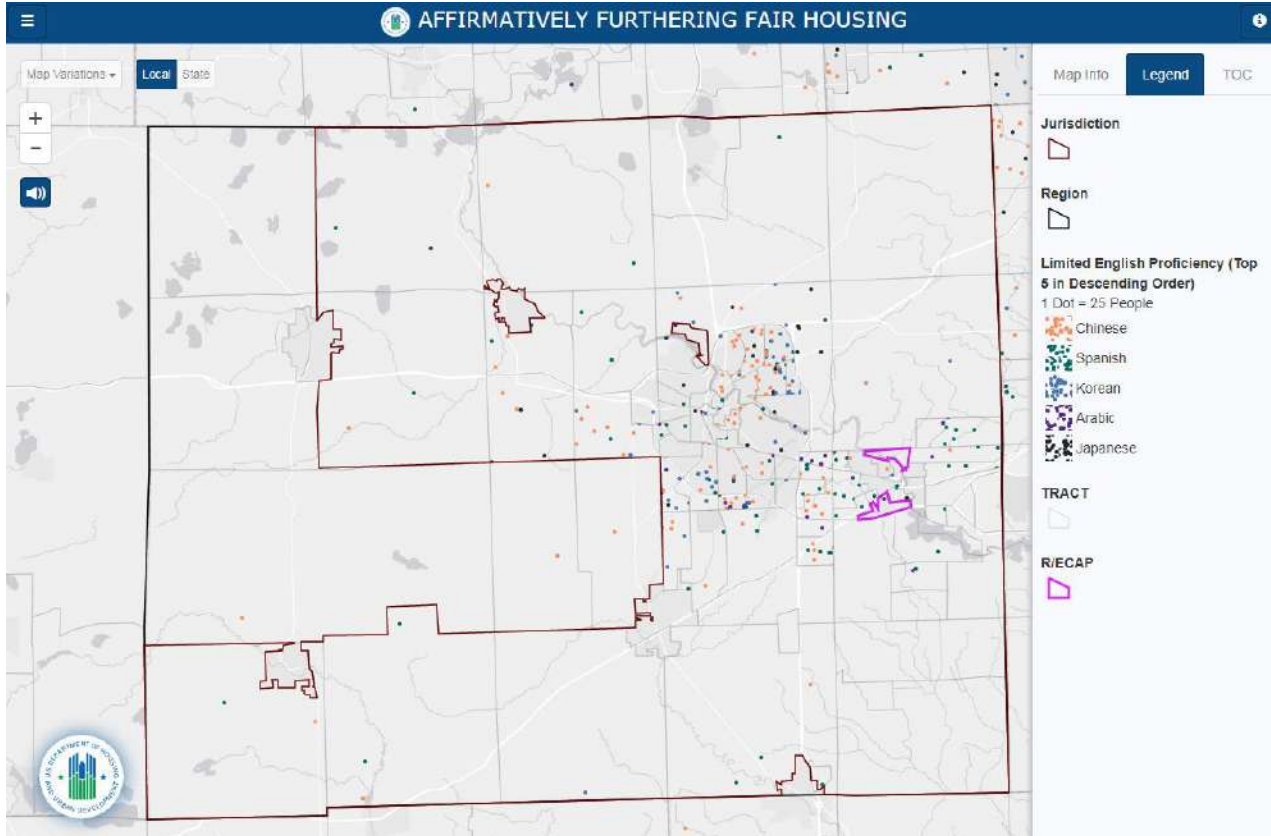
TABLE 14\_LEP TRENDS FROM 1990, 2000 AND 2010

	1990 Trend	2000 Trend	2010 Trend	Percent Change, 1990-2010
Limited English Proficiency	7,286	13,041	13,398	83.89%

Source: HUD-Provided Table 2, Demographics Trends

Clustering of residents with Limited English Proficiency resemble the clusterings of Foreign-born residents (Map 5).

### MAP 5\_LEP & THE FIVE MOST COMMONLY USED LANGUAGES



### Disability Type

Within the Urban County, 15.6% residents reportedly live with a disability. The three most reported disabilities are ambulatory difficulty (4.44%), cognitive difficulty (3.39%), and independent-living difficulty (3.12%). Note for definitions of each disability type, see List of Acronyms and Definitions.

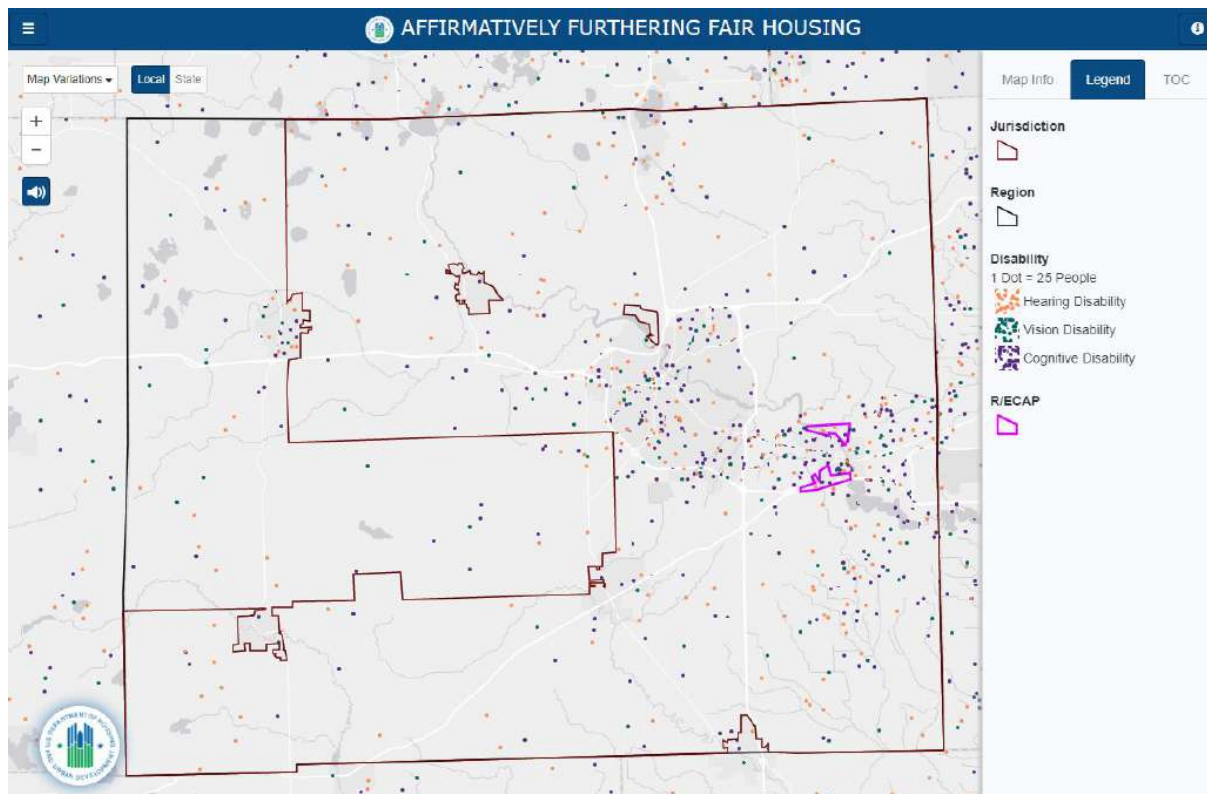
TABLE 15\_DISABILITY TYPES

Disability Type	(Washtenaw County, MI CDBG, HOME, ESG) Jurisdiction		(Ann Arbor, MI) Region	
	Count	Percentage	Count	Percentage
Hearing difficulty	6,784	2.29%	7,886	2.42%
Vision difficulty	3,409	1.15%	3,907	1.20%
Cognitive difficulty	10,049	3.39%	11,135	3.42%
Ambulatory difficulty	13,183	4.44%	14,821	4.55%
Self-care difficulty	4,907	1.65%	5,560	1.71%
Independent living difficulty	9,265	3.12%	10,284	3.16%
TOTAL	47,597	15.63%	53,593	16.06%

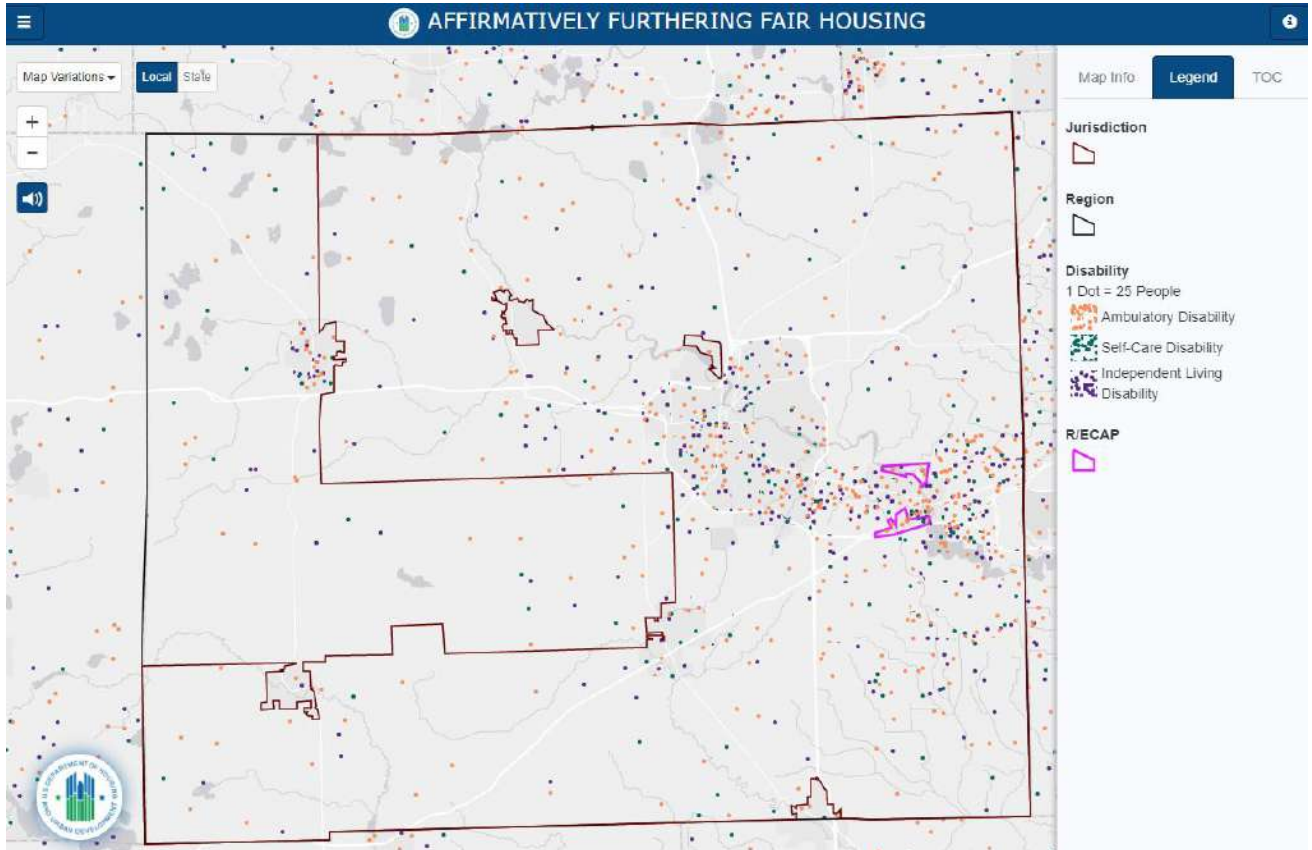
Source: HUD-Provided Table 1, Demographics

As seen in Maps 6 and 7, persons living with a disability reside in more urbanized areas, which matches trends in other demographic categories.

MAP 6\_HEARING, VISION, AND COGNITIVE DISABILITY



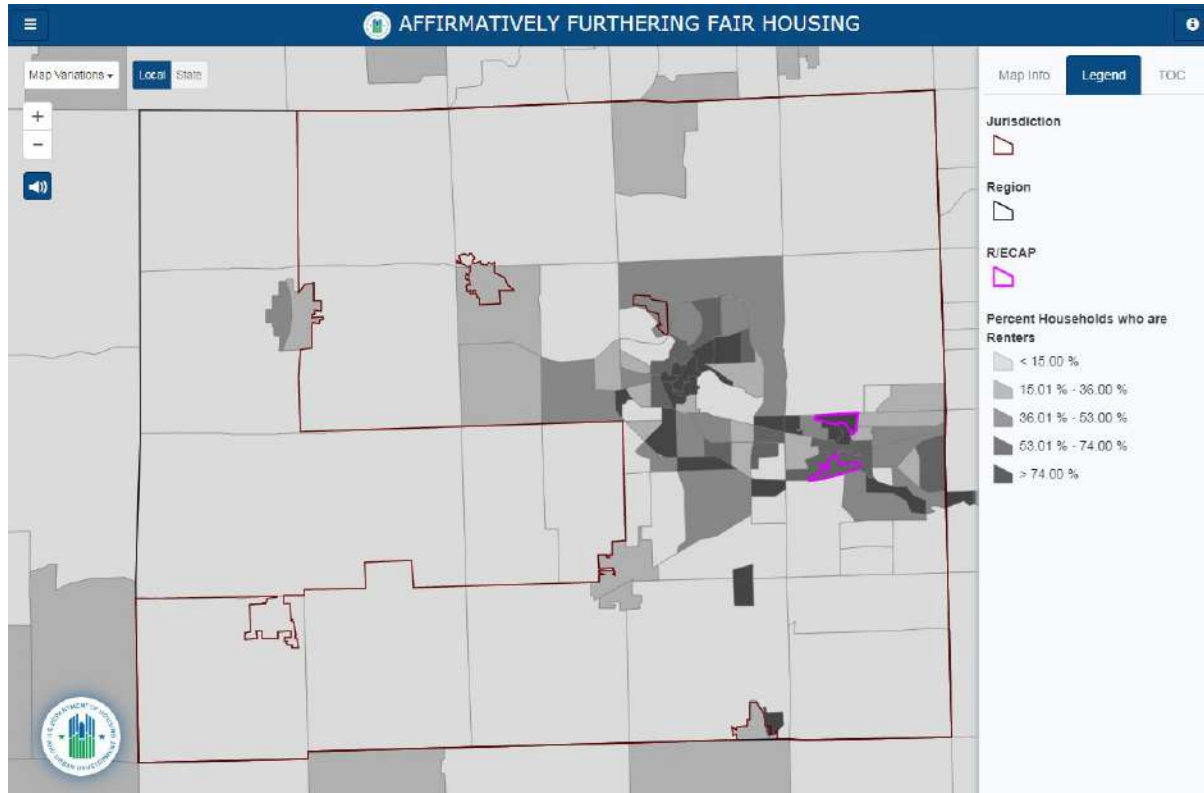
### MAP 7\_ AMBULATORY, SELF-CARE, AND INDEPENDENT LIVING DIFFICULTY



## Housing Tenure

Washtenaw County is unique in that it hosts two major universities, the University of Michigan in the City of Ann Arbor and Eastern Michigan University in the City of Ypsilanti, which creates clusterings of renters in both cities (Map 8). The overall tenure of the Urban County is fairly balanced with 58.2% owner-occupied households and 41.8% renters.

MAP 8\_HOUSING TENURE BY RENTERS



When comparing housing tenure by race (Table 16), it is notable that:

- There are more white homeowners than white renters
- Whites have the highest rate of homeownership
- All other races have more renters than homeowners

TABLE 16\_HOUSING TENURE BY RACE & ETHNICITY

Race/Ethnicity	Homeowners		Renters	
	#	%	#	%
White, Non-Hispanic	59,910	82.1%	30,705	60.4%
Black, Non-Hispanic	5,890	8.1%	9,718	19.1%
Hispanic	1,497	2.1%	2,529	5%
Asian or Pacific Islander, Non-Hispanic	4,213	5.8%	5,685	11.2%
Native American, Non-Hispanic	82	0.1%	115	0.2%
Other, Non-Hispanic	1,355	1.9%	2,109	4.2%
Total Household Units	72,955	-	50,875	-

Source: HUD-Provided Table 16, Homeownership and Rental Rates by Race/Ethnicity

Geographically, certain areas have more renters than homeowners (Map 8). The City of Ann Arbor and City of Ypsilanti both have more renters than homeowners. The contrast of owner/renter tenure is greater in the City of Ypsilanti with 65.8% renters and 34.2% owners, whereas Ann Arbor's owner/renter tenure is more balanced with 54.3% renters and 45.7% owners (Table 17).

TABLE 17\_HOUSING TENURE IN THE CITY OF ANN ARBOR AND THE CITY OF YPSILANTI

	City of Ann Arbor		City of Ypsilanti	
	#	%	#	%
Owner Occupied	21,031	45.7%	2,625	34.2%
Renter Occupied	24,965	54.3%	5,059	65.8%
Total Units	45,996		7,684	

Source: American Community Survey 2013 5-year Estimates, US Census Bureau

While the two universities have had a great influence on the number of rental units, the housing downturn has created a change in attitude around home-ownership as well. Focus group participants also spoke in regards to the housing tenure in their neighborhood:

- With mortgages nearly paid off, it was apparent that the homeowners in one focus group were unaware of the cost of living for current renters.
- The Ypsilanti Renter focus group noted rents in Ypsilanti increasing annually post-recession.
- Participants in another focus group unanimously agreed that it is cheaper to own a home in their neighborhood than it is to rent.

- In another focus group, participants who are homeowners expressed their preference in living in an area with more homeowners than renters, commenting that they would be more accepting if renters acted more like homeowners.

## Neighborhood Profiles

The AFFH Subcommittee was interested in using local data and additional census data to dig deeper into certain neighborhoods to understand how they have changed over time.

For example, Southside R/ECAP (Racially or Ethnically Concentrated Area of Poverty) is historically and predominantly an African American neighborhood. There have been trends of disinvestment and a lack of resources and/or a lack of access to opportunities; which the profile alludes to through tracking changes based on race as well as housing values.

Another example is the Waterhill and Kerrytown neighborhood in the City of Ann Arbor. Both areas were once a predominantly African American neighborhood; however, they have become more white over time. While the housing market has been stable over the years (even through the Recession), the AFFH Subcommittee and staff wanted to look closer and to explore demographic changes that may pertain to potential displacement.

There are 12 profiles in total and each one tells a different story:

City of Ann Arbor:

- Bryant
- Platt & Packard
- Waterhill & Kerrytown

City of Ypsilanti:

- Southside & Historic Southside District

Pittsfield Township:

- Carpenter & Packard

Northfield Township:

- Whitmore Lake

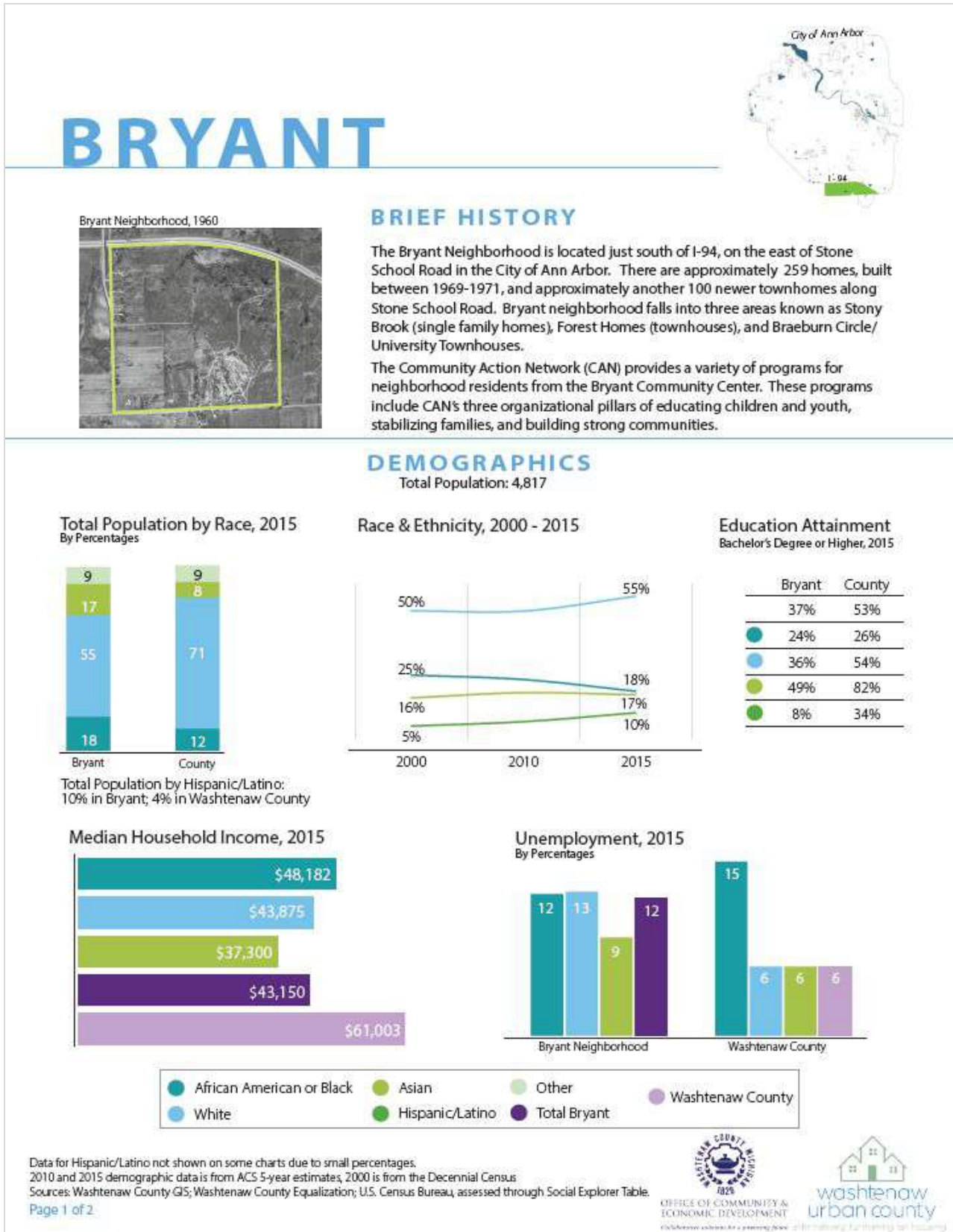
Ypsilanti Township:

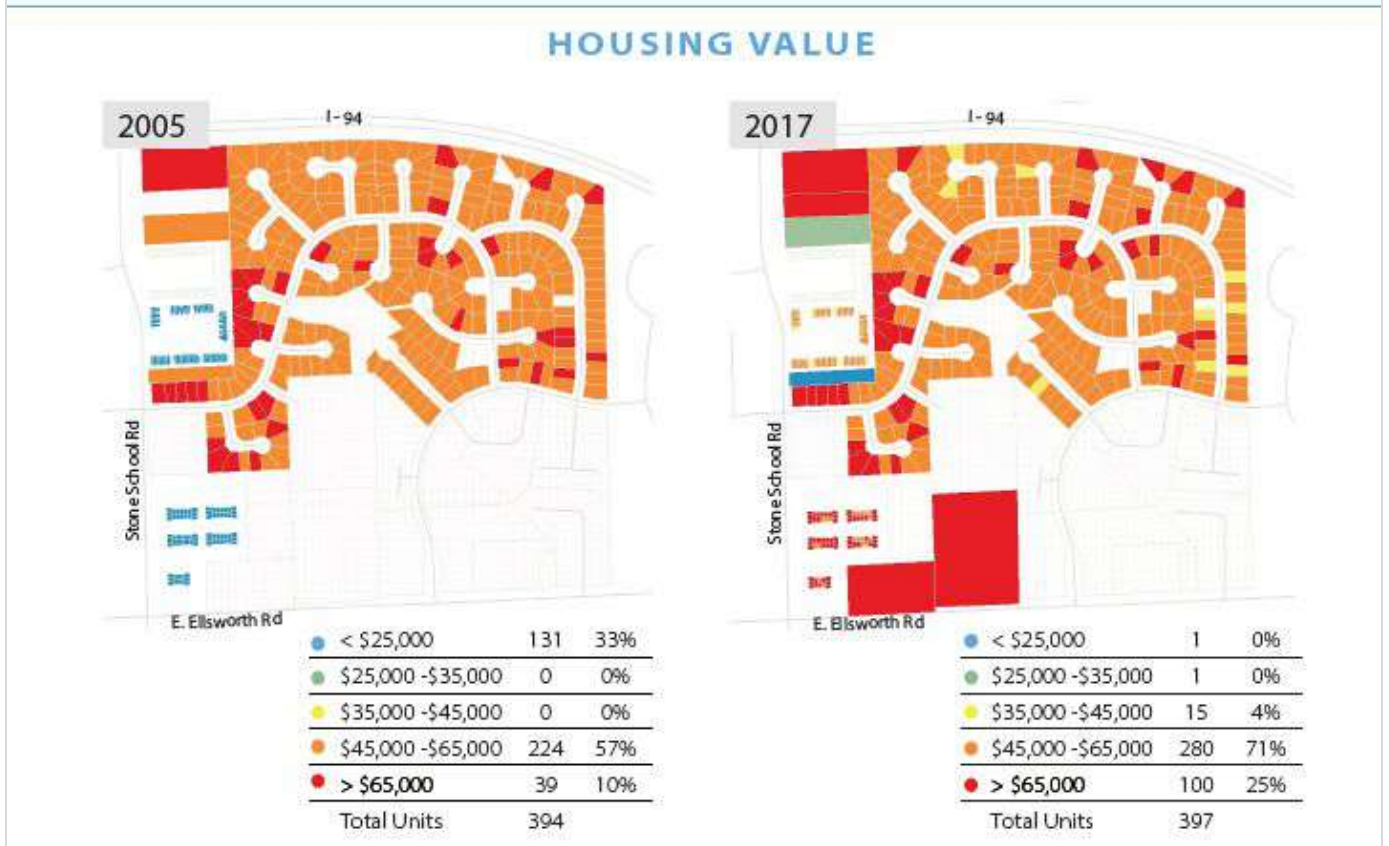
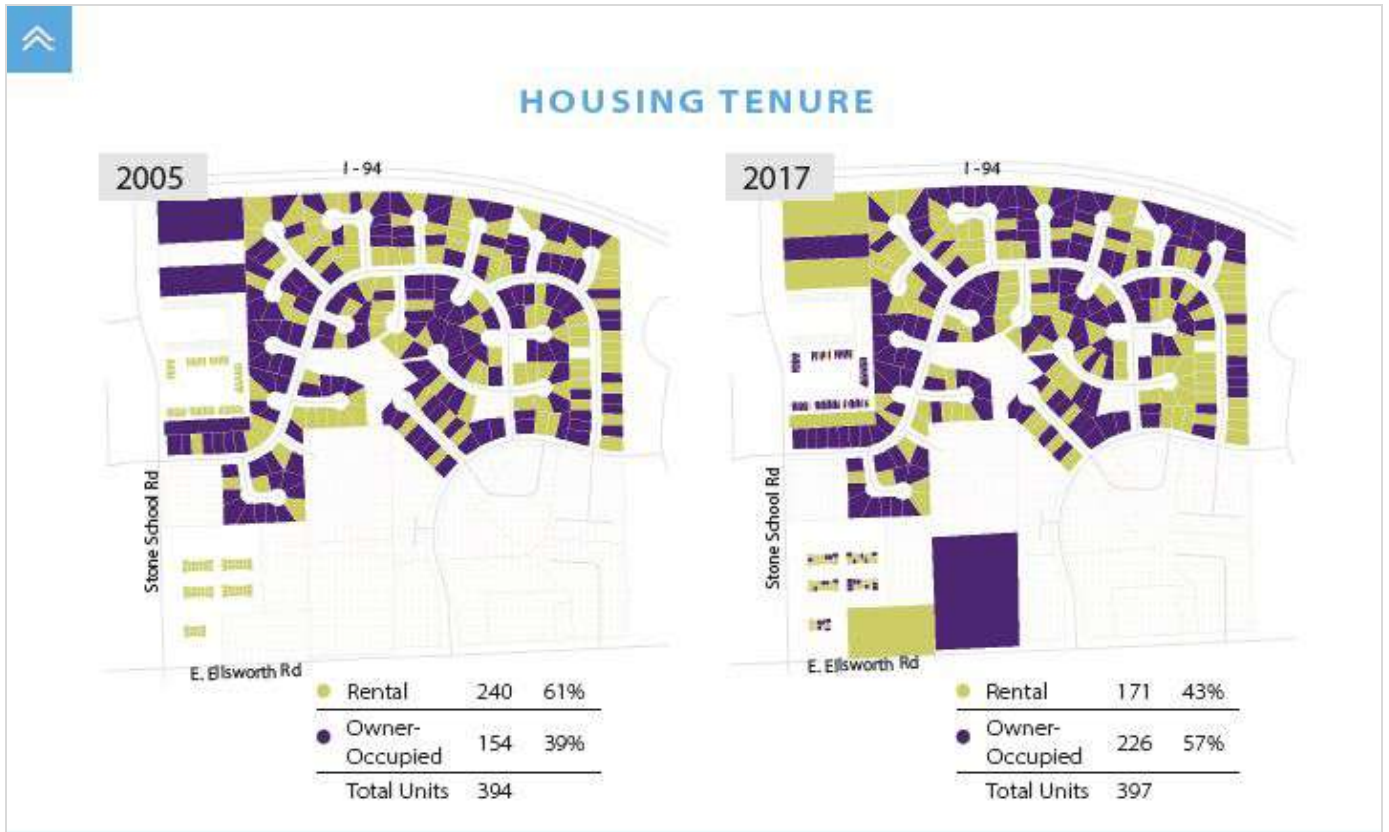
- Clark Road
- Ecorse
- Gault Village
- Sugarbrook & Lakeview
- West Willow

The profiles below are in alphabetical order. For individual neighborhood profiles, visit [www.ewashtenaw.org/affh](http://www.ewashtenaw.org/affh).



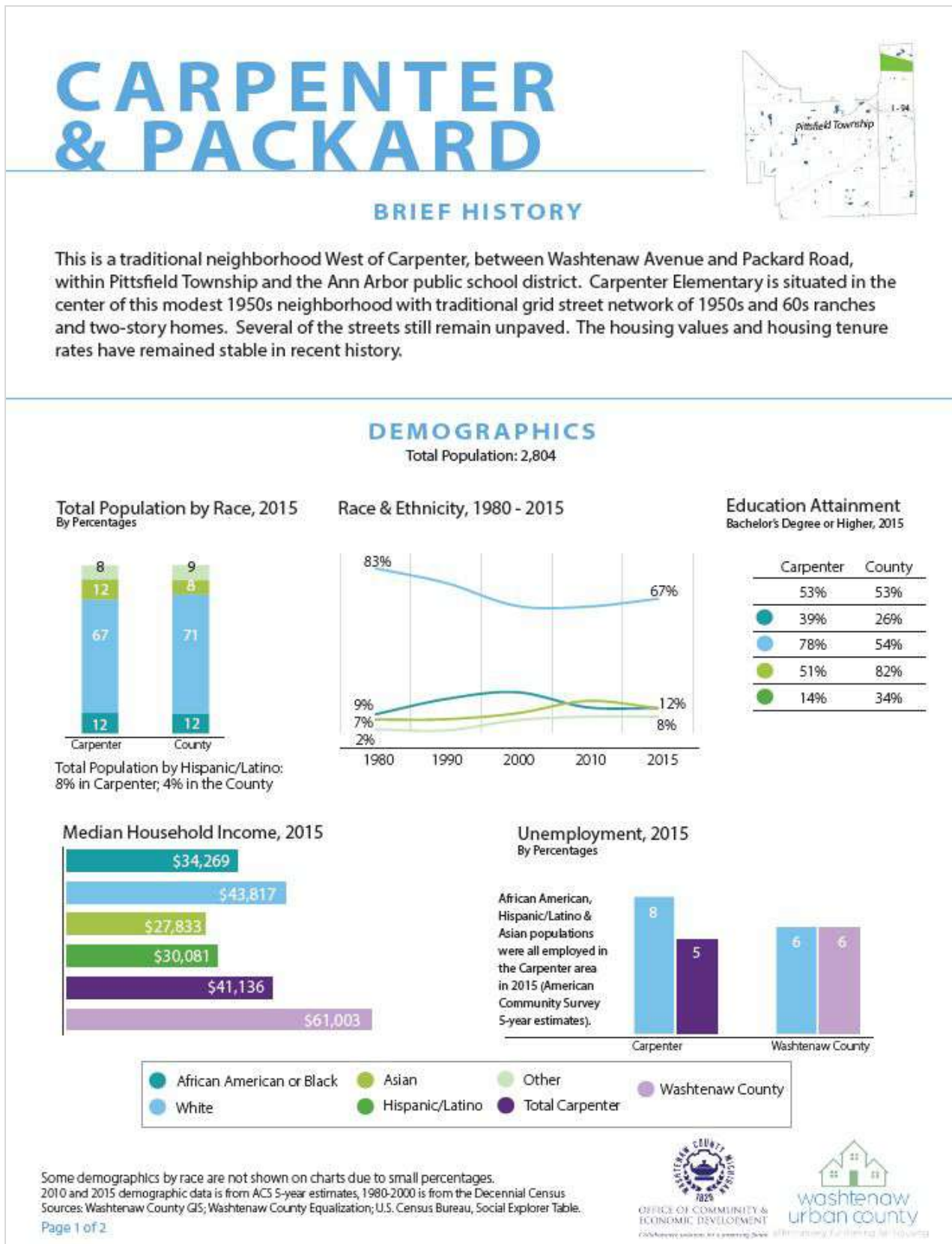
FIGURE 1\_BRYANT PROFILE





Housing Value maps show the State Equalized Value (SEV). Double the SEV is considered an estimate of housing value.

FIGURE 2\_CARPENTER AND PACKARD PROFILE



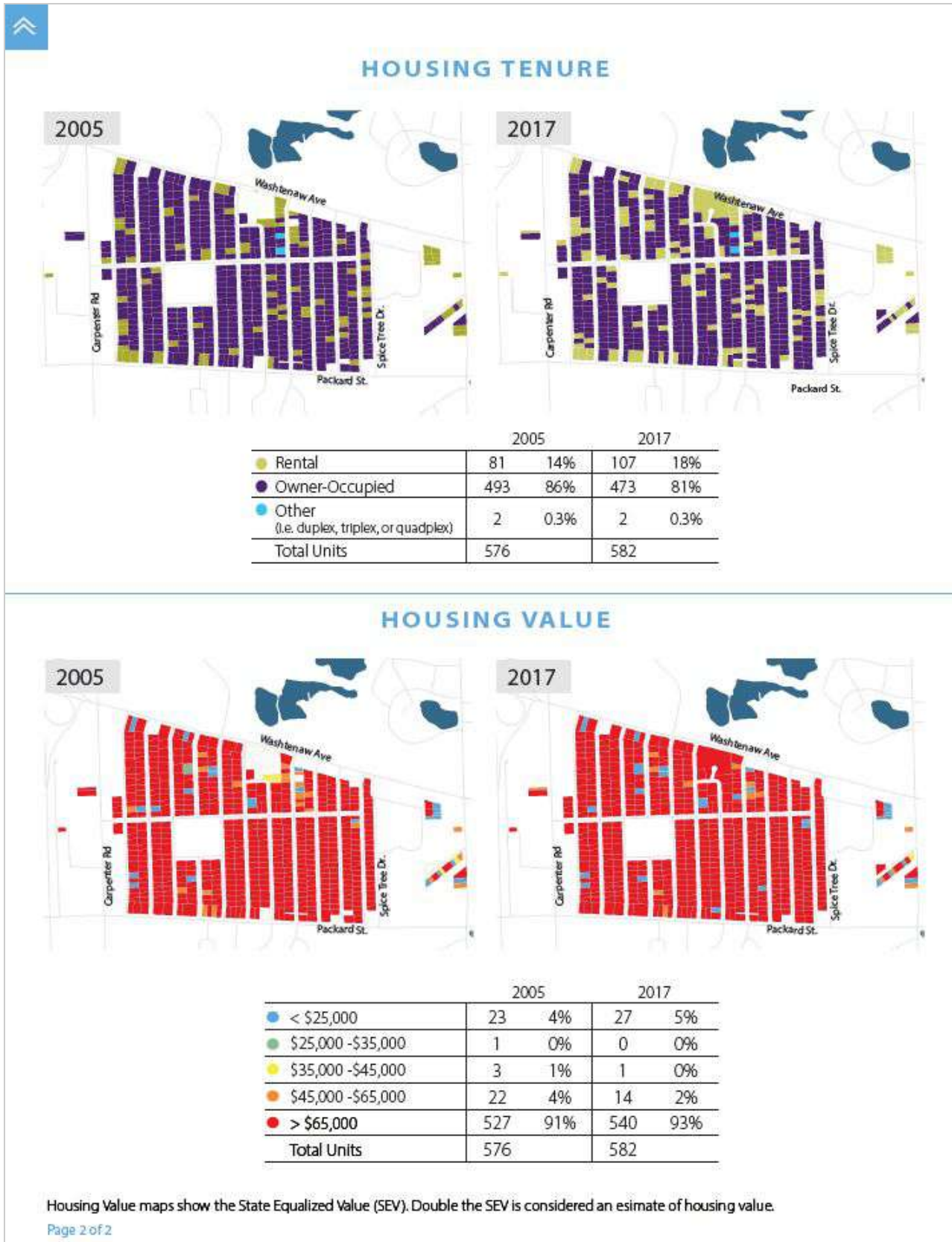
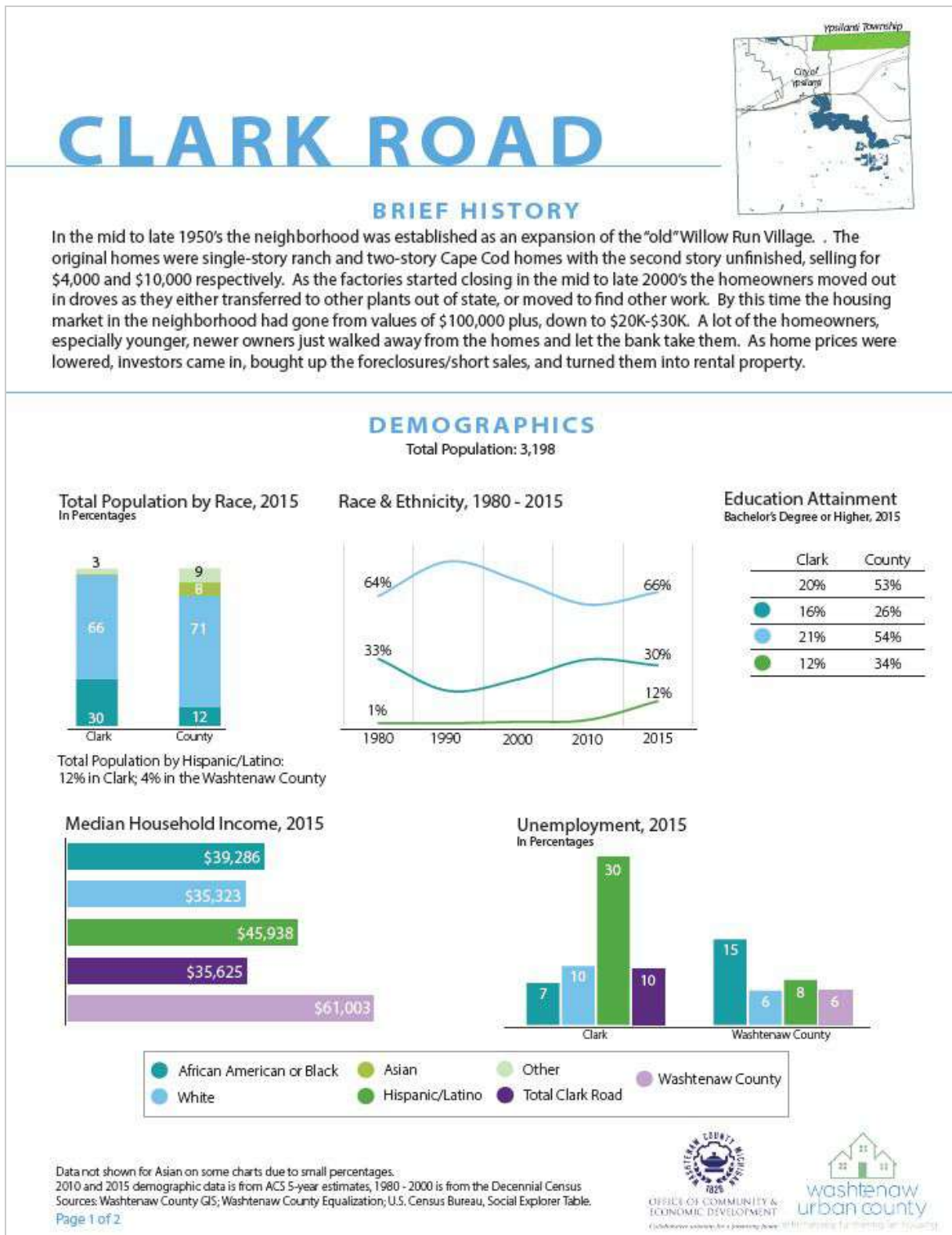


FIGURE 3\_CLARK ROAD PROFILE



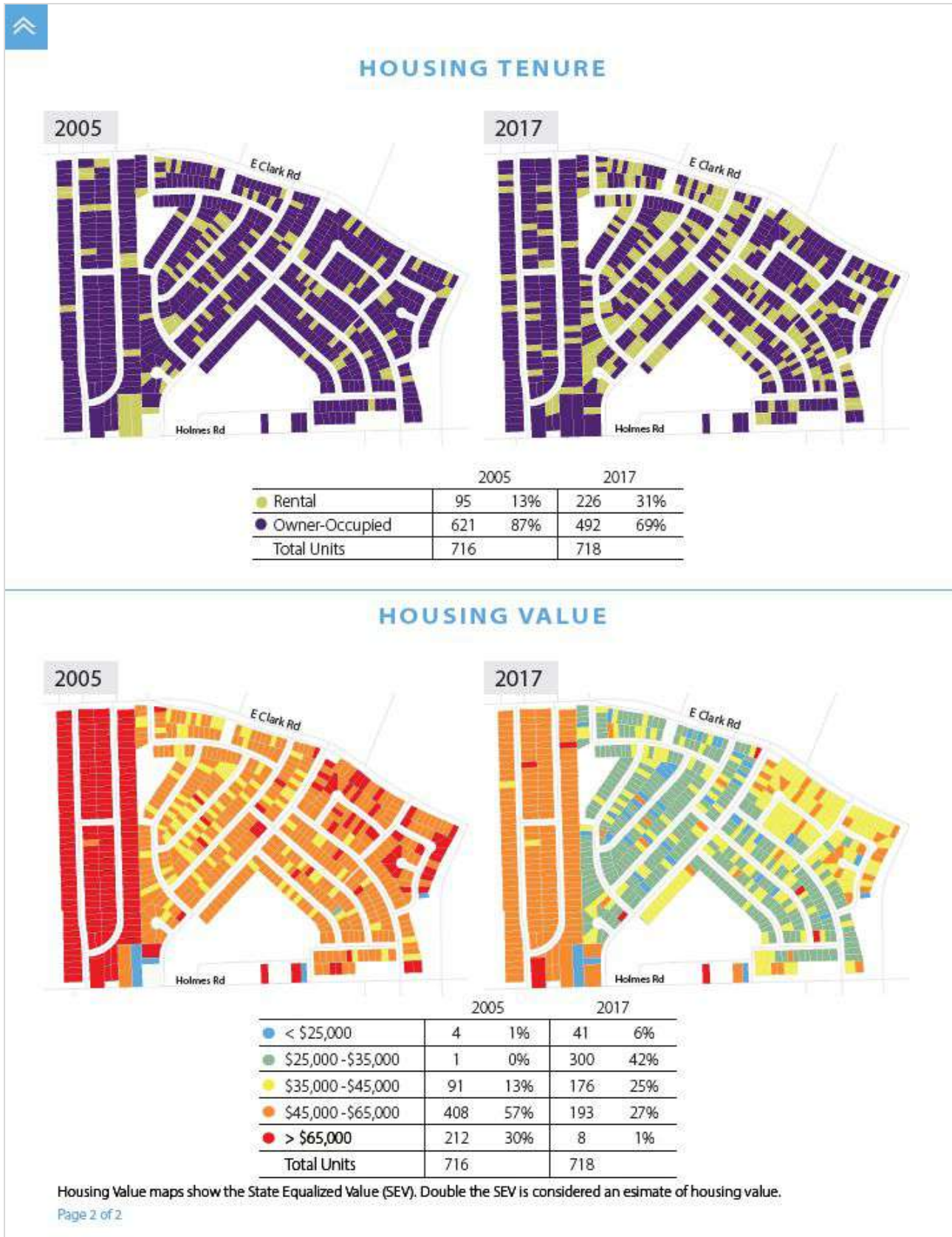
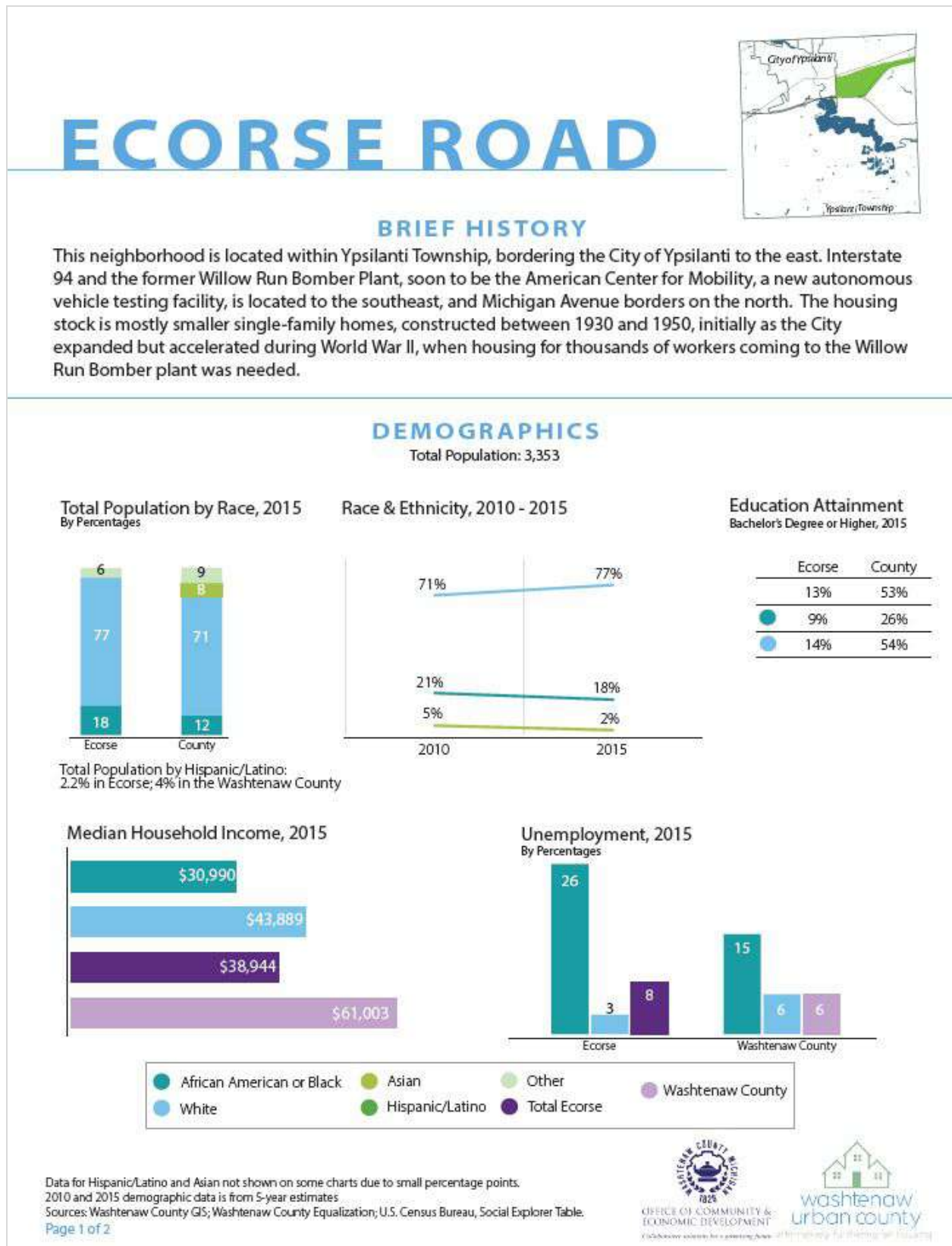
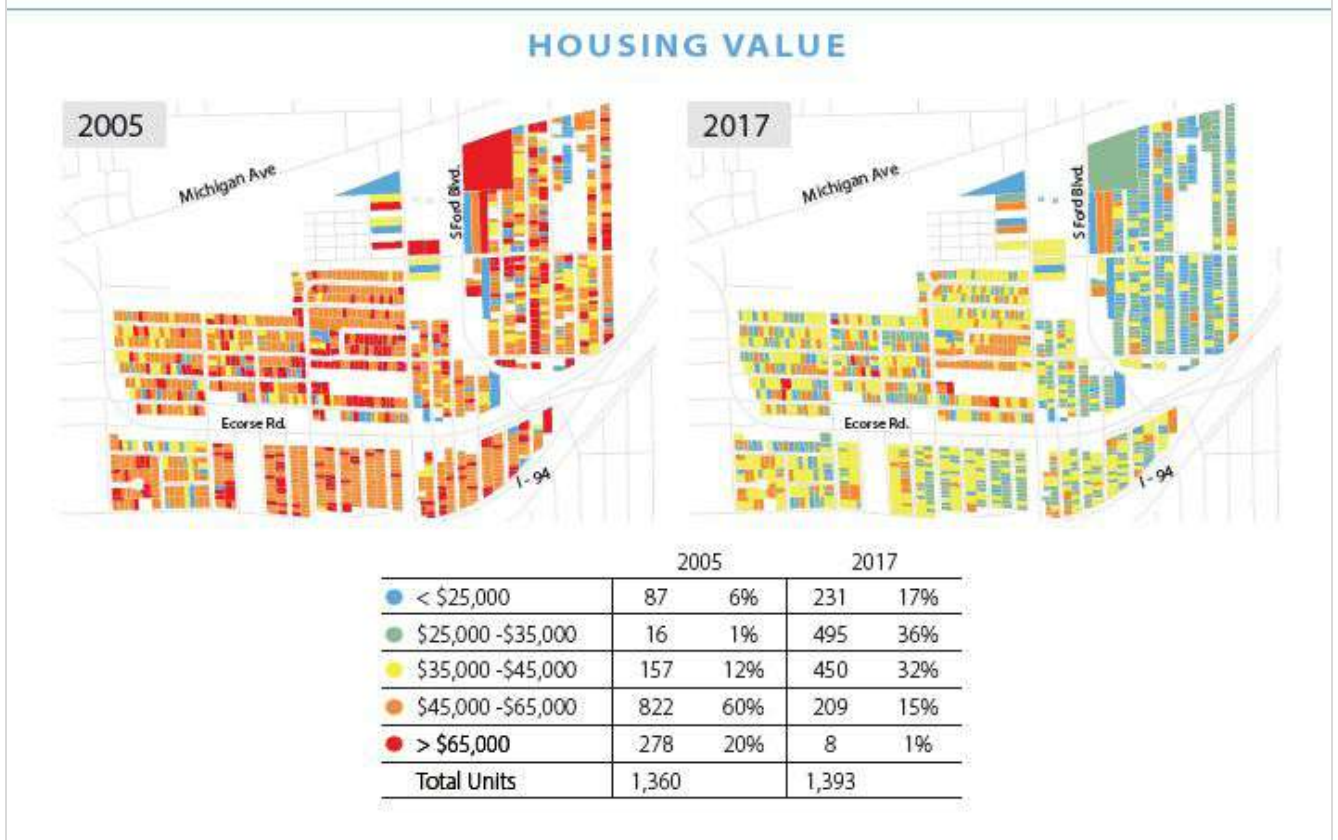


FIGURE 4\_ECORSE PROFILE

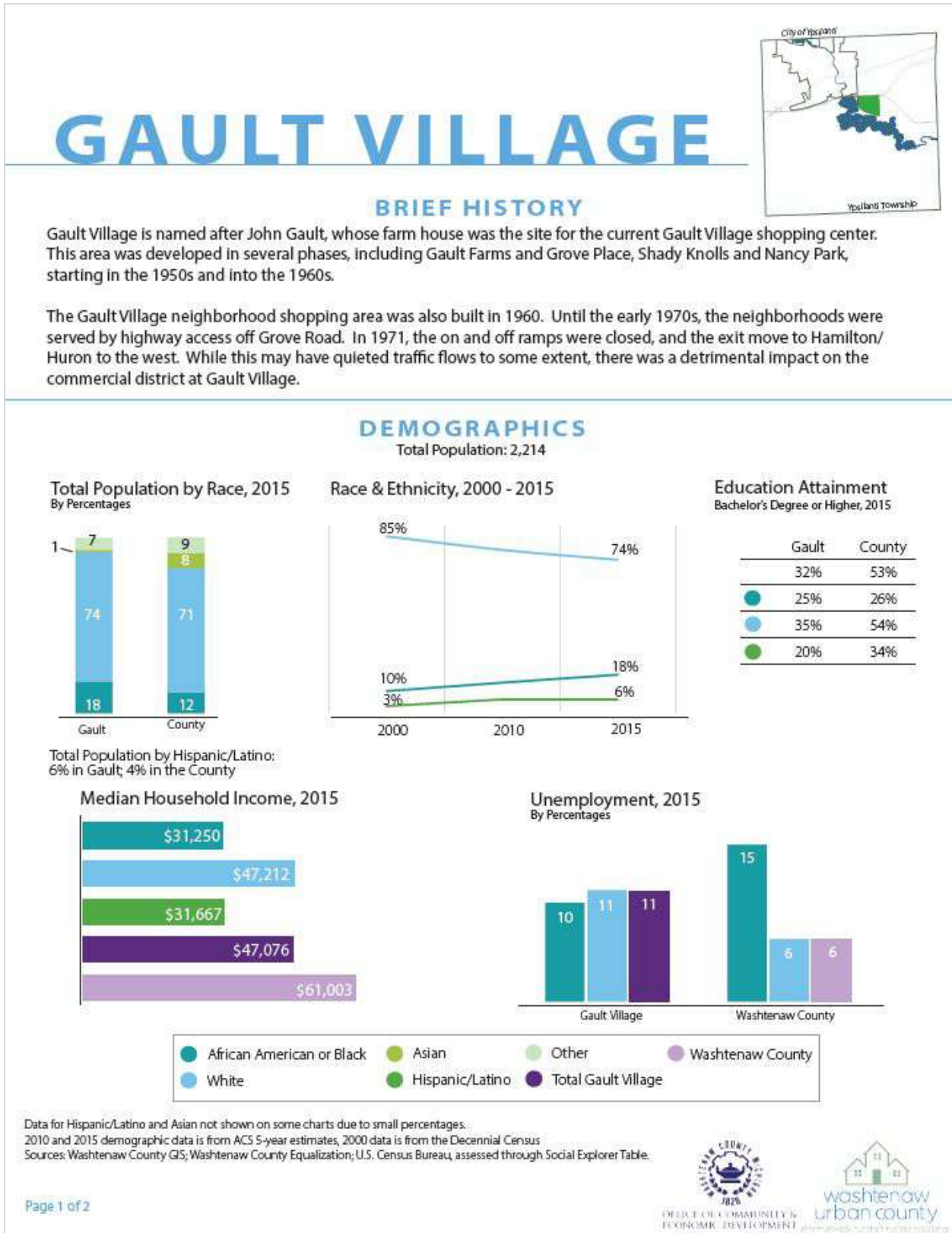




Housing Value maps show the State Equalized Value (SEV). Double the SEV is considered an estimate of housing value.



FIGURE 5\_GAULT VILLAGE PROFILE



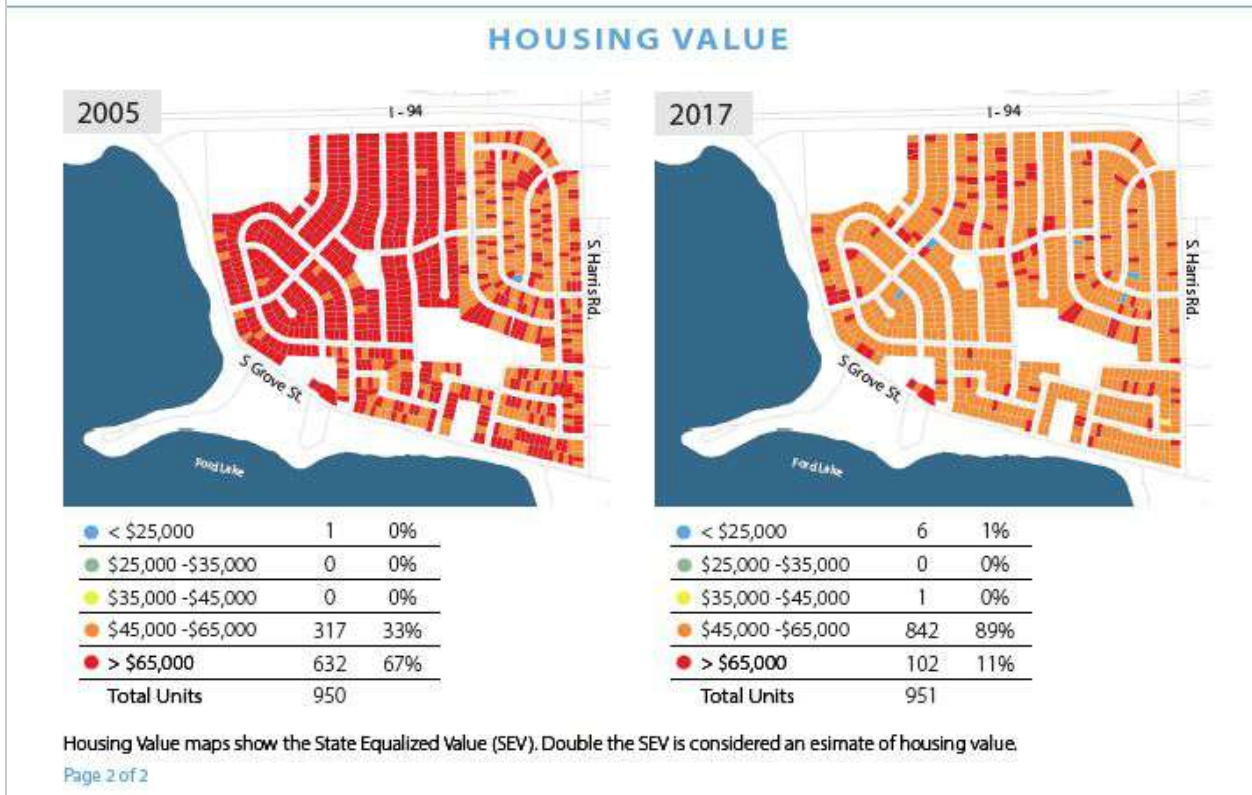
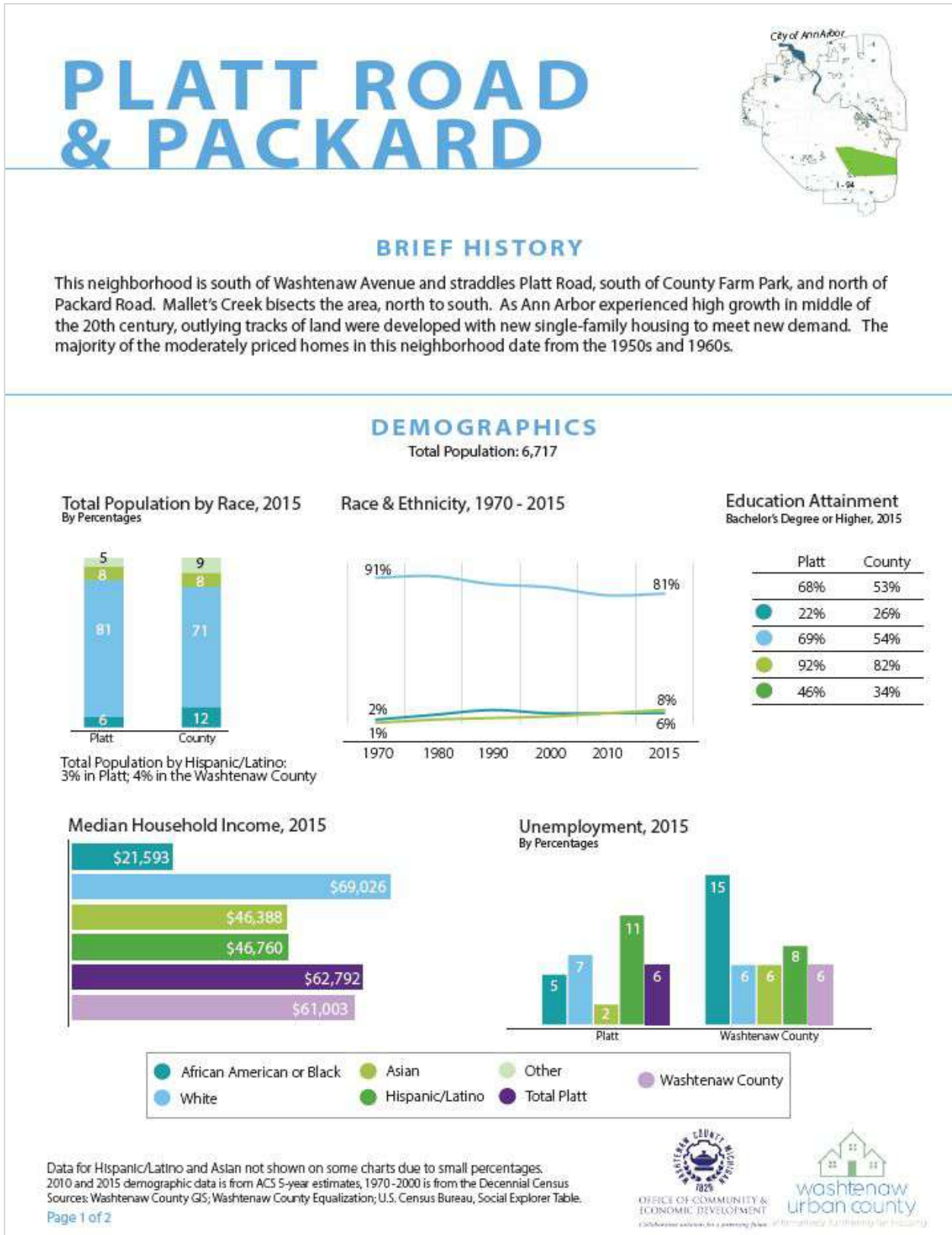


FIGURE 6\_PLATT AND PACKARD PROFILE



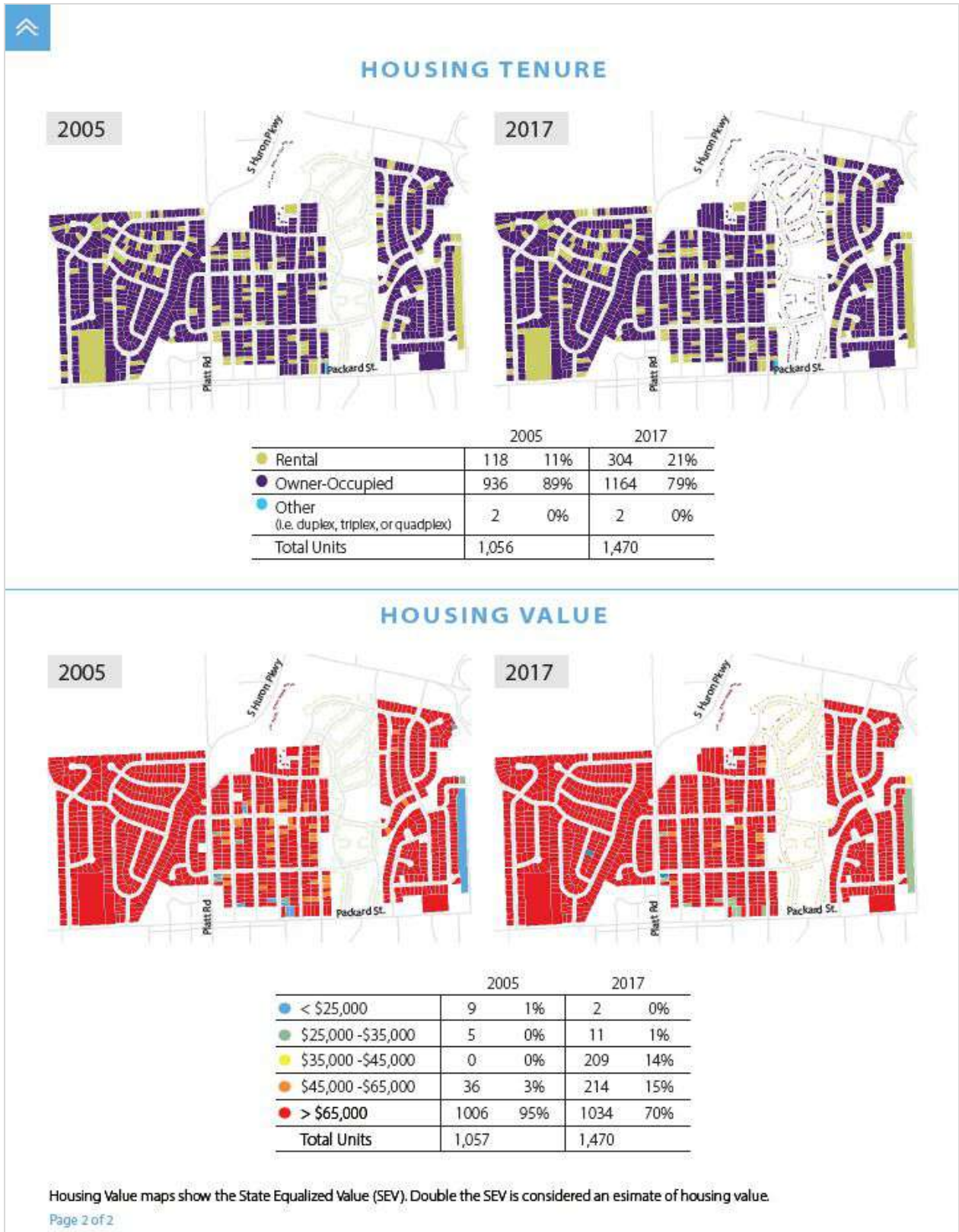
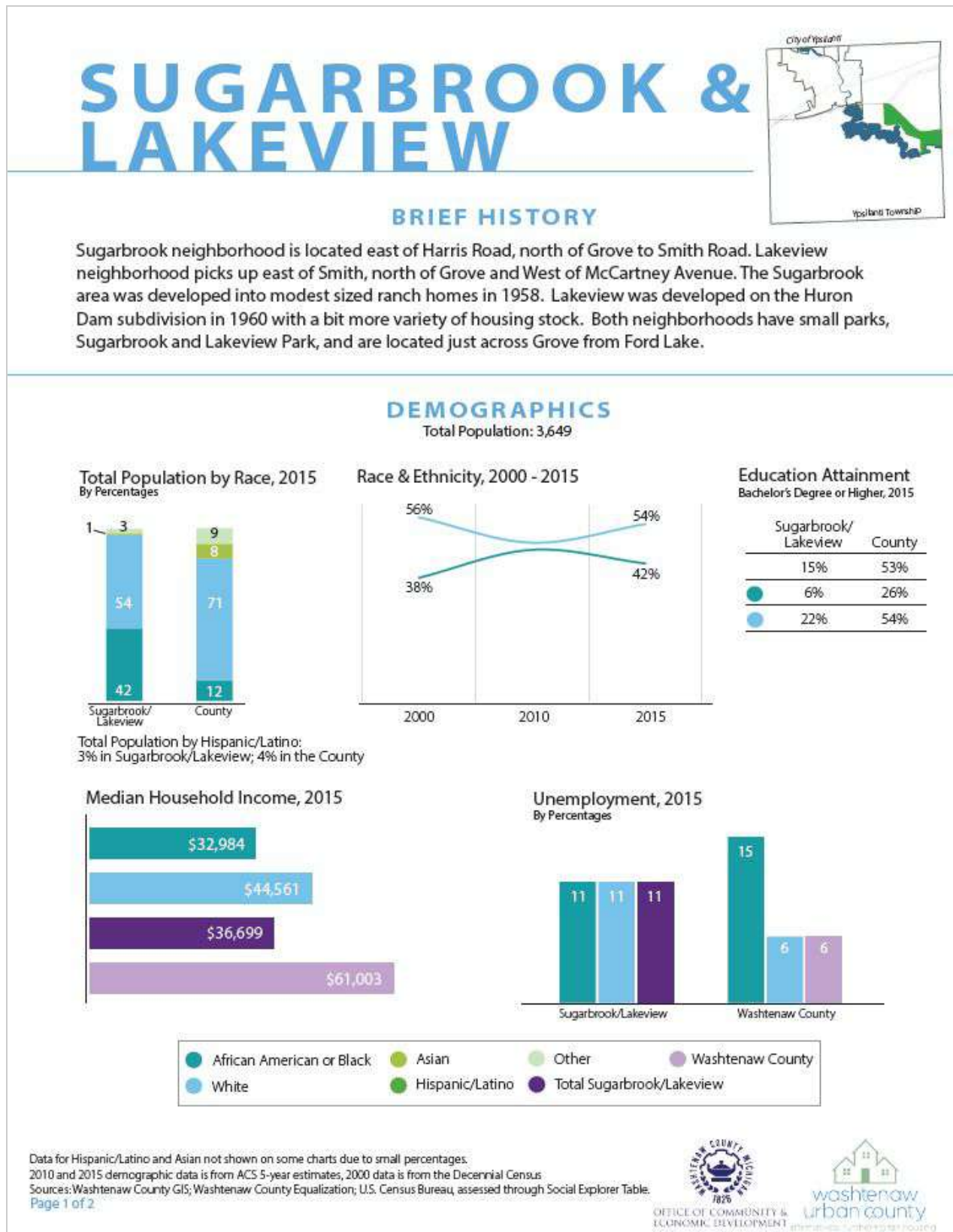
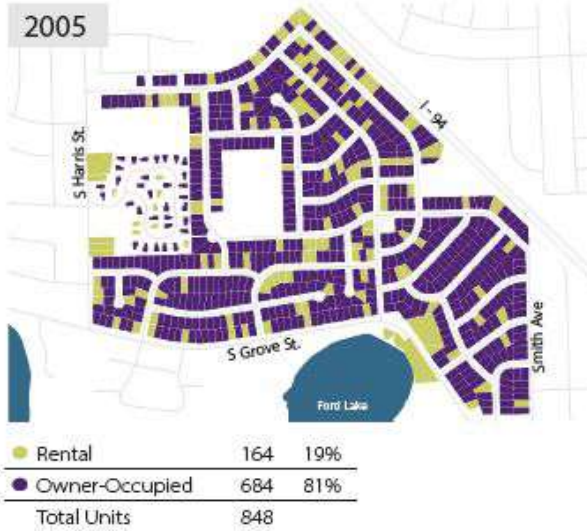


FIGURE 7\_SUGARBROOK AND LAKEVIEW PROFILE

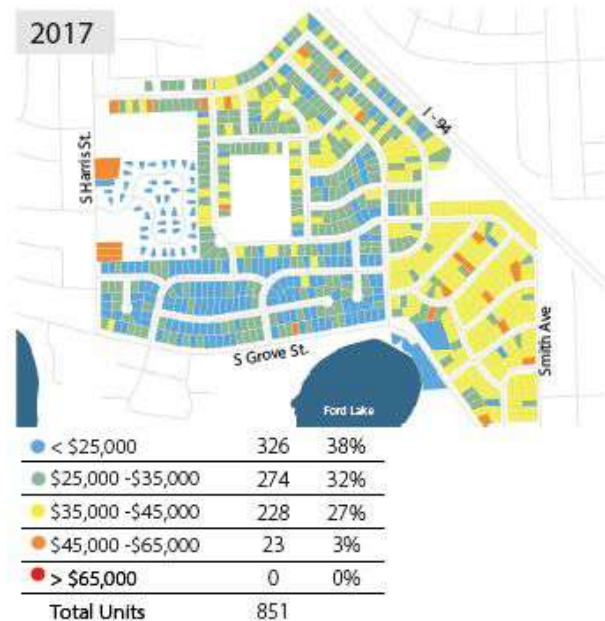
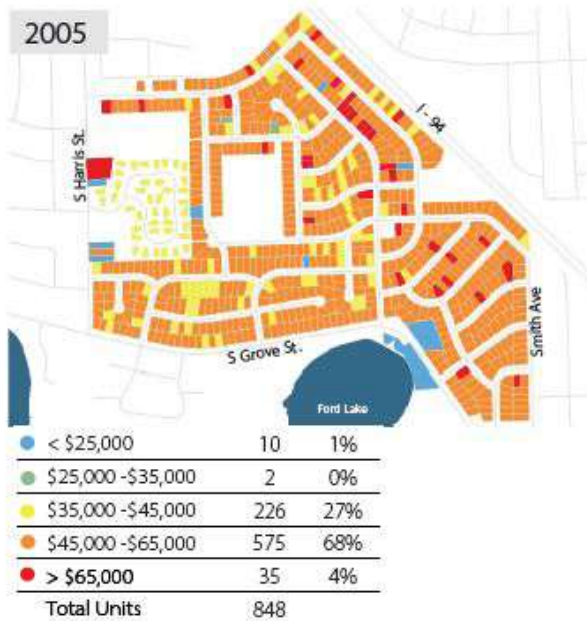


# SUGARBROOK

## HOUSING TENURE



## HOUSING VALUE



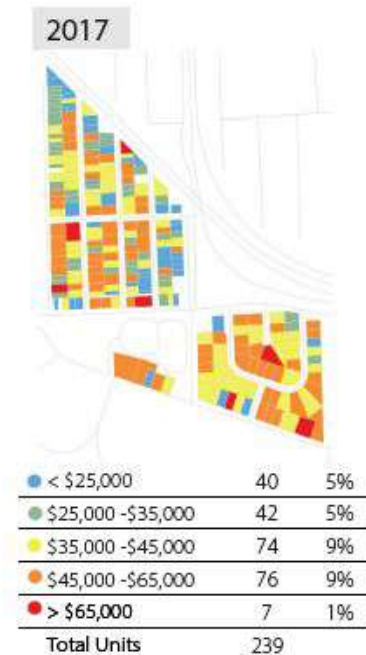
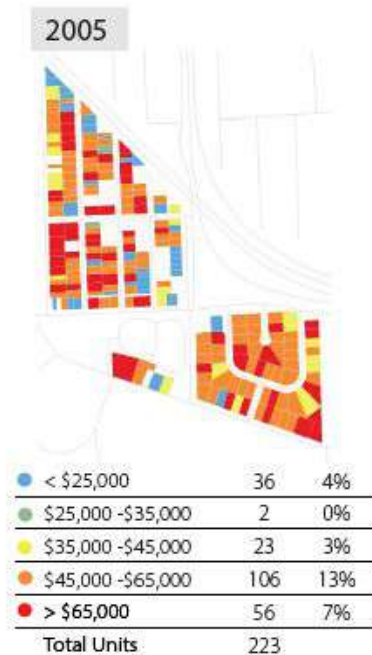
Housing Value maps show the State Equalized Value (SEV). Double the SEV is considered an estimate of housing value.  
Page 2 of 3

# LAKEVIEW

## HOUSING TENURE

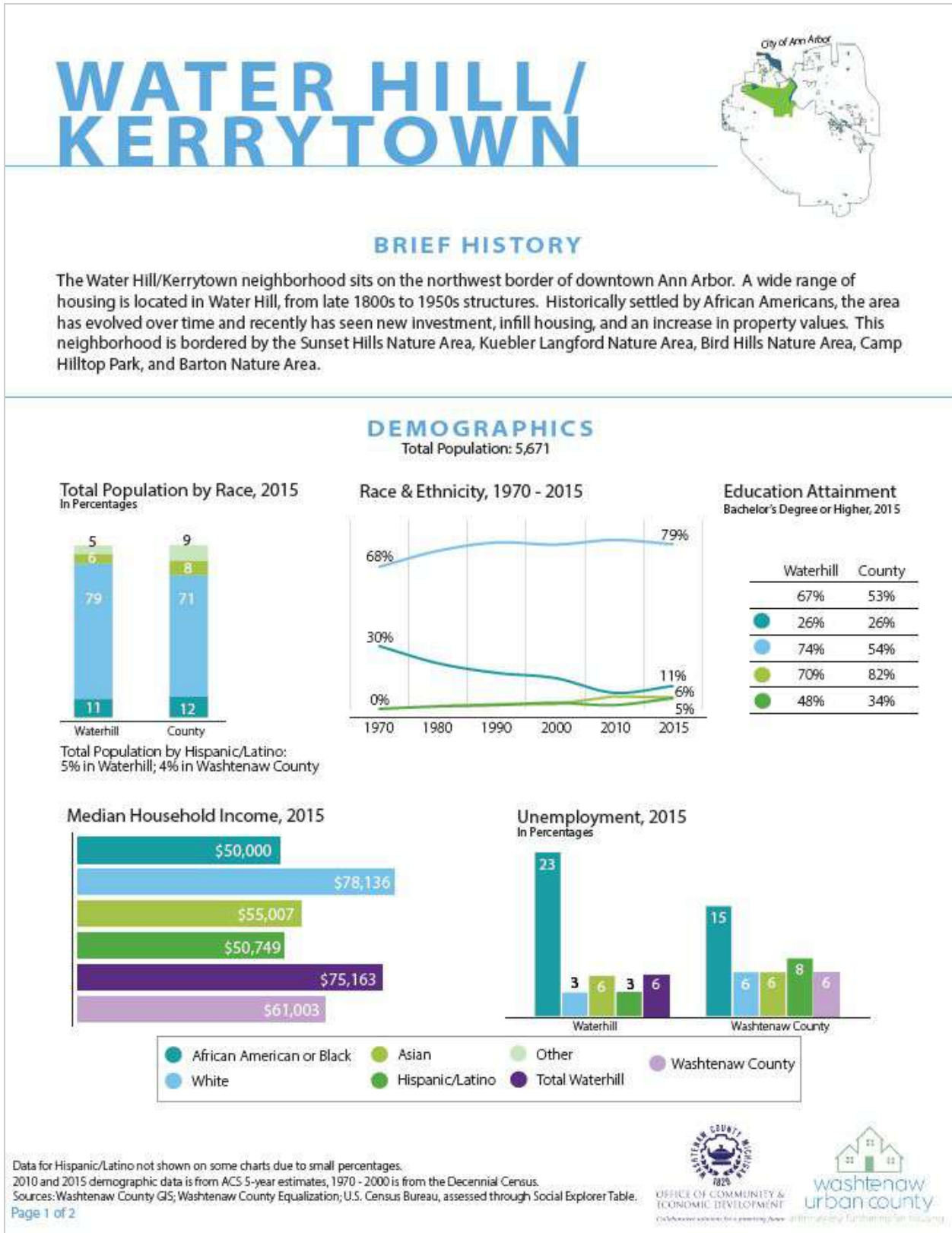


## HOUSING VALUE



Housing Value maps show the State Equalized Value (SEV). Double the SEV is considered an estimate of housing value.  
Page 2 of 3

FIGURE 8\_WATERHILL AND KERRYTOWN PROFILE





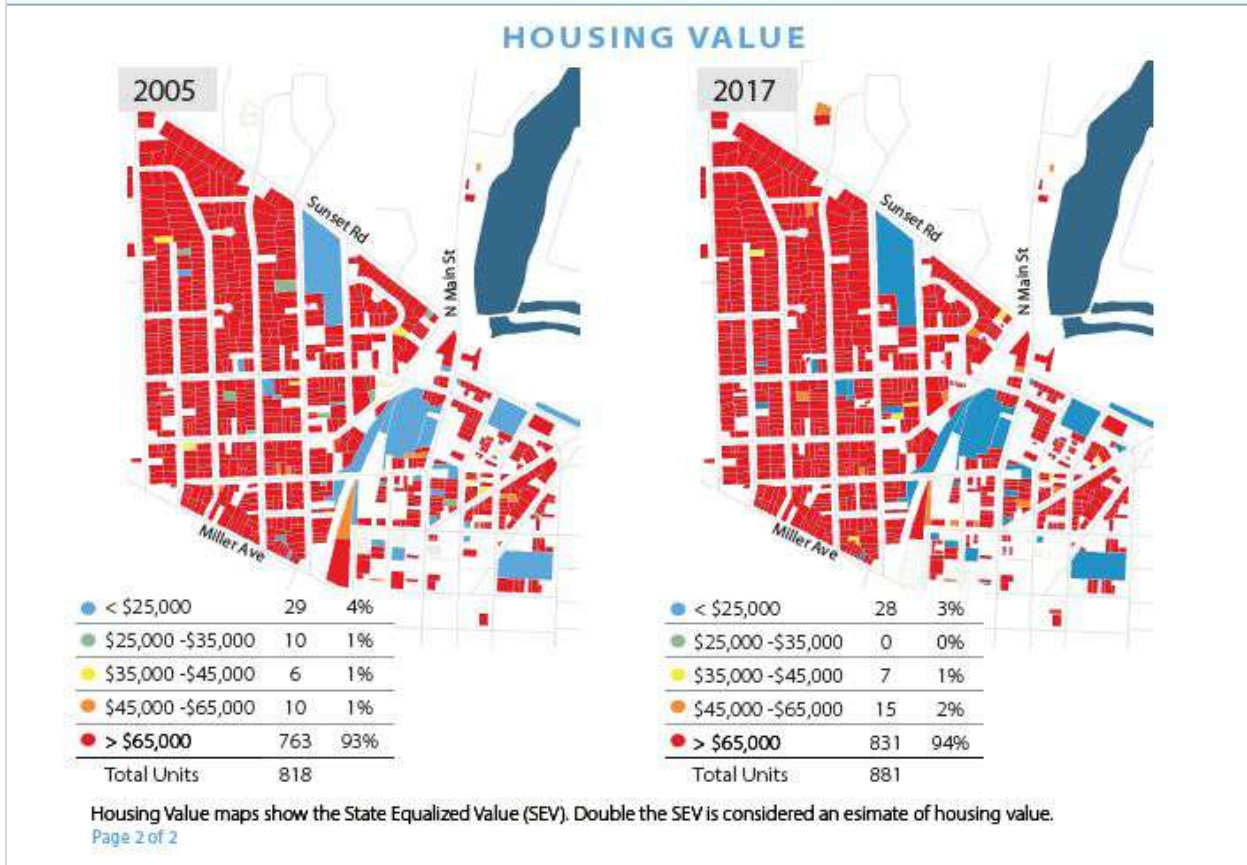
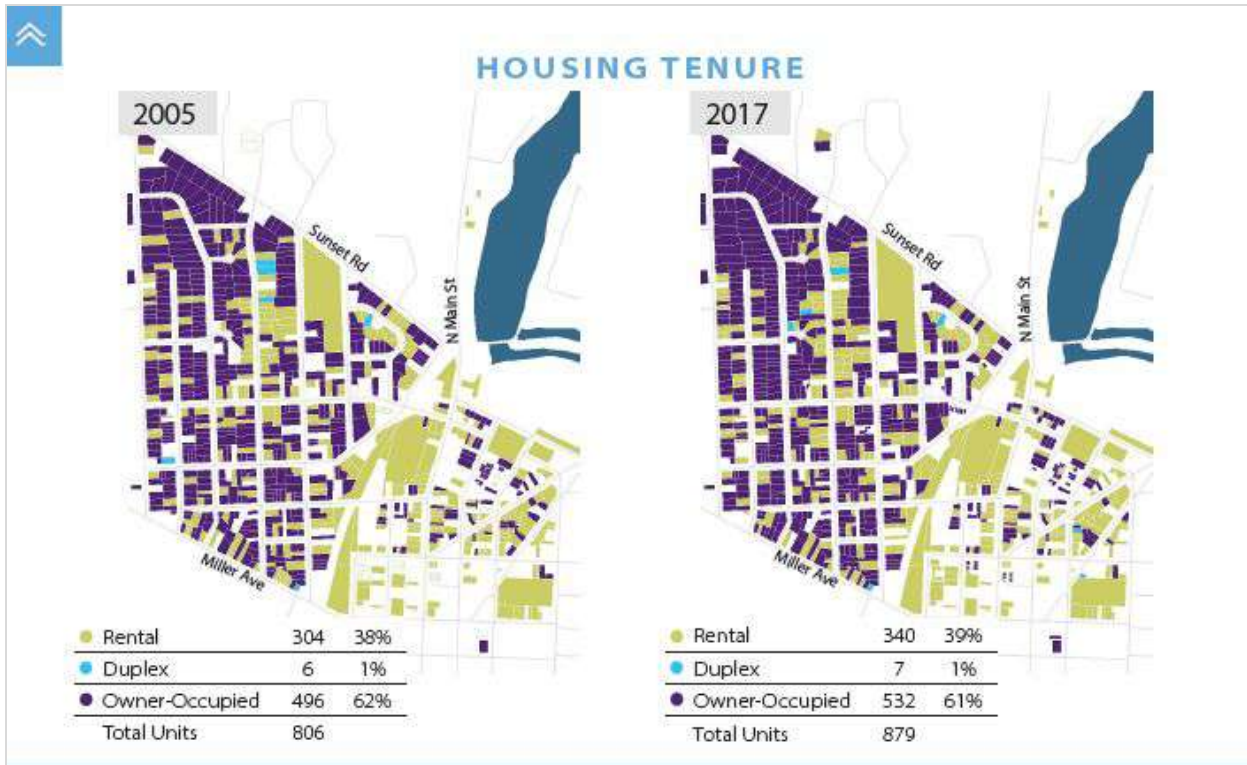
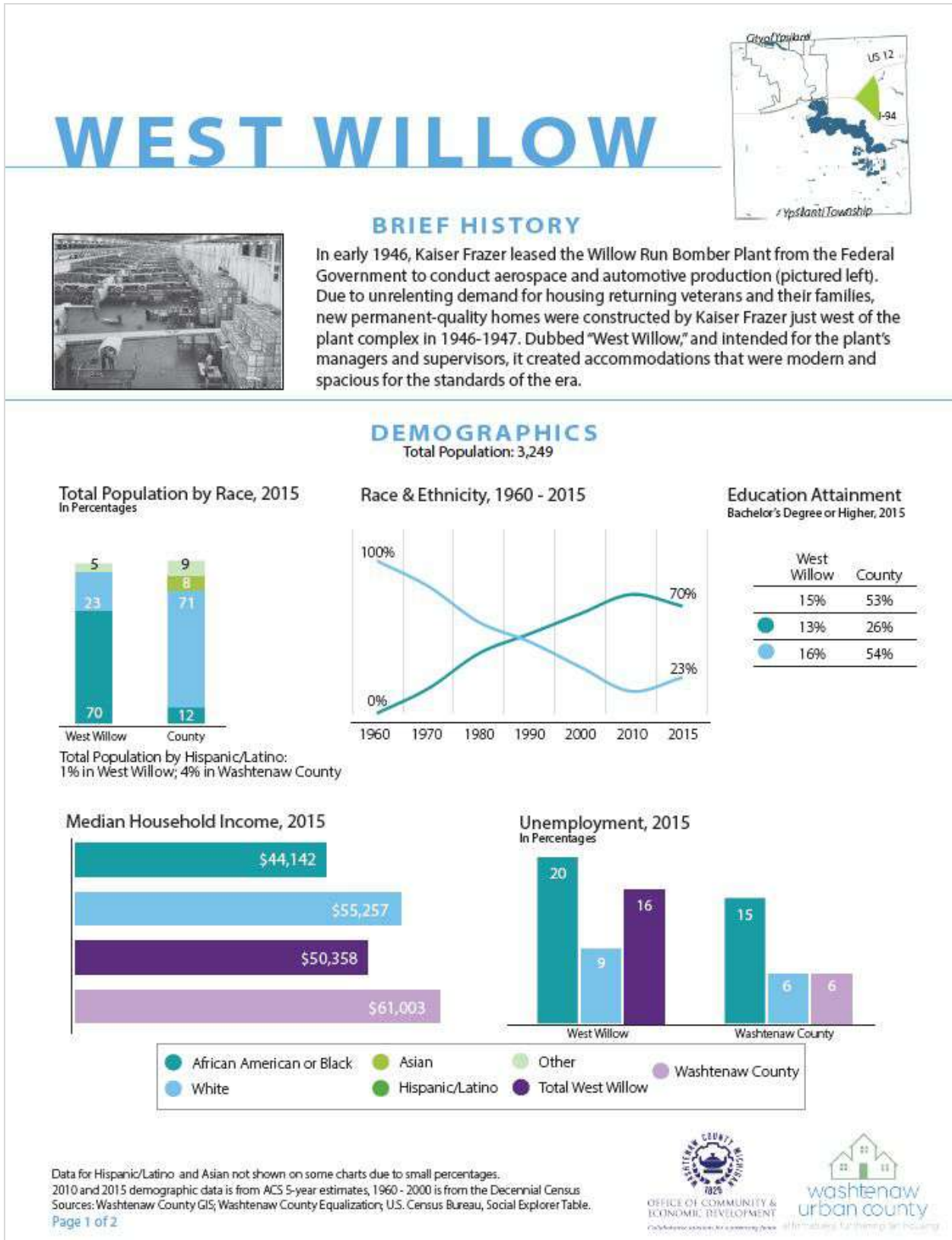
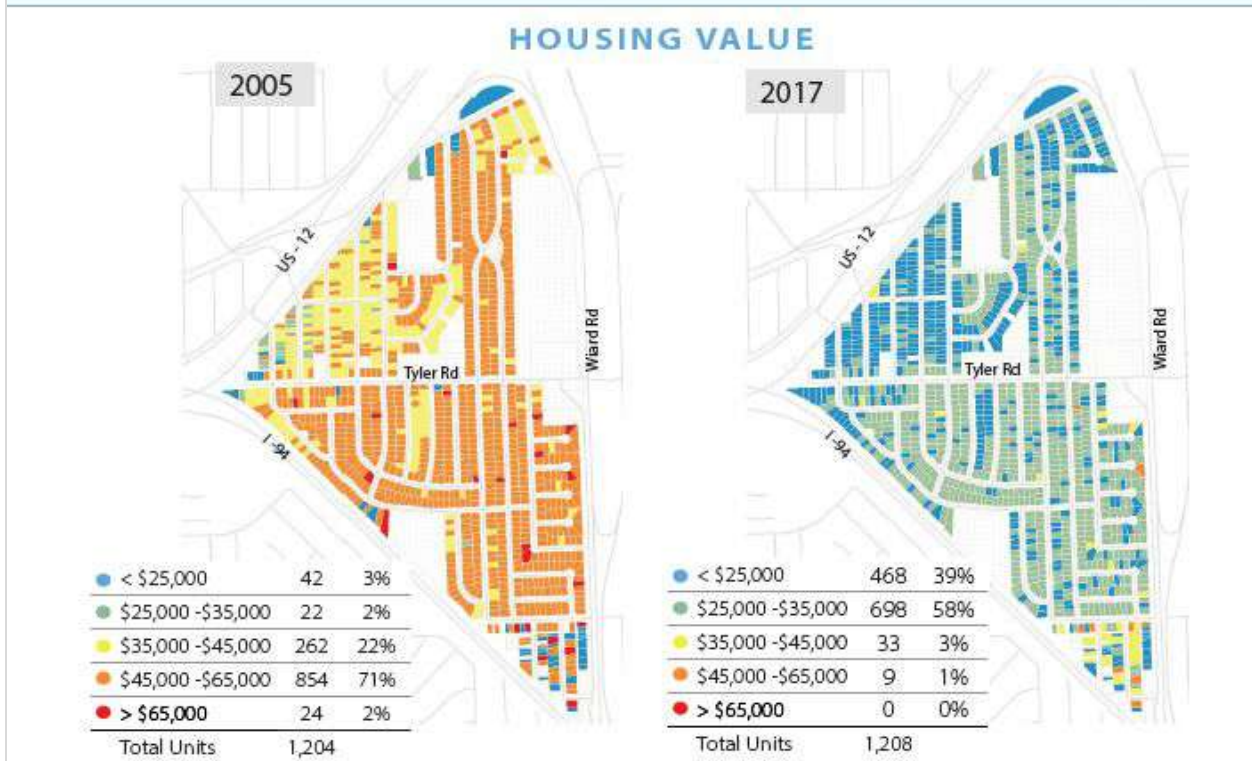


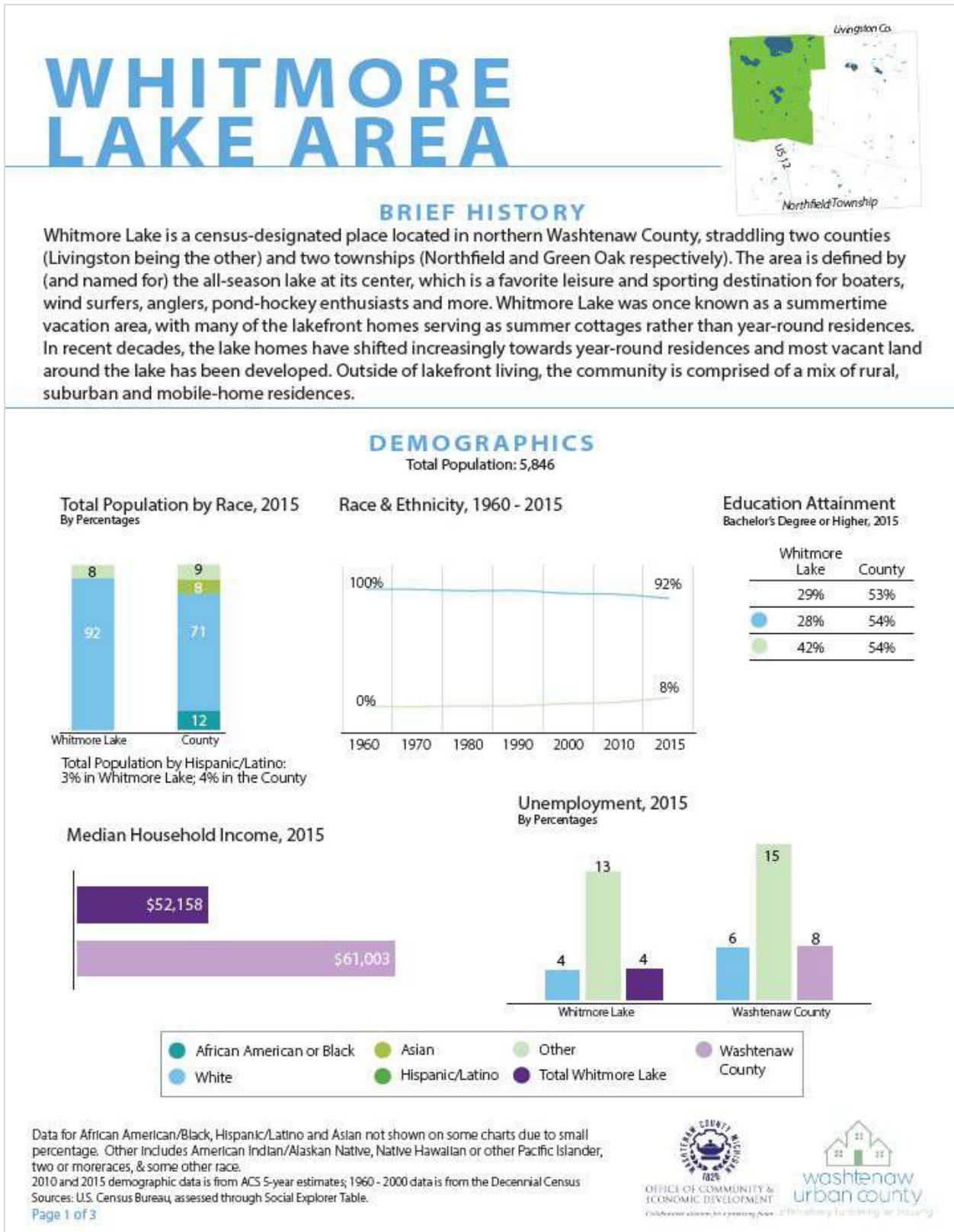
FIGURE 9\_WEST WILLOW PROFILE

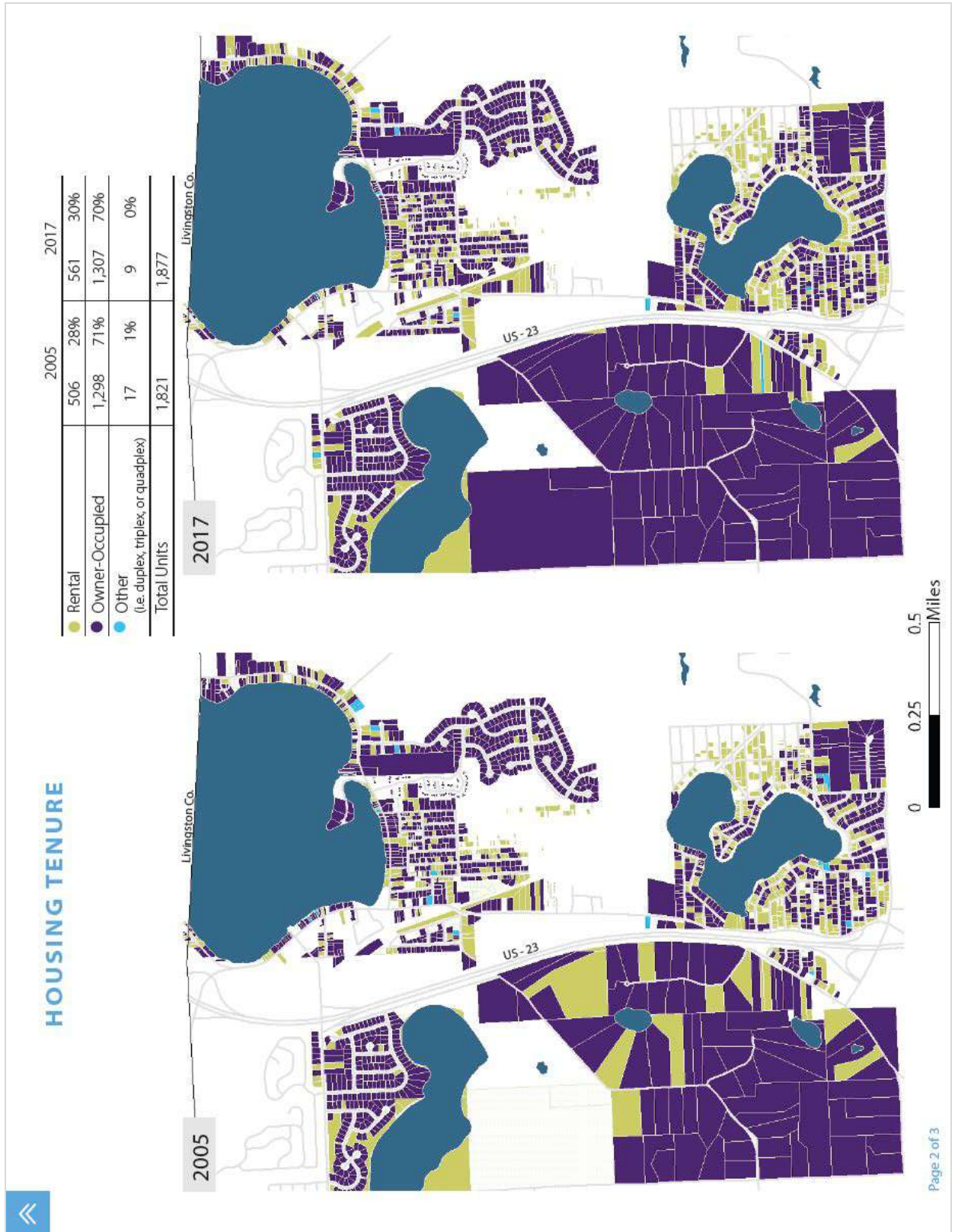




Housing Value maps show the State Equalized Value (SEV). Double the SEV is considered an estimate of housing value.

FIGURE 10\_WHITMRE LAKE PROFILE





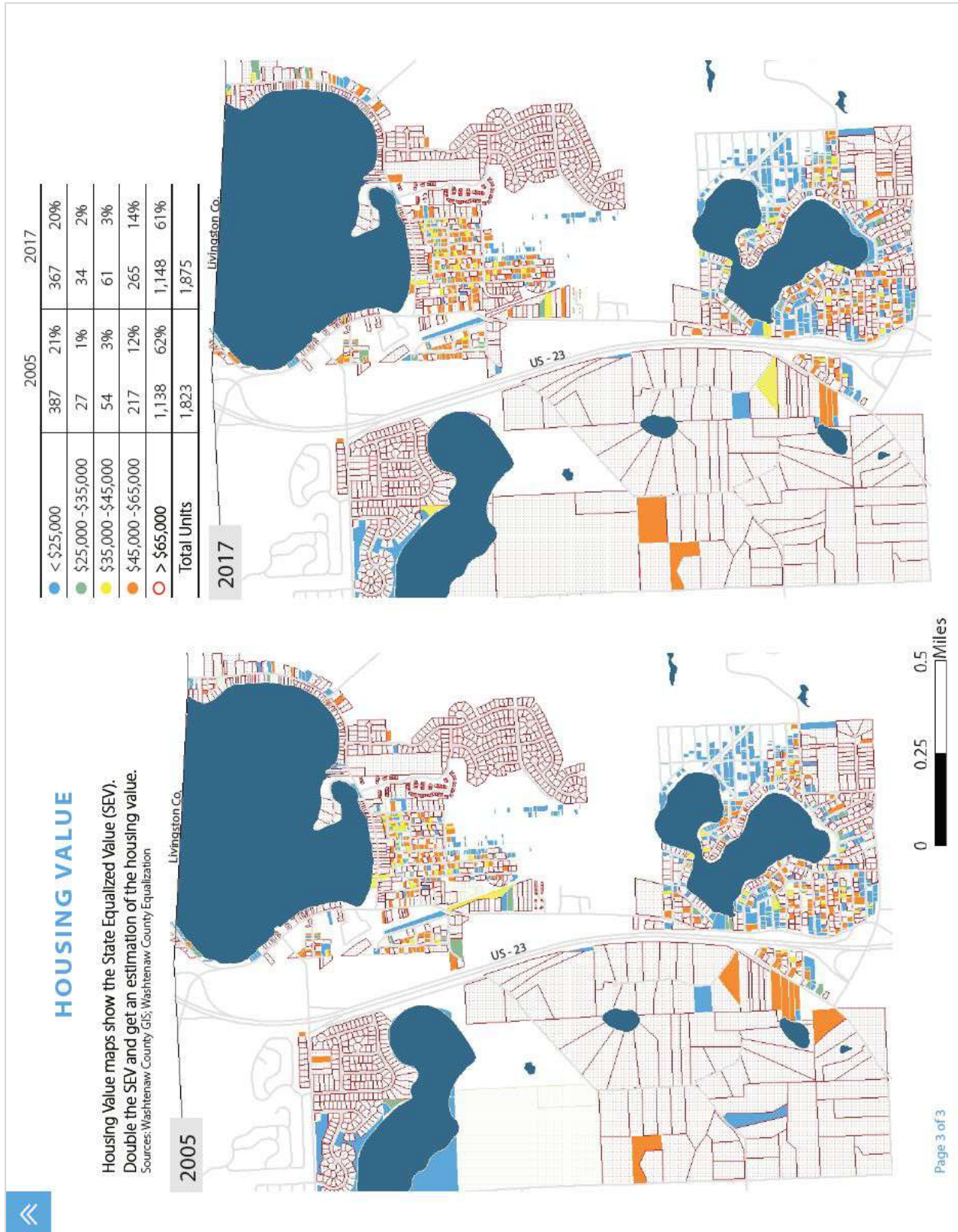
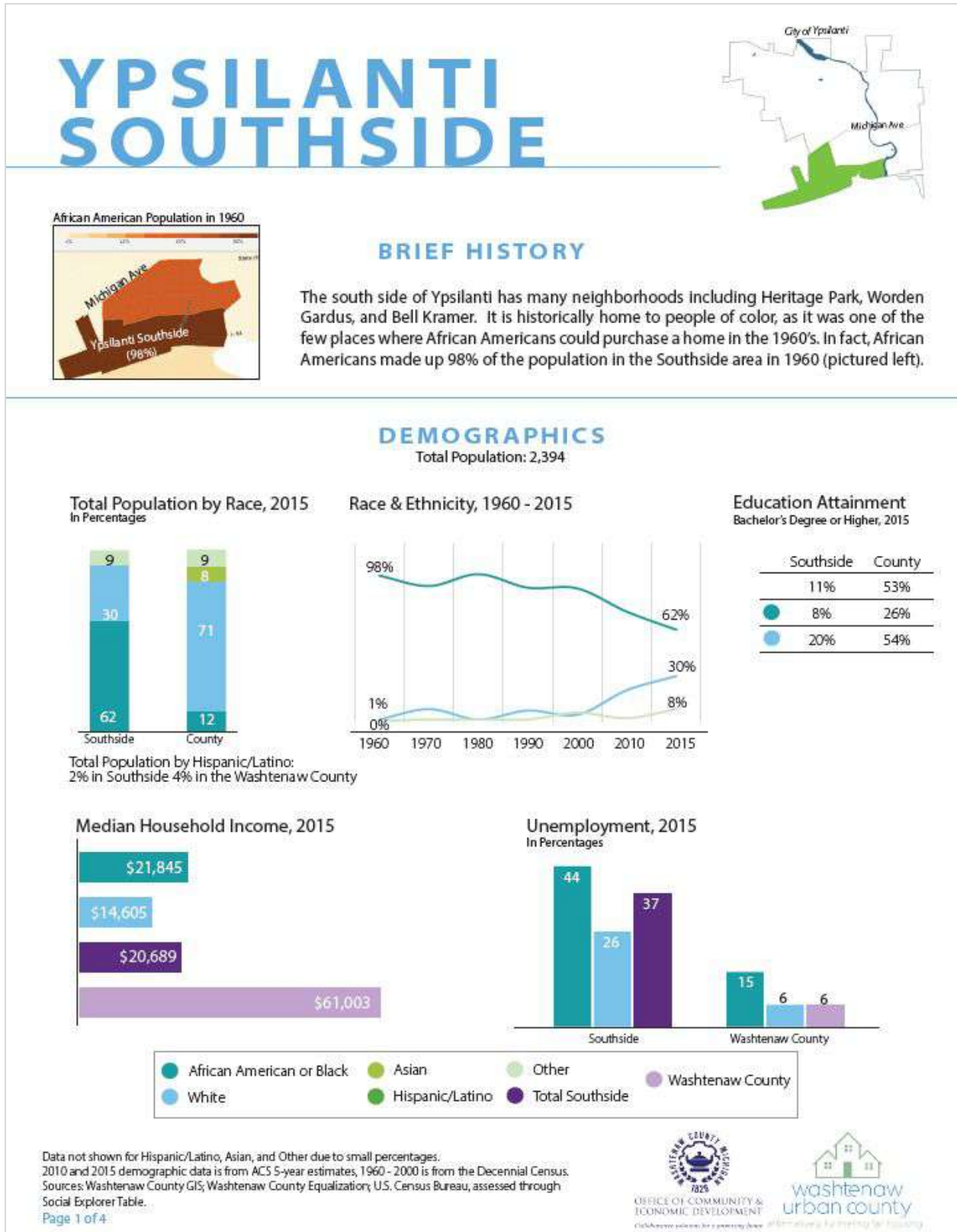
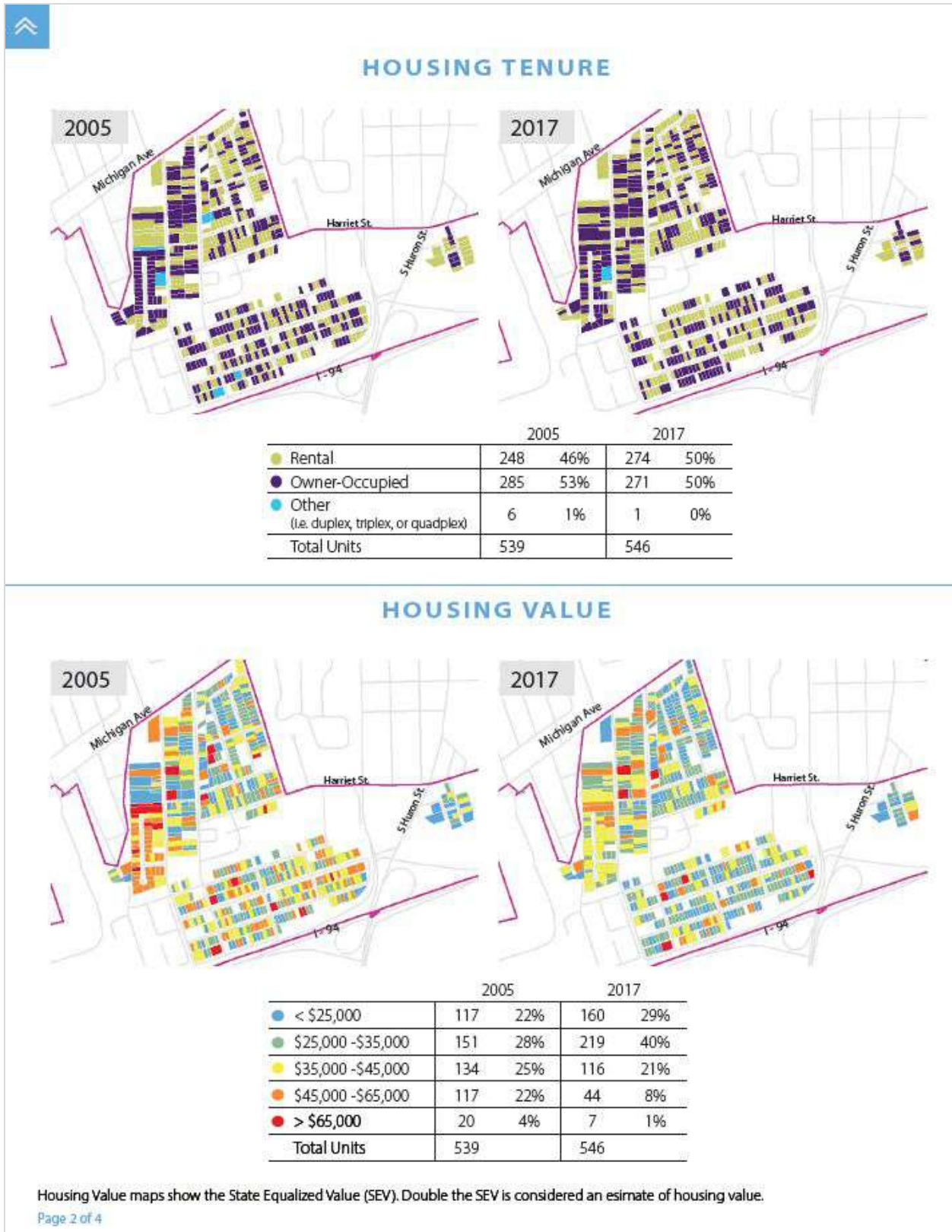


FIGURE 11\_YPSILANTI SOUTHSIDE AND HISTORIC SOUTHSIDE







# HISTORIC SOUTHSIDE



## BRIEF HISTORY

Next door to the Southside are several other traditional African American neighborhoods, including Historic Southside, Ainsworth and Ainsworth Circle. Similar to other southside neighborhoods, this area has been historically home to predominately African Americans and home to businesses owned by African Americans. Pictured left: Allen's Grocery located at 510 S. Huron Street, demolished in 1971 (Source: Lee Azus)

## DEMOGRAPHICS

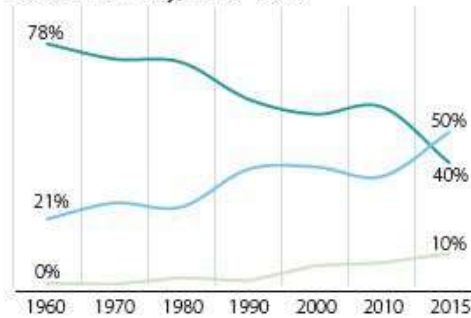
Total Population: 1,290

Total Population by Race, 2015  
In Percentages



Total Population by Hispanic/Latino:  
0% in Historic Southside; 4% in the County

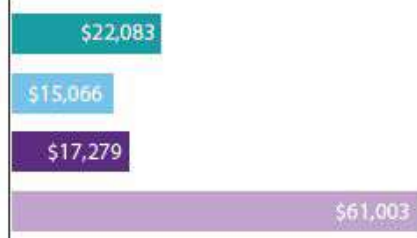
Race & Ethnicity, 1960 - 2015



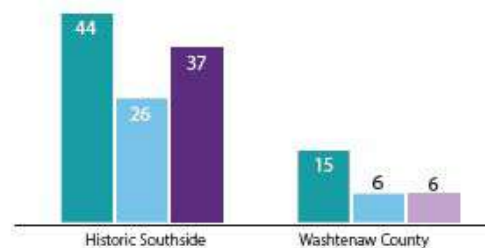
Education Attainment  
Bachelor's Degree or Higher, 2015

	Historic Southside	County
African American or Black	25%	53%
White	10%	26%
Other	34%	54%

Median Household Income, 2015



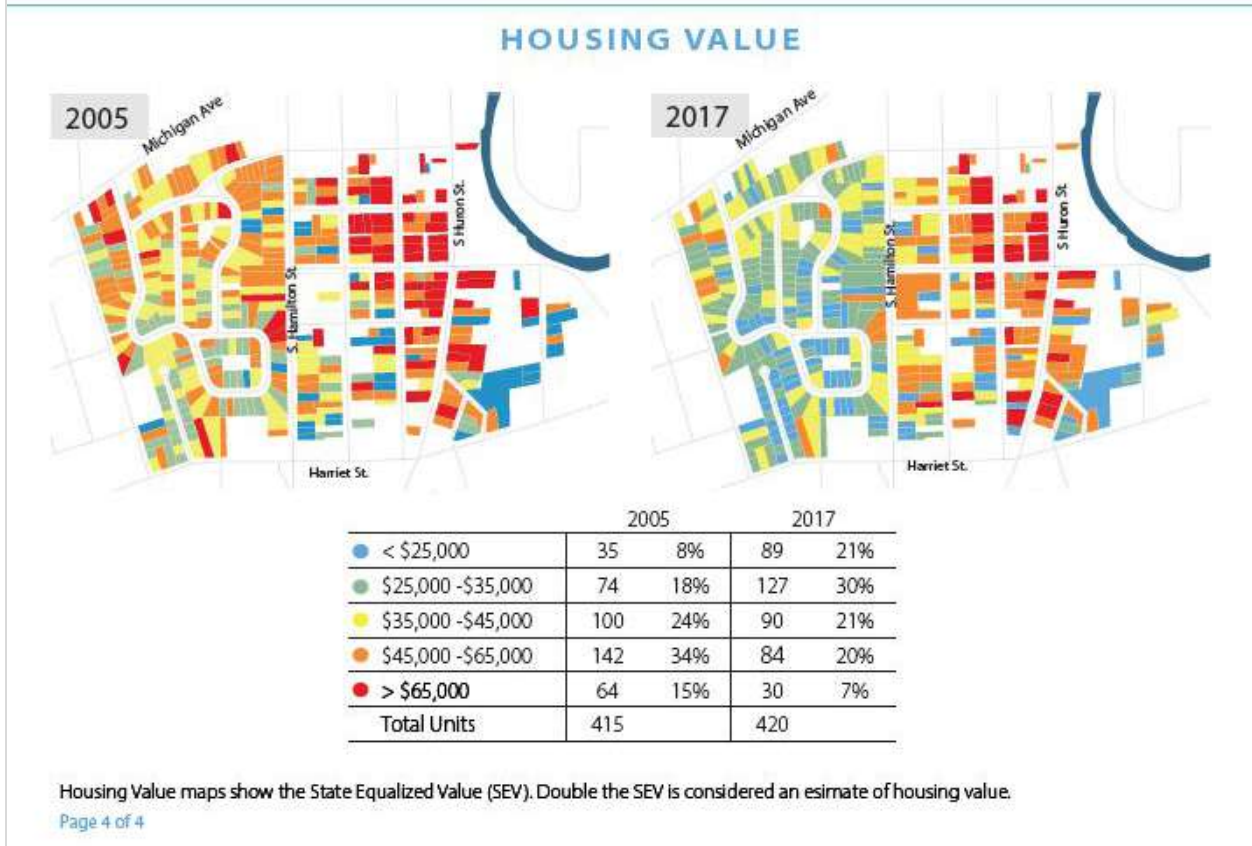
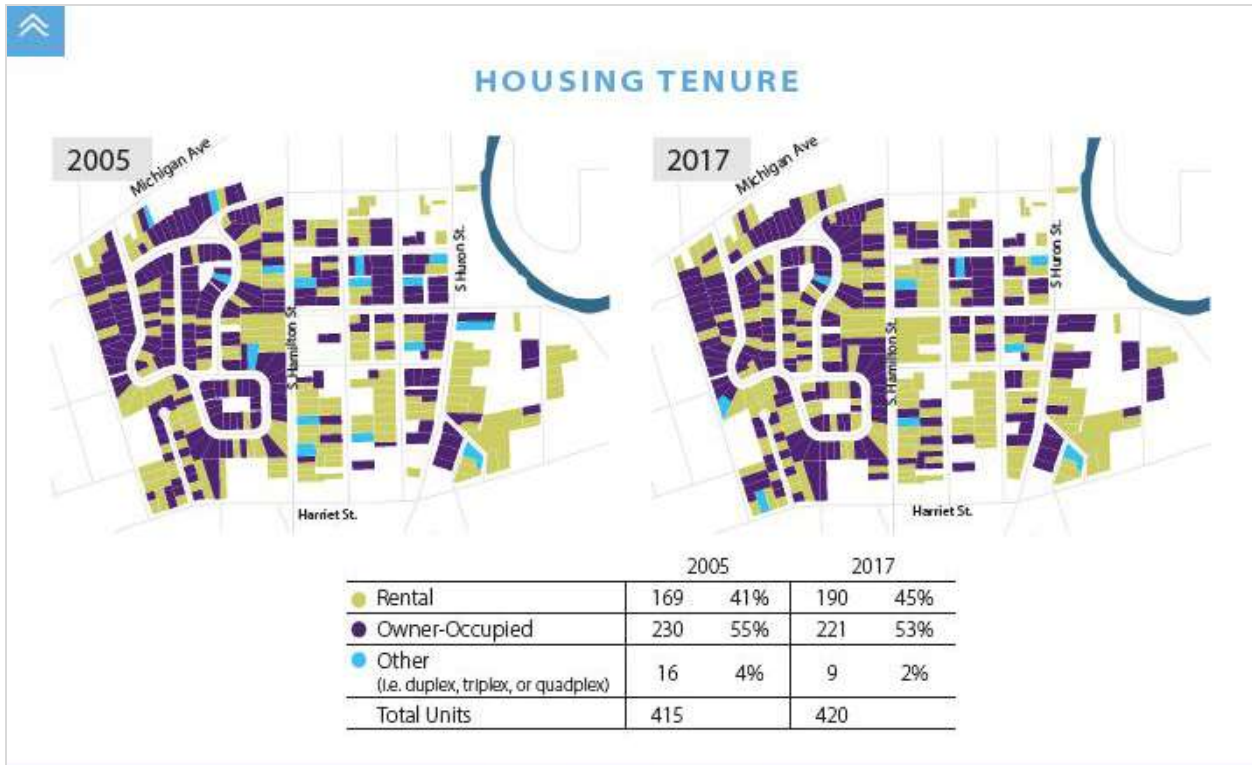
Unemployment, 2015  
In Percentages



- African American or Black
- Asian
- Other
- Washtenaw County
- White
- Hispanic/Latino
- Total Historic Southside

Data not shown for Hispanic/Latino, Asian, and Other due to small percentages.  
2010 and 2015 demographic data is from ACS 5-year estimates, 1960 - 2000 is from the Decennial Census.  
Sources: Washtenaw County GIS; Washtenaw County Equalization; U.S. Census Bureau, accessed through Social Explorer Table.  
Page 3 of 4





## Segregation/Integration

### Key Findings

A history of racism, segregation, and exclusion still has a negative impact on neighborhoods with high-concentrations of people of color, primarily located on the east side of the county. Increased demand and high housing prices in the Ann Arbor Area exacerbate this problem. According to the 2015 *Housing Affordability and Economic Equity Analysis*:

*The reality is that Washtenaw County has two distinct housing markets. One is fundamentally strong, anchored by the City of Ann Arbor, The other in the City of Ypsilanti and Ypsilanti Township is fundamentally weak and in some respects, in abject distress.*

*The former has high quality of life and excellent public schools. The latter faces real challenges. The former does not have a perception problem when it comes to safety and housing equity, the latter does.*

This dynamic is a function of previous segregation policies and actions. Without targeted intervention, the status quo will continue, and will advantage and reward the primarily white, middle and upper-middle class populations in the county. It will also exacerbate the lack of opportunity for communities of color, particularly on the east side of the county.

## History of Segregation in the Urban County<sup>1</sup>

In the early 1800s to 1900s, Ypsilanti was home to a free black population, many of which were laborers and slaves fleeing the impact of the Fugitive Slave Act. The area was also part of a broader network in Michigan and Ontario that served as a connection to Canada as part of the underground railroad. Much of this population located in the area, which is now considered the Historic South Side of Ypsilanti. After the Civil War, as the Jim Crow era began with laws codifying discrimination and segregation, separate districts for African American cultural and social organizations and businesses grew in Ypsilanti, Ann Arbor and other communities in the area.

### **Discriminatory Practices**

Specific to housing, there are no historical red-lining maps as there are for Detroit, Cleveland, Philadelphia or many others. However, similar practices were in place, including limitations on where African Americans could purchase homes, the practice of using racially restrictive covenants in subdivisions to prohibit African American ownership or residence, and lending policies directing African Americans to specific communities.

Oral histories provide stories of housing discrimination and segregation instances in which people of color were denied home loans in some communities while being directed to specific African American areas in the county. For example, in response to a surge in employment for the Willow Run Bomber Plant in the 1940's, African American and Black workers were not allowed to live in most neighborhoods, but instead were permitted to live in neighborhoods already experiencing racial segregation. The Southside of Ypsilanti (city) was one of the few nearby areas where people of color could purchase a home, and today, is known as a racially concentrated area.

### **Racially Restrictive Covenants**

As mentioned above, deed restrictions and racially restricted covenants were often used to enforce racial segregation. Records from the Washtenaw County Register of Deeds provide examples in various parts of the county used in the 1940s. Nationally, these covenants were at the height of their use from 1926 until 1948, when the Supreme Court case, Shelley v. Kramaer, determined that courts could not enforce racial covenants on real estate. These racially restrictive covenants state that no persons of any race other than the Caucasian race can use or occupy the home.

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<sup>1</sup> South Adams Street, 1990: An Historic Ypsilanti African-American Neighborhood. Website by Matthew Siegfried <https://southadamstreet1900.wordpress.com/>

A.P. Marshal African American Oral History Archive (Ypsilanti District Library) <http://history.ypsilibrary.org/>

## FIGURE 12\_RACIALLY RESTRICTIVE COVENANTS

E. The said lots shall be used and occupied by members of the Caucasian race only. This covenant and restriction shall not be interpreted so as to exclude bona fide domestic servants of a different race or nationality employed by an owner or tenant of any of said lots.

(7) No persons of any race other than the Caucasian race shall use or occupy any premises, or any part thereof, in said Sub-division, except that this provision shall not prevent occupancy by domestic servants of a different race domiciled with an owner or tenant.

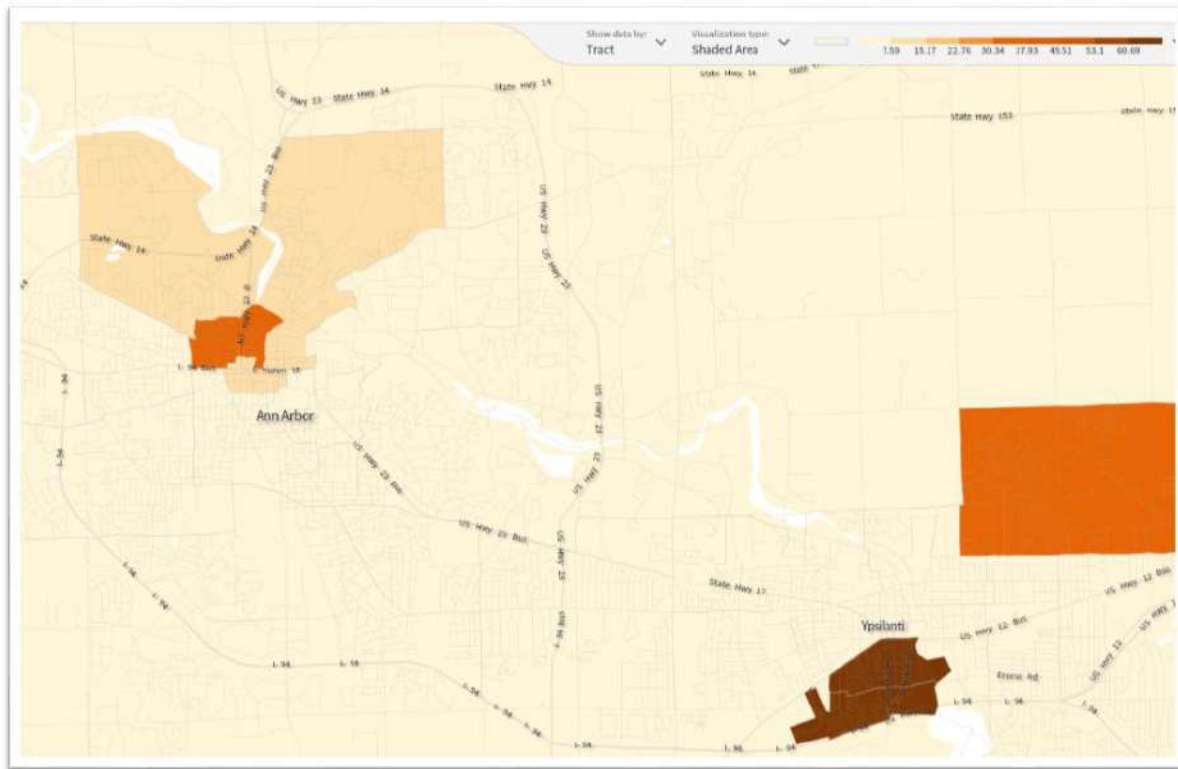
That no person of any race other than a member of the Caucasian race shall use or occupy any premises, or any part thereof, herein enumerated in said subdivision, except that this provision shall not prevent occupancy by domestic servants of a different race domiciled with an owner or tenant.

Source: Washtenaw County Register of Deeds

These practices had an impact on the development of the region. Looking back to census data from 1960, the areas with higher concentrations of African American Population are the Water Hill/Kerrytown neighborhoods of Ann Arbor, the South Side of Ypsilanti, including historic African American neighborhoods, and portions of Superior and Ypsilanti Township on the east side of the county.

Outside of the Ann Arbor neighborhoods, the areas showing higher African American populations in 1960 are similar today, and include one of the Racial/Ethnicly Concentrated Areas of Poverty (R/ECAP) areas (Map 9).

MAP 9\_AFRICAN AMERICAN POPULATION IN 1960



Source: US Census Data, 1960, provided by Social Explorer

**Impact of Segregation and Exclusion**

When referring to the Racial/Ethnic Dissimilarity Index, provided by HUD, there is less racial/ethnic segregation in the the Washtenaw Urban County than in the Region (all of Washtenaw County). Urbanized areas tend to attract people for its employment opportunities, access to goods and services, public transportation, entertainment and so on. Because there is less development and more agricultural land use in rural areas, these opportunities and services are fewer, as is the population. These differences between urban and rural areas may affect the Dissimilarity Index.

TABLE 18\_RACIAL/ETHNIC DISSIMILARITY INDEX (CURRENT)

	Urban County	Washtenaw County
Non-White/White	39.59	41.51
Black/White	53.61	55.37
Hispanic/White	26.88	27.93
Asian or Pacific Islander/White	47.90	49.82
< 40 = Low Segregation; 40 to 54 = Moderate Segregation; > 55 = High Segregation		
Source: HUD-Provided Table 3, Racial/Ethnic Dissimilarity Trends		

The Race/Ethnic Dissimilarity Index shows high segregation between Blacks and whites, as well as moderate segregation between Asian or Pacific Islanders and Whites, in both Urban County

(Jurisdiction) and Washtenaw County (Region). Segregation between non-whites and whites is moderate in the Jurisdiction, whereas segregation between non-whites and whites is high in the Region.

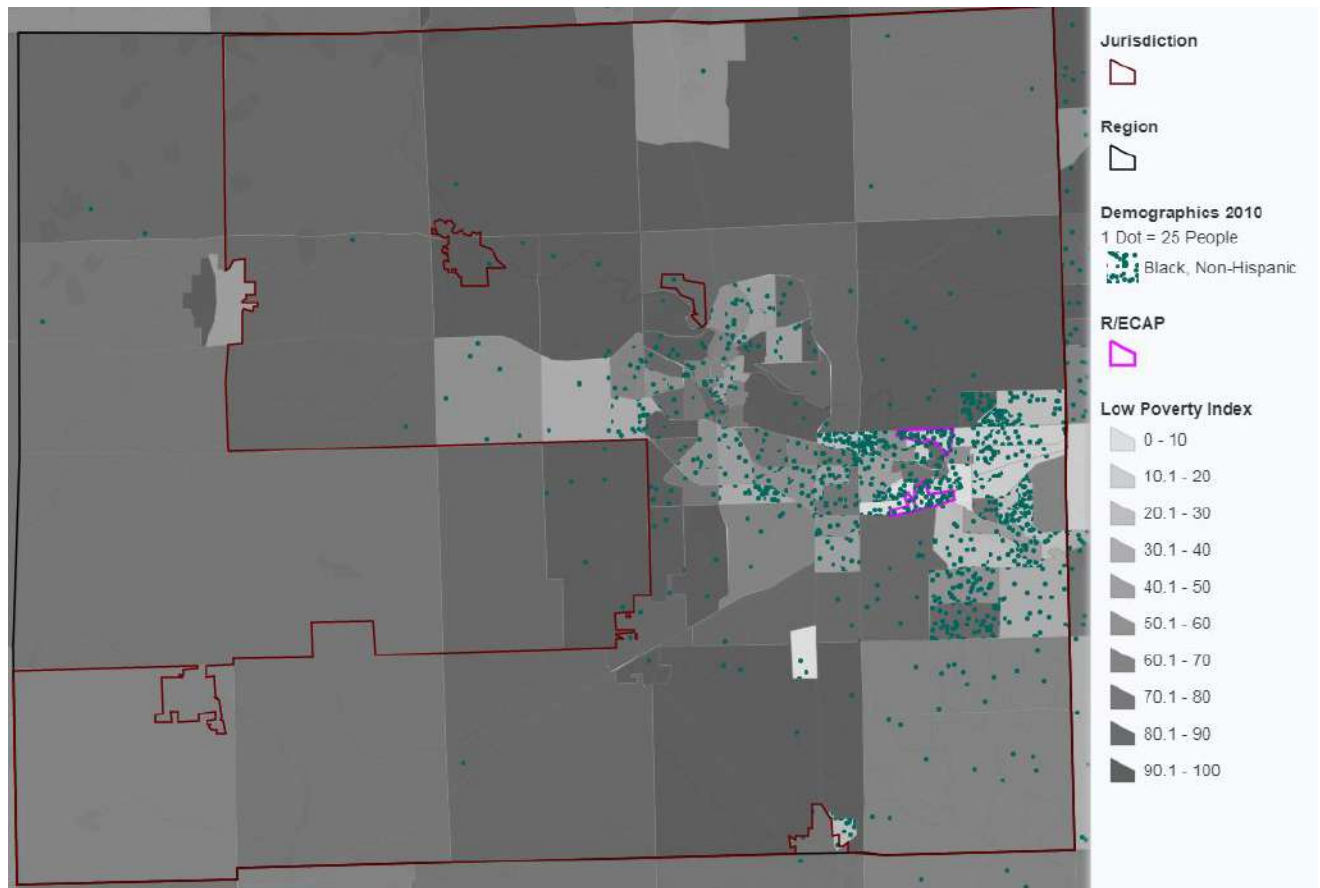
In the Urban County, there has been a steady increase in segregation among Blacks and whites (largest increase), Asian/Pacific Islanders and whites (second largest), and Hispanic/Latinos and whites. It is notable that although segregation has increased among Hispanic/Latinos and whites, the Dissimilarity Index indicates the segregation currently is low (less than 40). Likewise, segregation among Asian/Pacific Islanders and whites is moderate (40 to 54). Segregation among Blacks and whites is right on the border of moderate and high, and shows the highest level of segregation when comparing the other dissimilarities.

TABLE 19\_RACIAL/ETHNIC DISSIMILARITY INDEX TRENDS FROM 1990, 2000 AND 2010

	1990 Trend	2000 Trend	2010 Trend	Current	Change 1990-Current
Non-White/White	37.97	39.36	36.87	39.59	+ 1.62
Black/White	48.25	50.51	52.30	53.61	+ 5.36
Hispanic/White	25.53	26.53	24.77	26.88	+ 1.35
Asian or Pacific Islander/White	44.40	48.90	43.66	47.90	+ 3.5
< 40 = Low Segregation; 40 to 54 = Moderate Segregation; > 55 = High Segregation					
Source: HUD-Provided Table 3, Racial/Ethnic Dissimilarity Trends					

A [2015 report by the Martin Prosperity Institute](#) finds that the Ann Arbor MSA (Washtenaw County) is the 5th most poverty-segregated community in the nation, and 8th in the nation for overall economic segregation. Ann Arbor joins a few other university towns on this index (Ames, Iowa and New Haven, Connecticut.). The influence of the University of Michigan (U of M) and the University of Michigan Hospital on housing and transportation patterns cannot be underplayed. The impact on the housing market is documented in the [2015 Housing Affordability and Economic Equity Analysis](#) published by the OCED. More about both reports will be discussed in the access to opportunity chapter. However, the poverty maps and areas with high African American population are strikingly similar. For instance, Map 10 shows African American populations living areas of high poverty.

### MAP 10\_LOW POVERTY INDEX AND AFRICAN AMERICAN POPULATION

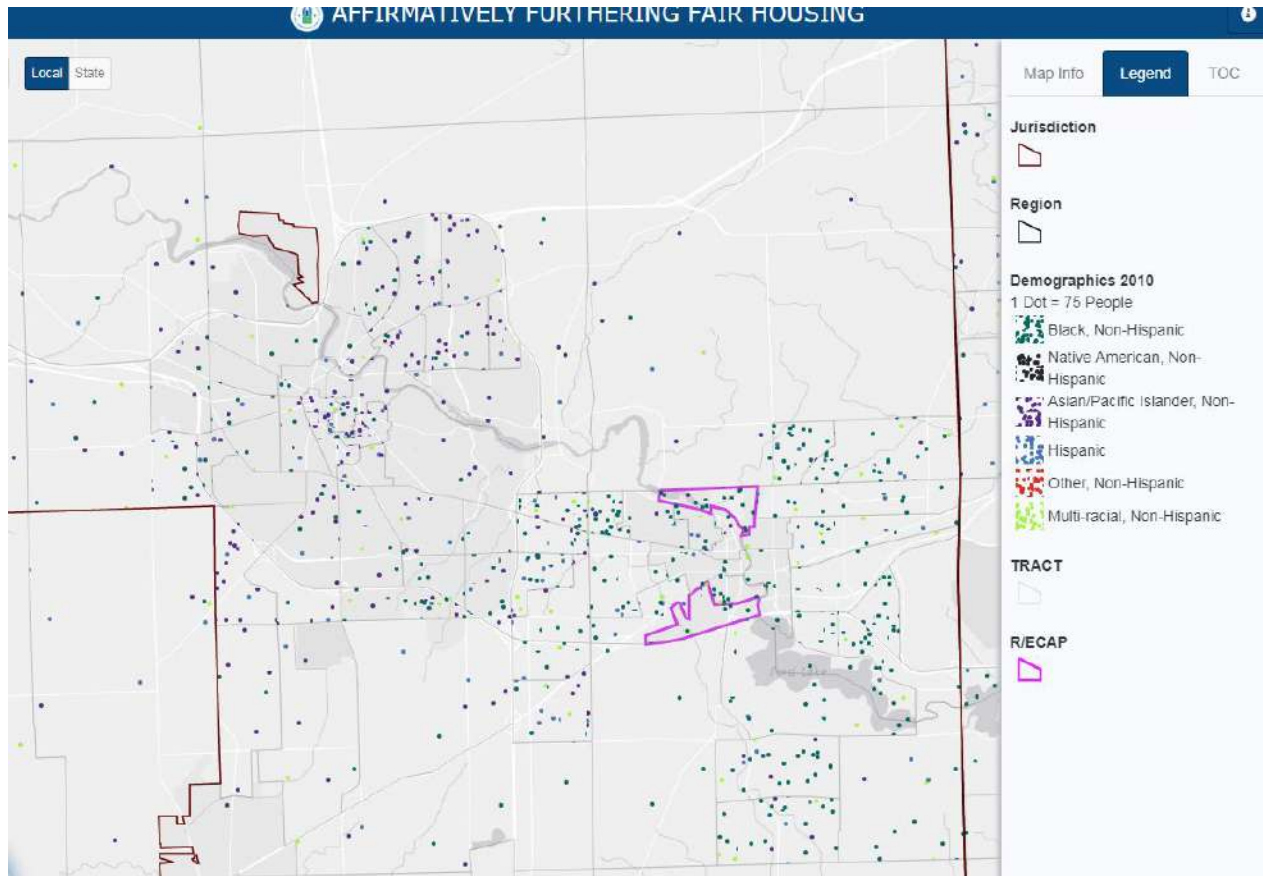


Today's maps (Map 11) mirror some of the historic racial segregation with clusterings of concentrated race and ethnicities:

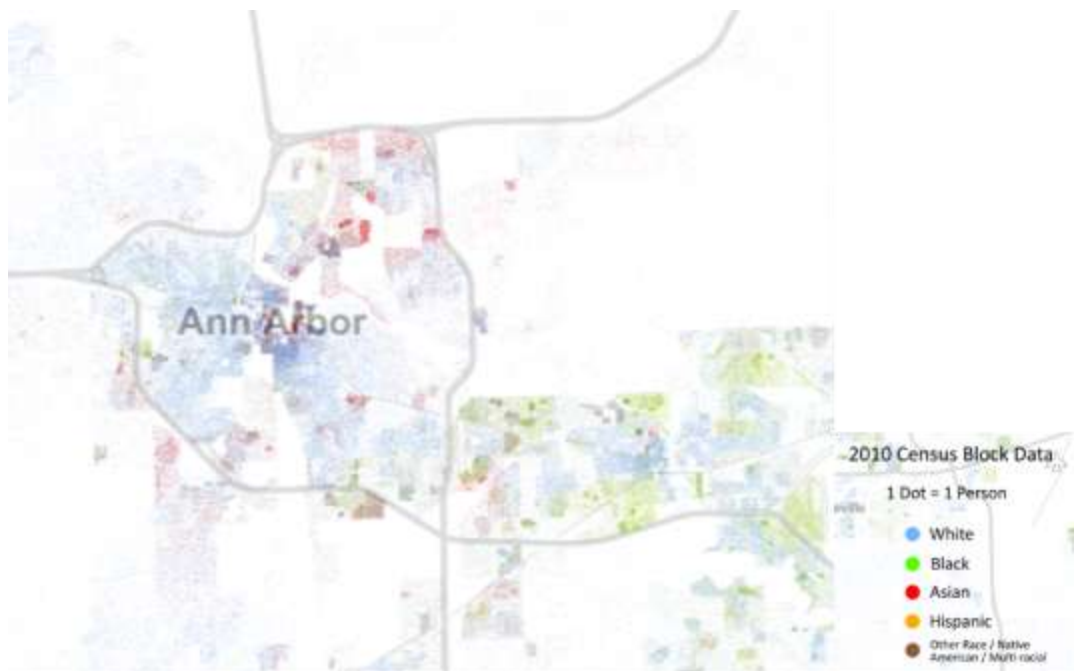
- African American and Blacks predominantly reside in the City of Ypsilanti, Ypsilanti Township, portions of Scio Township, Pittsfield Township (especially in the Golfside and Washtenaw Ave area), and Milan/York Township area
- Asian and Pacific Islanders clustered in Ann Arbor's north end and downtown area, and in Pittsfield Township.
- Hispanic/Latino populations clustered in Pittsfield Township (also in the Golfside area), Ypsilanti Township, Ann Arbor, and Milan/York Township.



MAP 11\_POPULATION BY RACE



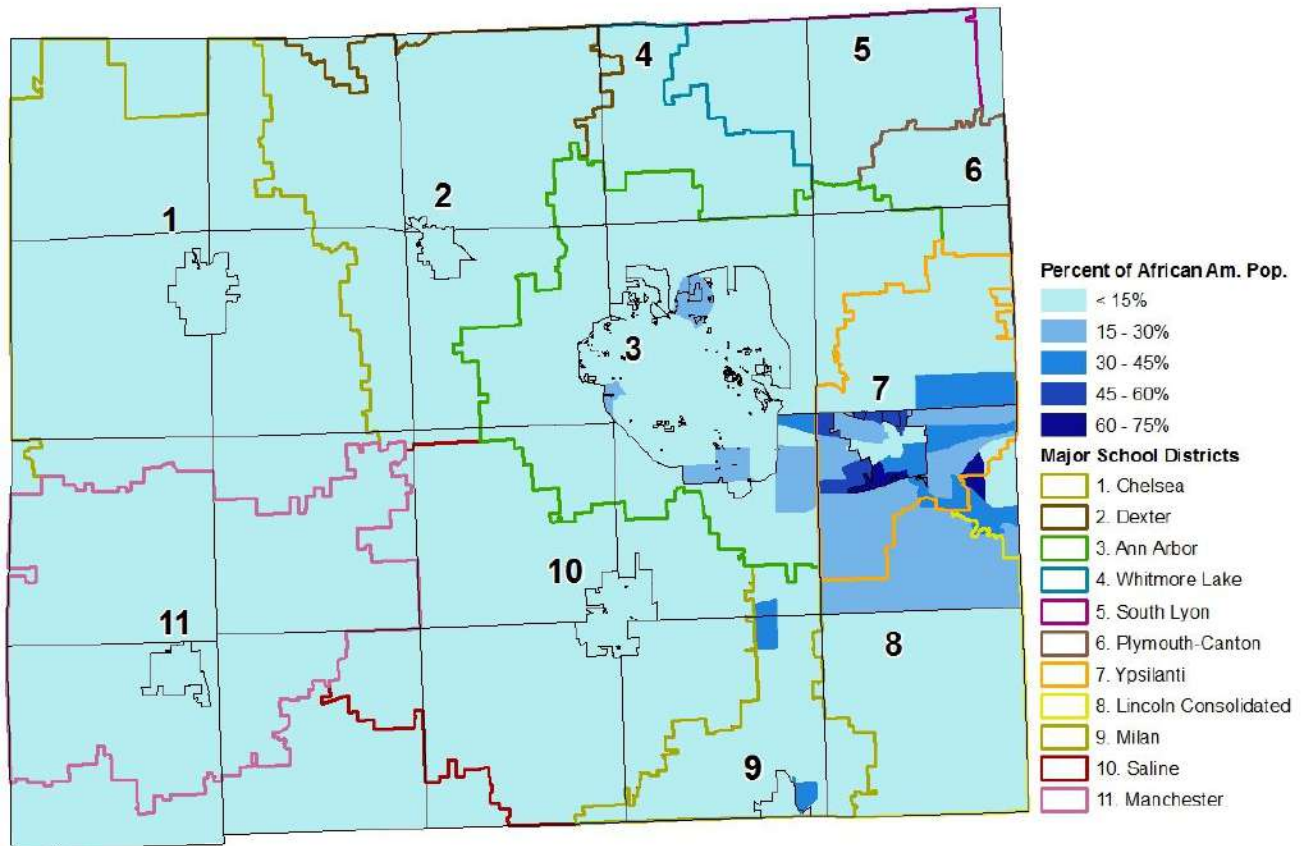
MAP 12\_RACIAL DOT MAP, 2010



Source: The Racial Dot Map

Another way to look at the potential segregation is to look at minority populations within given school districts. As seen on Map 13, the majority of the census tracts with higher percentages of African American students are located in the Ypsilanti Community Schools and Lincoln Consolidated Schools Districts. Neighborhood or regional segregation is playing out in school district segregation as well.

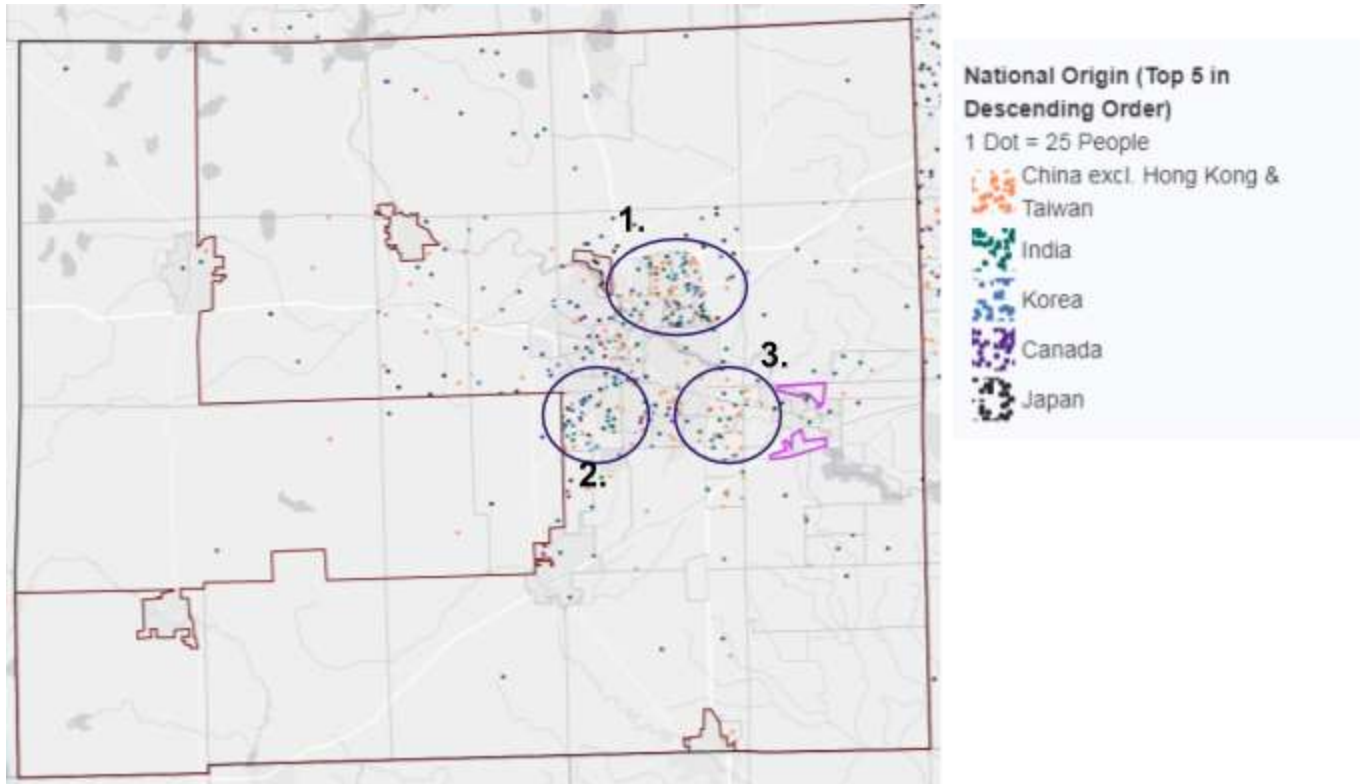
MAP 13\_SCHOOL DISTRICTS BY AFRICAN AMERICAN POPULATION



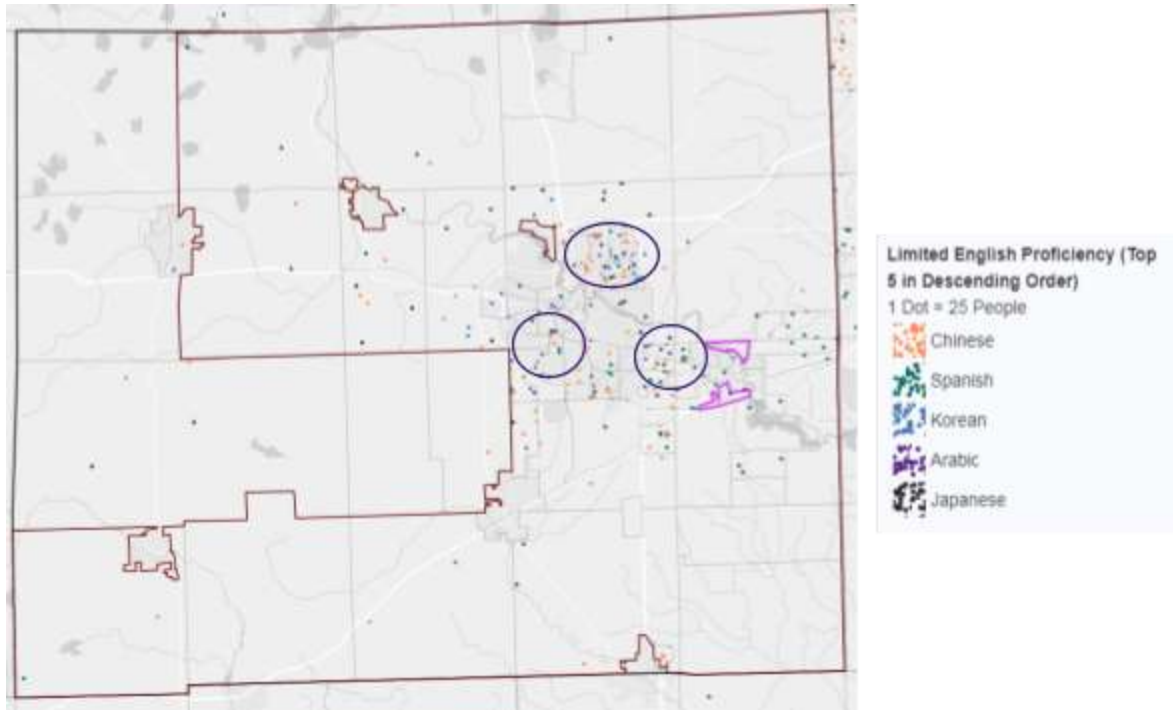
Source: Race by Black or African American Alone, 2015 American Community Survey 5-year Estimates

As mentioned in the Demographic Summary Chapter, there are clusterings of Foreign-Born residents and LEP residents, especially in certain areas in the City of Ann Arbor and Pittsfield Township. Residents with Limited English Proficiency live in similar clusters.

MAP 14\_\_FIVE MOST POPULOUS NATIONAL ORIGINS



## MAP 15\_LIMITED ENGLISH PROFICIENCY



Washtenaw County is unique in that it hosts two major universities, the U of M in Ann Arbor and Eastern Michigan University (EMU) in the City of Ypsilanti. While both universities draw international populations, 15% of enrolled U of M students in 2016 (6,754) were international students.

### Contributing Factors

Each chapter discusses contributing factors that continue, worsen, or otherwise prevent resolution to the fair housing issue discussed in the chapter. These contributing factors help direct the development of goals and strategies to counter the issue.

### Community Opposition

Community Opposition is common when there are proposals for specific developments looking to add affordable housing or when there are proposed zoning changes to add residential density. While these changes in high opportunity could help offset some of the push of lower income (often African American) households to the east side, they continue to be difficult to implement. In continuation of this vicious cycle, lower income households are then pushed out of the east side as more people relocate to the east side, potentially raising cost of living and rents throughout the east side. It is also important to note that the community opposition is not exclusive to high-opportunity markets and is in play throughout the county.

The opposition to affordable housing sometime takes the form of “green or environmental” concerns. When pressed, the conversation usually sources concerns related to safety, the increase in low-income households, and concerns about different races moving into the neighborhood.

A smaller, but persistent, way this opposition also plays out is in the location of group housing that provides support and treatment for persons with disabilities and/or substance abuse issues.

### **Displacement of residents due to economic pressures**

A few factors are at play with concerns about displacement. As frequently discussed in the [2015 Housing Affordability and Economic Equity Analysis](#), high housing prices in the Ann Arbor area are pushing many households out of Ann Arbor, often to the east side of the county, specifically in Ypsilanti and Ypsilanti Township. The high cost of housing, due in large part to the presence and dominance of the U of M and its hospital system, impacts renters and homeowners alike.

In some cases, loss of committed affordable units has also caused displacement. Of current concern is the Cross Street Village in the City of Ypsilanti. Cross Street Village is an affordable senior living facility where the property owners have completed the 15-year mandatory affordability period, but are opting out of the 99-year extended affordability period by using the IRS Qualified Contract exemption that allows them to “list” the property for sale. Based on the calculation involved, the property is listed for sale at \$12,050,000, significantly higher than its appraisal of \$4 million. While the affordability period will extend 3 years, current tenants are seeing rent increases and are concerned about how long they will be able to stay. Many are already looking to relocate and are finding few affordable options.

The Ypsilanti Housing Commission’s Rental Assistance Demonstration (RAD) conversion is having a positive impact on neighborhoods due to the renovation of all units, including demolition and redevelopment in some cases. These properties moved out of public ownership to a public/private partnership to allow the use of Low-Income Housing Tax Credits to fund renovation and redevelopment. The total affordability period for these properties is 45 years once construction is complete.

The Ann Arbor Housing Authority is also in the middle of a full RAD conversion, but the AAHA/City of Ann Arbor are maintaining ownership of the land to control long-term affordability for those properties. The City of Ann Arbor provided a 99 year ground lease to the entity developing the property. In both cases, long-term planning will be needed to maintain affordability at either the 45 or 99 year point.

### **Lack of community revitalization strategies**

The foreclosure crisis had a particularly negative impact on Ypsilanti Township. In response, the township partnered with Habitat for Humanity of Huron Valley and provided resources to launch revitalization strategies in three neighborhoods: West Willow, Gault Village, and Sugarbrook.

The partnership includes funding for acquisition and rehab of foreclosure of lower-quality houses for rehabilitation and ownership for low-income households. In addition, Habitat has provided community development support through neighborhood organization, capacity building and development, and supportive programs, including exterior cleanups, park improvements and more.

The City of Ypsilanti has created a disposition policy for vacant lots deeded to the city through tax foreclosure and has success putting them into private ownership. That policy is supported by the creation of a Neighborhood Enterprise Zone (NEZ), which uses tax abatement and encourages infill on the southside of the city.

Areas lacking any revitalization strategy include the MacArthur Boulevard area of Superior Township and the LeForge Road area, which straddles both Ypsilanti City and Township.

### **Lack of private investments in specific neighborhoods**

The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. That said, there has been great improvements through RAD conversion of Ypsilanti Housing Commission properties, and residential investments in rehabilitation of post-foreclosure properties. There are several new prospects in the planning stages, but still limited investment, particularly in the south and southeast neighborhoods.

Private investments in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development often with new ownership. Additionally, there is interest in investment along several corridors (i.e. Whittaker Road); however, the Gault Village shopping area- previously a neighborhood center with a grocery and related convenience shopping- is still in transition and is experiencing high degree of vacancy.

### **Lack of public investments in specific neighborhoods, including services or amenities**

Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to it's age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.

The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.

Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.

Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.

### **Lack of regional cooperation**

Positive regional cooperation include the Urban County, the Continuum of Care for homelessness services, and the expansion of the Ann Arbor Transportation Authority to the Ann Arbor Area Transportation Authority, now including the City of Ypsilanti and Ypsilanti Township, While five jurisdictions have adopted the 2015 Housing Affordability and Economic Equity Analysis, there is some tension around implementation of regional goals for the effort. In some cases that includes some communities interest in gentrification more than revitalization, and in other cases, limited investment and engagement in removing exclusionary policies.

Areas where regional cooperation could benefit are efforts involving a countywide public education district, coordinated hiring efforts from anchor institutions, and ongoing coordination on affordable housing for the urbanized area. The 2016 failure of the Regional Transit Authority (RTA) Millage presents some broader regional coordination needs. The effort looks to connect 4 counties with transit services that will expand employment opportunities and improve access overall.

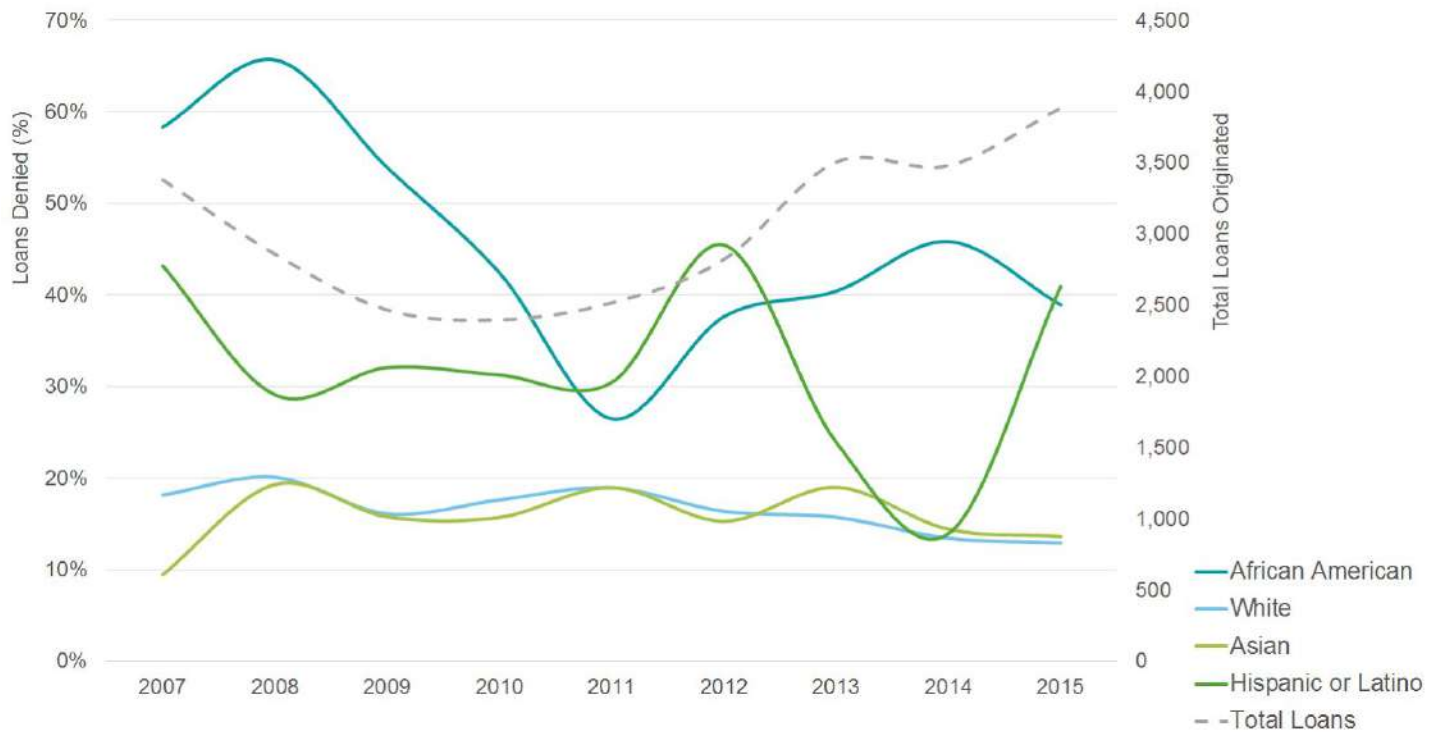
### **Land use and zoning laws**

Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.

### **Lending discrimination**

Figure 13 shows the recent history of mortgage lending in Washtenaw County as reported through Home Mortgage Disclosure Act (HMDA). African Americans are denied mortgages for single family, duplex, triplex and quad buildings at a rate often 2-3 times that of whites or Asians. Hispanics are also denied at a much higher rate, than whites or Asians. The smaller number of loan originations does show more fluctuation in the information for Hispanics/Latinos.

FIGURE 13\_ORIGINATED LOANS DENIED FROM 2007 TO 2016



Source: Home Mortgage Disclosure Act, <https://www.consumerfinance.gov/data-research/hmda/>

Anecdotally, there have been numerous stories of EMU professors looking for housing that are immediately directed to the Ann Arbor Housing market by realtors and others, rather than neighborhoods with quality and affordable housing stock within walking or shorter commuting distances in the City of Ypsilanti and Ypsilanti Township. Anecdotal reports from realtors indicate that steering occurs related to school districts, with school district boundaries serving as the modern era “redline” districts.

### Location and type of affordable housing

As the map in the Publicly Supported Housing Analysis section shows, the City of Ypsilanti and Ypsilanti township host the vast majority of committed affordable housing units for the county, creating areas of disproportionate housing needs and areas of concentrated poverty. For example, in the City of Ypsilanti, more than 95% of the committed affordable units in the city are located South of Michigan Avenue - this includes the 632 units located in the Southside R/ECAP.

### Occupancy codes and restrictions

Most local units use the state building code to define occupancy limits. As far as the definition of a family, there is variation among jurisdictions related to the number of unrelated individuals that can live together under the definition of family. Most of the out-county townships limit this number to 1 or 2 individuals. However, state case law has broadened the definition of functional



family in a number of cases, even if local zoning ordinances haven't been amended to reflect current case law.

**Private discrimination**

Through both surveys and focus groups, it was affirmed that discrimination is still an issue in particular for people of color and persons with disabilities. In the Ypsilanti Renters focus group, it was posited that one reason for this ongoing discrimination is a lack of diversity among property managers and landlords. This could minimize cultural misunderstandings that can lead to applications being denied and, in some cases, eviction.

# Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

## Key Findings

This section creates a snapshot of two census tracts in Washtenaw County - one in the City of Ypsilanti Southside and the other around Leforge, which is inclusive of both the the City of Ypsilanti and Ypsilanti Township jurisdictions, located just north of Eastern Michigan University and Huron River Drive. Both areas are identified as Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs). Using HUD-provided data and local knowledge, this section highlights the following findings:

- Combined, the R/ECAPs are predominantly African Americans, low-income, and have high concentration of children and youth:
  - 59% African American, 30% White, 1.3% Asian, and 10.1% some other race/two or more races.
  - Median Household income in R/ECAPs was \$22,700 in 2015. Washtenaw County's median household income was \$61,003.
  - Over half (58%) of households in the Southside R/ECAP live in poverty; 33% of households in the Leforge R/ECAP live in poverty.
  - 30.5% of residents in the R/ECAPs are under the age of 18 years old.
- The R/ECAPs have limited access to amenities and other opportunities, such as banks or other financial institutions, full-service grocery stores and other services, and access to employment opportunities.
- Overall educational attainment is relatively low in the R/ECAPs, with over half (57%) of the Southside R/ECAP population and 28% of the Leforge R/ECAP having a high school education (GED equivalent) or less.
- Connecting residents to training and hiring opportunities can help relieve the high unemployment rates as well as increase household incomes. The unemployment rate in the R/ECAPs is 21.7%. In Washtenaw County, it is 7.4%.
- Local data puts the Southside R/ECAP at 51% owner-occupied and 49% rental households. This represents a slight decline in homeownership since 2005. In the

Leforge R/ECAP, almost all (99.2%) housing is renter occupied. This is reflective of almost all the housing stock in Leforge being multi-family.

- The Southside R/ECAP has a high concentration of committed affordable housing units with 63.8% (632 of 990) of the City of Ypsilanti's committed affordable housing located in this area.

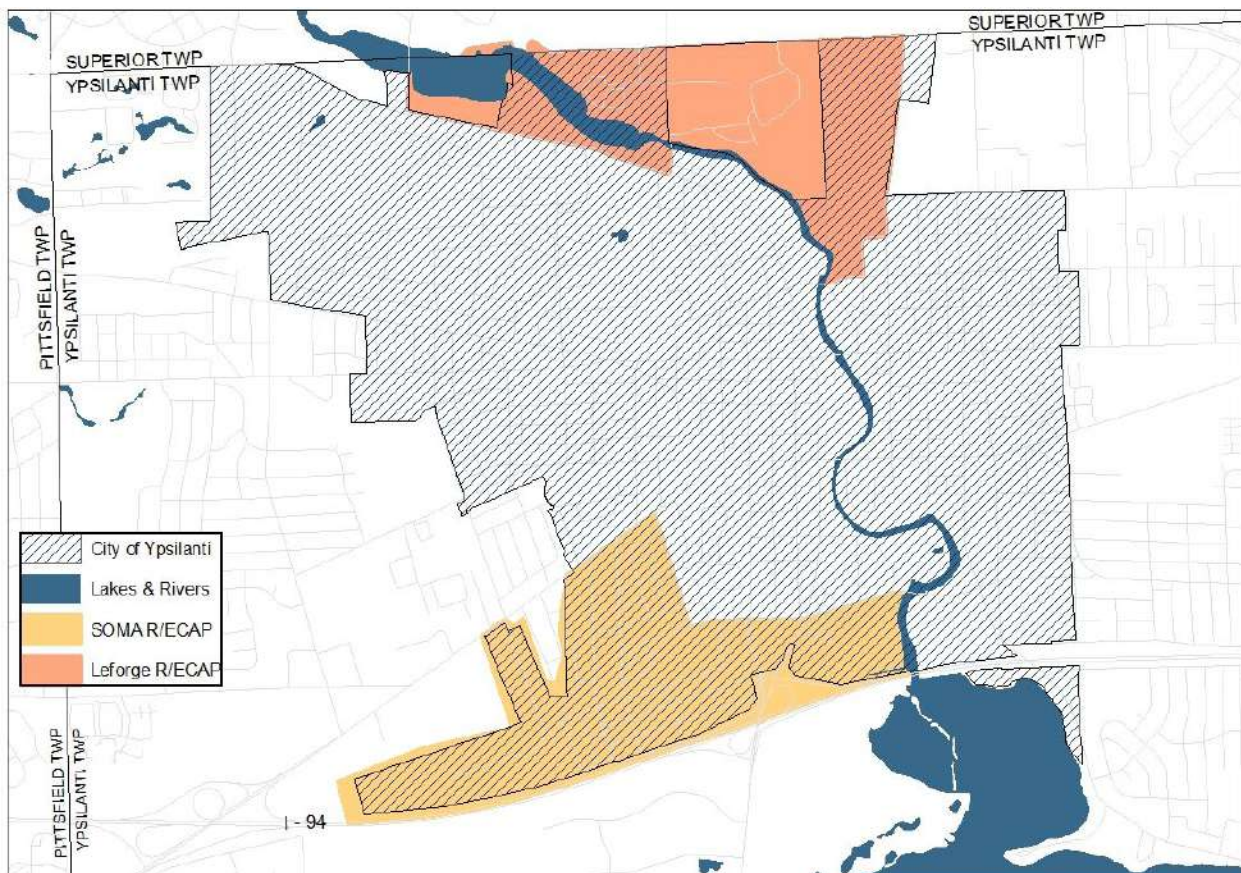
## Identification of R/ECAP Groupings

The US Department of Housing and Urban Development (HUD) defines a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as a census tract where:

- 1) The non-white population comprises 50 percent or more of the total population and
- 2) The percentage of individuals living in households with incomes below the poverty rate is either
  - a) 40 percent or above or
  - b) Three times the average poverty rate for the metropolitan area, whichever is lower.

Using the 5-year data from the 2013 American Community Survey (ACS), there are two census tracts in the county that meet the criteria for R/ECAPS, as defined by HUD. The tracts are located in the City of Ypsilanti and Ypsilanti Township. With a population of 4,667, the two R/ECAPS represents 25% of the City of Ypsilanti population, 9% percent of Ypsilanti Township and 1.4% of the entire Washtenaw County population.

MAP 16\_LOCATION OF R/ECAPS



Map 17 shows the population density by race in the City of Ypsilanti and Ypsilanti Township area along with the R/ECAPs, revealing the distribution of population within and surrounding the R/ECAPs, as well as the racial segregation that exists around each area. Of the 4,667 residents in the R/ECAPs, 69.8% are African American or Black, 20.4% White, and 2.7% Hispanic or Latino (Table 20).

MAP 17\_R/ECAPS WITH POPULATION BY RACE

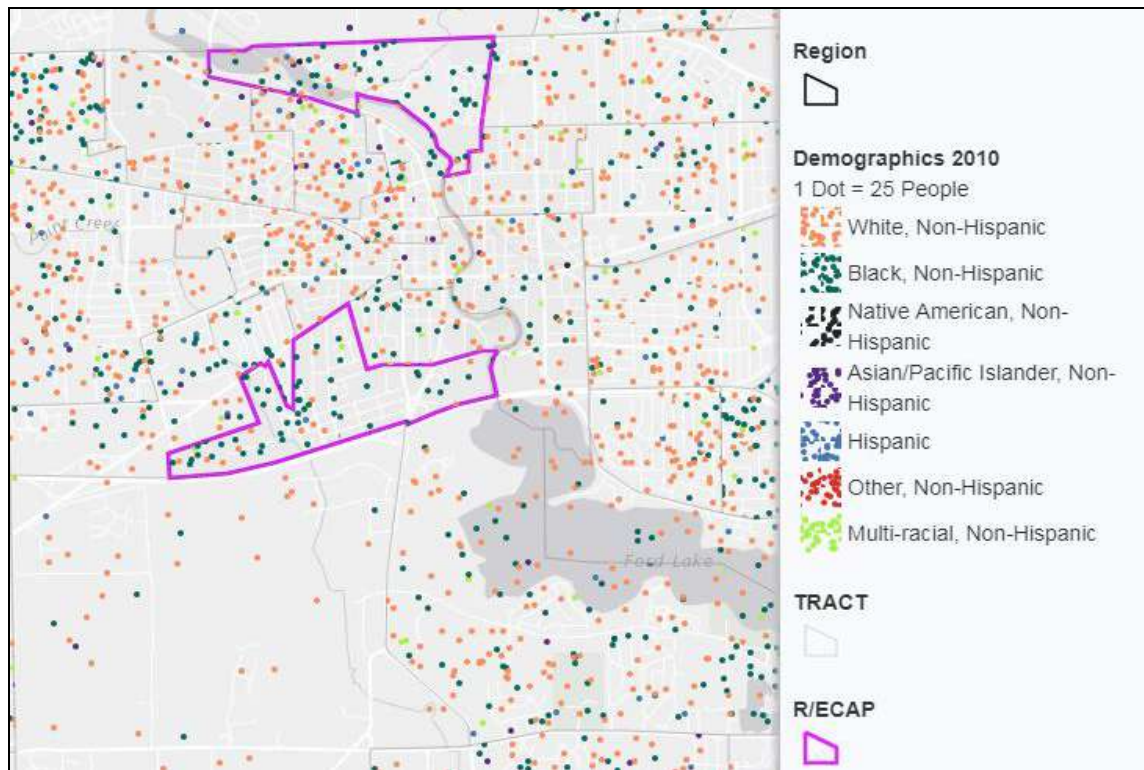


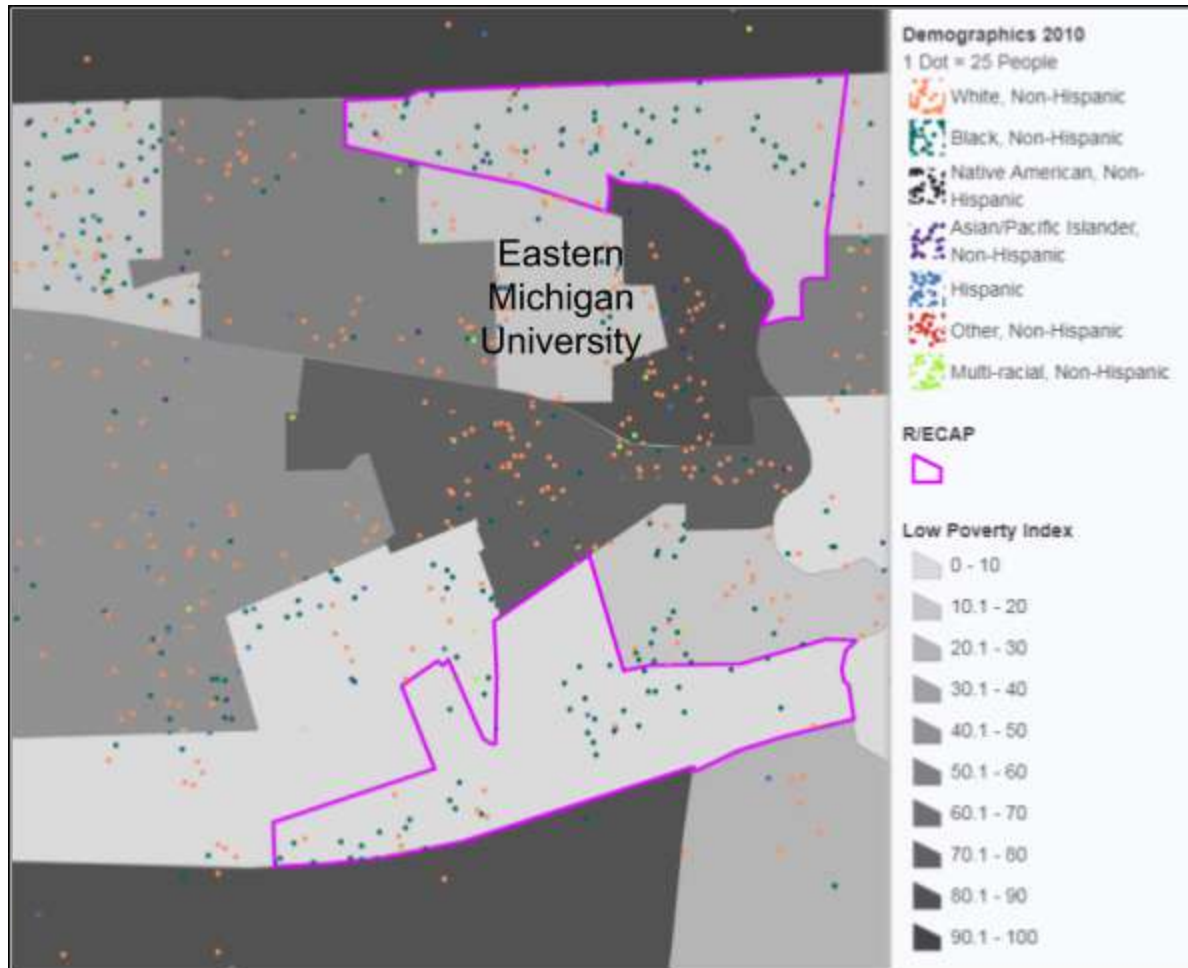
TABLE 20\_R/ECAP RACE & ETHNICITY

Total Population in R/ECAPs	4,667	
White, Non-Hispanic	956	20.5%
Black, Non-Hispanic	3,258	69.8%
Hispanic	127	2.7%
Asian or Pacific Islander, Non-Hispanic	98	2.1%
Native American, Non-Hispanic	24	0.5%
Other, Non-Hispanic	8	0.2%

Source: HUD-Provided Table 4, R/ECAP Demographics

Map 18 also shows population by race. Additionally, when using the HUD-provided Low Poverty Index, the R/ECAPs and surrounding areas score low on the poverty index, indicating these areas have high exposure to or concentration of poverty.

MAP 18\_R/ECAP WITH LOW POVERTY INDEX AND POPULATION BY RACE



In comparison to the Urban County, the R/ECAPs have high rates of families with children. There are 977 families in the R/ECAPS. Of those families, 63% are families with children (Table 21). In comparison, 47% of the Washtenaw Urban County population are families with children (2013 American Community Survey (5-Year Estimates, US Census Bureau)).

TABLE 21\_R/ECAP FAMILY TYPE

Total Families in R/ECAPS	977	0.2%
Families with children	616	63.0%

Source: HUD-Provided Table 4, R/ECAP Demographics

As shown in Table 22, 7.24% of R/ECAP residents are from different national origins, predominantly from Iraq, Laos, and Other Western Africa.

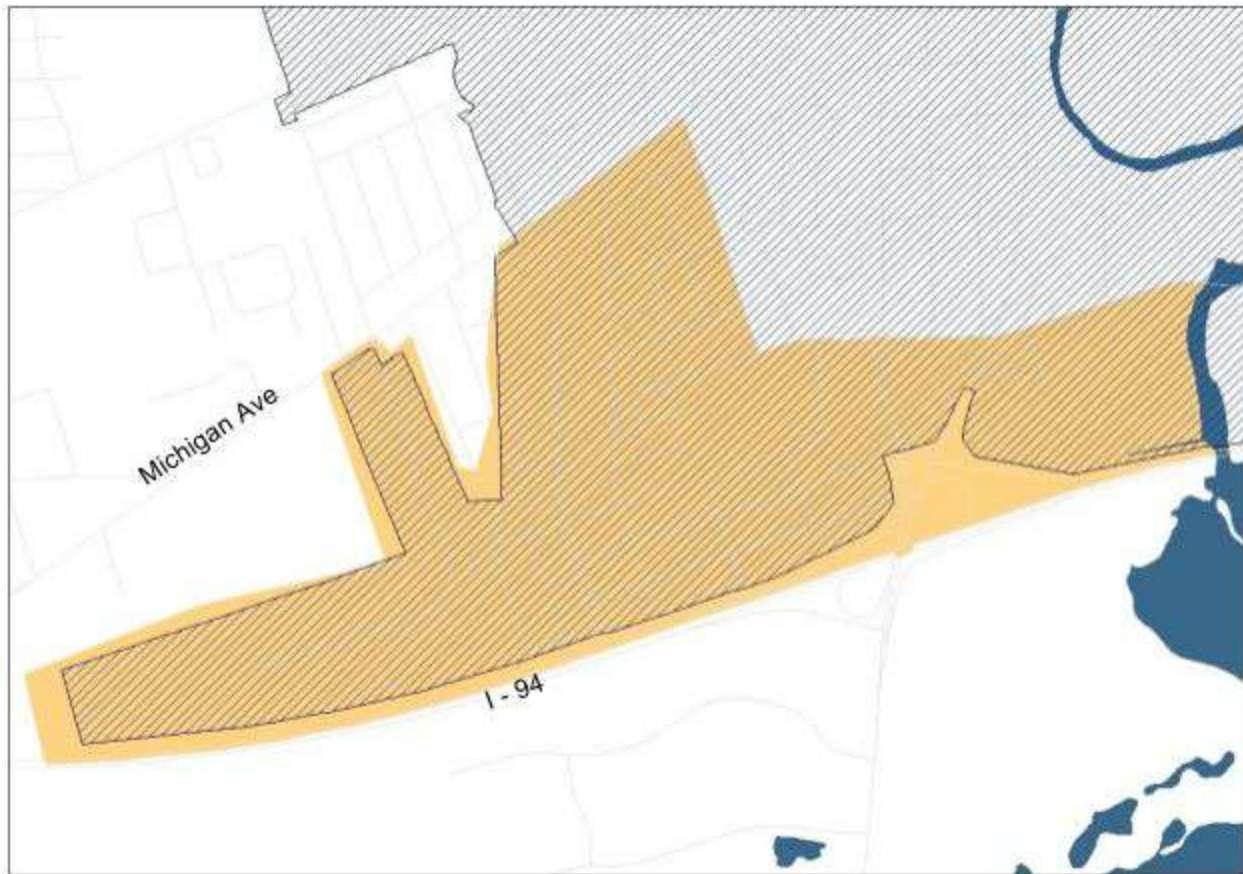
TABLE 22\_R/ECAP NATIONAL ORIGIN

Total Population in R/ECAPs		4,667	
#1 country of origin	Iraq	81	1.7%
#2 country of origin	Laos	61	1.3%
#3 country of origin	Other Western Africa	59	1.3%
#4 country of origin	Morocco	29	0.6%
#5 country of origin	Other Eastern Africa	26	0.6%
#6 country of origin	Sudan	23	0.5%
#7 country of origin	Cambodia	19	0.4%
#8 country of origin	Mexico	19	0.4%
#9 country of origin	Korea	11	0.2%
#10 country of origin	Haiti	10	0.2%

Source: HUD-Provided Table 4, R/ECAP Demographics

### Southside R/ECAP

MAP 19\_SOUTHSIDE R/ECAP



**Location:** Census Tract 4106

**City:** Ypsilanti

**County/State:** Washtenaw County/MI

**School District:** Ypsilanti Community Schools

The census tract boundaries are south of Michigan Avenue, north of Interstate 94, east of S. Hamilton Street, and west of the intersection of Michigan Avenue and Highway I-94. The western section includes the city's industrial park. Surrounding census tracts also have higher poverty rates; however, the Southside R/ECAP has a high concentration of non-white residents (69.7% non-white residents).

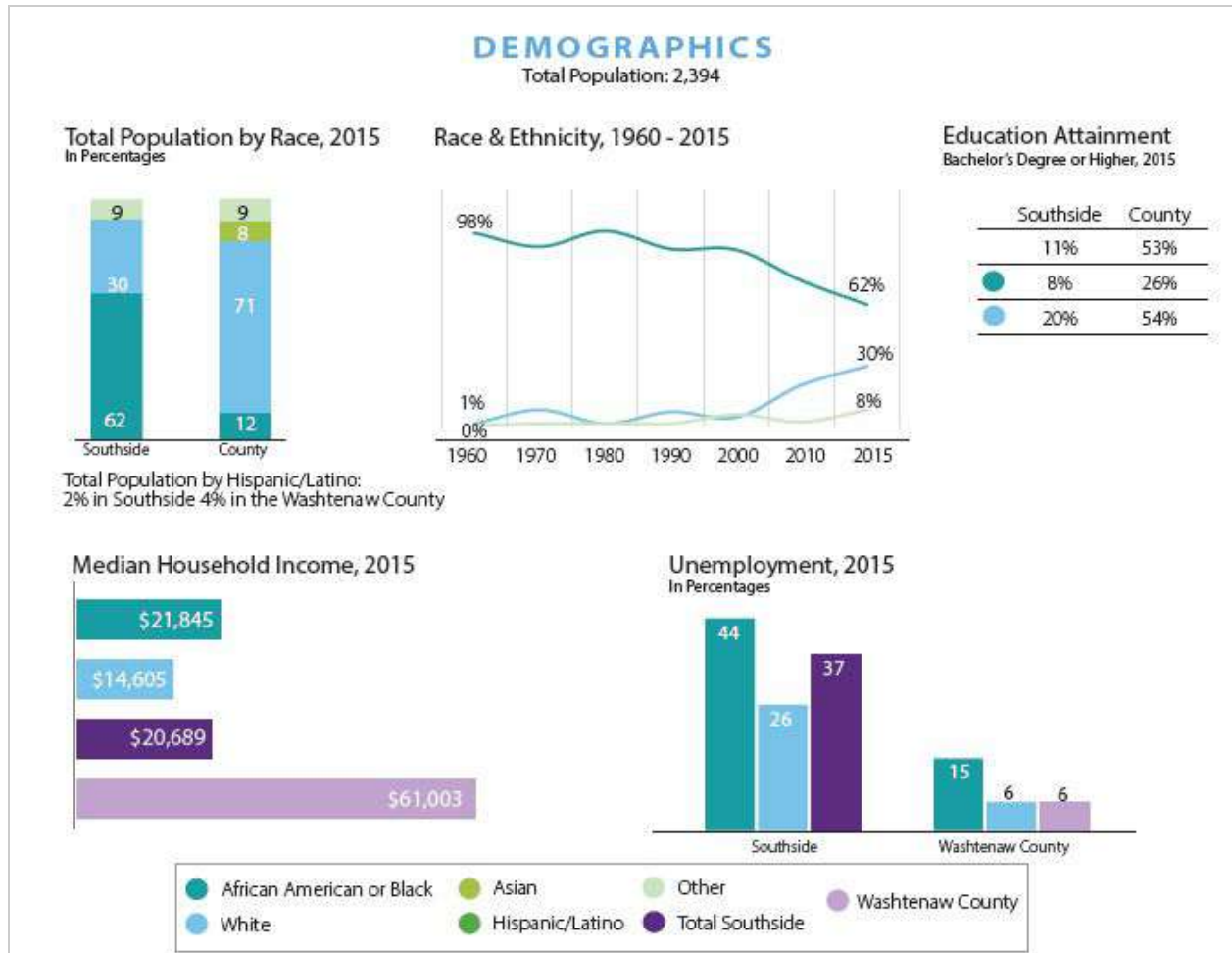
This R/ECAP has faced changes in race and ethnic makeup. In 1960, the area was made of almost exclusively African American/Blacks (98%). Today, the area is much more diverse compared to the county's racial makeup, with 62% African American/Black, 30% white, and 9% other (including Asian, American Indian and Alaska Native, Native Hawaiian and other Pacific Islander, some other race, and two or more races) (Figure 14).

In Figure 14, educational attainment, median household income, and unemployment rates are broken down by race. In general, 11% of the Southside R/ECAP residents have a Bachelor's degree or higher, and of African American residents, 8% have a Bachelor's degree or higher. The overall median household income is \$21,689, compared to the County's median household income of \$61,003. Lastly, compared to County's unemployment rate of 6%, Southside's unemployment rate is 37%, the highest for any census tract in the county. The unemployment rate for African Americans in the county is 15%, almost triple (at 44%) in the Southside R/ECAP.

Additionally, the population in the southside census tract is quite young, with almost 40% of its population under 18 years old, one of the highest percentages in the county (Table 21). 72% of children under the age 18 are living in poverty.



FIGURE 4\_SOUTHSIDE R/ECAP DEMOGRAPHICS



Source: 2015 American Community Survey Estimate, 1960-2010 Decennial

The southside neighborhoods includes Worden Gardens, Heritage Park, and Bell/Kramer, among others. These neighborhoods have a wealth of history as a long-standing African American neighborhood with ties to the underground railroad, origins of many businesses, civic, religious and educational institutions and the home to many local and regional African American leaders. Today, the neighborhoods boasts a wealth of community institutions and activities, including 4 schools, 16 places of worship, 8 civic/nonprofits, the Parkridge Community Center with community initiatives, after-school and other youth-focused programs.

From the Parkridge focus group, it was clear that while the concentration of African American residents may be a remnant of exclusionary practices, such as segregation, many residents appreciate that they are not living as a minority population in the neighborhood. Several noted that for African American residents, the neighborhood provides a comfort and safety not experienced in other neighborhoods where they would be a minority. Several focus group participants noted the long history families have in the area and appreciate the generations of

families and friends in the neighborhood. Many residents find that having an African American majority population is a positive attribute to embrace and celebrate.

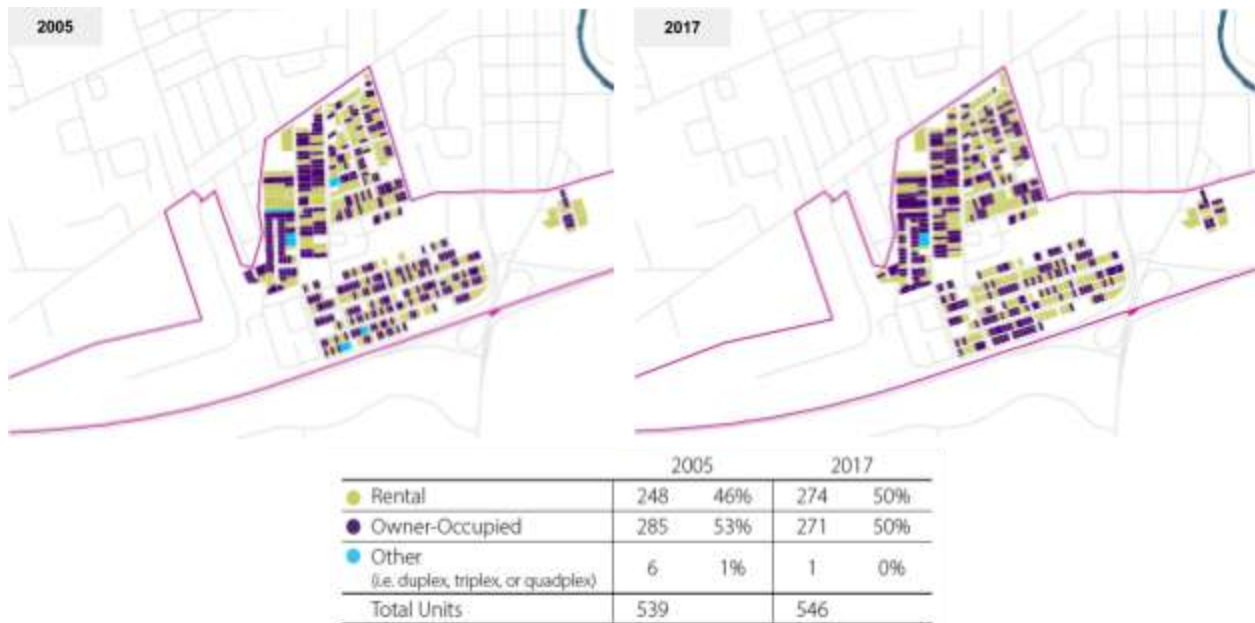
TABLE 23\_SOUTHSIDE R/ECAP DEMOGRAPHICS

<b>POPULATION</b>	
<b>Total Population</b>	2,394
Population Density (per sq. mile)	3,413.7
<b>Race &amp; Ethnicity</b>	
African American	61.5%
White	30.3%
Asian	0.2%
Some other Race	3.5%
Two or More Races	4.6%
Hispanic	1.9%
<b>Age</b>	
Under 18	944 (39.4%)
Over 65	212 (8.8%)
<b>EDUCATION ATTAINMENT (25 YEARS AND OLDER)</b>	
Less than High School	26.8%
High School Graduate (GED)	30.2%
Some College	32%
Bachelor's Degree	6.6%
Master's, Professional School, Doctorate Degree	4.6%
<b>POVERTY</b>	
Median Household Income	\$20,689
Children under 18 years living in poverty	72%
Unemployment Rate	36.9%
<b>HOUSING</b>	
Total Housing Units	1,043
Vacancy Rate	17.9%

Publicly Supported Housing	632
% of rental units using a Housing Choice Voucher	20%
<b>AMENITIES &amp; SERVICES</b>	
Banks	1
Full-service Grocery Store	0

Source: 2015 American Community Survey Estimates

FIGURE 15\_HOUSING TENURE OF SOUTHSIDE YPSILANTI, 2005 & 2017

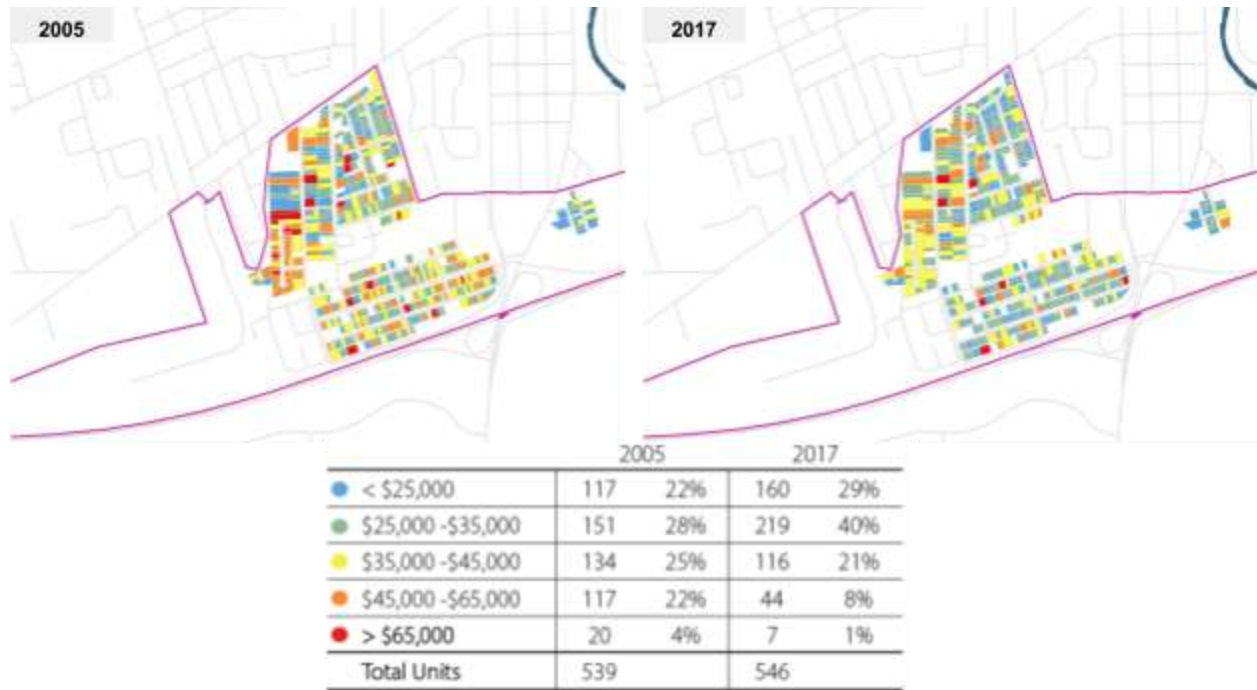


Source: Washtenaw County Equalization

The parcel maps above (Figure 15) illustrate the changes of homeownership in the Southside R/ECAP between 2005 and 2017 using Washtenaw County Equalization data. This period of time shows before the housing crash to post-crash “recovery”. In the Southside R/ECAP, rental properties increased slightly from 45 to 50% of non-multifamily housing stock. Home ownership rates dropped slightly from 53% in 2005 to 50% in 2017.

Not shown are the Ypsilanti Housing Commission properties that have undergone rehabilitation. The rehabilitation of units could provide a boost in property values to adjacent properties, as they are in despair prior to redevelopment. For more on the properties, see the Publicly-Supported Housing Chapter.

FIGURE 16\_HOUSING VALUE OF SOUTHSIDE R/ECAP, 2005 & 2017



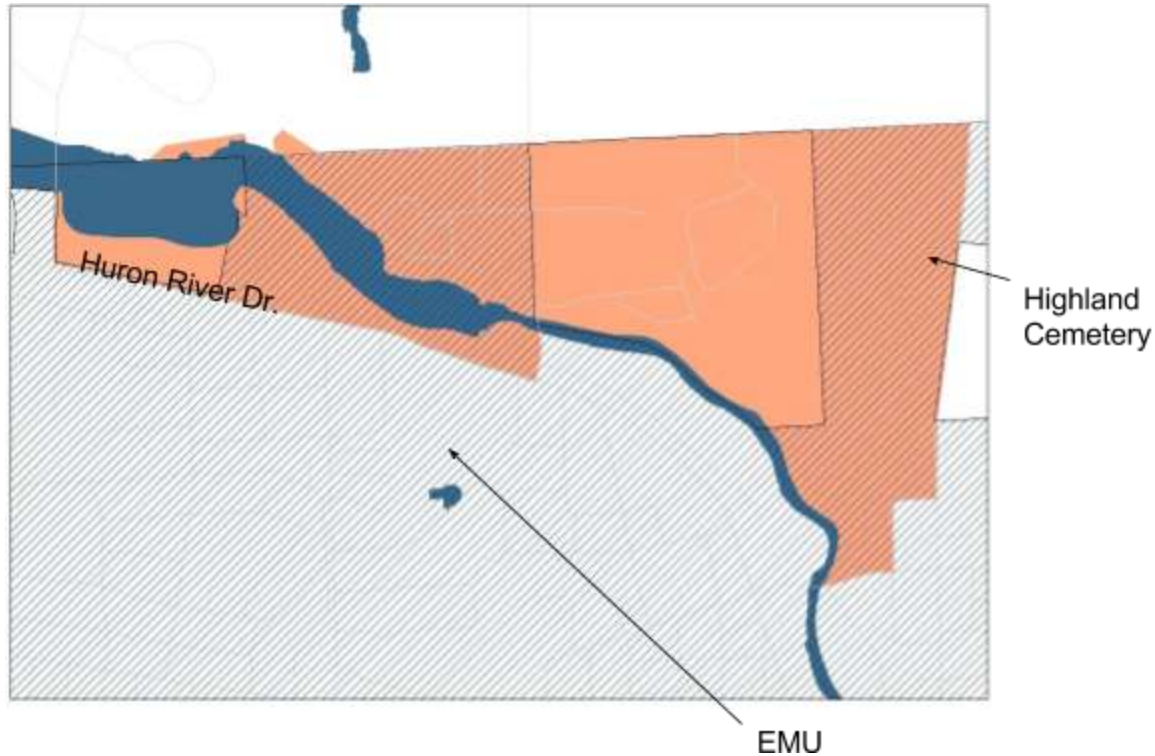
Note: The map above utilizes the State Equalized Value (SEV). Double the SEV is considered an estimate of housing value.

Source: Washtenaw County Equalization

Viewing the same time frame of 2005 and 2017, the change in State Equalized Value (SEV) shows an overall decrease in property values, though not to the extent of other communities profiled in the Demographics Chapter (Figure 16). As the Southside R/ECAP is an older community with diversity of housing stock, rather than a subdivision with limited housing types, various housing values are intermingled throughout. As a note, double the SEV is considered an estimate of housing value.

## LEFORGE R/ECAP

MAP 20\_LEFORGE R/ECAP

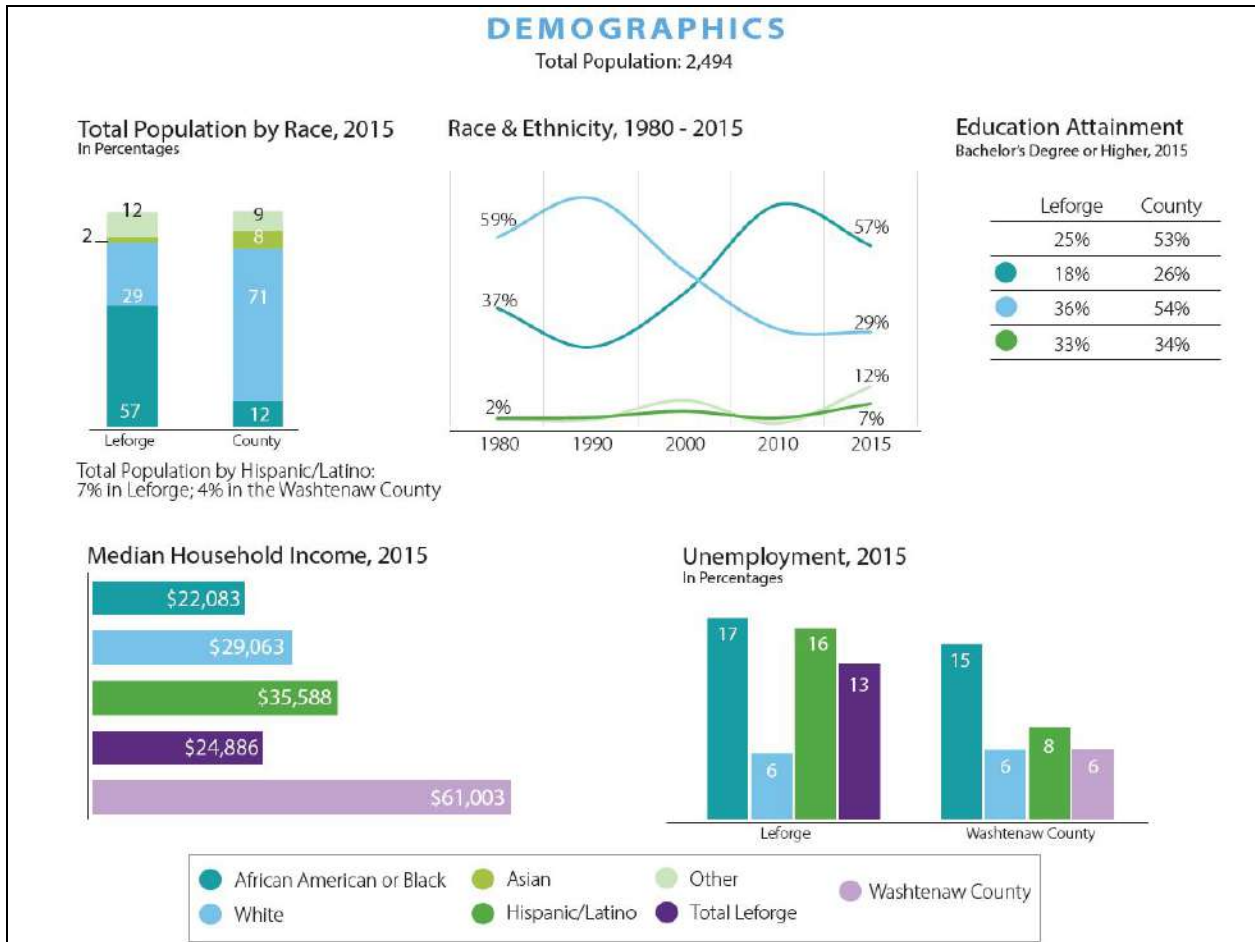


**Location:** Census Tract 4112  
**City:** Ypsilanti and Ypsilanti Township  
**County/State:** Washtenaw County/MI  
**School District:** Ypsilanti Community Schools

This census tract is located both in the City of Ypsilanti and Ypsilanti Township. It's boundaries are south of W. Clark Road, north of N. Huron River Drive and the Eastern Michigan University campus, east of N. River Street, and west of Superior Road.

Similar to the Southside R/ECAP, the census tracts surrounding the Leforge R/ECAP also experience high poverty; however, 71% of residents are non-white, with 57% African American, 2% Asian, and 12% Other (including Asian, American Indian and Alaska Native, Native Hawaiian and other Pacific Islander, some other race, and two or more races) (Figure 17). Racial and ethnic changes from 1980 to 2015 are dramatic, with 59% white and 37% African American in 1980 and 57% African American in 2015. This may result from the addition of multifamily housing in the 1990s and early 2000s.

FIGURE 17\_LEFORGE DEMOGRAPHICS



Source: 2015 American Community Survey Estimate, 1960-2010 Decennial

Leforge is unique in it is mostly a renter-occupied census tract. In fact, with five large apartment complexes, 99.2% of the occupied housing units are renter-occupied. Most of these apartment buildings were built in the late 1960s and 1970s- with the exception of Huron Heights built in the late-1990s and Peninsular Place in 2005/2006. Peninsular Place was built as part of a brownfield redevelopment project that included demolition and cleanup of the Peninsular Paper Company, the discontinued paper mill previously located on the site.

The proximity to Eastern Michigan University makes this area a good location for students; however, most residents are families often with children, and one of the apartment complexes is comprised of committed affordable rental housing units.

One issue in the area is the relative isolation of the multi-family housing. Located north of the river and railroad tracks (with the exception of Peninsular Place) and the very busy Huron River Drive, there is limited pedestrian access to Eastern Michigan University (across Huron River Drive). The intersection at Huron River Drive and Leforge is one of the most challenging in the area. It is not ADA accessible, and the rail and road crossings are problematic. Additionally

there are minimal services in the area for such a dense population, which if you're considering the west side of Leforge (a single block group, is 8,800 people per square mile.

TABLE 22\_LEFORGE DEMOGRAPHICS

<b>POPULATION</b>	
<b>Total Population</b>	2,494
Population Density (per sq. mile)	4,780.2
<b>Race &amp; Ethnicity</b>	
African American	56.5%
White	29.2%
Asian	2.3%
Some other Race	1.8%
Two or More Races	10.2%
Hispanic	6.6%
<b>Age</b>	
Under 18	545 (21.8%)
Over 65	36 (1.4%)
<b>EDUCATION ATTAINMENT (25 YEARS AND OLDER)</b>	
Less than High School	5.9%
High School Graduate (GED)	22%
Some College	47.2%
Bachelor's Degree	19.3%
Master's, Professional School, Doctorate Degree	5.5%
<b>POVERTY</b>	
Median Household Income	\$24,886
Children under 18 years living in poverty	49.1%
Unemployment Rate	13.3%
<b>HOUSING</b>	
Total Housing Units	1,253
Vacancy Rate	12.8%

Publicly Supported Housing	142 Units
% of rental units using a Housing Choice Voucher	15%
<b>AMENITIES &amp; SERVICES</b>	
Banks	0
Full-service Grocery Store	0

Source: 2015 American Community Survey Estimate, 1960-2010 Decennial

## Contributing Factors of R/ECAPs

Each chapter discusses contributing factors that continue, worsen, or otherwise prevent resolution to the fair housing issue discussed in the chapter. These contributing factors help direct the development of goals and strategies to counter the issue.

TABLE 23\_POPULATION OF R/ECAPS

	SOUTHSIDE R/ECAP	LEFORGE R/ECAP	COMBINED R/ECAPS	WASHTENAW COUNTY
Total Population	2,394	2,494	4,888	354,092
Non-White Population	69.8%	70.8%	70.3%	25.9%
Hispanic/Latino Population	1.9%	2.7%	4.3%	4.4%

Source: 2015 American Community Survey 2011 - 2015 (5-Year Estimates), U.S. Census Bureau

### Community Opposition

Community opposition is an issue particularly when trying to add affordable units to high opportunity neighborhoods. As both R/ECAPS contain substantial amounts of affordable housing, it is less of an issue in these areas.

### Deteriorated and abandoned properties

In the case of the Southside R/ECAP, there is concern, post housing crisis, about an increase in rental properties by non-local landlords. Based on local assessor data, 51% of residential units are owner-occupied and 50% rental. The loss of home ownership also impacts the creation of long-term wealth for African American residents. Focus group participants in areas with high renter occupation spoke to their concern of property value and quality of neighborhood, and hoped to see more owner-occupied homes in their neighborhood. Lower-incomes in the Southside R/ECAP have been problematic for ongoing care and maintenance of properties as well. Recommendations related to supporting home ownership, property upkeep and investment will be included for both R/ECAPS, but the Southside R/ECAP in particular.



In comparing in the county, the United States Postal service vacancy data for 2016, the two R/ECAPs are in the top 10% for vacancy rates at the 3 month and 36 month ranges (Table 26). The City of Ypsilanti was able to demolish a number of vacant and condemned houses in the southside R/ECAP in the last 10 years, including a number of condemned and vacant single-family units, as well as a large number of Ypsilanti Housing Commission properties (Parkridge and others) as part of the RAD conversion.

TABLE 26\_RENTER OCCUPANCY & VACANCY RATES IN R/ECAPS

	SOUTHSIDE R/ECAP	LEFORGE R/ECAP
Renter Occupied	51%	99.2%
Vacancy Rate up to 3 months	10%	6%
Vacancy rate of 36 months or more	7%	6%

Renter Occupancy Rates for Southside R/ECAP: Washtenaw County Equalization  
 Renter Occupancy Rates for Leforge R/ECAP: American Community Survey 2011 to 2014  
 Vacancy rates: United States Postal Services 2016 annual data by census tract.

**Displacement of residents due to economic pressures**

While there are concerns of displacement throughout the county, residents in the R/ECAPs face economic pressures including high unemployment rates, lower incomes, more housing problems, lower school proficiency, and a lack of job opportunities.

In comparison to the county, the R/ECAPs experience higher poverty rates and more housing problems. 47.6% of households in both R/ECAPs have an income below the poverty level whereas 8% of households in the county have an income below the poverty level. 58.4% of households in the Southside and 68.7% of households in Leforge experience any 4 housing problems, which includes either incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and/or cost burden (monthly housing costs and utilities exceeds 30% of monthly income) (Table 27). In Washtenaw County, 17.2% of households experience any of 4 housing problems.

Additionally, Washtenaw County is known for its wealth and job opportunities from its major employers, such as the University of Michigan, Trinity Health, General Motors, and Eastern Michigan University.<sup>1</sup> However, income disparities and the unemployment rate are much higher in the R/ECAPs than in the entire county. The average median household income in both R/ECAPs is \$22,700, compared to the median household income in the county of \$61,003. While the median household income does not vary too much between the general population in the R/ECAPs and African American residents in the R/ECAPs, it is notable that the median household income for African American residents in the county is much lower than the median

<sup>1</sup> Ann Arbor Area Top Employers, January 2017 Retrieved from Ann Arbor SPARK  
<http://www.annarborusa.org/site-selectors/top-employers>

household income in the general county population. The county median household income is almost three times that of either R/ECAP.

Likewise, unemployment rates are much higher in R/ECAPs than in the rest of the county, with 36.9% of residents who are unemployed in the Southside R/ECAP, 13.3% in Leforge, and 7.4% in the county.

TABLE 27\_ECONOMIC DEMOGRAPHICS OF R/ECAPS

	SOUTHSIDE R/ECAP	LEFORGE R/ECAP	R/ECAPS COMBINED	WASHTENAW COUNTY
Income Below Poverty Level	58.1%	33.4%	47.6%	8.0%
Households with any of 4 Housing Problems	58.4%	68.7%	-	17.2%
Median Household Income	\$20,689	\$24,886	\$22,700	\$61,003
Median Household Income (Black Only)	\$21,845	\$22,083	\$22,331	\$35,301
Unemployment Rate	36.9%	13.3%	21.7%	7.4%
Source: 2015 American Community Survey 2011 - 2015 (5-Year Estimates), U.S. Census Bureau, from Social Explorer, AFFH Data and Mapping Tool, HUD Exchange				
Unemployment Rate for Civilian Population in Labor Force 16 Years and Over. HUD identifies households with any of 4 Housing Problems as household that lacks complete kitchen facilities, lacks complete plumbing facilities, more than one person per room, cost burden (monthly housing costs, including utilities, exceed 30% of monthly income).				

The R/ECAPs also experience educational and employment pressures that may lead to displacement. When looking at the opportunity indicators provided by HUD (Table 28), the R/ECAPs score low when it comes to most school proficiency, environmental health, labor markets and job proximity, and scoring low in most indicators compared to the county. Participants in the Parkridge focus group expressed concern of the quality of schools and the availability and accessibility to employment, expressing that residents and local leaders should work toward improving the Ypsilanti Community School (YCS) district. Participants also discussed the importance of retaining talent- from teachers to police officers- noting there is a lack of representation of African Americans.

While the R/ECAPs are in close proximity to bus routes, the time needed to travel from Ypsilanti to surrounding areas varies. However, Southside and Leforge to the University of Michigan Hospital in Ann Arbor travel times usually hover about 1 hour one-way. While this is an improvement from past AAATA services, a 1 hour one-way trip to work can deter people from searching for work in areas of high employment opportunities (i.e. Ann Arbor), as well as travel for certain goods and services (i.e. medical, grocery).

TABLE 28\_OPPORTUNITY INDICATORS IN R/ECAPS

	SOUTHSIDE R/ECAP	LEFORGE R/ECAP	WASHTENAW COUNTY
School Proficiency Index	18-34	6-17	61.2
Environmental Health Index	38	29	51.8
Labor Market Index	1	25	65.4
Jobs Proximity Index	5-10	3-27	47.38
Low Transportation Cost Index	84	89	79.19
Transit Trips Index	75	79	68.1

Sources: 2015 American Community Survey 2011 - 2015 (5-Year Estimates), U.S. Census Bureau, from Social Explorer, HUD-Provided Table 12, Opportunity Indicators by Race/Ethnicity

School Proficiency Index: The higher the score (0 to 100), the higher the quality of school system in the neighborhood. County Index is average of index broken down by race/ethnicity.  
 Environmental Health Index: the higher the value (0 to 100), the less exposure to toxins harmful to human health. The higher the value, the better the environmental quality of a neighborhood.  
 Labor Market Index: the higher the score (0 to 100), the higher the labor force participation and human capital in a neighborhood.  
 Jobs Proximity Index: the higher the value (0 to 100), the better access to employment opportunities for residents in a neighborhood.  
 Low Transportation Cost Index: The higher the value (0 to 100), the lower the cost of transportation in that neighborhood.  
 Transit Trips Index: The higher the value (0 to 100), the more likely residents in that neighborhood utilize public transit  
 County Index is average of index broken down by race/ethnicity.

**Lack of community revitalization strategies**

Participants from the Parkridge focus group were very open and transparent about the support they receive from neighbors and the sense of community they have in their neighborhood. With multiple churches, non-profit agencies, and the Parkridge Community Center, the Southside area has a plethora of community initiatives, support, and activities. Coordination among these efforts is often inconsistent, and can suffer from both overlap and gaps in service. While individual partners may have goals and a vision for their work in the area, there is not a coordinated revitalization strategy.

In the Leforge R/ECAP there are less resources. The area is predominantly multi-family housing, with no nonprofit agencies, churches, schools, businesses or other institutions to provide support. No revitalization strategy exists for the area.

There is a need for investment and continued engagement with Southside and Leforge residents and local stakeholders to determine the most appropriate strategies as well as an overall community revitalization strategy.

### **Lack of private investments in specific neighborhoods**

In the Southside R/ECAP, the City of Ypsilanti has created and utilized a property disposition strategy to encourage reuse of tax foreclosed property. They have also implemented a Neighborhood Enterprise Zone (NEZ) to incentivize, through tax relief, infill development. However, there is a lack of commercial development in the area.

As noted previously, the isolation of the Leforge area is also problematic. The addition of retail, child care and other services would greatly benefit the community.

### **Lack of public investments in specific neighborhoods, including services or amenities**

Today, there is a lack of public investment in the Leforge R/ECAP, but in the Southside R/ECAP, there is room to grow. Both Peninsular Park and Parkridge Park would benefit from ongoing maintenance and additional amenities. Also, pedestrian improvements are in need at Huron River Drive and Leforge intersections. As mentioned above, increasing communication and engagement with stakeholders and residents is an ongoing goal, and could help push forward the need and desire for investment. To support investment one recommendation will be to dedicate CDBG program income to projects in R/ECAPs.

### **Lack of regional cooperation**

As noted, both R/ECAPs have significant number of youth, but provide minimal services. This has been identified in City of Ypsilanti and county plans, but there has been minimal cooperation to address the need for youth programming in the form of recreation, education, and mentoring. Parkridge Center does benefit from the ongoing partnership with Washtenaw Community College, but often the Center is not well utilized by neighborhood residents. A regional partnership with a focus on service provision and supporting youth is a worthy regional effort.

### **Land use and zoning laws**

The Southside R/ECAP was recently down-zoned to a single-family district. While this is a common strategy to try and provide more stability for property owners, it does create problems for those who own a duplex, or who may benefit from additional income of a second unit. Allowing duplexes could also help support infill development, allowing for both owner-occupancy and rental income in some cases. The Leforge R/ECAP is zoned primarily for multi-family housing. This is not necessarily problematic, but flexibility in zoning to allow for some commercial uses (i.e. stores, childcare and other supportive uses) can assist with the lack of nearby services in the area.

### **Location and type of affordable housing**

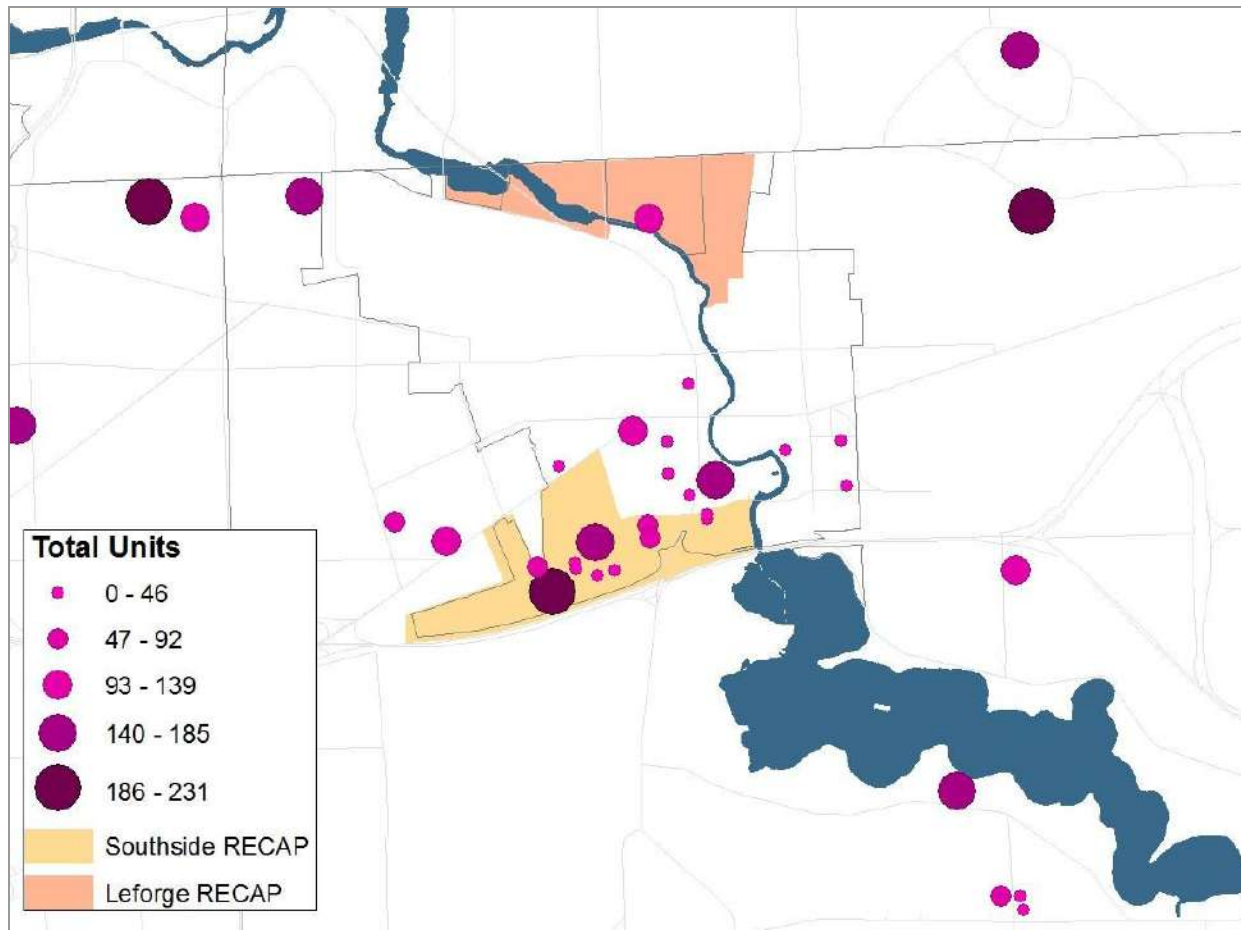
OCED created an inventory of committed affordable units (Table 29). These are affordable units that have rent and income restrictions through various subsidies, deed restrictions, zoning or other mechanisms. There are 4,220 committed affordable units in Washtenaw County. Committed affordable units in the City of Ypsilanti and Ypsilanti Township make up almost 50%

of these units. More specifically, 15% of the county's committed affordable units are located in Southside and 2.8% are located in Leforge. Even more specific, of all the committed affordable units in the City of Ypsilanti, 95% of them are located south of Michigan Avenue. The concentration of committed affordable housing in these census tracts is problematic, and is likely contributing to the R/ECAP status in both areas.

TABLE 29\_COMMITTED AFFORDABLE UNITS IN R/ECAPS

	SOUTHSIDE R/ECAP	LEFORGE R/ECAP	R/ECAPS COMBINED	WASHTENA W COUNTY
Committed Affordable Units	632	119	752	4,220
% of Total Committed Affordable Housing Units	15%	2.8%	17.8%	
Total units = 4,220 Source: 2017 Washtenaw County Affordable Housing Inventory				

MAP 21\_LOCATION OF COMMITTED AFFORDABLE UNITS IN CITY OF YPSILANTI AND YPSILANTI TOWNSHIP



### **Private discrimination**

In several focus groups, it was affirmed that discrimination still occurs, especially related to race and disability. The Fair Housing Center of Southeast and Mid Michigan (FHC) reports an uptick in discrimination complaints from landlords in 2016 as well as in 2017. In 2016, complaints in Washtenaw County were at the highest since 1995. In August of 2017, complaints are already 2 weeks ahead of total complaints the same time in 2016. In focus groups, participants commented on private discrimination related to disability, race, income and sexual orientation. In Washtenaw County, the top two complaints are race and disability discrimination.

## Disparities in Access to Opportunity

### Key Findings

For such a small county, Washtenaw maintains a striking geographic disparity in race, income, educational attainment, employment and overall opportunity. Whether it's disparity and segregation in schools districts or racial and economic disparity related to income and education, the same pattern repeats.

**Education:** Choice and Charter school options magnify racially and economically concentrated areas of poverty within Ypsilanti Community Schools (YCS) and related geographies. Districts, such as YCS, with more students of color and more students in poverty also have less resources, less funding, and as a result, are continually in crisis. The result is that east side communities of color are most negatively impacted (including the two R/ECAPs), with no new ideas on the horizon for structural change.

**Employment:** Employers and residents speak to a job skills mismatch resulting from broader economic shifts over the last 10-20 years. With fewer good-paying jobs for individuals with less than a college degree, jobs either fall into the service/retail category, or the advanced manufacturing/IT category. The former suffers from low wages and limited upward mobility. The latter is considered desirable, but education and experience requirements make many of these positions unobtainable for residents without college degrees or advanced training. This is clearly illustrated by the higher unemployment and less educational-attainment on the east side, in primarily African American neighborhoods.

Racial discrimination, lower-education levels and related issues are ongoing problems with the unemployment in the African American community in the City of Ypsilanti and Ypsilanti Township as well as portions of Superior Township.

**Transportation:** Recent improved transit options through the Ann Arbor Area Transportation Authority (AAATA, also branded as The Ride) expansion have provided additional relief (note expansion is too recent to be included in HUD in this chapter). The AAATA changes are being reviewed to determine the impact of transit expansion and route change on service. Additional transportation options are needed, especially as the lack of access to a car is more of an issue for maintaining employment than education, as reported in a 2016 survey of Michigan Works! job seekers.

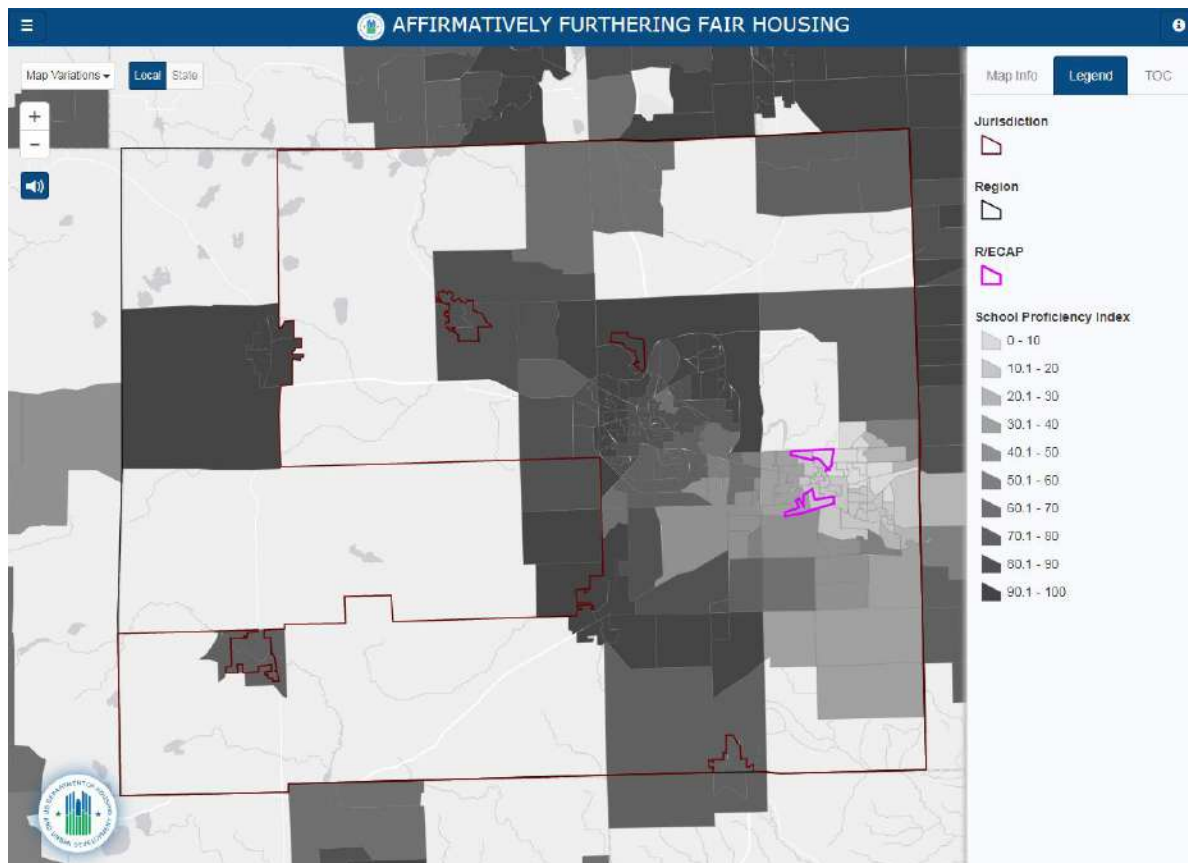
**Poverty:** Tied in closely to race, and racial segregation patterns, high poverty areas most negatively impact communities of color, primarily African American, Native American and Hispanic.

## Educational Opportunities

### School Proficiency by Race and Poverty

The most proficient school districts based on the School Proficiency map (Map 22) and corresponding districts would be Ann Arbor Public Schools (AAPS), Chelsea Public Schools and Saline Public Schools. Using the same school proficiency data below, the lower performing school districts are Ypsilanti Community Schools (YCS), Whitmore Lake and Lincoln Consolidated School districts.

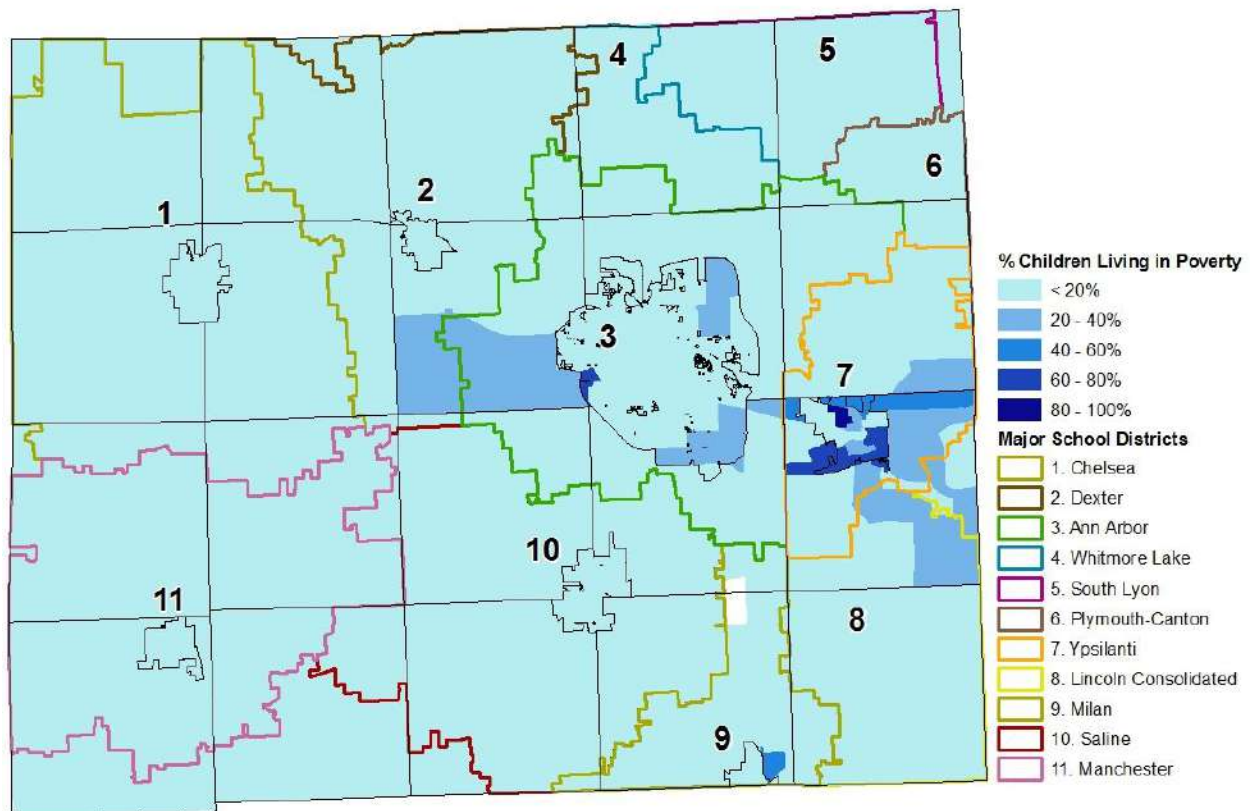
MAP 22\_SCHOOL PROFICIENCY





As shown in Map 23, the majority of the census tracts in the YCS district show high percentages of children living in poverty, with a few in Lincoln Consolidated School District, AAPS and Chelsea Community Schools. The concentration of students living in poverty in a given school district puts more pressure on the schools to meet a host of needs for those students.

MAP 23\_SCHOOL DISTRICTS BY CHILDREN LIVING IN POVERTY

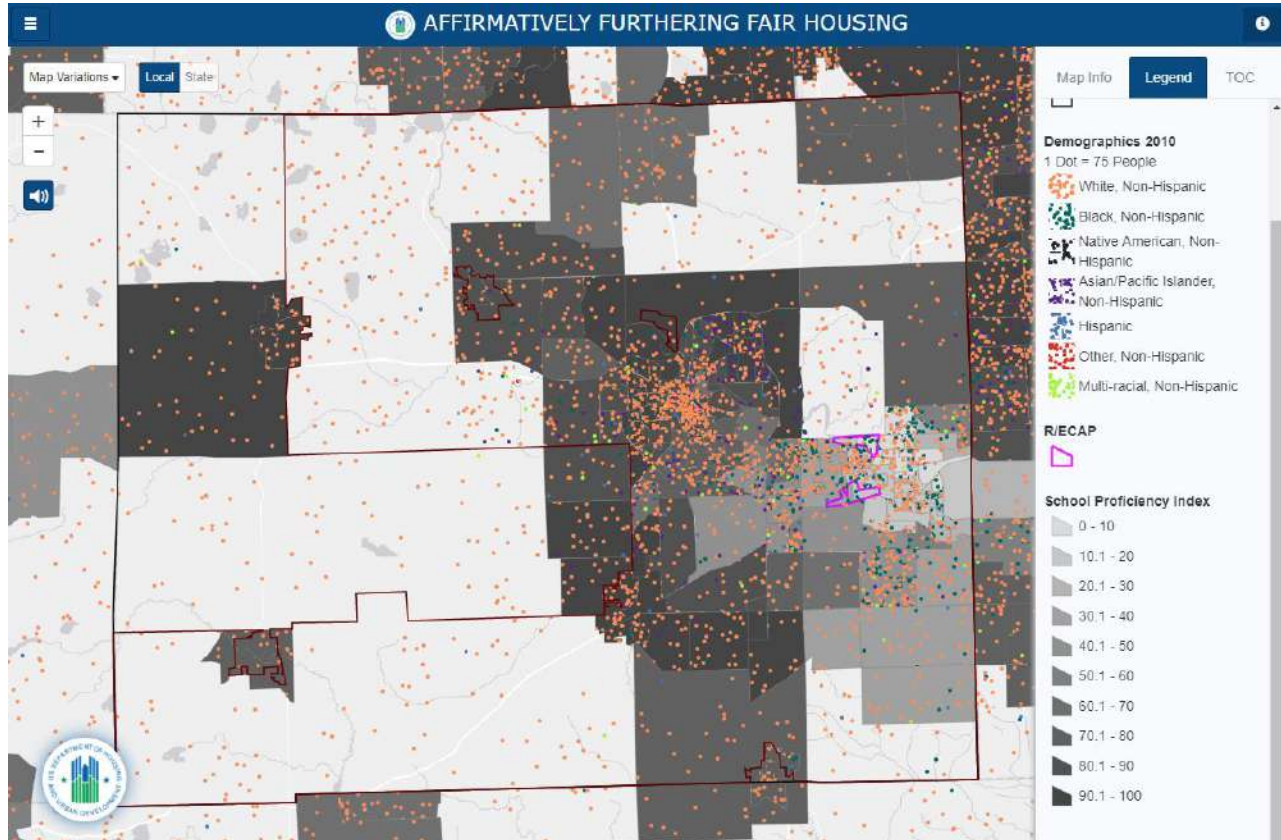


Source: Race by Black or African American Alone, 2015 American Community Survey 5-year Estimates

As mentioned previously, the current racial distribution in Washtenaw County finds that the eastern portion of the county includes the a combination of the highest concentration of African American households in census tracts that are lower income, and lower educational attainment. As evidenced by Map 22, the east side census tracts also broadly show lower proficiency in schools that are predominantly attended by African Americans. These areas correspond with the YCS District shown above (Map 23).

Outside of specific school district performance, analysis of local data released in 2015 reveals that there was a 35 point gap on 3<sup>rd</sup> grade reading tests between African American and white students and a 42 point gap in 8<sup>th</sup> grade math proficiency. That's telling, as 3rd grade reading scores are highly predictive of high school graduation, and 8th grade math scores often indicate the likelihood that a student will attend college.

### MAP 24\_SCHOOL PROFICIENCY BY RACE & ETHNICITY



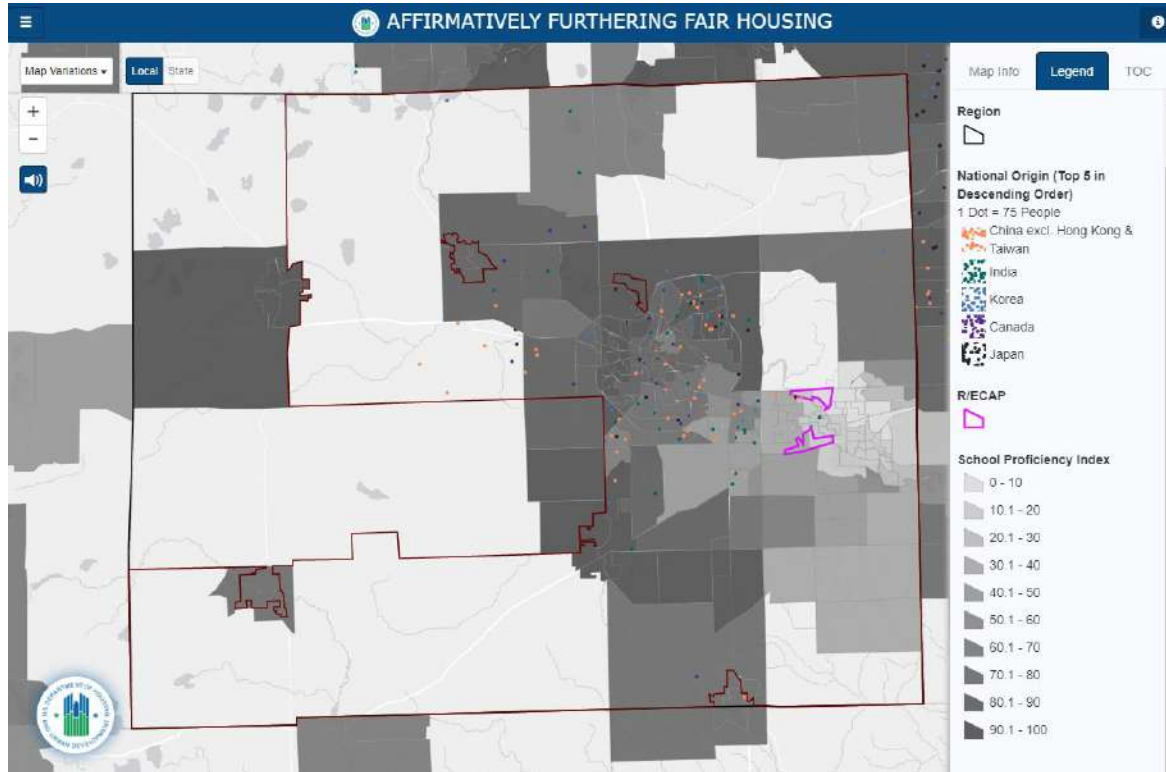
#### **School Proficiency by Nation Origin and Limited English Proficiency (LEP)**

Washtenaw County includes two large universities, the University of Michigan (U of M) and Eastern Michigan University (EMU). U of M draws faculty, staff and students from around the world. One result has been a growth in the Asian population in and around Ann Arbor, showing up in Map 25 (below) with in the pockets of Limited English Proficiency (LEP) for Chinese, Korean and Indian households (referenced to Map 26).

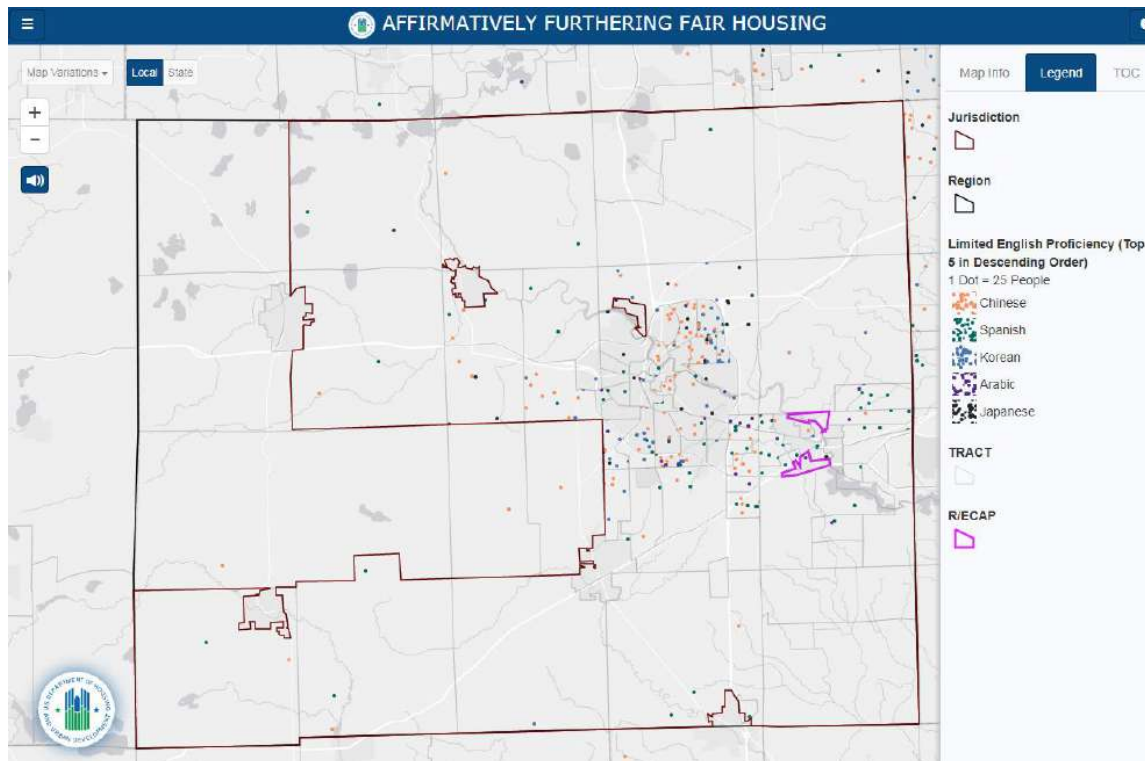
These households vary from those of Latino or African American in the county as they are often highly-educated and/or middle to higher income. The LEP status is mainly related to immigration due to the university, which has the ability to provide some support to non-native speakers. However, City of Ann Arbor officials in particular note that there is minimal outreach to these communities, and have indicated that they would like to improve outreach and engagement with the larger communities (Chinese, Korean) in the near future.

Spanish speakers, however, are located mainly in areas with a larger number of multi-family apartment units and are centered in Pittsfield and Ypsilanti Township. Depending on location that could be either AAPS or YCS.

Map 25\_SCHOOL PROFICIENCY BY NATIONAL ORIGIN



MAP 26\_LIMITED ENGLISH PROFICIENCY

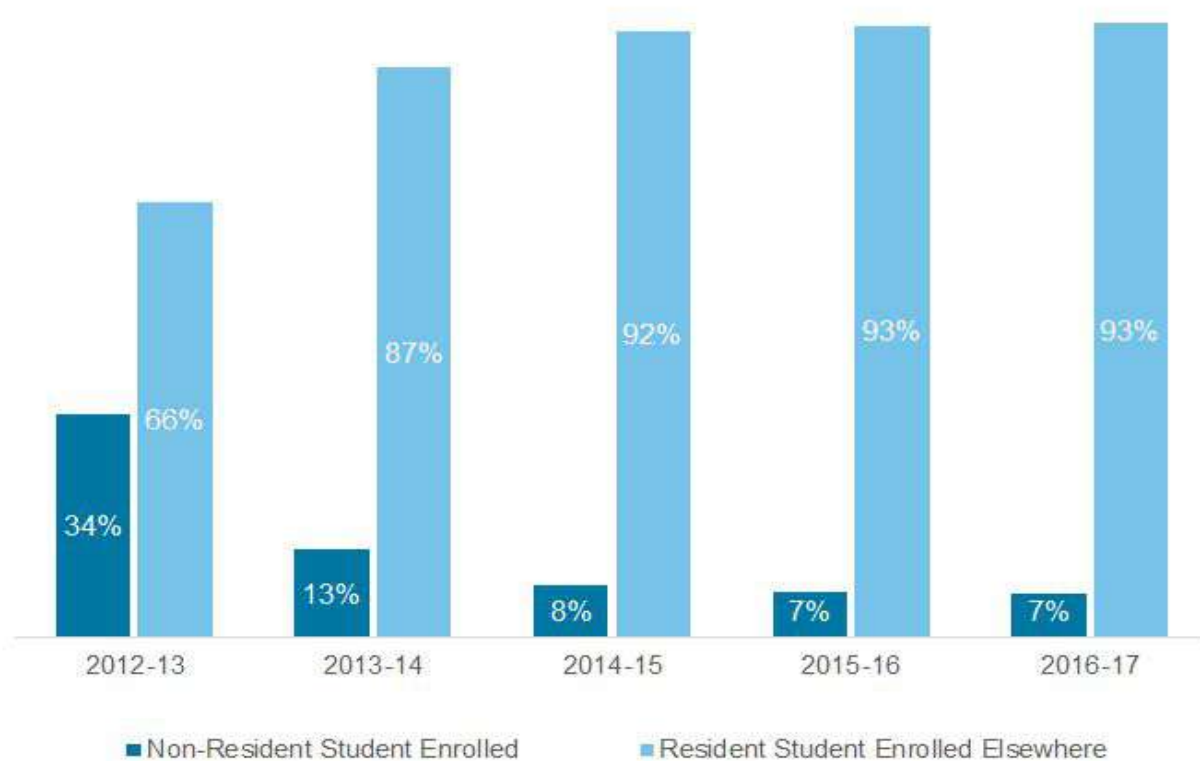


### Charter and School of Choice Programs

Additional challenges to east-side school districts include the prevalence of Charter Schools and School Choice. For example, YCS opened in 2013 due to the merger of the former Willow Run and Ypsilanti School Districts. Over the past 5 years, more and more Ypsilanti City and Township residents have used School of Choice Programs to attend schools in other districts in the region (“Choicing out” of YCS).

Prior to the merger, and continuing after, the Ann Arbor School District has increased the number of seats available for choice students who opt out of their local district and instead enroll in an Ann Arbor Schools. While students from other districts can “choice in” to YCS, this number is fairly small and has leveled off as shown below (Figure 18).

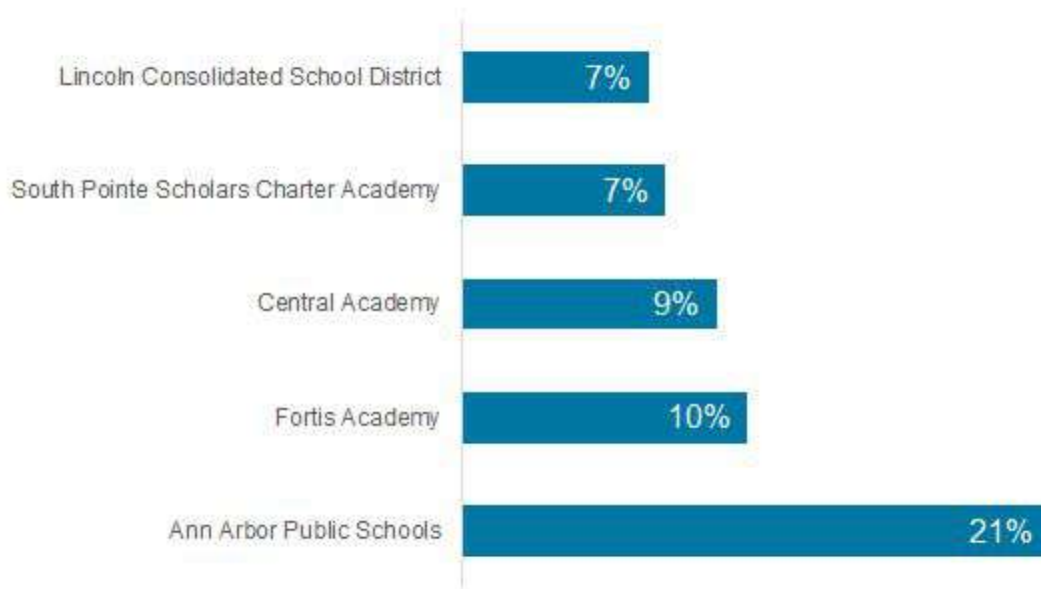
FIGURE 18\_SCHOOL CHOICE, YPSILANTI COMMUNITY SCHOOLS



Source: MI School Data, Student Count, accessed through <https://www.mischooldata.org/DistrictSchoolProfiles/StudentInformation/NonResidentStatus.aspx>

In the academic year 2016-2017, 4,336 Ypsilanti resident students “choiced out” of YCS. The largest attractor of those students was AAPS, in which 1 in 5 of all students who choiced out of YCS enrolled. Five local schools accounted for more than half (55%) of all Ypsilanti students who choiced out of YCS in 2017 (Figure 19).

FIGURE 19\_DESINATION OF YPSILANTI STUDENTS WHO “CHOICED OUT”, 2016-2017

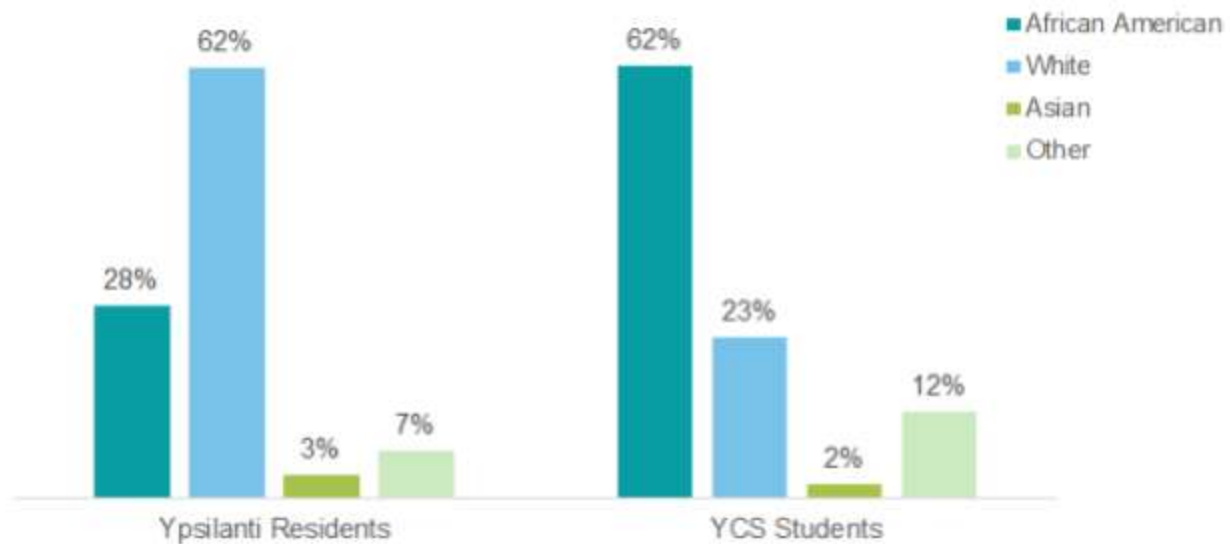


Source: MI School Data, accessed through <https://www.mischooldata.org/DistrictSchoolProfiles/StudentInformation/NonResidentStatus.aspx>

While some students do “choice” into YCS, in particular for the international baccalaureate school program, that total is relatively low at 304 students in 2016-2017 school year.

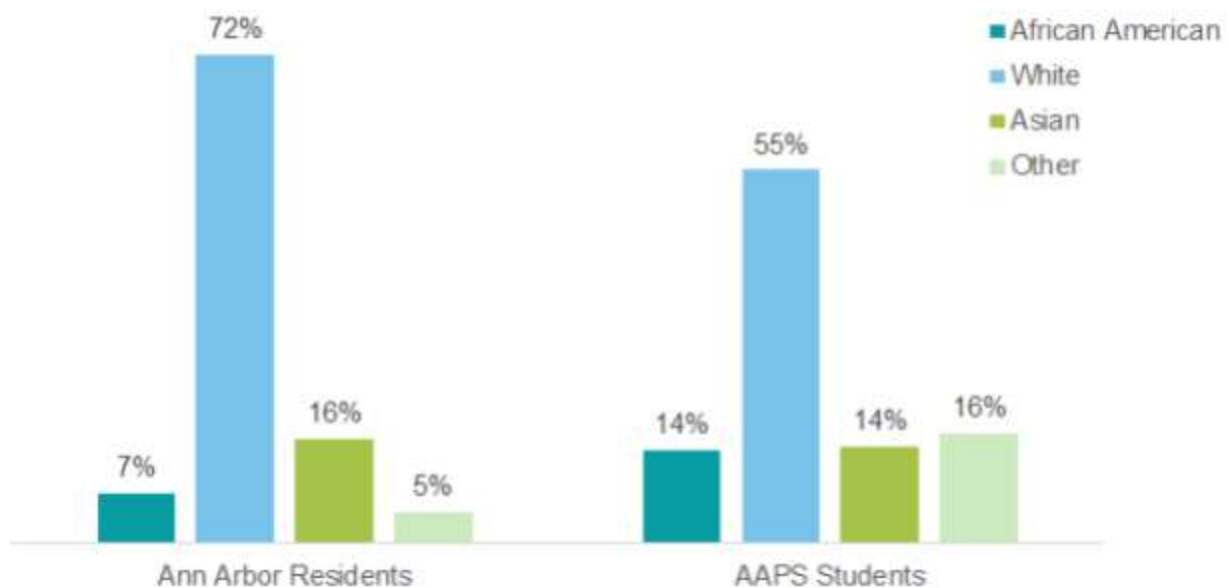
The charter and choice programs have resulted in dramatic changes to the racial makeup of YCS. School funding has also decreased dramatically due to declining enrollment. The chart below (Figure 20) shows the racial makeup of school-aged children in the Ypsilanti school district boundary. Due to choice, charter, and private school utilization, YCS is now almost two-thirds African American, where the population in the district is less than one-third African American.

FIGURE 20\_DEMOGRAPHICS OF YPSILANTI RESIDENTS & YCS STUDENTS, 2015



Sources: US Census 2015 ACS 5 yr. Estimates, and MI School Data, accessed through <https://www.mischooldata.org/DistrictSchoolProfiles/StudentInformation/NonResidentStatus.aspx>

FIGURE 21\_DEMOGRAPHICS OF ANN ARBOR RESIDENTS & AAPS STUDENTS, 2015



Sources: US Census 2015 ACS 5 yr. Estimates, and MI School Data, accessed through <https://www.mischooldata.org/DistrictSchoolProfiles/StudentInformation/NonResidentStatus.aspx>

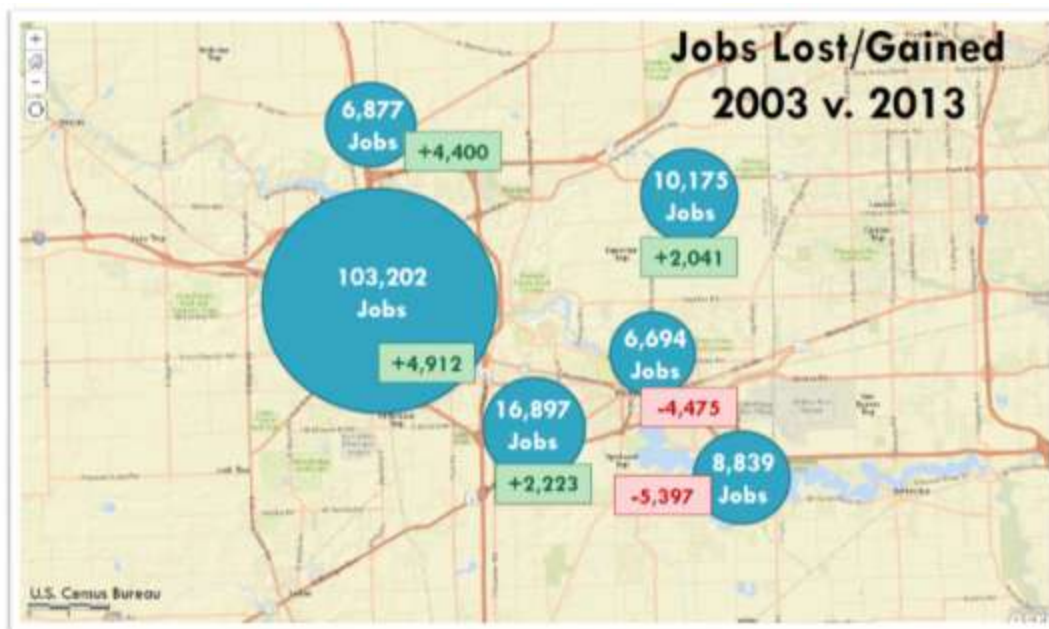
In contrast, the changes within the AAPS are less dramatic, and in some ways could provide an argument for increasing diversity within that district (Figure 21). However, the segregation of African American students in YCS is so dramatic, it is now a concern raised with the Michigan Civil Rights Division by local activists.

## Employment Opportunities

Massive market changes in the past 30-40 years have dramatically impacted the region. The east-side communities previously hosted numerous automotive, or automotive industry manufacturing plants that relied on a steady stream of workers, often without technical or advanced degrees. These were good paying, often union, jobs that provided financial security and access to opportunity for the middle class. With the broader shift to factory automation, and overall decline in manufacturing, several larger manufacturing facilities have closed in the last 10 to 20 years, solidifying Ann Arbor as the center of the job market in Washtenaw County.

As Map 25 below indicates, about 10,000 jobs losses have occurred on the east side in the past 10 years. A similar addition of jobs has occurred in the Ann Arbor area, due to both the strength of the University of Michigan and University of Michigan Hospital, as well as related retail, restaurant and service jobs. The jobs created in Ann Arbor represent a shift - either requiring advanced degrees (even in manufacturing) and/or have become lower-paying service level jobs that, while not requiring advanced education, have limited potential for advancement or income growth.

MAP 25\_ NUMBER OF JOBS LOST AND GAINED IN 2003 VS. 2013



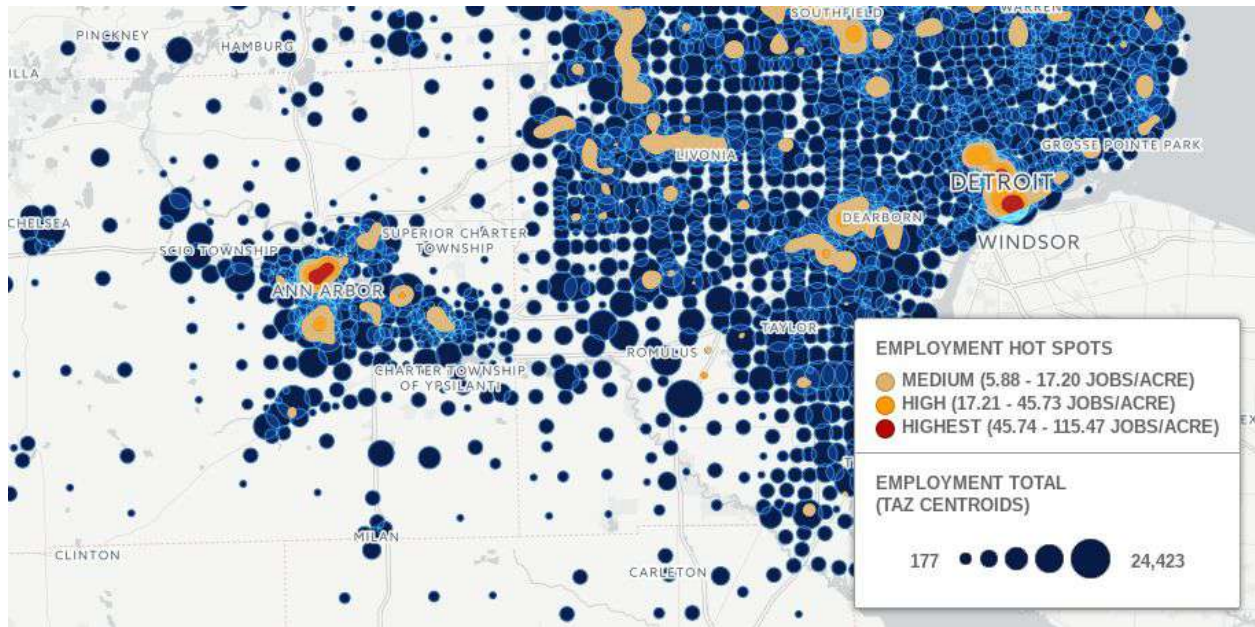
Source: On the Map - LEHD Census Data 2003 and 2013.

This has provided added challenges to the African American community, still primarily concentrated on the east side of Washtenaw County, which experiences higher unemployment rates, lower educational-attainment and lower incomes.

Currently, the primary job center is located in the Ann Arbor and Pittsfield Township area, as well as other urbanized areas of the county. Those living in rural areas will have less access through transit to jobs.

Developed by the Southeast Michigan Council of Governments (SEMCOG), Map 28 shows that while there is a moderate employment center in Ypsilanti due to the presence of EMU, the overall employment centers are in Ann Arbor, or further east in the Detroit area.

### MAP 28\_EMPLOYMENT DENSITY

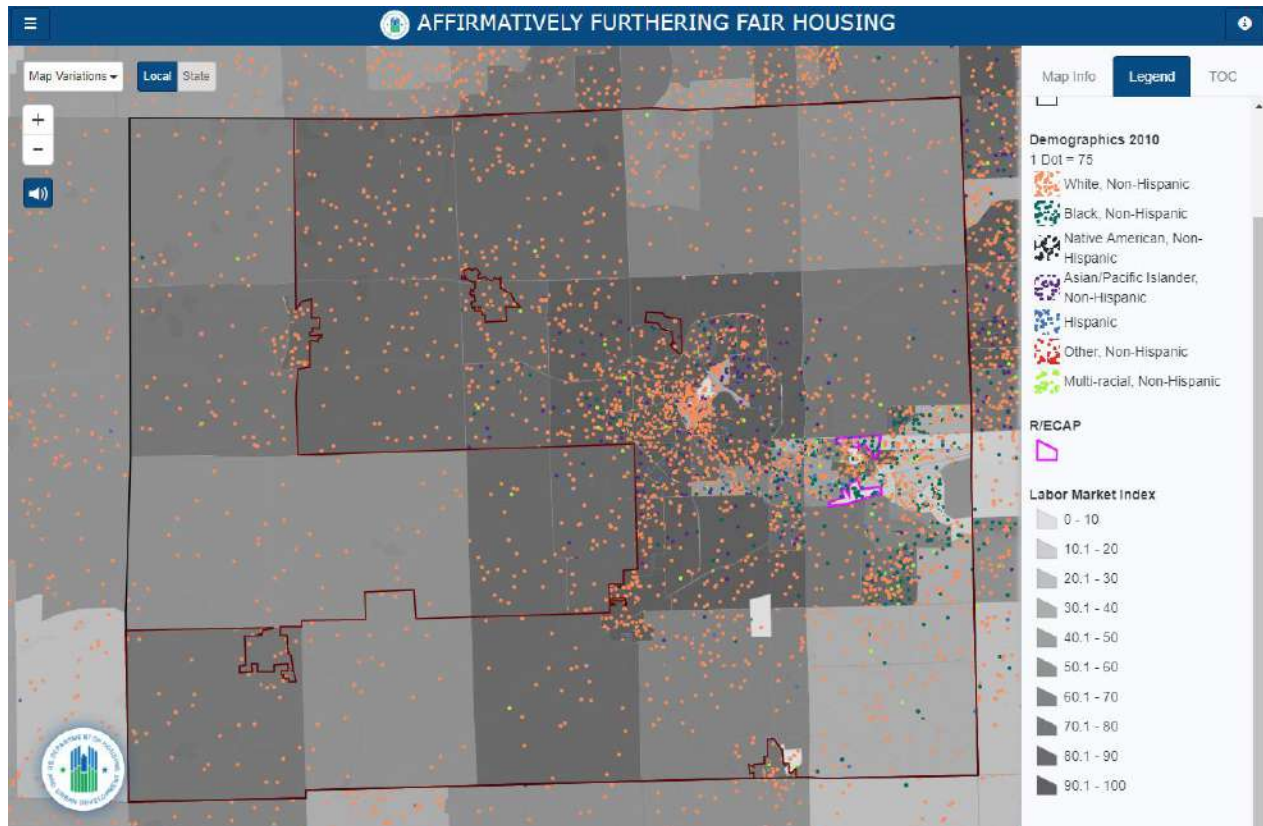


Source: SEMCOG Employment Density Map



The labor market (Map 29) shows a lower index in predominantly African American neighborhoods on the east side of the county. Additionally, the census tracts with low values are the areas with the U of M (downtown and North Ann Arbor), EMU (north side of City of Ypsilanti), and two prisons in Ypsilanti/Pittsfield/York Township and in Milan. Excluding these four areas, lower scores match up with predominantly African American neighborhoods almost exactly, including the two R/ECAPs.

#### MAP 29\_LABOR MARKET BY RACE & ETHNICITY



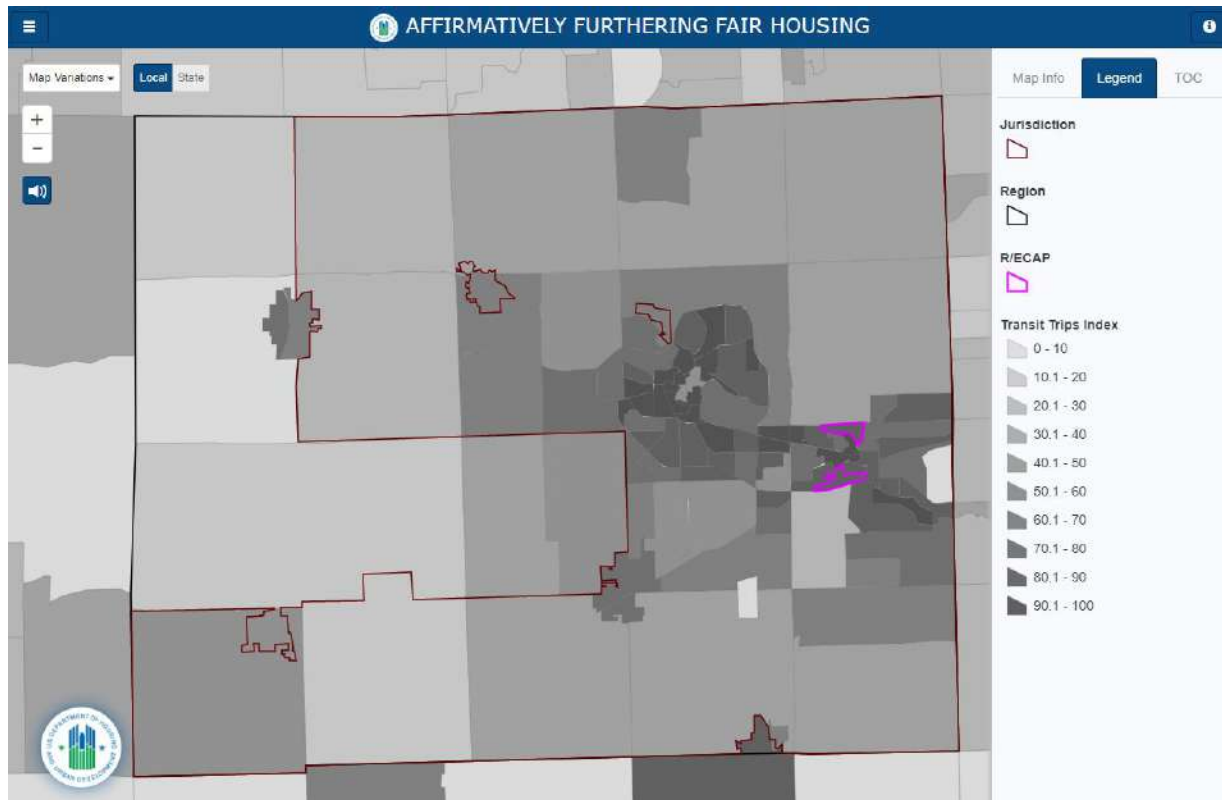
### Transportation Opportunities

As noted previously, the major employment sectors are in the City of Ann Arbor and Pittsfield Township, and the broader Detroit region. Those in rural areas and in larger population centers on the eastern side of the county have less access to employment, due to distance, and in the case with some areas on the east side of the county, less consistent access to a working automobile.

Prior to 2013, the former Ann Arbor Area Transportation Authority provided fixed route transit service through a fee for service with adjacent communities including Pittsfield, the City of Ypsilanti, and Ypsilanti Township. In 2013, the Authority officially expanded to include Ypsilanti City and Ypsilanti Township, changing its name to the Ann Arbor Area Transportation Authority

(AAATA) and adding two seats to the board, one for each community. This change was on the heels of millage decisions in both communities that provided, similar to Ann Arbor, dedicated funding for transit. As an expanded authority, the newly formed AAATA expanded and revised its service to improve timeliness and overall service by adding or changing routes throughout the system, but significantly in Ypsilanti, in 2015 and 2016. Increased weekend service has been provided, particularly on routes between Ypsilanti and Ann Arbor, to provide improved access to those who rely on transit for weekend work schedules. These recent improvements are not reflected in Map 30.

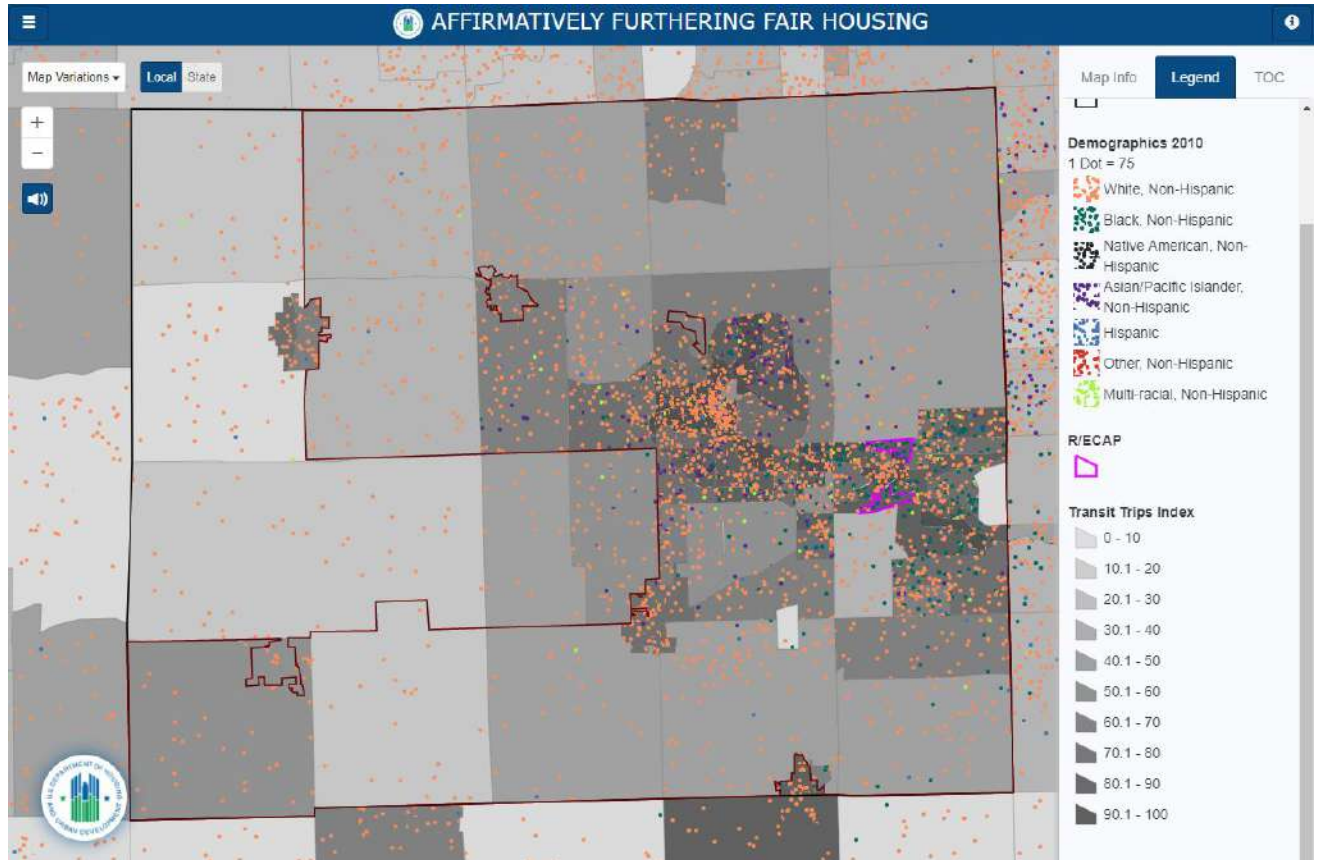
### MAP 30\_TRANSIT TRIPS INDEX



The two hubs of the AAATA transit system are stationed in downtown Ann Arbor and downtown Ypsilanti (city). Additionally, express service is available between Chelsea and Ann Arbor. Map 30 reflects higher usage near both transit hubs, as well as in Chelsea. A gap of service and usage is shown south of the City of Ypsilanti, due mainly in part to the location of Ford Lake - transit routes effectively operate to the east and west of the lake.

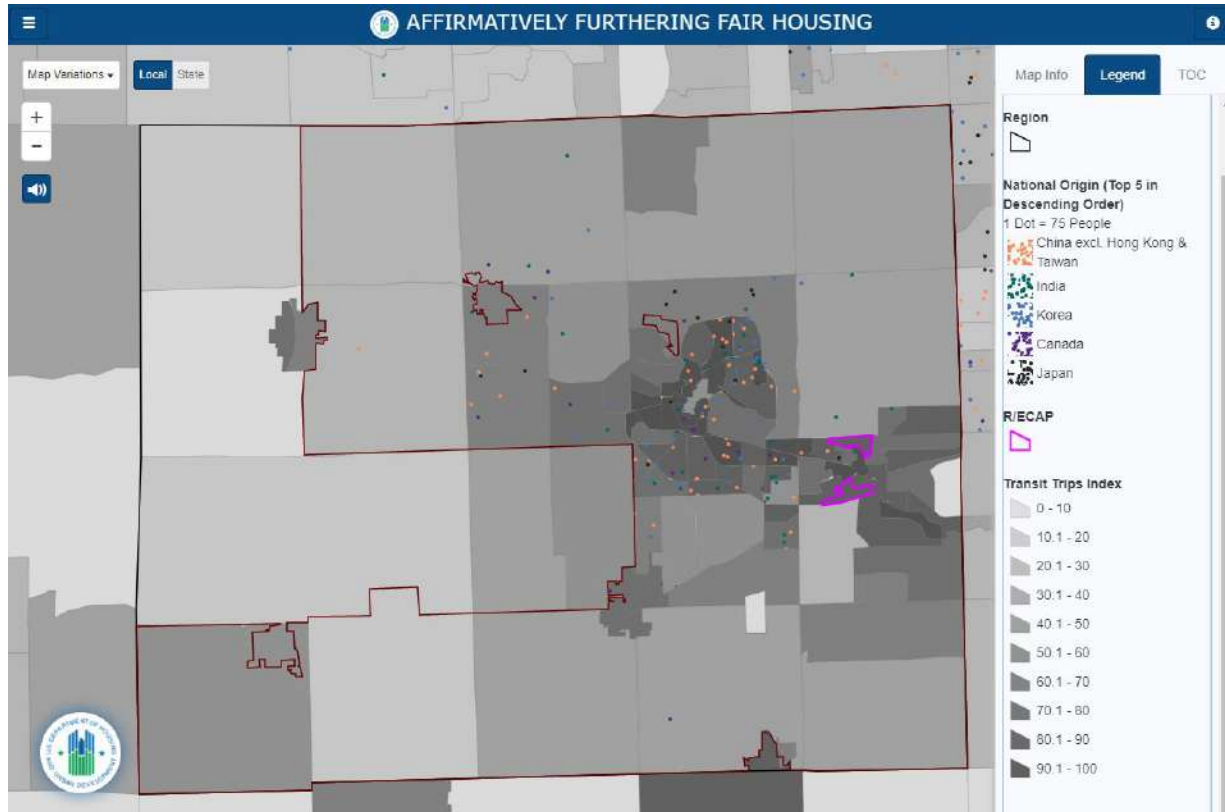
Access to transportation and jobs was a concern many focus groups participants shared, especially in areas in Ypsilanti (city and township). This is notable as these areas have more people of color residing in the east-side of the county (Map 31).

### MAP 31\_TRANSIT TRIPS INDEX BY RACE & ETHNICITY



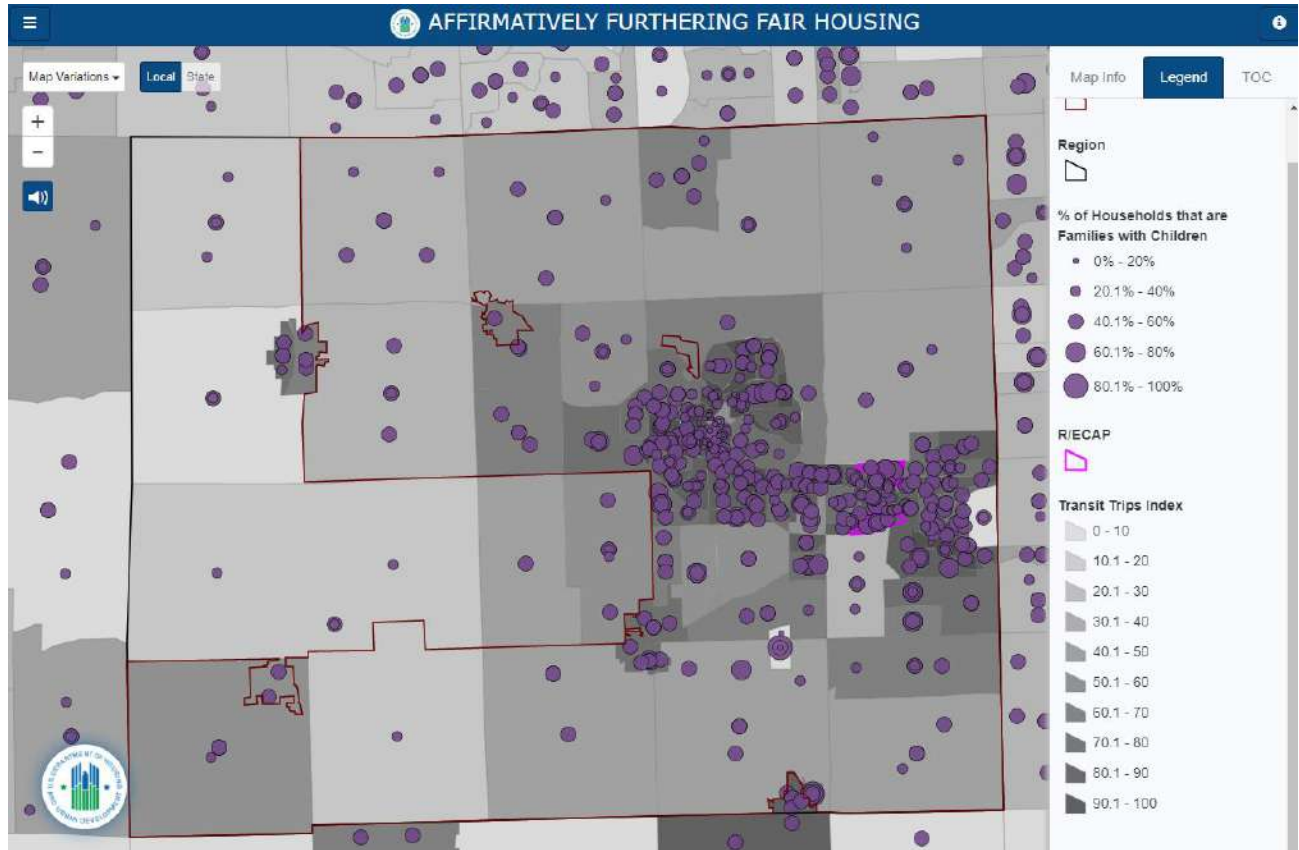
AAATA provides ride guides and schedules in English, Spanish, Chinese and Korean, representing the four most commonly spoken languages in the region. As noted previously, the University of Michigan draws international students, faculty and staff, in particular with Asian backgrounds (Map 32) and some with Limited English Proficiency (LEP). In coordination with AAATA, all U of M students and faculty have transit passes, further emphasising the need for transit information in multiple languages.

### MAP 32\_TRANSIT TRIPS INDEX BY NATIONAL ORIGIN



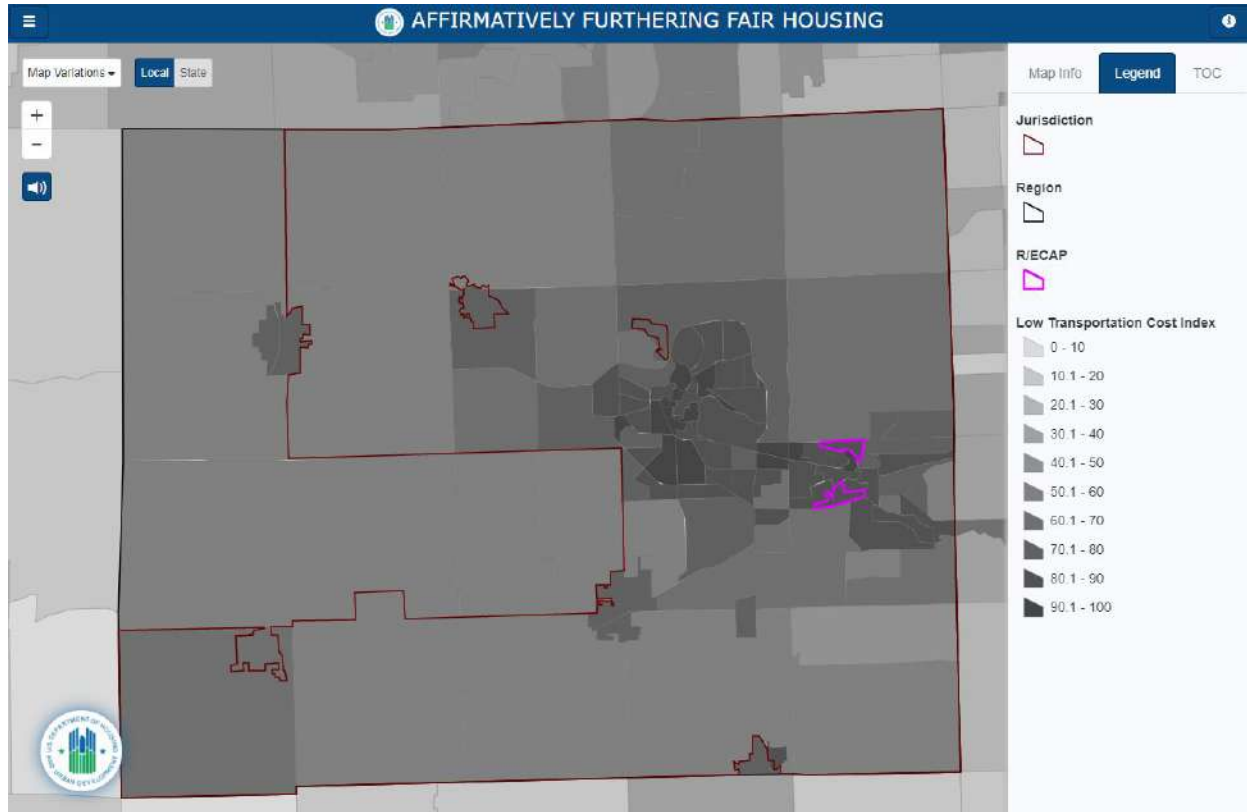
Areas with a concentration of households with families with children are also areas with high usage of transit trip. This reflects the general urbanized areas in population demographics and access to transportation (Map 33).

MAP 33\_TRANSIT TRIPS INDEX BY FAMILIES WITH CHILDREN



Overall, the county appears to fare well with the low-cost transportation index (Map 34). The expansion of the AAATA allows for more fixed and dial-a-ride service. The urbanized area has higher scores than the rural parts of the county, as would be expected.

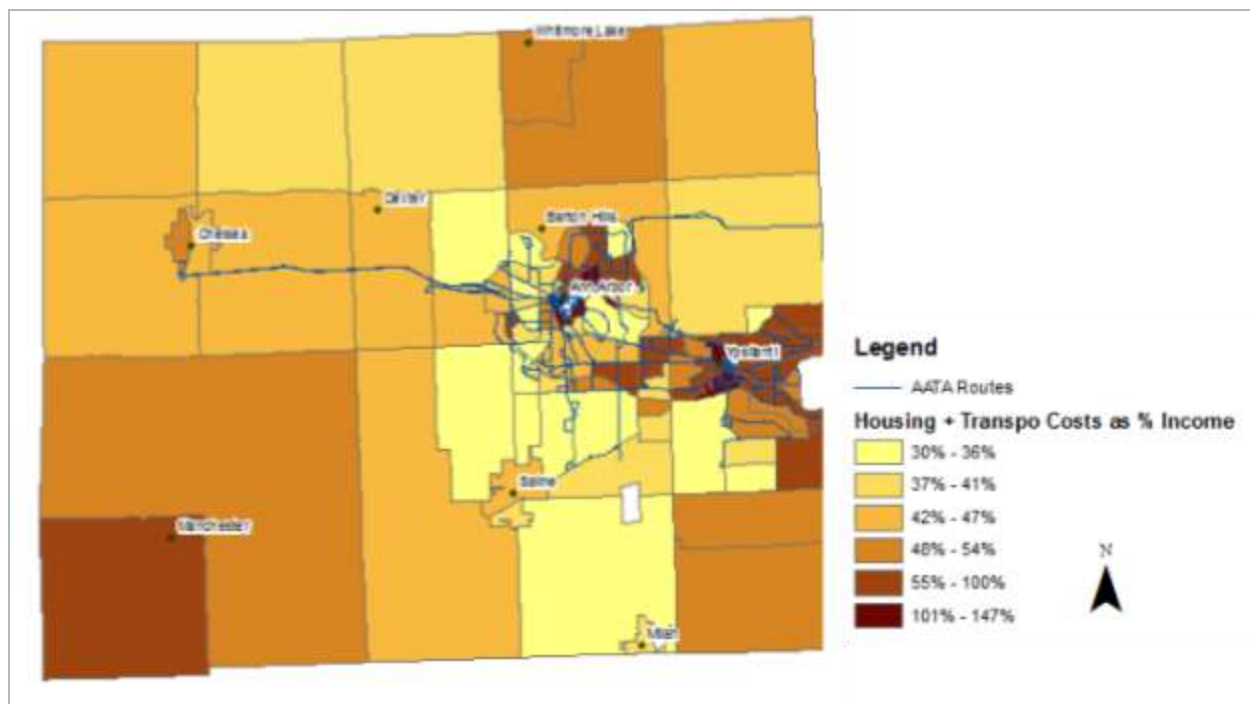
### MAP 34\_LOW TRANSPORTATION COST INDEX



Map 35 is a variation on the Center for Neighborhood Technology’s map of housing and transportation costs. The premise is that housing and transportation costs should not exceed 45% of gross income, or the household is unduly burdened, and will not have funds available for medical, insurance, food, clothing, education, childcare and other basic needs. The CNT index applies median household income to all census tracts. In Map 35, the variation creates an index based on the median household income of each census tract, along with transportation cost. This shows the impact on the lower-incomes on the east side and elsewhere in the county when looking at the housing and transportation cost burden in the county as a whole. Furthermore, this illustrates the following issues:

- Higher incomes and higher rents in Ann Arbor, but less transportation/access to transportation needs
- Lower rents and significantly lower incomes in Ypsilanti (city and township)
- Fewer jobs opportunity/access to job opportunity in Ypsilanti, thus increasing transportation costs

MAP 35\_HOUSING & TRANSPORTATION COSTS AS A PERCENT OF INCOME



While downtown Ann Arbor appears to be extremely burdened, the caveat is that many U of M students on Main and North Campus do not report family income, therefore spending more than 100% of student income on housing and transportation when this may be subsidized by family members. This is also applicable to the census tract in Ypsilanti that includes and are near the EMU Campus.

## Low Poverty Exposure

Of the five census tracts with the highest poverty levels (excluding university census tracts), here are the demographic breakdowns by race:

TABLE 30\_DEMOGRAPHICS OF CENSUS TRACTS WITH HIGHEST POVERTY LEVELS

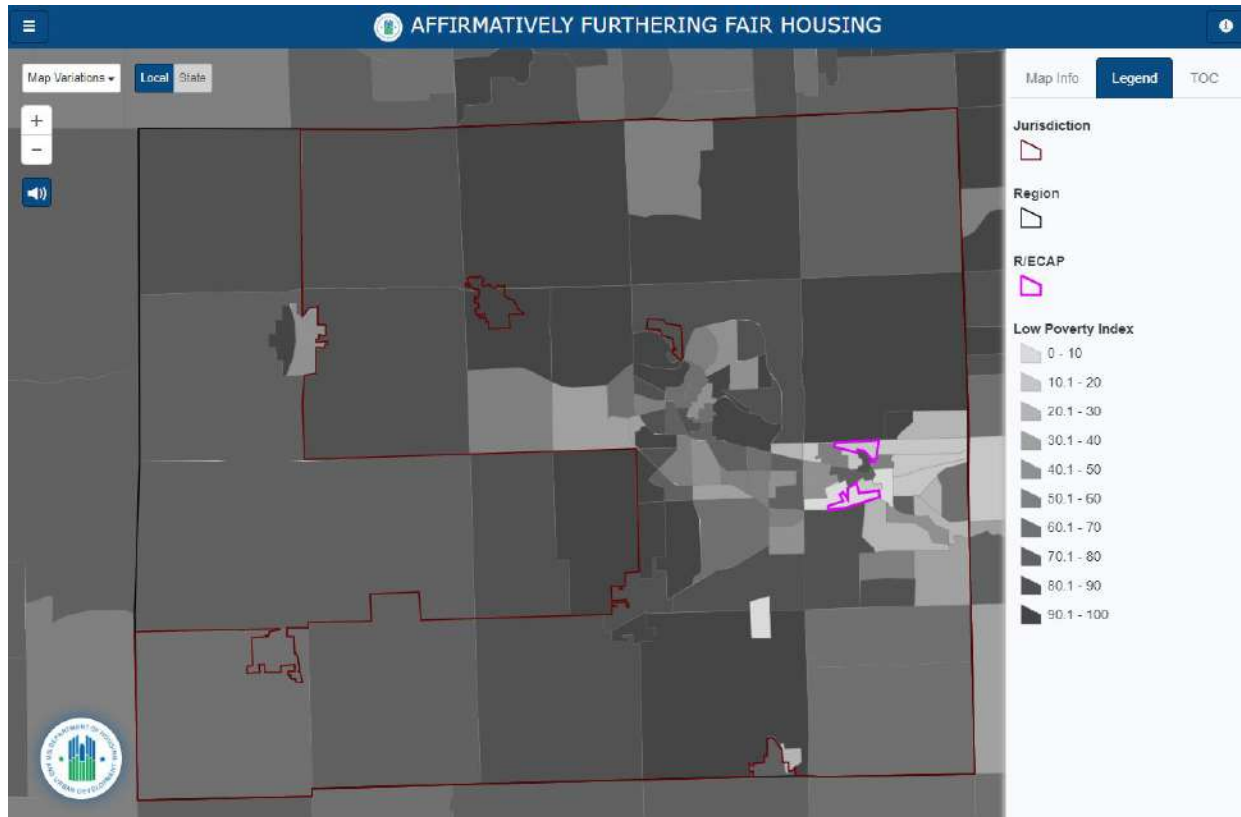
Neighborhood, City, Census Tract	% Families in Poverty	% White	% African American	% Hispanic
Southside R/ECAP City of Ypsilanti (4106)	58%	30%	61%	2%
Ecorse Ypsilanti & Ypsilanti Township (4108)	45%	49%	41%	2%
Golfside Ypsilanti Township (4101)	45%	33%	47%	12.5%
West of Southside R/ECAP Ypsilanti Township (4105)	43%	30%	47%	17%
Leforge R/ECAP Ypsilanti city and Township (4112)	33%	29%	56%	6%
Source: ACS 2015 (5-Year Estimates), ACS 2015 (5-Year Estimates), Social Explorer; U.S. Census Bureau				

The tracts above are all located in the City of Ypsilanti and/or Ypsilanti Township. As noted above (Table 30), these also coincide with areas of a high concentration of African American residents, including the two R/ECAPs for the county, highlighting a long-standing pattern of low opportunity areas for African Americans in Washtenaw County.



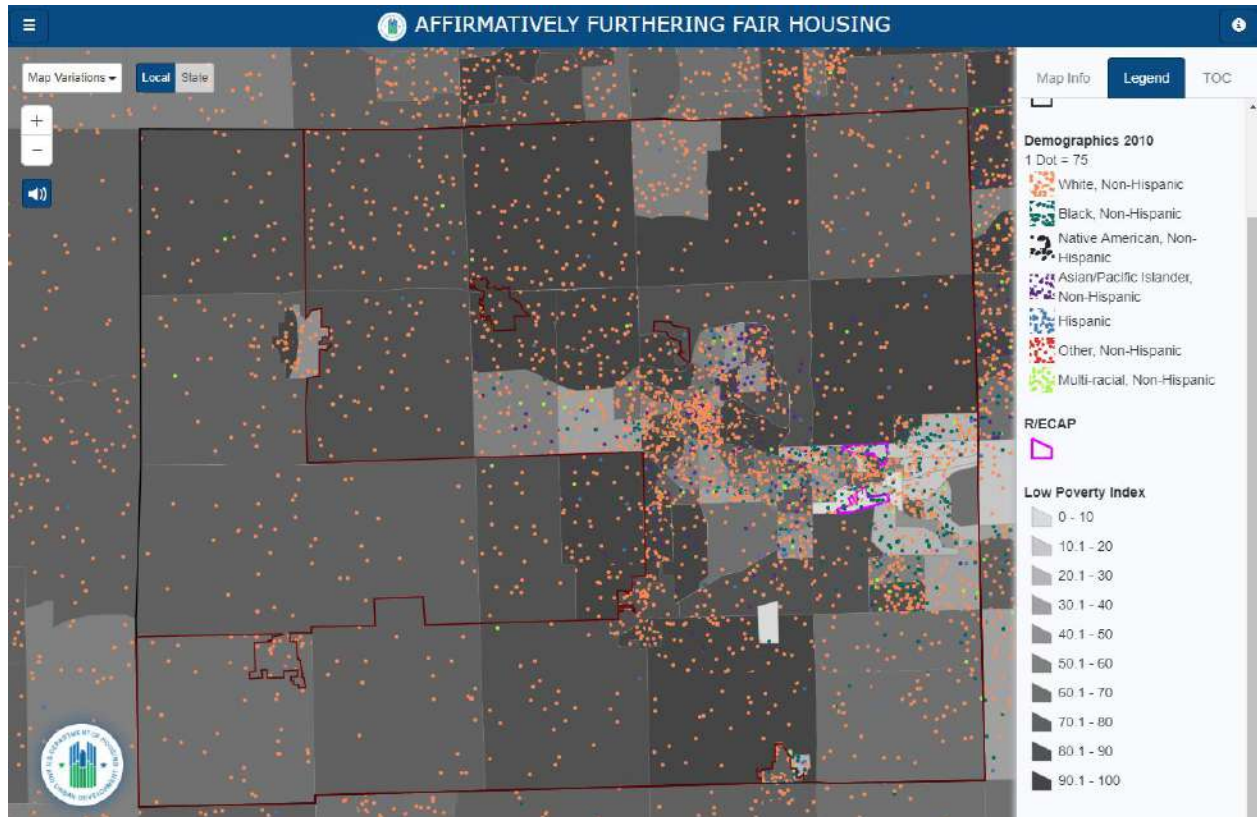
Outside of the east-side communities, other areas of concern are portions of Scio Township, which include a large trailer park and a number of low-income residents, the Whitmore Lake/Northfield Township area, Superior Township, and Chelsea, where there are a number of nursing homes (Map 36).

MAP 36\_LOW POVERTY INDEX



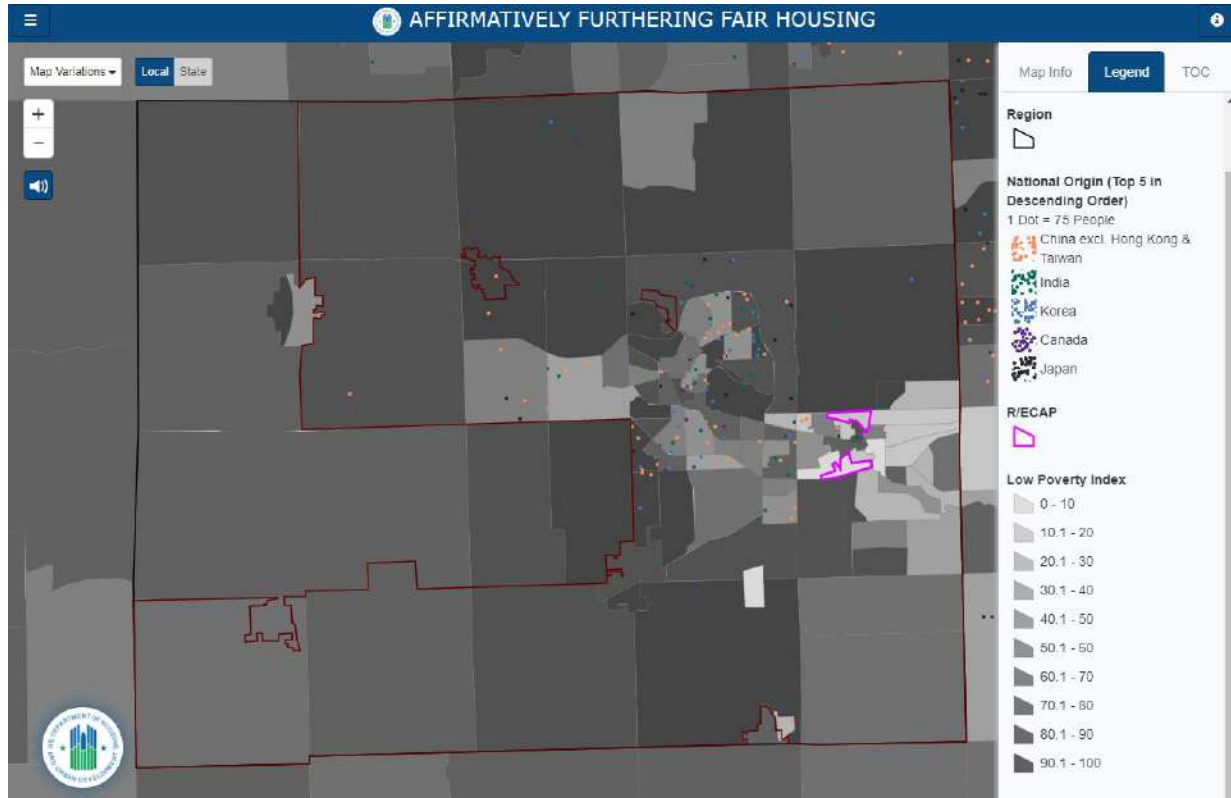
As discussed, the majority high poverty areas are on the eastern side of the county, in areas with higher concentration of African American households. Additionally, Hispanic and Asian populations reside in several census tracts with high poverty, including near Golfside in Pittsfield/Ypsilanti Township and west of the Southside R/ECAP, also in Ypsilanti Township.

MAP 37\_LOW POVERTY INDEX BY RACE & ETHNICITY



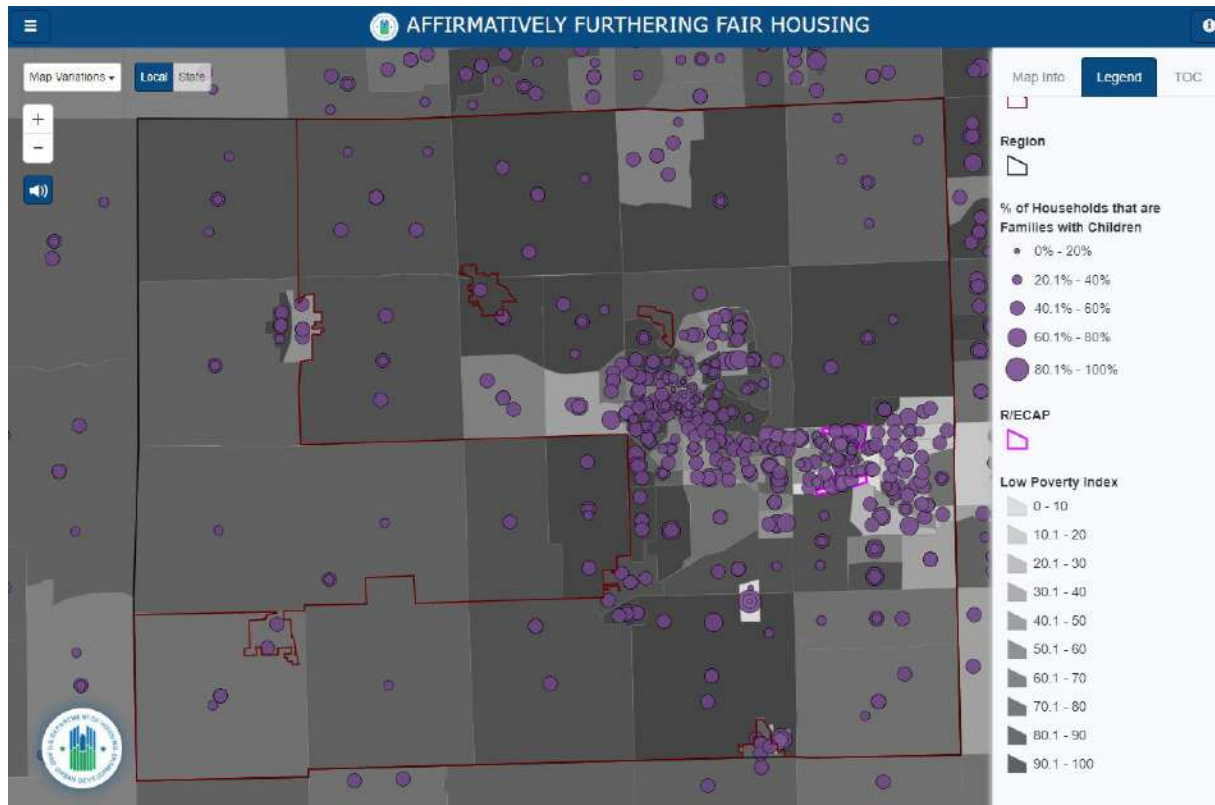
The top 5 National Origins for the county are Chinese, Indian, Korea, Canada and Japan. Most of this population is centered in and around Ann Arbor, and dispersed throughout. There does appear to be more of a concentration near the U of M downtown and north campuses (Map 38).

MAP 38\_POVERTY INDEX BY NATIONAL ORIGIN



Families with children are located throughout the county, and make up generally 40-60% of the population in high poverty census tracts.

### MAP 39\_POVERTY INDEX BY FAMILY STATUS



### Environmentally Healthy Neighborhoods

The general urbanized area has a lower environmental health score than the rest of the county and local communities have voiced concerns.

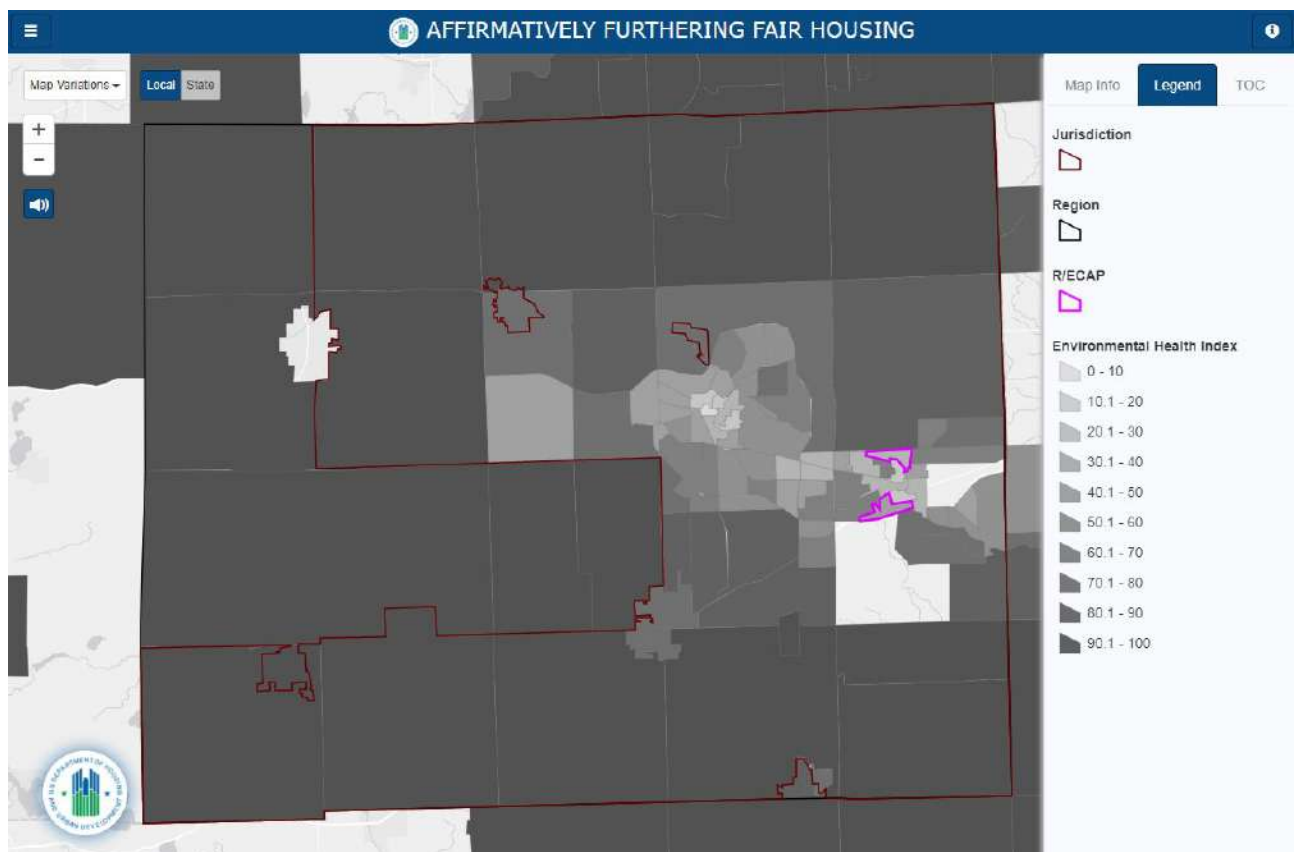
The West Willow neighborhood is located near the former Willow Run Bomber Plant, the Willow Run Airport and a landfill that allows hazardous materials. In reviewing the recent information on the landfill, there haven't been any recent reports of concerns, spills, leaks, and so on; however, the neighborhood residents express concern regarding the introduction of radioactive materials into the landfill. This additional substance has been approved by the Michigan Department of Environmental Quality (MDEQ). Note the West Willow neighborhood is 70% African American.

Another known issue, located in the City of Ann Arbor and Scio Township, is a Dioxin plume. The majority of homes in the area are not using wells for water; however, there are homes in the area of the plume with wells that may be using them. Those specific wells tested below state

criteria. All the remaining homes in the plume were already on, or have been switched to, a municipal water supply. The area is being closely monitored by the MDEQ and Washtenaw County Environmental Health, among others, to ensure there aren't any related issues including ambient air.

In reviewing Map 40, there are several areas within Washtenaw County with elevated airborne pollutants outside denser urban areas. While some of these areas are related to larger manufacturing facilities, others are not as clearly explained. The data displayed is from 2005, and overall levels of manufacturing in the region have decreased since that time. Further, Washtenaw County has a robust brownfield redevelopment program, established in 2002 under Public Act 381 of the State of Michigan, that has successfully supported demolition, cleanup and redevelopment of over 1,000 acres of previously blighted and/or contaminated commercial and industrial properties. Many of these projects are within urban areas where at risk populations are located, and elevated airborne pollution risks exist.

#### MAP 40\_ENVIRONMENTAL HEALTH INDEX



## Patterns in Disparities in Access to Opportunity

### Education

Long-term racial and socioeconomic segregation is reinforced through local school districts. Uneven funding is a result of segregation and ongoing concentration of lower-income families on the east side. The middle and upper class families that do live with in the YCS District frequently utilize charter and the choice schools program to have their children attend other schools.. This adds additional pressure to YCS which is left with more lower income students and students of color, often with additional resource needs.

While this issue has been identified frequently, state school funding formulas encourage more successful (and better resourced) school districts to cherry-pick middle and upper middle-class predominantly white students. This ongoing competition for funding exacerbates the disparity. While a countywide merger has often been cited as a means to rectify this problem, experts note that long-term debt and racial and economic prejudices make this unlikely.

The result is that east side communities of color are most negatively impacted (including the two R/ECAPs), with no new ideas on the horizon for structural change.

### Employment

Employers and residents speak to a job skills mismatch resulting from broader economic shifts over the last 10-20 years. With fewer good-paying jobs for individuals with less than a college degree, jobs either fall into the service/retail category, or the advanced manufacturing/IT category. The former suffers from low wages and limited upward mobility. The latter is considered desirable, but education and experience requirements make many of these positions unobtainable for residents without college degrees or advanced training. This is clearly illustrated by the higher unemployment and less educational-attainment on the east side, in primarily African American neighborhoods.

Racial discrimination, lower-education levels and related issues are ongoing problems with the unemployment in the African American community in the City of Ypsilanti and Ypsilanti Township as well as portions of Superior Township.

### Transportation

Recent improved transit options through the Ann Arbor Area Transportation Authority (AAATA, also branded as The Ride) expansion have provided additional relief (note expansion is too recent to be included in HUD in this chapter). The AAATA changes are being reviewed to determine the impact of transit expansion and route change on service. Additional transportation options are needed, especially as the lack of access to a car is more of an issue for maintaining employment than education, as reported in a 2016 survey of Michigan Works! job seekers.

### **Poverty**

Tied in closely to race, and racial segregation patterns, high poverty areas most negatively impact communities of color, primarily African American, Native American and Hispanic.

### **Additional Information**

#### **Washtenaw County Opportunity Index**

In 2015, Washtenaw County worked with local partners to develop a broad Opportunity Index to score each census tract for access to opportunity based on 5 categories: Health, Education & Training, Job Access, Neighborhood Safety and Stability and Economic well-being.

In Map 41, the blue areas have high opportunity, whereas the dark red areas have lower opportunity.

As expected, this matches closely with the HUD-provided data and shows a pattern of lower opportunity on the east side of the county which has the majority of African American populations and neighborhoods (like in Ypsilanti City, Ypsilanti Township, and portions of Superior and Augusta Township. Whitmore Lake also shows up as well). More information on the index and the County's work toward racial equity can be found at [www.opportunitywashtenaw.org](http://www.opportunitywashtenaw.org).

### MAP 41\_OPPORTUNITY INDEX OVERVIEW

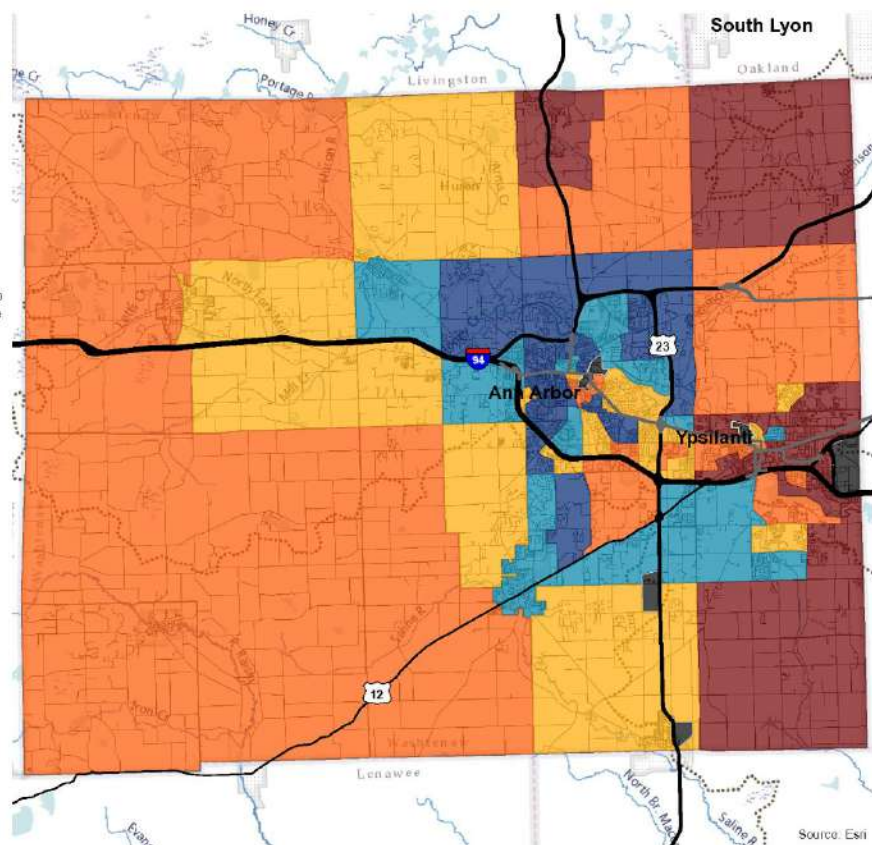
#### Map Overview

This map illustrates comprehensive opportunity by Census tract relative to indicator averages across the entire county. Opportunity indicators were chosen through collaboration between the Washtenaw County Office of Community and Economic Development and the Kinwan Institute to best represent existing conditions with respect to Health, Job Access, Economic Well-Being, Education & Training, and Neighborhood Safety & Stability.

The overlay pie charts show the relationship between the county's opportunity landscape and Black or African American residents. Chart size is indicative of total African American population along with adjacent label.

Data sources include the County Health Department, the American Community Survey, US Census and MI Department of Labor (LEHD), Consumer Financial Protection Bureau, US Postal Service, and County Equalization Data.

#### Opportunity Index



The high opportunity areas are centered around Ann Arbor, Pittsfield Township and portions of Scio and Ypsilanti Townships (Map 41). There is concern within some neighborhoods of Ann Arbor, that lower-income households may be priced out due increased cost of housing. Neighborhood profiles (in Demographic Summary Chapter) are in response to requests from the AFFH Subcommittee to “deep dive” into the change happening within neighborhoods.



## Contributing Factors of Disparities in Access to Opportunity

Each chapter discusses contributing factors that continue, worsen, or otherwise prevent resolution to the fair housing issue discussed in the chapter. These contributing factors help direct the development of goals and strategies to counter the issue.

### Access to financial services

Recently, the United Way of Washtenaw County convened a working group on financial services and financial literacy related to low income Washtenaw County residents. As part of this, Map 42 was developed, showing check cashing locations. As you can see from the map below, the number of check cashing locations (red pins) are clustered around the east side of the county, in lower income areas. In Ann Arbor, the jurisdiction with the largest population, there are only two locations.

MAP 42\_CHECK CASHING LOCATIONS



### **The availability, type, frequency, and reliability of public transportation**

As mentioned previously, the AAATA largely expanded transit services in 2016. As a result, wait times were reduced from 1 hour to 30 minutes, and in regard to routes in Ypsilanti and Ypsilanti Township, most routes now travel in both directions rather than a one-way loop. While greatly improved, travel times from the following locations to U of M Hospital (for example) usually hover about 1 hour one way:

- West Willow Neighborhood - minimum of one hour, one way
- Southside R/ECAP - between 55 and 60 minutes one way
- Leforge R/ECAP - 47-57 minutes depending on route

Two hours of travel time, at minimum, puts a burden on residents with other needs such as running errands, getting to and from childcare and schools, spending time with family, and so on.

As to reliability and on-time performance, FY 2016 data provided by The Ride indicates that 90% of trips were on-time at route endpoints. That number decreased to 84% for on-time performance at all timepoints along the route. Currently on fixed-routes, 43% of bus stops have accessibility enhancements, but 100% of the bus fleet contain accessibility features.

The A-Ride service from Ann Arbor Area Transportation Authority also provides shared-ride transportation service for persons with disabilities. This service is available for individuals within  $\frac{3}{4}$  mile of fixed route service and available. Additionally, A-Ride is available for ADA eligible residents of Ypsilanti, Pittsfield and Superior Townships who reside beyond the Base Service Area. These riders may request trips to locations within their township on weekdays between 6:30 a.m. and 6:30 p.m. Additional funding permits:

- Eligible Pittsfield Township riders to travel within the Ann Arbor City limits
- Eligible Ypsilanti Township riders to travel within the Ypsilanti City limits.

Outside of AAATA's service area, People's Express serves residents of Saline; Dial a ride is available to residents of Manchester (including accessible transportation); Western-Washtenaw Area Value Express (WAVE), provides affordable transportation to older adults, persons with disabilities and other transit-dependent individuals. The WAVE's service area includes Chelsea, Dexter and provides an inter-urban express route along Jackson Road. With that said, many rural areas are not covered by dial-a-ride or other paratransit services.

As mentioned previously there are no connections east of Washtenaw County to Dearborn, Canton, and the Detroit Area. A four-county Regional Transit Authority (RTA) has been formed, but a 2016 millage effort to fund service to link all four counties (including the links from Washtenaw east to other employment opportunities) failed. Another attempt is expected, although not yet announced.

### **Lack of private investments in specific neighborhoods**

The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. However, there has been great improvements in existing single and multi-family commercial stock, including the RAD conversion of Ypsilanti Housing Commission properties and investment in rehabilitation of a variety of properties post foreclosure. There are several new residential developments in the planning stages, but still limit investment, particularly in the southside and southeast neighborhoods.

Private investment in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development and boosted new homeownership. Additionally there is interest in investment along several corridors, including Whittaker Road. However, the Gault Village shopping area, previously a neighborhood center with a grocery and related convenience shopping, is still in transition and experiencing a high degree of vacancy.

### **Lack of public investments in specific neighborhoods, including services or amenities**

Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to its age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.

The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.

Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.

Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.

### **Lack of regional cooperation**

Positive regional cooperation include the Urban County, the Continuum of Care for homelessness services, and the expansion of the Ann Arbor Transportation Authority to the Ann Arbor Area Transportation Authority, now including the City of Ypsilanti and Ypsilanti Township, While five jurisdictions have adopted the 2015 Housing Affordability and Economic Equity Analysis, there is some tension around implementation of regional goals for the effort. In some cases that includes some communities interest in gentrification more than revitalization, and in other cases, limited investment and engagement in removing exclusionary policies.

Areas where regional cooperation could benefit are efforts involving a countywide public education district, coordinated hiring efforts from anchor institutions, and ongoing coordination on affordable housing for the urbanized area. The 2016 failure of the RTA Millage presents some broader regional coordination needs. The effort looks to connect 4 counties with transit services that will expand employment opportunities and improve access overall.

### **Land use and zoning laws**

Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment in lieu of taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.

Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.

### **Lending Discrimination**

The recent history of mortgage lending in Washtenaw County as reported through Home Mortgage Disclosure Act (HMDA). African Americans are denied mortgages for single family, duplex, triplex and quad buildings at a rate often 2-3 times that of whites or Asians. Hispanics are also denied at a much higher rate, than whites or Asians. The smaller number of loan originations does show more fluctuation in the information for Hispanics/Latinos.

Anecdotally, there have been numerous stories of EMU professors looking for housing that are immediately directed to the Ann Arbor Housing market by realtors and others, rather than neighborhoods with quality and affordable housing stock within walking or shorter commuting distances in the City of Ypsilanti and Ypsilanti Township. Anecdotal reports from realtors

indicate that steering occurs related to school districts, with school district boundaries serving as the modern era “redline” districts.

### **Location of employers**

Previously noted, the majority of employers in the county are located in the Ann Arbor and Pittsfield area. The University of Michigan and University of Michigan Hospital employ more people than almost all the other top 20 employers in the county combined. Transit service does link much of the urbanized area to these major employers; however, in several cases in eastside neighborhoods, the commute is one hour one way.

The other large job center is in the City of Detroit and its metropolitan region. There is no transit access from Washtenaw County east. Plans for those connections as part of the RTA are on hold until the RTA determines how to move forward after the failed 2016 millage effort.

### **Location of environmental health hazards**

The MDEQ and Washtenaw County Department of Environmental Health is monitoring the Dioxin plume in the City of Ann Arbor. The new West Willow Neighborhood Association is seeking advocacy support from Congresswoman Dingell to encourage limited use of the nearby hazardous waste landfill. The Washtenaw County Brownfield Authority continues to support local units with cleanup and redevelopment of brownfield sites.

### **Location of proficient schools and school assignment policies**

The less proficient school systems on the eastern side of the county (YCS and Lincoln Schools) are a frequent deterrent for homebuyers with the income and flexibility to purchase or even rent throughout the region. The AAPS are the primary draw, and further contribute to the high cost of housing in Ann Arbor and surrounding areas. School district lines have become a modern equivalent of redlining, with more African American and students of color attending YCS and Lincoln Schools than other county school districts. The result is a vicious cycle of individuals with higher incomes and education adding to the expense and exclusivity of Ann Arbor, while households with lower incomes find themselves in an underperforming and underfunded school district.

### **Location and type of affordable housing**

As the map in the Publicly-Supported Housing Analysis section shows, the City of Ypsilanti and Ypsilanti township host the vast majority of committed affordable housing units for the county, creating areas of disproportionate housing needs and areas of concentrated poverty. For example, in the City of Ypsilanti, more than 95% of the committed affordable units in the city are located South of Michigan Avenue - this includes the 632 units located in the Southside R/ECAP.

### **Occupancy codes and restrictions**

Most local units use the state building code to define occupancy limits. In reviewing the definition of a family, there is variation among jurisdictions related to the number of unrelated individuals that can live together under the definition of family. Most of the out-county townships limit this number to 1 or 2 individuals. However, state case law has broadened the definition of functional family in a number of cases, even if local zoning ordinances haven't reflected the latest case law.

### **Private discrimination**

Through both surveys and focus groups, it was affirmed that discrimination is still an issue in particular for people of color and persons with disabilities. In the Ypsilanti Renters focus group, it was posited that one reason for this ongoing discrimination is a lack of diversity among property managers and landlords. This could minimize cultural misunderstandings that can lead to applications being denied and, in some cases, eviction.

## Disproportionate Housing Needs

### Key Findings

The 2015 Housing Affordability and Economic Equity Analysis demonstrates the existence of two distinct housing markets in the county. One in the Ann Arbor area featuring high rents and high incomes, and a second in Ypsilanti and Ypsilanti Township with lower rents and even lower incomes. The Ann Arbor area needs to add its fair share of affordable housing (140 units a year for 20 years) and eastside neighborhoods need to stabilize and add amenities, services, and improve institutions (like schools districts) to support existing and future residents.

Beyond neighborhood stabilization and investment, higher incomes are needed (through education, training, recruitment, hiring strategies) for Ypsilanti and Ypsilanti Township residents to prevent displacement, and to improve quality of life.

Outside of the urbanized area, several rural areas are also experiencing housing problems and housing cost burden.

And disproportionately, Native American populations, although small, are seeing the biggest challenges around housing. Outreach and engagement with this community is needed along with African American neighborhoods and ongoing work with the Latino community.

## Housing Cost Burden Across Populations

In 2015, Washtenaw County released the Housing Affordability and Economic Equity Analysis ([www.ewashtenaw.org/affordablehousing](http://www.ewashtenaw.org/affordablehousing)). The report noted that the urbanized area of Washtenaw County experiences, in effect, two housing markets.

One is a higher-priced market in and around the City of Ann Arbor, that is considered most desirable due to access to employment centers and a higher-performing school district. Not only are rents and housing prices more expensive, but incomes are also generally higher in this area. Many low and moderate income households are priced out of the area.

The second market is in Ypsilanti and Ypsilanti Township, where rents are considered more reasonable, but where incomes are lower still, creating housing cost burdens for lower and moderate income households.

The analysis based its findings and recommendations on the concept that each community should provide their “fair share” of housing for households at various income and education levels. The resulting recommendation is that communities such as City of Ann Arbor, Ann Arbor Township, Pittsfield Township and other nearby communities should add committed affordable housing units. The annual target for the next 20 years for the City of Ann Arbor is adding 140 and adding 17 units a year in Pittsfield Township.

In Ypsilanti City and Ypsilanti Township, the goal is to attract or grow 69 college-educated households a year in the City of Ypsilanti and 140 households a year in Ypsilanti Township. One approach to raise the household is through training and education. Another approach is through placemaking and adding other housing products to meet the needs of underserved (low opportunity) areas.

Map 43 below shows housing burden, with higher areas in downtown Ann Arbor (the high rent issue) and in the City of Ypsilanti and Ypsilanti Township (the lower income issue).

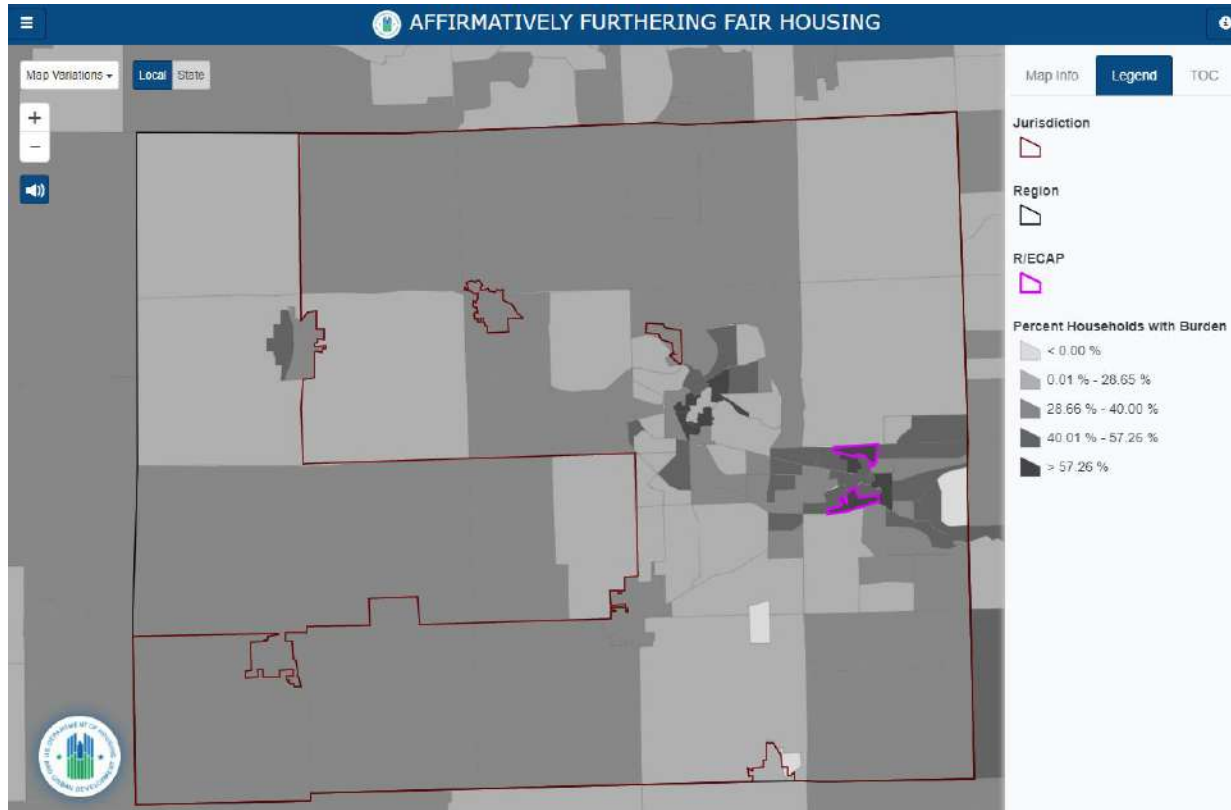
## Housing Cost Burden Across Jurisdictions

There are higher percentages of households with burden around downtown Ann Arbor and the University of Michigan (Map 43). Often those areas have issues related to housing cost burden and/or housing with more than 1 person per room. Some issues with housing cost burden are related to the student population where students often report low incomes, but are still part of the parent’s household, making some income analysis difficult in and around the University campuses.



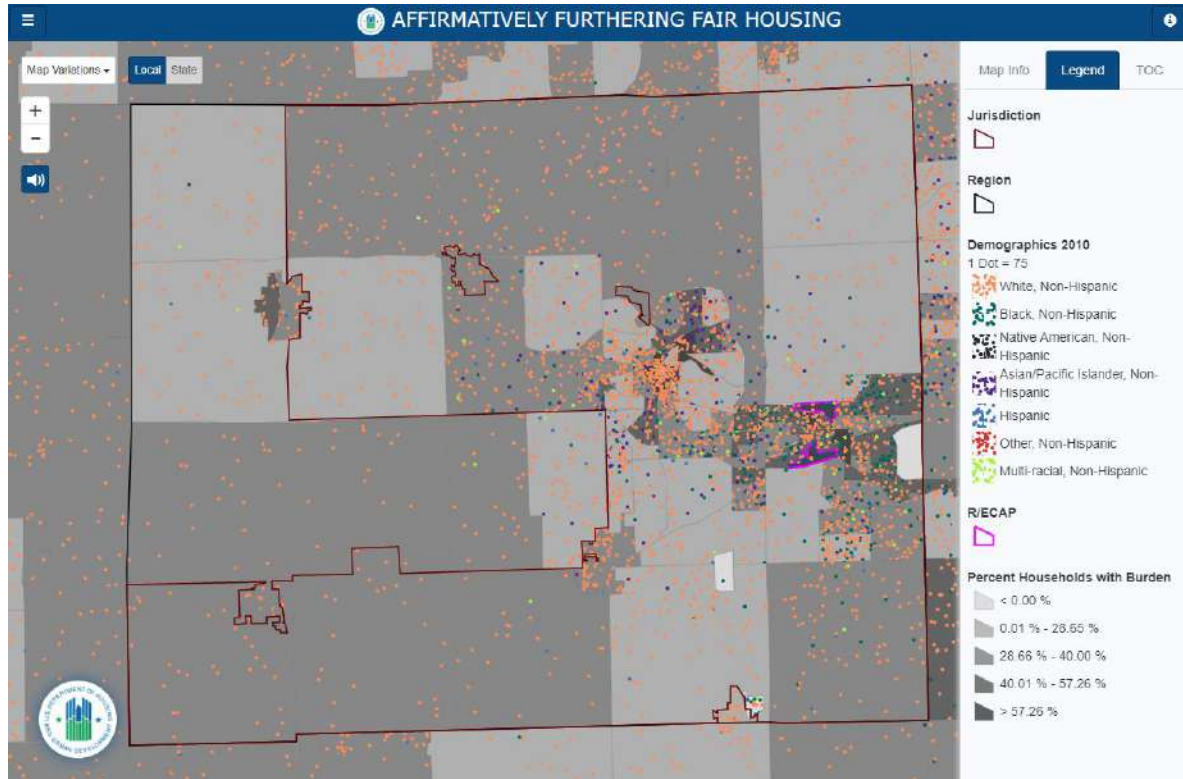
Otherwise, the other census tracts with higher percentages of households with burdens are located primarily on the east side of the county, with the exception of the western half of Chelsea, which is the location several nursing and assisted living facilities. The higher east side census tracts are in Pittsfield, Ypsilanti Township and the City of Ypsilanti, and are also areas with higher concentration of African American and Hispanic residents.

MAP 43 HOUSEHOLDS WITH HOUSING BURDEN



In Ypsilanti, both R/ECAPs have high percentages of households with burden. The Leforge R/ECAP shows 69% of the population experience one or more housing problems. In the southside R/ECAP, 58% of the households experience housing problems. Other areas on the east side with higher African American and Hispanic populations also have higher percentages of households with housing problems.

MAP 44\_HOUSEHOLDS WITH HOUSING BURDEN BY RACE & ETHNICITY



Outside of the adjacent University of Michigan campus neighborhoods, it does appear some households of Chinese national origin are disproportionately burdened with housing problems, in particular along the Washtenaw corridor in Ypsilanti and Pittsfield Townships including areas along Carpenter and Golfside Roads (Map 45).

MAP 45\_ HOUSEHOLDS WITH HOUSING BURDEN BY NATIONAL ORIGIN

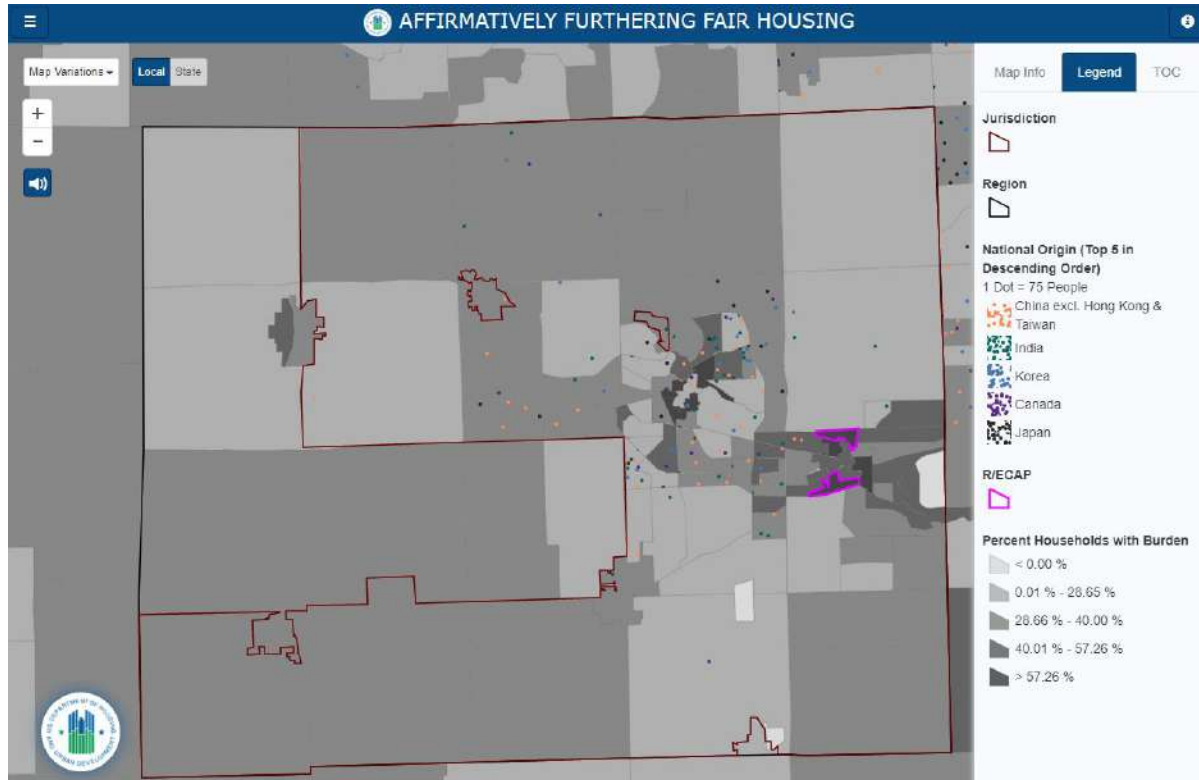


TABLE 31\_ DEMOGRAPHICS OF HOUSEHOLDS WITH DISPROPORTIONATE HOUSING NEEDS

(Washtenaw County, MI CDBG, HOME, ESG) Jurisdiction			
Race/Ethnicity	# with problems	# households	% with problems
White, Non-Hispanic	30,400	90,602	33.55%
Black, Non-Hispanic	8,118	15,608	52.01%
Hispanic	1,696	4,031	42.07%
Asian or Pacific Islander, Non-Hispanic	3,800	9,870	38.50%
Native American, Non-Hispanic	105	188	55.85%
Other, Non-Hispanic	1,677	3,490	48.05%
<b>Total</b>	<b>45,809</b>	<b>123,830</b>	<b>36.99%</b>
Household Type and Size			
Family households, <5 people	16,413	62,329	26.33%
Family households, 5+ people	3,133	7,755	40.40%
Non-family households	26,290	53,750	48.91%
Race/Ethnicity	# with severe problems	# households	% with severe problems

White, Non-Hispanic	14,706	90,602	16.23%
Black, Non-Hispanic	4,353	15,608	27.89%
Hispanic	847	4,031	21.01%
Asian or Pacific Islander, Non-Hispanic	2,040	9,870	20.67%
Native American, Non-Hispanic	73	188	38.83%
Other, Non-Hispanic	948	3,490	27.16%
Total	22,959	123,830	18.54%

\*The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Source: HUD-Provided Table 9, Demographics of Households with Disproportionate Housing Needs

## Housing Needs of Families with Children

Both the Ann Arbor Housing Commission (AAHC) and the Ypsilanti Housing Commission (YCS) are converting their units through the RAD program to project-based voucher/LIHTC units. In both of these cases, the Housing Commissions are trying to provide a range of units, including barrier-free one bedrooms and some larger-sized 3 and 4 bedroom units for families. The LIHTC units done by non-local providers often focus more on 1 and 2 bedroom units, and overall the committed affordable units, tracked over all types, show more 1 and 2 bedroom units as part of the committed affordable unit stock.

Also, some Housing Choice Voucher (HCV) households prefer renting in single family neighborhoods to be able to rent an entire house, which usually has 2 or 3 bedrooms as well as a yard (e.g. West Willow and Clark Road neighborhoods).

TABLE 32\_ DEMOGRAPHICS OF HOUSEHOLDS WITH SEVERE HOUSING COST BURDEN

	(Washtenaw County, MI CDBG, HOME, ESG) Jurisdiction		
<b>Race/Ethnicity</b>	<b># with severe cost burden</b>	<b># households</b>	<b>% with severe cost burden</b>
White, Non-Hispanic	13,890	90,602	15.33%
Black, Non-Hispanic	3,894	15,608	24.95%
Hispanic	728	4,031	18.06%
Asian or Pacific Islander, Non-Hispanic	1,794	9,870	18.18%
Native American, Non-Hispanic	74	188	39.36%
Other, Non-Hispanic	917	3,490	26.28%
<i>Total</i>	<i>21,297</i>	<i>123,830</i>	<i>17.20%</i>
<b>Household Type and Size</b>			
Family households, <5 people	6,982	62,329	11.20%
Family households, 5+ people	930	7,755	11.99%
Non-family households	13,383	53,750	24.90%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: The # households is the denominator for the % with problems, and may differ from the # households for

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the table on severe housing problems.

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Source: HUD-Provided Table 10, Demographics of Households with Severe Housing Cost Burden

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Native Americans and other non-Hispanic groups are a smaller portion of the population, but are experiencing a disproportionate percentage of housing problems and housing cost burden. African American and other non-Hispanic groups are also experiencing a high percentage of housing problems and severe housing cost burden, with a geographic focus on the east side of the county, which has been documented previously.

Based on sheer numbers, the white population has the most people with housing problems and cost burden - which might explain why rural areas are showing a considerable amount of housing problems and cost burden as shown on the above maps.

## Contributing Factors of Disproportionate Housing Needs

Each chapter discusses contributing factors that continue, worsen, or otherwise prevent resolution to the fair housing issue discussed in the chapter. These contributing factors help direct the development of goals and strategies to counter the issue.

### **The availability of affordable units in a range of sizes**

As noted previously, committed affordable units in the county are primarily 1 and 2 bedroom units, but there is a mix within project-based voucher units, as well as units available for rentals through housing choice vouchers. Recent RAD conversion projects have allowed for both housing commissions to add larger unit sizes into their inventories.

### **Displacement of residents due to economic pressures**

A few factors are at play with concerns about displacement. As frequently discussed in the [2015 Housing Affordability and Economic Equity Analysis](#), high housing prices in the Ann Arbor area are pushing many households out of Ann Arbor, often to the east side of the county, specifically in Ypsilanti and Ypsilanti Township. The high cost of housing, due in large part to the presence and dominance of the U of M and its hospital system, impacts renters and homeowners alike.

In some cases, loss of committed affordable units has also caused displacement. Of current concern is the Cross Street Village in the City of Ypsilanti. Cross Street Village is an affordable senior living facility where the property owners have completed the 15-year mandatory affordability period, but are opting out of the 99-year extended affordability period by using the IRS Qualified Contract exemption that allows them to “list” the property for sale. Based on the calculation involved, the property is listed for sale at \$12,050,000, significantly higher than its appraisal of \$4 million. While the affordability period will extend 3 years, current tenants are seeing rent increases and are concerned about how long they will be able to stay. Many are already looking to relocate and are finding few affordable options.

The Ypsilanti Housing Commission's Rental Assistance Demonstration (RAD) conversion is having a positive impact on neighborhoods due to the renovation of all units, including demolition and redevelopment in some cases. These properties moved out of public ownership to a public/private partnership to allow the use of Low-Income Housing Tax Credits to fund renovation and redevelopment. The total affordability period for these properties is 45 years once construction is complete.

The Ann Arbor Housing Authority is also in the middle of a full RAD conversion, but the AAHA/City of Ann Arbor are maintaining ownership of the land to control long-term affordability for those properties. The City of Ann Arbor provided a 99 year ground lease to the entity developing the property. In both cases, long-term planning will be needed to maintain affordability at either the 45 or 99 year point.

### **Lack of private investments in specific neighborhoods**

The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. That said, there has been great improvements through RAD conversion of Ypsilanti Housing Commission properties, and residential investments in rehabilitation of post-foreclosure properties. There are several new prospects in the planning stages, but still limited investment, particularly in the south and southeast neighborhoods.

Private investments in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development often with new ownership. Additionally, there is interest in investment along several corridors (i.e. Whittaker Road); however, the Gault Village shopping area- previously a neighborhood center with a grocery and related convenience shopping- is still in transition and is experiencing high degree of vacancy.

### **Lack of public investments in specific neighborhoods, including services or amenities**

Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to its age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.

The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.

Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.

Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.

### **Land use and zoning laws**

Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment in lieu of taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.

Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.

### **Lending Discrimination**

The recent history of mortgage lending in Washtenaw County as reported through Home Mortgage Disclosure Act (HMDA). African Americans are denied mortgages for single family, duplex, triplex and quad buildings at a rate often 2-3 times that of whites or Asians. Hispanics are also denied at a much higher rate, than whites or Asians. The smaller number of loan originations does show more fluctuation in the information for Hispanics/Latinos.

Anecdotally, there have been numerous stories of EMU professors looking for housing that are immediately directed to the Ann Arbor Housing market by realtors and others, rather than neighborhoods with quality and affordable housing stock within walking or shorter commuting distances in the City of Ypsilanti and Ypsilanti Township. Anecdotal reports from realtors indicate that steering occurs related to school districts, with school district boundaries serving as the modern era “redline” districts.

## Publicly Supported Housing Analysis

This section was completed primarily using HUD-provided data for demographics related to race and income. However, several of the tables and maps are incomplete, leaving out demographic information for some public housing, low-income housing tax credit properties (LIHTC), senior affordable housing, and other properties. When possible, a county inventory of properties including LIHTC, multi-family and other deed-restricted units is included in the narrative.

Throughout the text, the county inventory properties are collectively referenced as “Committed Affordable Units,” and they represent units for households at or below 60% AMI. The varying partners in affordable housing in the county work in close collaboration, so some distinctions (i.e. as “public housing” LIHTC, project-based vouchers, etc.) often overlap. However, partners support the the ultimate goal of providing quality, long-term affordable housing in the region. There are two overarching goals/efforts underway in Washtenaw County related to Affordable Housing: the Built for Zero campaign, and the 2015 Housing Affordability and Economic Equity Analysis.

### 1. Built for Zero Campaign

In January 2015, Washtenaw County Continuum of Care (CoC) signed on to participate in the Built for Zero Initiative, a national effort to end veteran and chronic homelessness in a core group of committed communities. Built for Zero (formerly Zero:2016) is led by Community Solutions, which is a national nonprofit based in New York and works with federal agency partners such as U.S. Department of Housing and Urban Development (HUD) and the Department of Veterans Affairs (VA), and national technical assistance providers a) to assist and support 70 participating communities in developing real-time data on homelessness, b) optimize local housing resources, c) track progress against monthly goals, d) and improve performance.

Over the past 2.5 years, Washtenaw County has permanently housed 364 homeless veterans and 321 individuals experiencing chronic homelessness as part of the Built for Zero Initiative. The community also has a real-time, by-name list of all homeless veterans and chronically homeless individuals in Washtenaw County. The County is well-positioned to achieve an end to veteran and chronic homelessness, with the goal that homelessness will be rare, brief and non-recurring.

The largest barrier to achieving an end to veteran and chronic homelessness is having enough resources to prevent homelessness whenever possible and quickly and stably re-house someone who has experienced homelessness. In Washtenaw County, one particular resource challenge that has been amplified through the Built for Zero Initiative is the lack of affordable housing stock. The CoC has been quite successful over the years in increasing the amount of permanent housing resources that come to the County, but being able to utilize those resources (mostly in the form of Housing Choice Vouchers (HCV) or other types of short- and long-term rental



assistance) has been challenging. Landlords either won't accept these types of rental assistance, or housing that is close to employment and service centers for individuals experiencing homelessness is not priced at what a HCV or other type of rental assistance can pay for, according to HUD's Fair Market Rent (FMR) standards. This means that a voucher-holder often cannot find a housing unit that will accept the voucher and can spend months searching for housing while at the same time remaining homeless. In some instances, people may end up losing their housing voucher if they cannot find housing. No matter the outcome, the lack of affordable housing prevents people from being able to quickly move from homelessness into housing.

## **2. Housing Affordability and Economic Equity Analysis<sup>1</sup>**

The crux of this Analysis is that within the relatively small Washtenaw County, there are two distinct housing markets in play. One in the Ann Arbor area featuring high rents and high incomes, and a second in Ypsilanti and Ypsilanti township with lower rents and even lower incomes. The high demand of Ann Arbor with numerous amenities, well-respected schools districts and access to job centers has only become more exclusive in recent years, pushing out lower-income households. Those households then live further away from job and education centers, and often find housing in Ypsilanti and Ypsilanti Township. There is a racial component to consider as well, as a larger African American population is also located in Ypsilanti and Ypsilanti Township. This is discussed further throughout the plan.

Referring to the county inventory, almost 50% of committed affordable units are in Ypsilanti and Ypsilanti Township, which represent only 20% of the county population. Additionally, HCV use is also more heavily utilized in Ypsilanti City and Township, primarily due to the lower rents in the area. This imbalance puts a burden on those communities, as they receive less in property taxes to provide services including schools, and the residents are further isolated from job and education centers.

### **Key Findings**

- The high rent and high income market of Ann Arbor and adjacent communities pushes working families further east, away from job and education centers.
- The lower rent and much lower incomes of Ypsilanti City and Township result in concentrations of affordable housing stock, and generally lower income populations that are predominantly African American.
- The imbalance of higher voucher distribution and a higher number of committed affordable units on the east side still does not meet the need for affordable housing, and due to the location, limits access to opportunity related to education, employment, and income among others.

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<http://www.ewashtenaw.org/government/departments/community-and-economic-development/plans-reports-data/housing-and-infrastructure/2015/washtenaw-county-affordability-and-economic-equity.pdf>

## Publicly Supported Housing Demographics

Traditional public housing is currently provided only by the Ann Arbor Housing Commission (AAHC) in 57 units, with only 27 (47%) of those units being occupied as other properties are scheduled to be demolished soon and redeveloped. The rest of the AAHC units are undergoing the Rental Assistance Demonstration (RAD) conversion which will continue for 5 more years. The Ypsilanti Housing Commission (YHC) will complete the RAD conversion for all of their properties by the end of calendar year 2017. Properties converted to RAD utilize project-based vouchers, and usually utilize Low-Income Housing Tax Credits (LIHTC). Table 33 includes the demographics for public housing units. The HUD provided demographic data for those units was found to be inaccurate, so it was replaced by local data in the Table 34.

TABLE 33\_RACE & ETHNICITY OF PUBLIC HOUSING UNITS' HEAD OF HOUSEHOLD  
(BASED ON 27 OCCUPIED UNITS)

Development Name	PHA Code	PHA Name	White only	Black/African American only	Hispanic	Non-Hispanic
Scattered Sites	MI064	AAHC	37%	63%	4%	96%

Source: Ann Arbor Housing Commission, Resident Characteristics Report (4/1/16-7/31/17)

The number of all publicly supported housing units in Washtenaw Urban County makes up only 4% of the total housing units (5,478 out of 135,837 units) according to HUD-provided data in Table 34. Of those publicly supported housing units, the large majority fall within the HCV program at nearly 60 percent, with the next largest category being Project-based Section 8 units, which accounts for another 38% of all publicly assisted housing in the Urban County.

TABLE 34\_PUBLICLY SUPPORTED HOUSING UNITS BY PROGRAM CATEGORY

Housing Units	#	%
Total housing units	135,837	-
Public Housing	50	0.04%
Project-based Section 8	2,067	1.52%
Other Multi Family	109	0.08%
HCV Program	3,252	2.39%
Total Publicly Supported Units	5,487	4%

Source: HUD-Provided Table 5, Publicly Supported Housing Units by Program Category

TABLE 35: PROJECT-BASED VOUCHER LOCATIONS

Development Name	# Units	% White	% African American	% Hispanic	% Asian	% Households w/ Children
Hamilton Crossing	70	9%	90%	0%	1%	89%
Pinelake Village Cooperative	81	48%	45%	3%	4%	75%
Parkway Meadows	349	49%	12%	1%	38%	17%
Clark East Tower	199	66%	30%	3%	1%	3%
Carpenter Place	151	63%	18%	4%	13%	-
Strong Future Homes	112	11%	77%	0%	2%	81%
Sycamore Meadows	262	9%	88%	2%	1%	78%
Arrowwood Hills	1	-	-	-	-	-
Forrest Knoll	231	48%	47%	2%	4%	66%
Mill Pond Manor	47	93%	-	4%	2%	-
Arrowwood Hills	55	50%	50%	0%	-	45%
Arbor Manor	80	38%	58%	0%	4%	52%
Danbury Park Manor	146	14%	85%	1%	-	68%
Chidester Place	151	74%	24%	1%	1%	1%
Cranbrook Tower	202	50%	8%	0%	42%	-
Total	2,067	-	-	-	-	-
PHA Code and PHA Name: N/a						
Source: HUD Provided Table 8, Demographics of Publicly Supported Housing Developments, by Program Category						

Based on Table 35, there are some notable differences in terms of how likely certain race/ethnic groups are to reside in a particular category of publicly supported housing. Specifically, African Americans households utilize HCV at more than double the number of African American households occupying Project-Based Section 8 properties (1,993 versus 721 households). A similar pattern is seen for Hispanic households, with 60% of all Hispanics in publicly supported housing using HCV, but only 34% being in Project-Based voucher properties. Conversely, 90% of all Asian or Pacific Islanders who receive housing assistance are in Project-Based voucher

properties. Residents of one specific housing development, Cranbrook Tower, accounts for the majority of Asian/Pacific Islanders in the county’s Project-Based voucher units; 42% of the residents occupying the 202 units of Cranbrook Tower identify as Asian or Pacific Islander (primarily Chinese). Whites are almost perfectly split between the HCV Program and Project-Based voucher property locations, at 47% and 49%, respectively.

TABLE 36\_PUBLICLY SUPPORTED HOUSEHOLDS BY RACE & ETHNICITY

Housing Type	White		African American		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	11	29.7%	24	64.9%	1	2.7%	1	2.7%
Project-Based Section 8	913	48.0%	721	37.9%	27	1.4%	240	12.6%
Other Multi-family	56	53.3%	41	39.1%	4	3.8%	4	3.8%
HCV Program	874	29.7%	1,993	67.6%	48	1.6%	21	0.7%

Source: HUD-Provided Table 6, Publicly Supported Households by Race/Ethnicity

TABLE 37\_TOTAL HOUSEHOLDS BY ANNUAL MEDIAN INCOME (AMI)

Washtenaw County	White		Black		Hispanic		Asian or Pacific Islander	
Total Households	90,602	73.2%	15,608	12.6%	4,031	3.3%	9,870	8%
0-30% of AMI	11,296	59.1%	4,166	21.8%	883	4.6%	1,698	8.9%
0-50% of AMI	17,957	53.4%	6,995	20.8%	1,463	4.4%	2,762	8.2%
0-80% of AMI	31,789	60.2%	9,909	18.8%	2,188	4.1%	4,014	7.6%

Source: HUD-Provided Table 6, Publicly Supported Households by Race/Ethnicity

The data in Table 36 and Table 37 is not reflective of all the committed affordable units in the county. The county inventory of committed affordable units shows 4,220 units available, significantly higher than reported in the tables in this chapter. However, demographics are not available for all properties, so HUD data will utilized for demographic details.

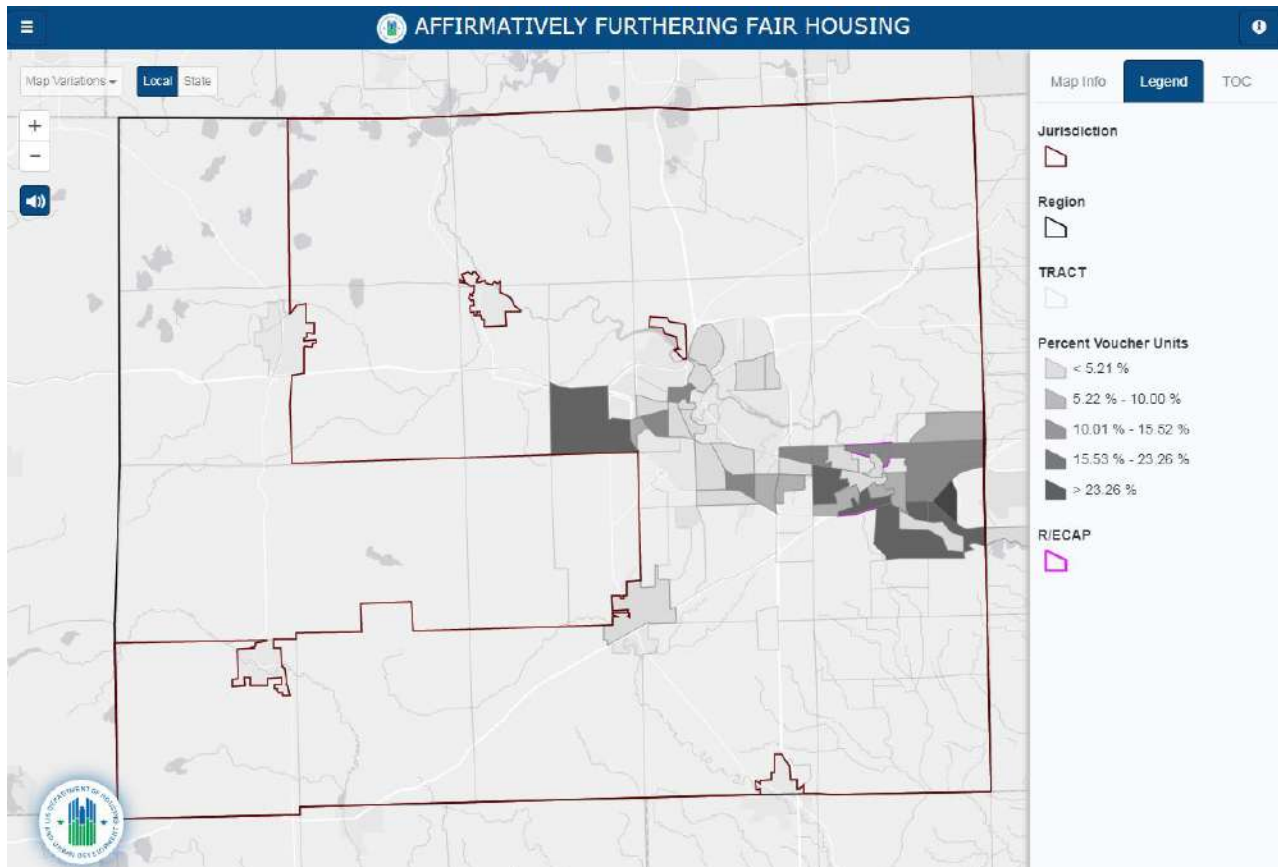
As shown in Table 37 above, while African American residents make up only 12.6% of all Washtenaw County households, they account for nearly 22% of the lowest income band (0-30% Area Median Income) in the county. While black households are overrepresented among 0-30%

AMI households, white households are underrepresented in this lowest income sector of the county; specifically, white residents make up 73% of all households but only 59% of the 0-30% AMI households.

Similarly, while African Americans make up less than 14% of the entire Urban County, more than half (55.8%) of all publicly supported housing units are occupied by African American households. Most notably, African Americans make up a disproportionate number of all HCV holders at nearly 68%. In contrast, while the county is predominantly white (70.3%), white households occupy less than 40% of all publicly supported housing units. Hispanics are not accessing publicly supported housing as much as other groups. The Hispanic population makes up 4% of all Urban County residents, but the Hispanic population represents 1.6% of residents in publicly supported housing.

Map 46 shows voucher utilization by census tract. The West Willow neighborhood has the highest percentage of renters using vouchers with 50% of all renters using HCV. This is fairly unique as this neighborhood is exclusively single-family residences, rather than larger apartment complexes as in other examples. The next few census tracts are in a similar range of utilization - the Southside R/ECAP is at 20%; Scio Township; 19%, Pittsfield Township (Carpenter road) 19%; and the Leforge R/ECAP at 15%.

### MAP 46\_VOUCHER UNITS (%)



As one of two administrators of HCV in the county (the other is Michigan State Housing Development Authority (MSHDA)), the AAHC has observed several trends. One, many households with vouchers are being priced out of Ann Arbor due to rents exceeding the maximum voucher value, defined by HUD as a Fair Market Rent (FMR). A second trend is that larger households seeking two or three bedrooms or more prefer to rent small houses in older neighborhoods in Ypsilanti, Ypsilanti Township and Superior Township. Several neighborhoods on the east side have smaller houses that turned to rental after the housing crisis. The starkest example is West Willow, a single-family neighborhood where 50% of renters use vouchers (see West Willow neighborhood profile in the Demographic Summary Chapter). These homes are often between 900 to 1000 square feet, but often have 3 bedrooms and a yard.

TABLE 38\_PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY BY RACE & ETHNICITY COMPARED TO OVERALL URBAN COUNTY

Race/Ethnicity	Washtenaw Urban County-Wide		Total Publicly Supported Housing		Public Housing		Project-Based Section 8		Other Multi-family		HCV Program	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
White, Non-Hispanic	221,320	70.3%	1,854	37.2%	11	29.7%	913	48.0%	56	53.3%	874	29.8%
Black, Non-Hispanic	42,689	13.6%	2,779	55.8%	24	64.9%	721	37.9%	41	39.0%	1,993	67.9%
Hispanic	12,943	4.1%	80	1.6%	1	2.7%	27	1.4%	4	3.8%	48	1.6%
Asian or Pacific Islander, Non-Hispanic	26,645	8.5%	266	5.3%	1	2.7%	240	12.6%	4	3.8%	21	0.7%
Native American, Non-Hispanic	888	0.3%										
Two or More Races, Non-Hispanic	9,637	3.1%										
Other, Non-Hispanic	802	0.3%										
<b>TOTAL</b>			<b>4,979</b>		<b>37</b>		<b>1,901</b>		<b>105</b>		<b>2,936</b>	

Source: HUD-Provided Table 6, Publicly Supported Households by Race/Ethnicity

### Older Adults

Older adults age 65 or older make up just under 10% of all Urban County residents. The elderly population are utilizing most categories of publicly assisted housing at high rates (Table 39). Specifically, 100% of other HUD multifamily housing units in the county are currently serving older residents. The other HUD multifamily housing units are specifically designed for the elderly through the section 202 program and persons with disabilities through the section 811 program. Additionally, older adults are overrepresented in the HCV units both within and outside of the two Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) (66.8% and 40% respectively).

The need for additional housing for older adults and persons with disabilities was a topic at several focus groups. Additionally, two recent developments will negatively impact committed affordable units available for seniors. Cross Street Village in the City of Ypsilanti is coming out of its LIHTC-required affordability period. Rents are to be maintained at affordable levels for three years for existing residents only. Similarly, Courthouse Square in downtown Ann Arbor may also end its affordability period in the next few years. Between these two properties, 220 affordable units for older adults will be lost in the next few years.

### Disability Status

According to HUD-provided data, less than 16% of all Urban County residents have some type of disability. HUD data only includes total numbers of people for specific disability types, but many individuals are assumed to fall into more than one type of disability and the number of persons with one or more disability is undetermined. However, by adding all percentages together for the

six disability types (hearing, vision, cognitive, ambulatory, self-care, independent living), persons with disabilities account for 16% of the County. That said, persons with disabilities appear to make up a disproportionately high percentage (31.8%) of the HCV users *outside* of the R/ECAP (Table 39). Several HCV programs (through Ann Arbor and MSHDA) have preferences for households with a disabled family member. Additionally, per the AAHC’s Public Housing Resident Characteristics Report from July 2017, 15 of the 27 (56%) families living in traditional public housing units reported a disability.

### Family Status

Families with children account for 46.6% of the Urban County household units. *Outside* of the R/ECAPs, families with children are under-represented across all categories of publicly assisted housing – for example, families only represent 2.7% of Project-Based voucher tenants in Non-R/ECAP tracts, and only 40% of the HCV Program users in Non-R/ECAP tracts (Table 39). In contrast, families with children are overrepresented in the R/ECAP tracts at 66.8% of HCV Program users and 59.4% of Project-Based voucher tenants.

TABLE 39: R/ECAP AND NON-R/ECAP DEMOGRAPHICS BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

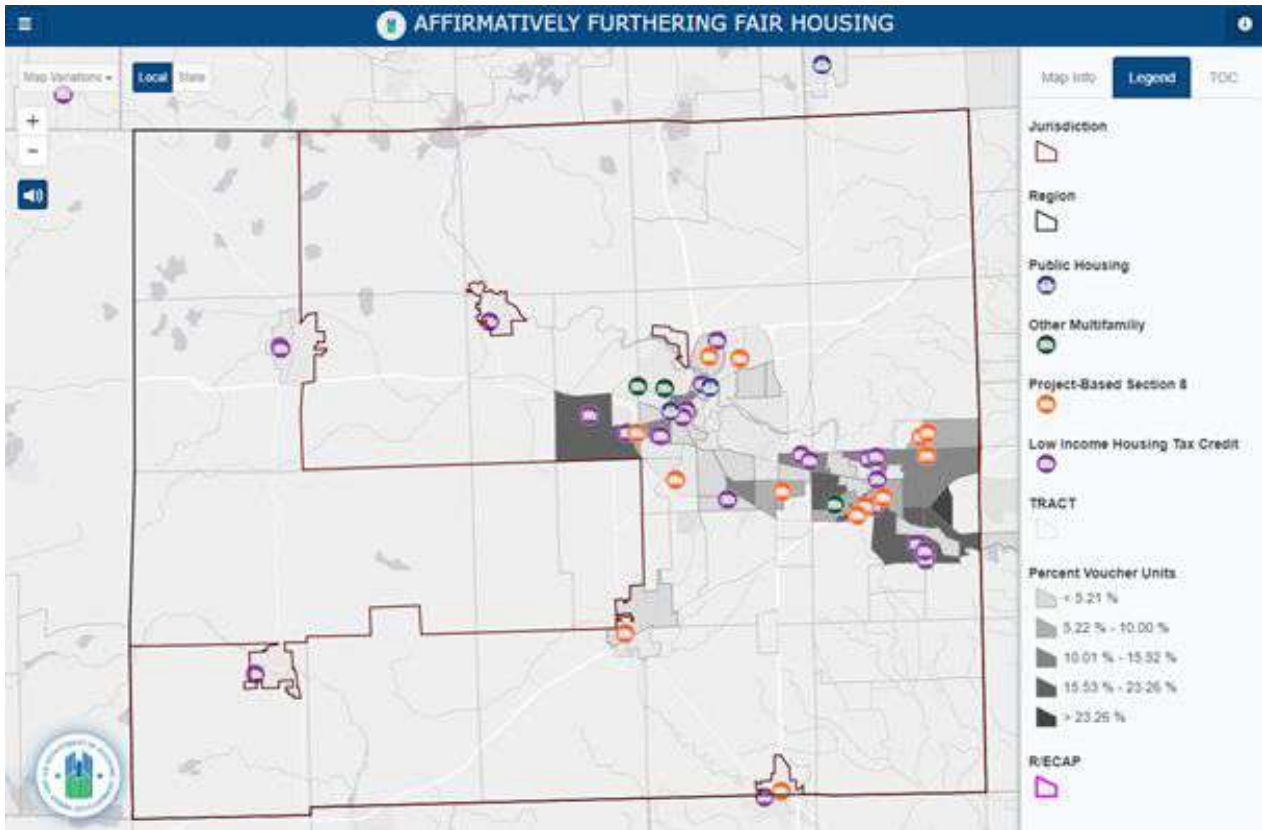
(Washtenaw County, MI CDBG, HOME, ESG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
<b>Public Housing</b>								
R/ECAP tracts	N/a	N/a	0.0%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	37	29.7%	64.9%	2.7%	2.7%	17.9%	20.5%	23.1%
<b>Project-Based Section 8</b>								
R/ECAP tracts	366	54.8%	41.4%	1.1%	2.72%	59.4%	10.8%	7%
Non R/ECAP tracts	1,575	46.4%	37.1%	1.5%	14.9%	27.7%	52.2%	17.5%
<b>Other HUD Multifamily</b>								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	106	53.3%	39.1%	3.8%	3.8%	0.00%	100.0%	8.5%
<b>HCV Program</b>								
R/ECAP tracts	263	6.5%	92.4%	0.4%	0.8%	66.8%	6.8%	13.2%
Non R/ECAP tracts	2,702	31.9%	65.2%	1.8%	0.7%	40.1%	15.9%	31.8%



Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

## Publicly Supported Housing Location and Occupancy

### MAP 47\_PERCENT OF VOUCHER UNITS WITH THE LOCATION OF INDIVIDUAL DEVELOPMENTS



The HUD-provided data does not include some publicly-funded or otherwise committed affordable units up to 60% AMI. The chart below is based on locally collected inventory data on public housing, RAD converted public housing utilized Low Income Tax Credits and project based vouchers, other LIHTC and affordable multi-family projects including deed-restricted units.

### Committed Affordable Units

As seen in the Table 40, both the City of Ypsilanti (990 units) and Ypsilanti Township (1,012 units) have a comparable number of committed affordable units than the City of Ann Arbor (1,106 units), with considerably smaller populations. Using census data for comparison, the committed

affordable units in Ypsilanti make up 21% of rentals units. In contrast, Ann Arbor’s committed affordable units make up only 4% of all Ann Arbor rentals.

While the City of Ypsilanti and Ypsilanti Township combined account for only 20% of the county’s population, the total committed affordable units in these two localities total 2,002 units, representing 47% of all committed affordable units in the county.

To be clear, the issue is not that there should be fewer affordable units in the City of Ypsilanti and Ypsilanti Township, but rather that more committed affordable units are needed in higher value markets to provide additional opportunity to low-income households in need of housing and to prevent concentrated low-income populations in particular areas.

For instance, there is a large number of committed affordable units in the two R/ECAPs: 142 in the Leforge R/ECAP and 632 units in the Southside R/ECAP, which hosts Hamilton Crossing, several Strong Housing sites, Arbor Manor, Forest Knoll, and Parkridge Home. 95% of the City’s committed affordable units are located South of Michigan Avenue, in predominantly African American neighborhoods.

With respect to voucher utilization, AAHC and MSHDA are the primary administrators of vouchers in Washtenaw County. Of the 1,689 vouchers currently administered by the AAHC in Washtenaw County, approximately 31% are located in Ann Arbor, 62% in Ypsilanti and Ypsilanti Township, and the remaining 7% in a variety of smaller jurisdictions within the county. Locations of these committed affordable units are shown in Map 48.

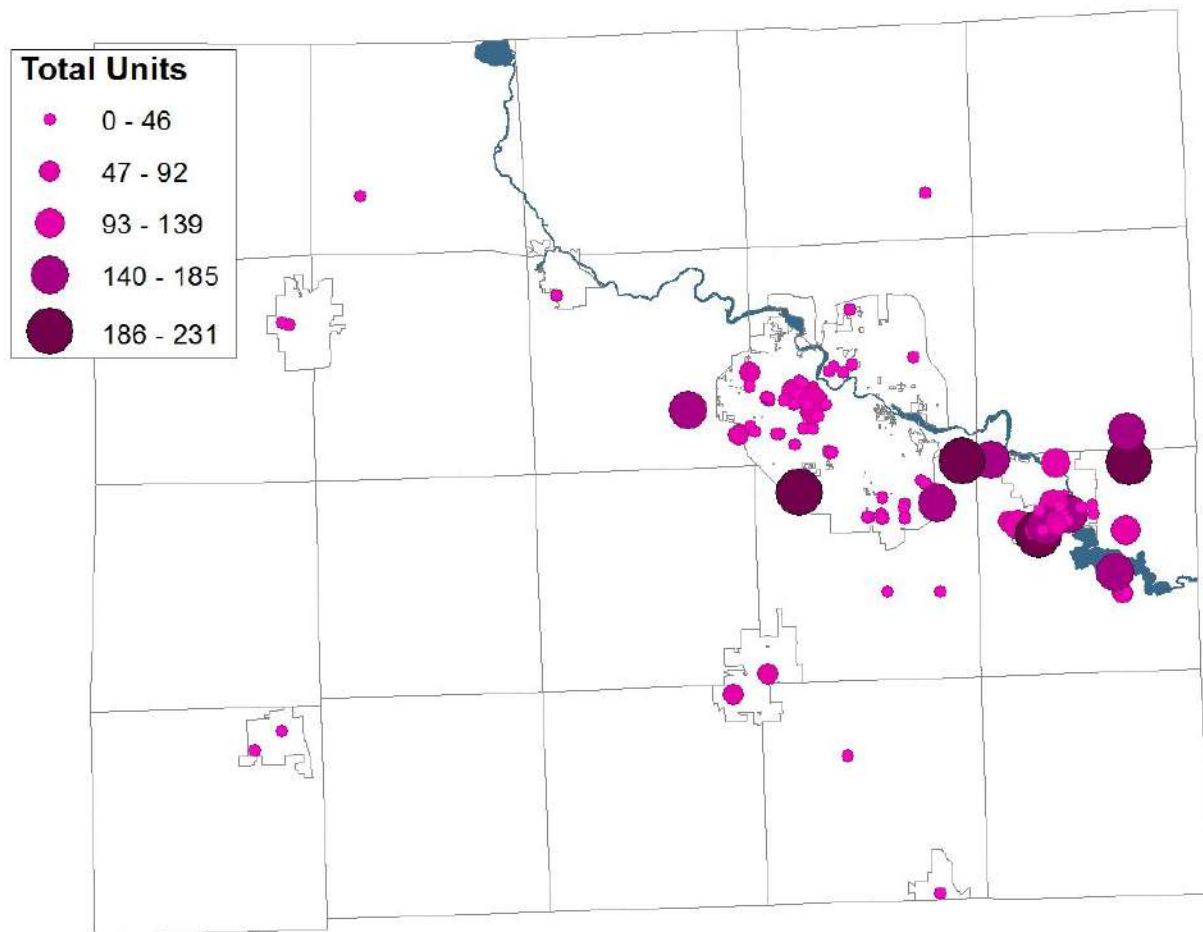
TABLE 40\_AFFORDABLE HOUSING UNITS IN WASHTENAW COUNTY & BY JURISDICTION

Jurisdiction	AH Developments	AH Units	% of all county AH units	Total rentals	% of all rentals that are affordable
Washtenaw County	111	4,220	100	55,542	8%
City of Ann Arbor	61	1,106	26%	26,056	4%
City of Dexter	1	20	0.5%	541	4%
City of Milan	1	36	1%	403	9%
City of Saline	3	96	2%	975	10%
City of Ypsilanti	21	990	23%	5,397	18%
Pittsfield Township	5	464	11%	6,214	7%

Scio Township	2	216	5%	1,715	13%
Superior Township	1	150	4%	1,061	14%
Manchester	3	56	1%	290	19%
Ypsilanti Township	10	1,012	24%	9,775	10%

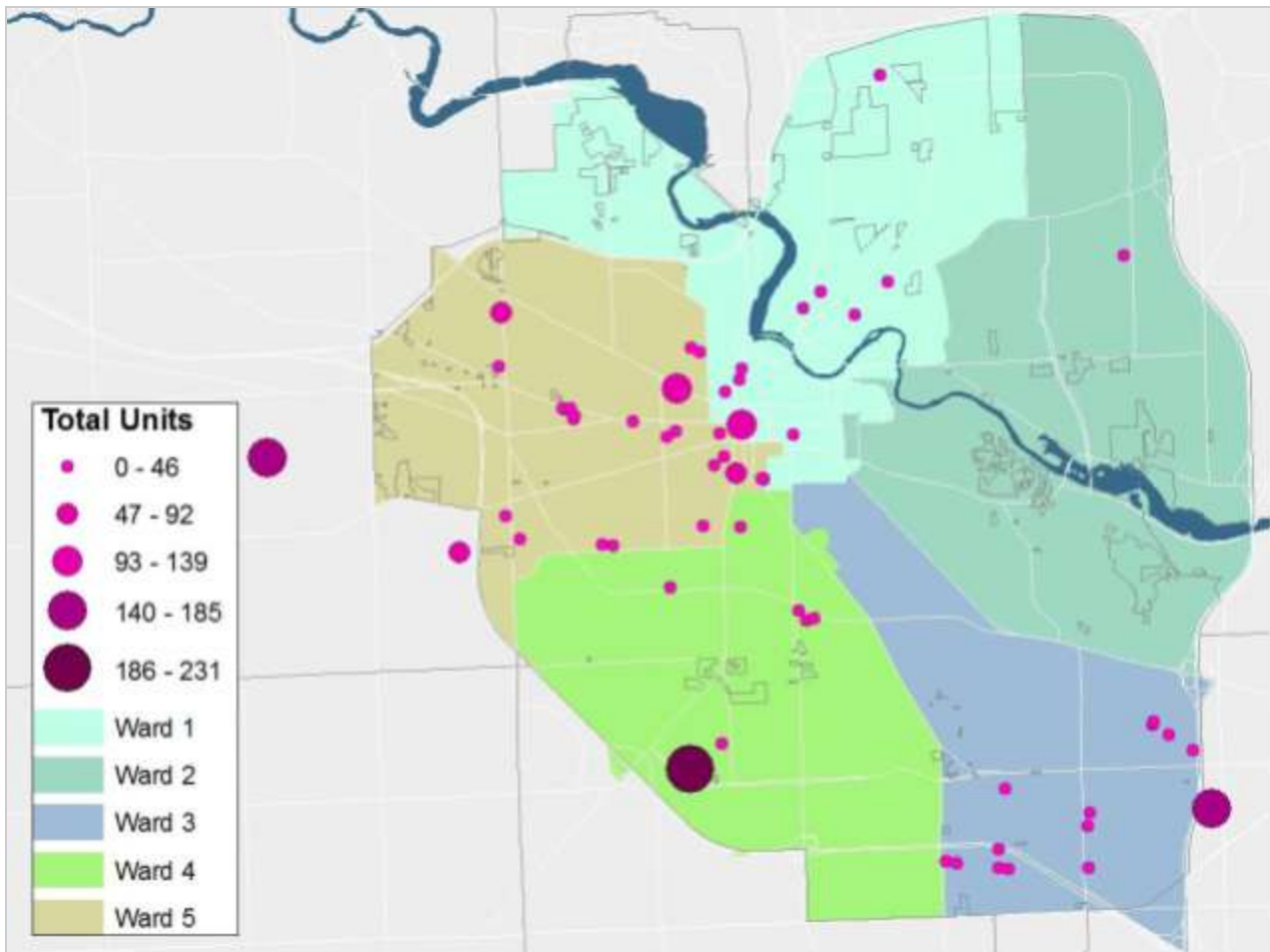
Source: Affordable Housing Counts from the 2017 Washtenaw County Housing Inventory  
Total rental units by jurisdiction represent total occupied rentals ACS 2011-2015

MAP 48\_ COMMITTED AFFORDABLE UNITS IN WASHTENAW COUNTY



Source: 2017 Washtenaw County Housing Inventory

MAP 49\_COMMITTED AFFORDABLE UNITS IN ANN ARBOR



Source: 2017 Washtenaw County Housing Inventory

In the City of Ann Arbor, three concentrations appear:

- Near downtown due to the location of Miller Manor (104 units) and Courthouse Square (116 units)
- The area along N. Maple (West Arbor with 55 units and Sequoia Place Senior Housing with 46 units)
- The southwest side, which includes Cranbrook Towers (202 units) and a few cooperatives

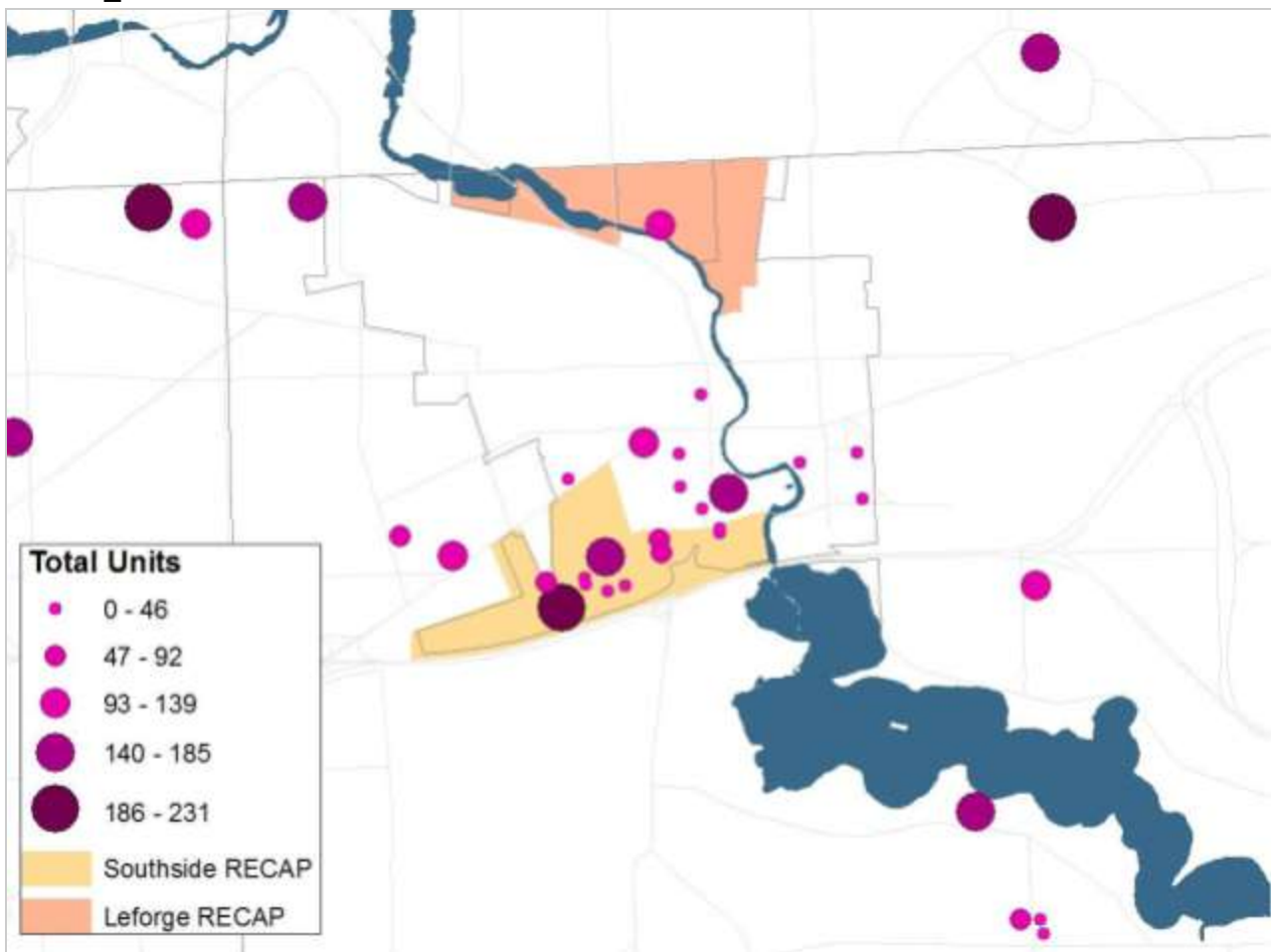
The East and southeastern portions of Ann Arbor have a limited number of affordable housing units.

In the City of Ypsilanti, all of the public housing that has been converted to project-based rental assistance through the RAD process is located south of Michigan Avenue, with the exception of

Sauk Trail Pointe, which is on the north side of Michigan Avenue. Michigan Avenue, as noted previously, includes a large number in the southside R/ECAP. Generally, public and affordable housing in the City of Ypsilanti has historically been located in predominantly low-income, African American, and low educational attainment neighborhoods.

Map 50 clearly illustrates the concentration of committed affordable units in the City of Ypsilanti, particularly south of Michigan Avenue, but also in the Southside R/ECAP. This concentration is problematic due to the lower incomes, higher percentage of African Americans and lower-educational attainment. Any future affordable housing development in the City should be focused in a variety of neighborhoods, further distributing locations throughout the city, and ideally along bus routes and near services, jobs and educational opportunities.

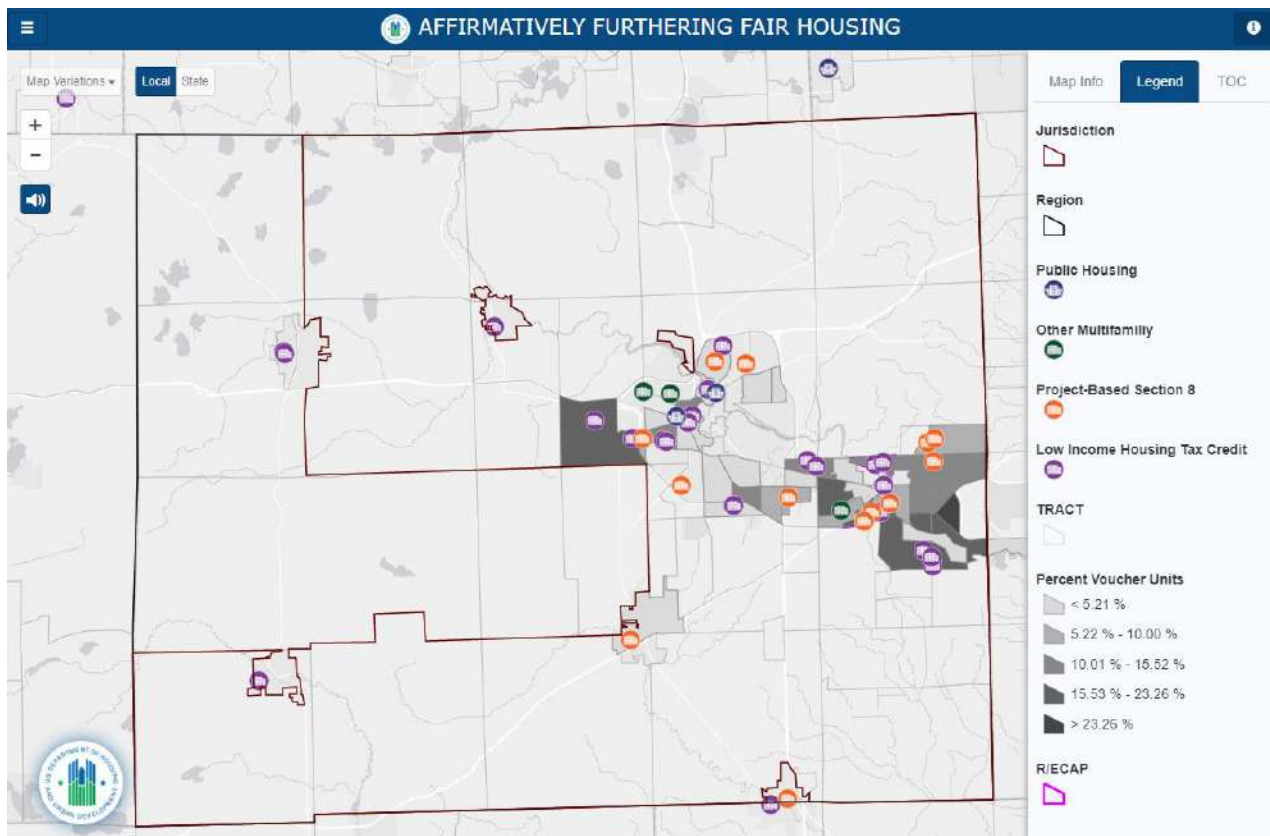
MAP 50\_COMMITTED AFFORDABLE UNITS IN YPSILANTI



Source: 2017 Washtenaw County Housing Inventory

Overall, Map 51 shows a fairly broad geographic distribution of publicly supported housing, but with an overconcentration on the east side of the county. In looking at specific categories of housing, the Urban County's Project-Based voucher properties tend to be clustered on the East side of the county with fewer on the west side and additional solitary sites scattered across the Urban County. Within the City of Ann Arbor, publicly housing sites are scattered.

### MAP 51\_PUBLICLY SUPPORTED HOUSING, BY CATEGORY & WITH PERCENT OF VOUCHER UNITS



Similar to the Project-Based voucher properties, the Low Income Housing Tax Credit units are primarily seen in clusters on the East side of the county and the West side of Ann Arbor. See updated Washtenaw County map above.

### Publicly Supported Housing Serving Older Adults

The HUD-provided data is slightly outdated compared to local data, and has been augmented for the purpose of this topic. Publicly supported housing for older adults is located within the County's urbanized areas including Ann Arbor, Ypsilanti, Ypsilanti Township, Pittsfield Township as well as the Cities of Chelsea, Saline, Milan, and Manchester. These developments include:

#### Ann Arbor

- Parkway Meadows – 2375 Sandalwood Circle (Northeast Ann Arbor)
- Sequoia Place – 1131 N. Maple Road (West side of Ann Arbor)
- Cranbrook Towers – 2901 Northbrook Place (Southwest Ann Arbor)
- Lurie Terrace – 600 W. Huron (Downtown Ann Arbor)

#### Ypsilanti/Ypsilanti Township

- Chidester Place - 330 Chidester St (South of Michigan Ave)
- Towne Center Place - 401 W. Michigan Avenue
- Clark East Tower - 1550 E. Clark Road
- Melvin T Walls Manor - 2189 Glory Lane

#### Pittsfield Township

- Carpenter Place - 3400 Carpenter Road
- Lexington Club - 2224 Golfside Road

#### City of Chelsea

- The Pines - 325 Wilkinson Street

#### City of Milan

- Milan Village - 71 Hurd Street
- Silver Fox - 317 Silver Fox Drive

#### City of Saline

- Mill Pond Manor - 460 W Russell

#### Village of Manchester

- Woodhill - 521 Galloway Dr.

## Publicly Supported Housing Serving Families with Children

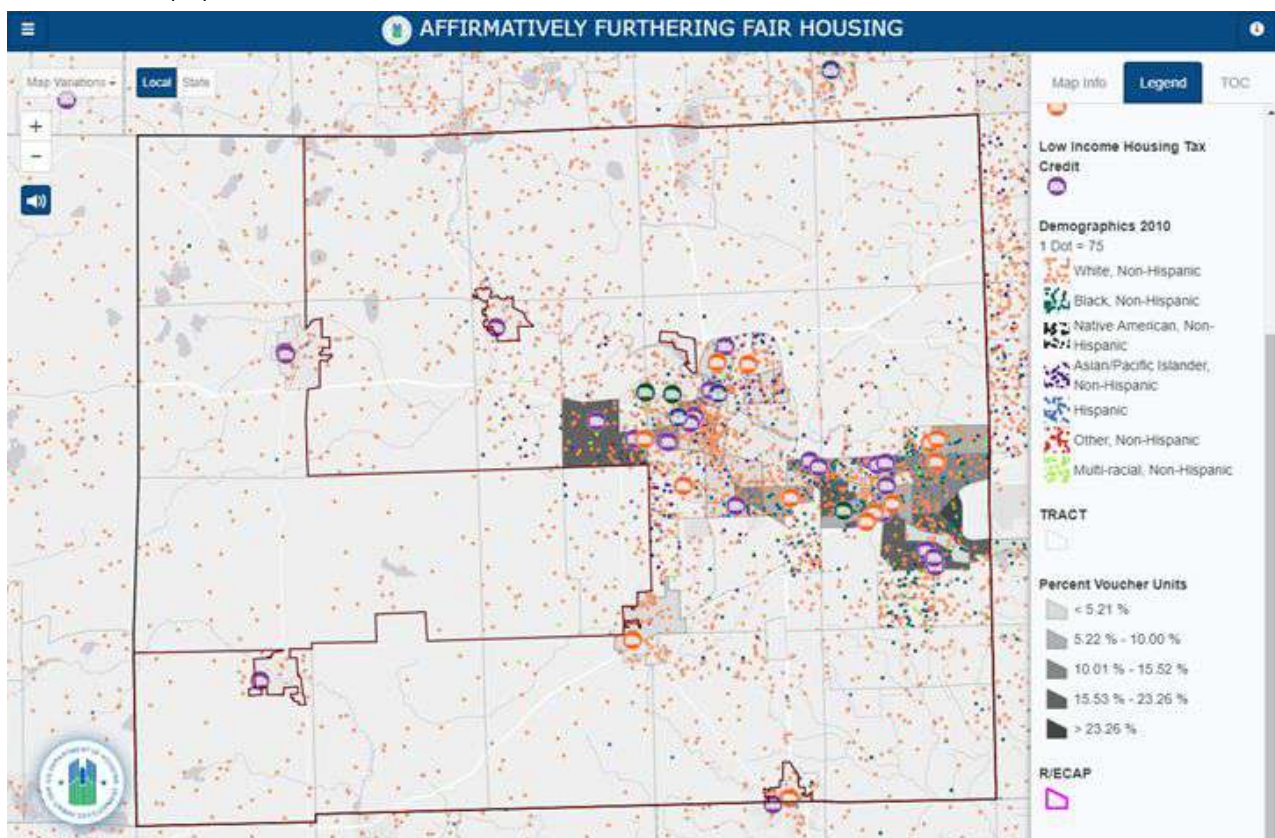
Housing not specifically targeted to senior or disabled, serves families with children. Rather than list all the properties here, note that they are primarily in the urbanized county. The full list of committed affordable units is located in Appendix G.

Consistent with the general description of the R/ECAPs throughout this plan, African American residents in publicly supported housing are much more concentrated in the R/ECAPs as compared to the demographics in the rest of the Urban County. Most noteworthy, the households utilizing HCV in the R/ECAPs are 92% African American, and only 6.5% white. Alternatively, whites jump up to 32% of housings using HCV outside the R/ECAPs. Asian/Pacific Islanders are

most concentrated in the Project-based voucher properties outside the R/ECAPs (at 15% of those units).

As seen in Map 51 (above), the public housing developments (dark blue icons) are located in primarily white, non-Hispanic areas within the City of Ann Arbor. This differs from the general racial makeup of the public housing in Ann Arbor, which is nearly 70% African American and only around 30% White. Traditional public housing is only located in the City of Ann Arbor due to the RAD conversion efforts of both Housing Commissions.

### MAP 52\_VOUCHER UNITS WITH LOCATION OF INDIVIDUAL DEVELOPMENTS AND RACE & ETHNICITY (%)



As mentioned previously, almost half of all committed affordable units are located in Ypsilanti and Ypsilanti Township, notably in primarily African American neighborhoods. In the City of Ypsilanti, 95% of all committed affordable units are located south of Michigan Avenue, in African American neighborhoods. Map 52 also reflects more usage on the east side of the county primarily in Ypsilanti and Ypsilanti Township, with the exception of Scio Township.

The Ann Arbor Housing Commission's public housing units consist of 30% elderly, half of whom are also disabled. Another 41% of households include non-elderly residents with a disability. Sixty



three (63) percent of AAHC public housing units' head of households are African American, with the remaining 37% being White.

## Disparities in Access to Opportunity

As has been discussed, the publicly supported housing demographics generally follow the trend of population over all, with low-income, African American and Hispanic populations located primarily in Ypsilanti and Ypsilanti Township. Publicly supported senior housing buildings are located in the urbanized area as well as Manchester, Milan, Chelsea and Saline. Homeless and affordable housing agencies are coordinating through the federal Built for Zero effort to dedicate new or existing affordable housing to individuals and families experiencing homelessness. With several buildings committed to older adults and/or persons with disability, there are some designated affordable housing, but it is not an adequate supply for these populations. The recent loss of Cross Street Village in the City of Ypsilanti and potential loss of Courthouse Square in downtown Ann Arbor are raising the profile for the need for affordable housing for older adults in the region.

Generally the comments below will mirror those in the Disparities in Access to Opportunity Chapter:

**Education:** Ann Arbor Public Schools greatly out-perform Ypsilanti Community Schools, yet the majority of HCV and committed affordable units are in the Ypsilanti Community Schools district.

**Transit:** If a transit trip initiates more than ¼ mile east or south of the Ypsilanti Transit Center, commuters will likely have to transfer at least once to get to a job center, and may spend an hour or more on a one-way bus commute. There is no transit connection to job centers to the east of Washtenaw County.

**Employment:** Similar to the transit disparities noted above, job centers in the county are primarily in and around Ann Arbor, with the exception of Eastern Michigan University in Ypsilanti. Other job centers outside of the county include Canton, Westland, Dearborn, and the Detroit metro area. There is no transit or related service to jobs to the east. Additionally, changes to the economy in the last 20-30 years have left individuals without a college-degree with limited options related to living-wage and jobs with upward mobility.

**Environmental Health** - West Willow and surrounding neighborhoods near airport experience higher noise levels and are also in close proximity to a large landfill, including one that accepts hazardous waste. The Southside R/ECAP is adjacent to Interstate 94, resulting in noise and air pollution. In the west side of Ann Arbor and east side of Scio Township, a dioxane plume can alter the water quality. Any households using well water have been tested and the levels are below state standards. Most residents are on municipal water supply.

**Poverty** - The Southside R/ECAP has the highest percentage of childhood poverty for any census tracts in the county (72%). Other areas with high childhood poverty include:

- The adjacent census tract to the west of the southside R/ECAP (4105 with 70%)
- Census tract on the west side of Ann Arbor (4042, 65% - including Pinelake Village cooperative and Maple Meadows)
- Golfside census tract in Ypsilanti township (4104, 50%)
- The Leforge R/ECAP census tract 4112, 51%)
- Near Ecorse shared between the Ypsilanti City and Ypsilanti Township (4108, 62%)

Note childhood poverty is an important indicator in the county as large student populations at U of M and EMU do not usually report family income while still a dependent.

**Limited English proficiency:** The highest concentration of LEP individuals in publicly supported housing is the Chinese population located in Cranbrook Village.

**Disability:** More detail is provided in the Disability and Access Analysis Chapter

**Domestic Violence:** There is a single domestic violence shelter in the county. All CoC funded agencies have been informed of the Violence Against Women Reauthorization Act of 2013 (VAWA) rule and will be implementing it starting this summer if not sooner. This will also apply to new rental housing constructed post 2017. This will provide additional protection to renters experiencing domestic violence & stalking.

Table 41 shows the number of Washtenaw County residents who applied to the 2012 voucher waitlist and the categories they self-selected on the application.

TABLE 41\_WASHTENAW COUNTY RESIDENTS WHO APPLIED TO THE VOUCHER WAITLIST, 2012

Washtenaw County	3651
Disabled	899
Disabled and elderly	64
Disables and Near Elderly	60
Elderly	115
Near Elderly	114
Elderly and Near Elderly	2

Homeless	743
Homeless and Disabled	161
Source: Ann Arbor Housing Commission FY18 Annual Action Plan submitted to HUD (MI064)	

The AAHC FY18 Annual Action Plan also stated:

*The AAHC currently has an open waitlist for homeless households who are working with a service provider. The AAHC’s regular waitlist has a preference for households with a disabled household member and a geographic preference for families who live and/or work in Washtenaw County. The intention is to provide disabled Washtenaw County households the highest preference, than other Washtenaw County residents, and than disabled households from other jurisdictions.*

*It is expected that when the AAHC opens its waitlists on-line, there will again be many thousands of applicants. The AAHC will not be able to manage a 15,000 household waitlist and will randomly select 500 households from those households with the highest points from meeting the preferences. If there are more than 500 households that are disabled Washtenaw County residents, then the 500 household waitlist will be selected randomly from all of the disabled Washtenaw County applicants. If there are less than 500 disabled Washtenaw County residents, then the remaining 500 household waitlist will be randomly selected from Washtenaw County residents and so on.*

## Additional Information

The AAHC provided data from its Family Report (50058) on resident characteristics of the HCV program for the period of December 1, 2015 through March 31, 2017:

- 84% of households reported average annual incomes classified as “extremely low income” (i.e. 0-30% Median income)
- Another 15% reported average annual incomes that are “very low” (i.e. 31-50% median income)
- Annual income for the 1,049 households with housing choice vouchers in Ann Arbor who submitted their resident characteristics paperwork averaged \$14,149.
- Average total tenant payment was \$330 per month, with 20% paying \$501 or above.

- 45% of households were a female head of household with children, with the next largest household type being Non-elderly, disabled adults(s) without children, at 26% of households.
- 12% were older adults and persons with disability without children, and another 12% were Non-elderly, non-disabled adult(s) without children.
- 73% of heads of household were African American; 25% were White, and 1% was one or more race.
- Only 2% of head of households identified as Hispanic or Latino.
- The most common household size was 1-person (39%). The pie chart below depicts the full distribution of Voucher Unit households by size (Figure 22).

FIGURE 22\_DISTRIBUTION OF AAHC VOUCHER UNITS BY HOUSEHOLD SIZE



### Contributing Factors of Publicly Supported Housing

Each chapter discusses contributing factors that continue, worsen, or otherwise prevent resolution to the fair housing issue discussed in the chapter. These contributing factors help direct the development of goals and strategies to counter the issue.

#### Land use and zoning laws

Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment

in lieu of taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.

Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.

### **Community Opposition**

Community opposition is common when there are proposals for specific developments looking to add affordable housing or when there are proposed zoning changes to add residential density. While these changes in high opportunity could help offset some of the push of lower income (often African American) households to the east side, they continue to be difficult to implement. In continuation of this vicious cycle, lower income households are then pushed out of the east side as more people relocate to the east side, potentially raising cost of living and rents throughout the east side. It is also important to note that the community opposition is not exclusive to high-opportunity markets and is in play throughout the county.

The opposition to affordable housing sometime takes the form of “green or environmental” concerns. When pressed, the conversation usually sources concerns related to safety, the increase in low-income households, and concerns about different races moving into the neighborhood.

A smaller, but persistent, way this opposition also plays out is in the location of group group housing that provides support and treatment for persons with disabilities and/or substance abuse issues.

### **Impediments to mobility**

Households using HCV in the area find that market rents limit where they can find rental housing. Fair Market Rent (FMR) rates do not cover the cost of most rentals in Ann Arbor (even when increased to 110% of value), and also create a detrimental situation on the east side single family communities with a large number of voucher rentals. The FMR covers much more than the mortgage payment, creating an artificial market situation in neighborhoods, such as West Willow. Discrimination continues to be reported as a setback for voucher holders in finding rental housing as well.

### **Lack of private investment in specific neighborhoods**

The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. That said, there has been great improvements through RAD conversion of Ypsilanti Housing Commission properties, and residential investments in rehabilitation of post-foreclosure properties. There are several new prospects in the planning stages, but still limited investment, particularly in the south and southeast neighborhoods.

Private investments in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development often with new ownership. Additionally, there is interest in investment along several corridors (i.e. Whittaker Road); however, the Gault Village shopping area- previously a neighborhood center with a grocery and related convenience shopping- is still in transition and is experiencing high degree of vacancy.

### **Lack of public investment in specific neighborhoods, including services and amenities**

Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to it's age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.

The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.

Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.

Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.

### **Lack of regional cooperation**

Positive regional cooperation include the Urban County, the Continuum of Care for homelessness services, and the expansion of the Ann Arbor Transportation Authority to the Ann Arbor Area Transportation Authority, now including the City of Ypsilanti and Ypsilanti Township, While five jurisdictions have adopted the 2015 Housing Affordability and Economic Equity Analysis, there is some tension around implementation of regional goals for the effort. In some cases that includes some communities interest in gentrification more than revitalization, and in other cases, limited investment and engagement in removing exclusionary policies.

Areas where regional cooperation could benefit are efforts involving a countywide public education district, coordinated hiring efforts from anchor institutions, and ongoing coordination on affordable housing for the urbanized area. The 2016 failure of the Regional Transit Authority (RTA) Millage presents some broader regional coordination needs. The effort looks to connect 4 counties with transit services that will expand employment opportunities and improve access overall.

### **Quality of affordable housing information programs**

Several efforts are underway to support this. Both the AAHC and Washtenaw Housing Alliance (WHA) have staff dedicated to working with landlords on understanding how vouchers work, from the landlord perspective, while at the same time addressing misconceptions about the households that use vouchers.

Homelessness providers work collaboratively to place individuals and families experiencing homelessness in rental housing. Housing Access of Washtenaw County (HAWC) maintains a list of affordable housing units and updates the info quarterly. Housing Bureau for Seniors maintains a list of senior specific affordable and market rate housing updated annually. OCED provides notice to homebuyers of available affordable condos as they come up for sale through Washtenaw Housing Education Partners (WHEP).

### **Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans (QAP) and other programs**

QAP parking requirements often exceed those of local zoning and do not defer to them, creating problems in urban locations, as well as increasing the cost of development. The QAP also has a section that awards points for proposals meeting a community's neighborhood strategic plan, however applicants have frequently noted that it's not clear how to meet this standard.

### **Source of income discrimination**

The Fair Housing Center of Southeast and Mid Michigan (FHC) notes that some housing providers and banks do not appropriately consider income, including SSI, Social Security, retirement and other incomes.

# Disability and Access Analysis

## KEY FINDINGS

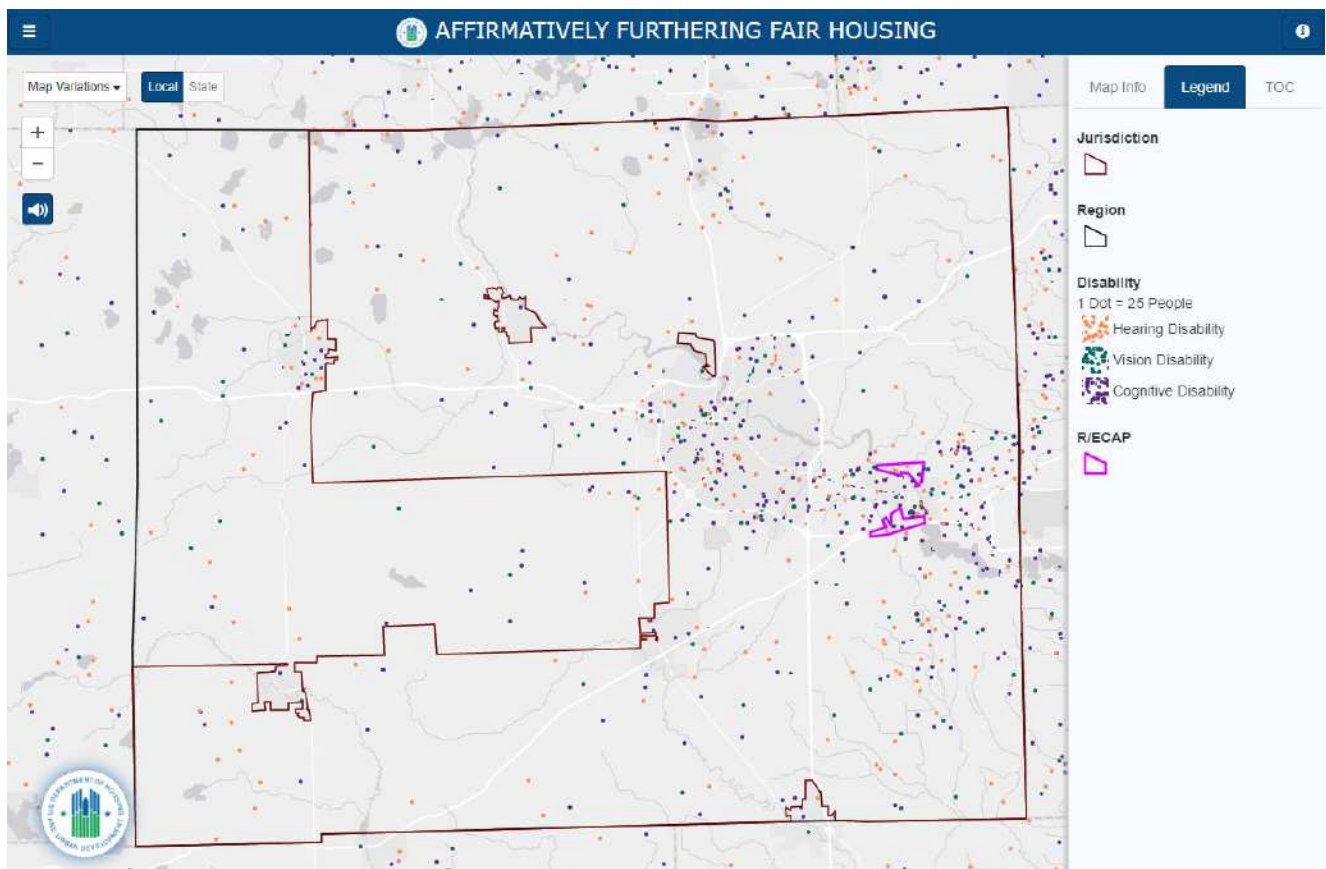
- With varied need and a dispersed population, disability and access needs can be overlooked, or at best, lack focused community attention
- The two Housing Commissions' RAD conversion efforts (and use of LIHTC) have helped increase the number and type of accessible and/or visitable units. However, more is needed in a variety of geographies.
- According to the Ann Arbor Center for Independent Living (CIL) single-family housing stock in particular lacks accessibility modifications, while more recent apartment developments often include some barrier-free units at a minimum.
- More analysis and engagement is needed to determine community-wide priorities



## Population Profile

The maps below show individuals with disabilities predominantly living in the urbanized area of Washtenaw County. There doesn't appear to be any disproportionality with the location of individuals with disabilities and the R/ECAPs; however, indicated in Maps 53 and 54, it does appear that there may be more individuals with disabilities living east of US-23 - the geography of the county often considered more affordable due to rent and home-ownership rates. The City of Chelsea appears to have a somewhat higher rate of individuals with disabilities, likely due to the prevalence of assisted-living and nursing home facilities in the community in comparison with overall population size.

MAP 53\_DISABILITY BY HEARING, VISION AND COGNITIVE



### MAP 54\_DISABILITY BY AMBULATORY, SELF-CARE, & AMBULATORY LIVING DIFFICULTIES

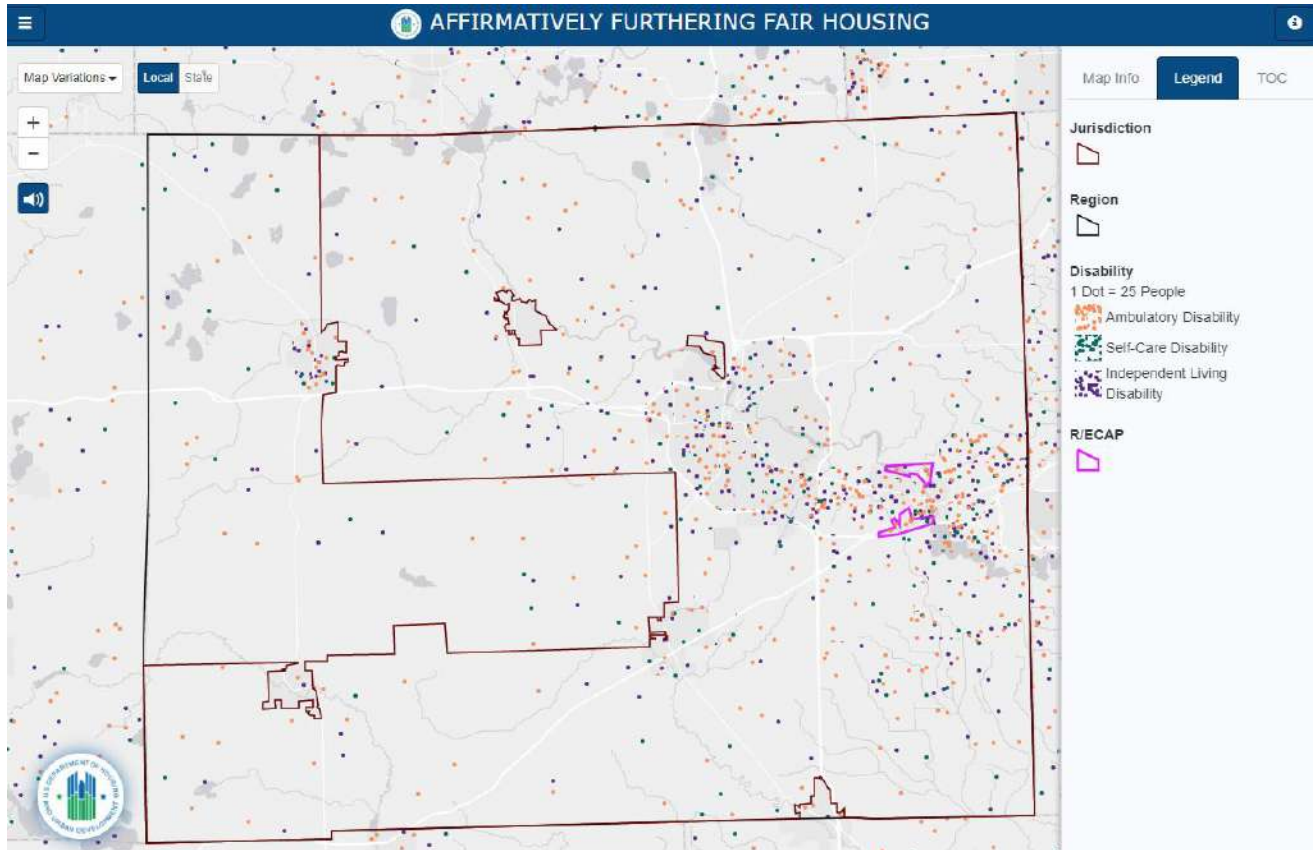


TABLE 42\_DISABILITY BY TYPE

<b>(Washtenaw County, MI CDBG, HOME, ESG) Jurisdiction</b>			
<b>Disability Type</b>	<b>#</b>	<b>%</b>	
Hearing difficulty	6,784	2.29%	
Vision difficulty	3,409	1.15%	
Cognitive difficulty	10,049	3.39%	
Ambulatory difficulty	13,183	4.44%	
Self-care difficulty	4,907	1.65%	
Independent living difficulty	9,265	3.12%	

Source: HUD-provided Table 13, Disability by Type

TABLE 43\_DISABILITY BY AGE GROUP

<b>(Washtenaw County, MI CDBG, HOME, ESG) Jurisdiction</b>			
<b>Age of People with Disabilities</b>	<b>#</b>	<b>%</b>	
Age 5-17 with Disabilities	1,982	0.67%	
Age 18-64 with Disabilities	14,479	4.88%	
Age 65+ with Disabilities	9,516	3.21%	

Source: HUD-provided Table 14, Disability by Age Group

TABLE 44\_DISABILITY BY PUBLICLY SUPPORTED HOUSING PROGRAM CATEGORY

	People with a Disability	
	#	%
Public Housing	9	23.08%
Project-Based Section 8	298	15.47%
Other Multifamily	9	8.49%
HCV Program	910	30.19%

Source: HUD-provided Table 15, Disability by Publicly Supported Housing Program Category

Based on Ann Arbor Housing Commission (AAHC) reporting, AAHC public housing units consist of 30% older adults, half of whom are also disabled. Another 41% of households include non-elderly residents with a disability.

### Housing Accessibility

In conversation with staff at the Ann Arbor Center for Independent Living (CIL), some of the biggest challenges for individuals with disabilities include the following:

- Overall cost is the biggest issue, noting that often there are apartment rentals that are barrier-free or with other accommodations, but often too expensive for individuals, due to the limitations of fixed-incomes, part-time work, and/or generally some of the limitations for people with disabilities resulting in their earning lower incomes broadly.
- Physical accommodations are often lacking for those with a variety of physical disabilities. It was noted that apartments are often more accommodating than single-family homes, which almost always require costly alterations.

Public housing and nonprofit affordable housing providers in the area have been including barrier-free units in new or rehabbed units. The state’s scoring for Low Income Housing Tax Credits (LIHTC) provides additional points for applications where 10% or more of the units are barrier-free (for new and rehab projects), and points for visitable units. The AAHC and the Ypsilanti Housing Commission (YHC) are both in the process of using the RAD program to convert all of the local public housing stock to a public/private partnership which will maintain affordability. As part of this effort both have added a number of barrier-free and accessible units.

#### **AAHC RAD converted units, using LIHTC (all located in City of Ann Arbor):**

As part of the RAD conversion, the Ann Arbor Housing Commission (AAHC) has committed to providing more barrier-free and accessible units overall. West Arbor development added the following barrier-free units at West Arbor:

- One (1) 5-bedroom
- One (1) 4-bedroom
- One (1) 3-bedroom
- Two (2) 2-bedroom

- Two (2) 1-bedroom.

Features were also added to a 1-bedroom and a 2-bedroom for a visual/hearing impaired person. At West Arbor numerous units were made visitable (no step entry, 1st floor bathroom and bedroom):

- Nine (9) 5-bedroom
- Eleven (11) 4-bedroom
- Seven (7) 3-bedroom
- Two (2) 1-bedroom.

At Green-Baxter, the 6-unit burned down building was redeveloped with 6 visitable units:

- Two (2) 2-bedroom
- Three (3) 3 bedroom
- One (1) 4 bedroom

Entry ramps were added to 3 apartments at South Seventh, and 2 ramps at Pennsylvania, to improve accessibility for renters with mobility issues, but they are not fully ADA accessible.

Additionally, all apartments at Miller (106 units) and all apartments at Baker (64 units) are accessible. They are not all ADA compliant, but someone in a wheelchair or who has mobility issues can get into the apartment. The portion of the 106 units that are accessible/visitable by someone with mobility issues is 60%. Of all the housing stock (public housing and/or RAD converted), only 8% is fully ADA or set up for sight/hearing.

More 2-bedroom apartments are needed that are accessible and visitable for people in wheelchairs and mobility issues who have a care-giver. The AAHC will be adding 2 ADA compliant and 7 visitable 2-bedroom units with the redevelopment of White State Henry, in addition to 2 ADA 1-bedroom units. Further, regarding the Platt Road housing site, the following units will be added:

- Two (2) ADA and 4 visitable 2-bedroom
- Two (2) ADA 1-bedroom
- One (1) ADA 3-bedroom
- Three (3) visitable 3-bedroom
- One (1) ADA 4-bedroom
- One (1) visitable 4-bedroom
- One (1) ADA 5-bedroom
- Three (3) visitable 5-bedroom

The AAHC makes modifications to units as needed by the occupants in the apartments, by adding automated door openers, roll-in showers, modified kitchens, grab bars and ramps, and

removing doors to bathrooms and bedrooms upon request. The AAHC has never turned down a request for a reasonable accommodation that is documented. If AAHC continues to make about 10% of their new apartments fully ADA accessible, they could meet the need.

### **Ypsilanti Housing Commission**

Much of the YHC's stock is in or adjacent to the Southside R/ECAP. However, larger buildings providing for Ypsilanti residents are all located in the south of Michigan Avenue neighborhoods. Chidester is reserved for persons with disabilities (151 units). Another property, Towne Center (102 units), reserved for individuals over 55 and often includes persons with disabilities. However, Towne Center has had serious issues maintaining working elevators. In a building serving a older and/or disabled population, this can result in tenants either being confined to their apartment/floor and/or not being able to access their apartments.

### **Access in Different Categories of Publicly Supported Housing**

Individuals and families with disabilities are utilizing the variety of subsidized housing stock, in particular the housing choice vouchers (30%). Overall the multifamily stock could use additional accessible units in the long term.

There is overlap between public housing (administered by AAHC), Project-Based vouchers (using both housing commissions' RAD conversions), Housing Choice Vouchers (HCV) (administered by the AAHC and MSHDA), and multifamily housing stock (which includes above as well as others). The long term goals ensure provisions provide more barrier free and accessible units in all publicly subsidized housing stock.

### **Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings**

Avalon Housing is the primary provider of supportive services in subsidized affordable housing. They contract with both Ann Arbor and Ypsilanti Housing Commissions for services, as well as with homelessness service providers. In efforts to reach across all unit types for services, but provide most services in the City of Ann Arbor. Several mental health providers provide group home options, but these are limited and are difficult to locate, maintain and/or acquire.

The AAHC reports a high need for assisted living with 24 hour supportive services. The AAHC and YHC properties are for people who can live independently with supportive services as needed. However, there are residents who need 24-hour individual care-givers, but there are limited places for them to move to. AAHC has 24-hour staffing at Miller Manor, but the staffing is not intended to cook, clean and pay bills for tenants, for example. That is a much more intensive service that is provided in group homes. Within AAHC properties, the need for supportive services (i.e. on-site eviction prevention and housing stabilization needs, which can include case managers, peer support, support groups, and medical support) needs to double. This is exclusive of individuals who need 24-hour care.

The Washtenaw County Continuum of Care (CoC) is committed to supporting and adding projects with supportive housing as part of homelessness services throughout the county. These programs include rapid rehousing and housing first programs, with wrap-around services to individuals and families experiencing homelessness. Many of these individuals and families have one or more disabilities. Through the program, the need for expanding supportive housing programming and services has been identified, reinforced and prioritized.

## Disparities in Access to Opportunity

### Government services and facilities

Public participation and engagement is encouraged by local units throughout the County. All provide accommodation for meetings upon request, including sign-language and other language interpreters. All public meetings are required to, and mostly are, held in buildings and rooms with barrier-free access.

### Public Infrastructure

The Ann Arbor Center for Independent Living has successfully taken legal action against multiple jurisdictions regarding their ADA sidewalk ramp program. The result is a number of court-monitored implementation programs, requiring the local units to replace or add ADA ramps as part of the local sidewalk network.

### Washtenaw Area Transportation Study (WATS)

Most of the urbanized areas of Washtenaw County have been working to implement traffic calming, including road diets, improved crosswalks, midblock crossings and other safety infrastructure to improve the pedestrian network. However, the prevalence of roads designed by, and under the jurisdiction of, the Michigan Department of Transportation (MDOT), bisecting what would be walkable communities, often encourages speeding to dangerous levels, and does not allow for smaller-scale pedestrian improvements. For example, Washtenaw Avenue passes through four jurisdictions in the County, and has the most-heavily used transit route (AAATA Route 4) in the County. However, MDOT has dedicated minimal resources to fill in sidewalk gaps, constructing mid-block crossings or even crosswalks along large sections of the trunkline. As a result, improvements have not occurred that are needed to address dangerous conditions for pedestrians, and particularly people with disabilities, who may need to cross the road to get to services, a residence, bus stop, etc.

### Transportation

Within the fixed-transit routes, AAATA provides kneeling buses which accommodate wheelchairs, scooters, etc. A-Ride is a complementary paratransit<sup>1</sup> shared-ride transportation service for persons with disabilities who, due to their disability, are prevented from traveling by The Ride's regular accessible line bus service. A-Ride is comparable to The Ride's regular line

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<sup>1</sup> <https://www.law.cornell.edu/cfr/text/49/37.131>

bus service in terms of shared rides, service area, trip lengths and days of operation. A-Ride trips are provided in lift-equipped buses and sedan type vehicles.

As well, AAATA partners with the People's Express (PEX), a low-cost public transportation service for townships in Washtenaw County with transfers to several bus stops on the AAATA bus route. Most our buses and vans are lift-equipped and meet ADA requirements. People's Express also provides transportation along the bordering townships of Oakland and Livingston County along the US-23 corridor from I-96 to Washtenaw County Hospitals (U of M and St. Joseph Mercy), Colleges, Businesses, Appointments and other destinations.

### **Proficient school and education programs**

Currently more than 6,500 students receive special education services in Washtenaw County, including the 13 eligible categories covered under the current Individuals with Disabilities Education Act (IDEA). The list includes: autism, deaf/hearing impairment, blind/visual impairments, cognitive impairments, early childhood developmental delays, emotional impairments, physical impairments, speech & language impairments, severe multiple impairments, traumatic brain injury, other health impairments (chronic or acute conditions).

The Washtenaw intermediate School District (WISD) provides special education services and programs to support the efforts of 9 local school districts, 14 private school academic and 20 private schools. This includes early childhood support, early intervention services, classroom support services, parent support, assistive technology and legal requirements. These services support approximately 300 students with moderate to severe disabilities, emotional disabilities, deaf/hard of hearing impairments, visual impairments from birth to 25 years old, and the Washtenaw County Court involved youth program.

School districts also develop special education plans and means for students and families to request accommodations and assistance. A renewal millage is scheduled for November 2017 to renew funding for more than 6,500 students receiving special education services in Washtenaw County.

### **Jobs**

Several community based organizations work with persons with disabilities around hiring, and/or provide jobs for persons with disabilities. Michigan Ability Partners (MAP) provide vocational services, Goodwill provides similar vocational supports and employment. The CIL provides a microenterprise program for those looking to pursue entrepreneurship, while also serving as a free staffing service to public and private groups and businesses looking to hire persons with disabilities. Michigan Rehabilitation Services works with eligible customers and employers to achieve quality employment outcomes and independence. This includes assisting persons with disabilities to prepare for and obtain competitive employment, and exploring the possibilities of self-employment or owning a small business. Comprehensive Services for the Developmentally Disabled, located in Saline, provides support for individuals to develop, display and sell art.

### **Reasonable accommodations**

Several of the groups mentioned above, provide support to individuals as they enter the workplace and/or find housing and provide technical assistance related to the provision of reasonable accommodations.

### **Homeownership**

Staff at the CIL noted that while there is rental stock that is barrier-free and/or available, most houses for sale lack any accessibility features. Housing Bureau for Seniors offers a small program to assist seniors and individuals with disabilities with housing modification programs but it is modest. Washtenaw County's OCED administers a housing rehabilitation program, but the program has temporarily suspended its accessible ramp program. Staff hopes to reinstate it by 2018.

## **Disproportionate Housing Needs**

As mentioned above, affordability continues to be the biggest issue, creating a disproportionate need, as many persons with disabilities have fixed incomes through SSI and related programs. Supporting homeownership for individuals with disabilities through financial support with purchase and/or modification is needed.

## **Disability and Access Issues Contributing Factors**

Each chapter discusses contributing factors that continue, worsen, or otherwise prevent resolution to the fair housing issue discussed in the chapter. These contributing factors help direct the development of goals and strategies to counter the issue.

### **Access to proficient schools for persons with disabilities**

While there is a broader question about access to proficient schools (less available to low-income families of color), all school districts in the county provide special education classes and supports.

### **Access to publicly supported housing for persons with disabilities**

30% of HCV are utilized by households with disabilities, and 20% of public housing is used by accessible housing.

### **Access to transportation for persons with disabilities**

There are gaps in service and availability in some rural areas and on the edges of the AAATA service area.

### **Inaccessible sidewalks, pedestrian crossings, or other infrastructure**

The CIL's litigation against various local jurisdictions around ADA sidewalks and curb cuts has resulted in improved attention to detail and improved accessibility.



Most of the urbanized areas of Washtenaw County have been working to implement traffic calming, including road diets, improved crosswalks, midblock crossings and other supports to improve the pedestrian network. However, the prevalence of MDOT roads cutting through what would be walkable communities, often increase speeds to dangerous levels, and does not allow for smaller-scale pedestrian improvements. For example, Washtenaw Avenue passes through four jurisdictions in the County, and has the most heavily used transit route (AAATA Route 4) in the County. MDOT has dedicated minimal resources towards adding in sidewalk gaps, installing mid-block crossings or even crosswalks through long sections of the road. This has been inadequate and sometimes dangerous for pedestrians, and particularly people with disabilities who may need to cross the road to get to services, a residence, bus stop, etc.

#### **Lack of affordable in-home or community-based supportive services**

The AAHC and other housing providers have documented the need for additional in-home supportive services (up to 24 hours). As well, the demand for supportive services is ongoing and particularly paired with the homelessness work in the community.

#### **Lack of affordable, accessible housing in range of unit sizes**

Both housing commissions are working to add to the variety of accessible housing including range of unit sizes as part of the RAD conversion projects.

#### **Lack of affordable, integrated housing for individuals who need supportive services**

Based on focus group responses, it is not common where an individual alone can provide for their housing and support services needs, even when receiving SSI, Medicaid and other government supports. Most families indicated that they provide additional financial support, and assistance with procuring and maintaining supportive services. Families also noted discrimination of apartment managers, providing examples when managers said no to disabled applicants who were looking to live in what would be an integrated setting. This indicates both a supply and a discrimination issue.

#### **Lack of assistance for housing accessibility modifications**

Modifications for tenants of properties in federally subsidized units is more common, in particular those managed by one of the housing commissions and/or Avalon Housing, MAP and other non-profit developers. Focus group participations have noted varying responses in the private sector. The Fair Housing Center of Southeast and Mid Michigan (FHC) noted that in their experience with many local building departments are not enforcing federal fair housing requirements as part of multifamily development, citing a lack of jurisdiction.

#### **Lack of assistance for transitioning from institutional settings to integrated housing**

Washtenaw County Community Mental Health staff report lack of resources for transition, and are looking to participate in broader discussions on providing additional supports.

### **Land use and zoning laws**

The prevalence of single-family zoning districts makes up the bulk of zoning districts throughout the region and limits the housing choices, price point and availability to populations most in need of housing. In some cases, there have been efforts to limit the number of affordable units or use of HCV through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.

As part of the prevalence of single family districts, there are limitations on group home placement. There are often negative associations with group housing and similar housing types, making it difficult to have them approved even as a conditional or special use.

### **Location of accessible housing**

Accessible housing is included in the majority of committed affordable units, so is most prevalent in Ypsilanti, Ypsilanti Township and in the urbanized area as a whole.

# Fair Housing Enforcement, Outreach Capacity, and Resources

## Key Findings

- Residents in Washtenaw County, as in many places, are unlikely to report a case of alleged discrimination. Reasons may include fear of retaliation, lack of awareness of one's rights under the fair housing laws, lack of awareness of which agencies may be of assistance, or limited support by private or public agencies.
- According to the Fair Housing Center of Southeast and Mid Michigan (FHC), complaints are more likely to be based on issues of race and disability, but discrimination regarding family size remains an issue.
- Complaints are primarily in the urbanized area of the county - City of Ann Arbor, Pittsfield Township, Ypsilanti Township, City of Ypsilanti and sections of Superior Township.
- Diminished resources at the federal, state and local levels limit opportunities for residents facing discrimination to receive support.

## Formal Fair Housing Actions

With a few exceptions, Federal and State law prohibits discrimination when based on the following classes:

- Race
- Color
- Religion
- Sex (including sexual harassment and pregnancy)
- National origin (including [immigration status](#))
- Familial status (the presence of children under the age of 18)
- Disability
- Age
- Marital status

In Michigan, housing discrimination is prohibited by the [Elliott-Larsen Civil Rights Act](#) and the [Persons with Disabilities Civil Rights Act](#). State law includes all federal protections as well as age, marital status, height and weight.

Local ordinances provide added protection against discrimination. The [City of Ann Arbor's non-discrimination ordinance](#) provides protections based on arrest record, educational association, family responsibilities, gender expression, gender identity, genetic information, height, HIV status, national origin, political beliefs, sexual orientation, source of income, veteran status, victim of domestic violence or stalking, or weight (City of Ann Arbor Code, Chapter 112, Section 9:150; Ord. No.14-25, Sec. 1, 10-20-14). The City of Ypsilanti was one of the first communities in the state to pass a [nondiscrimination ordinance in 1997](#). The Ypsilanti ordinance protects gender identity, immigration status, sexual orientation, educational association, or source of income.

To date, neither Washtenaw County, Washtenaw Urban County, nor the Ann Arbor Housing Commission (AAHC) has received any finding or issue, such as:

- A charge or letter of finding from HUD concerning a violation of a civil rights-related law,
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law,
- A letter of findings issue by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law,
- Or a claim under the False Claims Act related to fair housing, nondiscrimination or civil rights generally, including an alleged failure to affirmatively further fair housing.

There is, however, a pending fair housing lawsuit against an Ypsilanti Township landlord based on the protected class of sex currently assigned to Judge Linda Parker in Federal Court. More details on this case can be found [here](#).<sup>1</sup>

Recent settlements (from FHC website, August 2017)

- Mental/emotional disability, Ypsilanti Township: Welch v Cerda (2016)
- Race, Ypsilanti Township: Scott v Swan Creek (2015)
- Race, Ann Arbor: FHC v Ivanhoe House Apartments (2008)
- Race, Ann Arbor Township: Hatch v Flying Dutchman (2008)

TABLE 45\_FEDERAL LIST OF FAIR HOUSING COMPLAINTS

Year	Total Filed Cases	Race Basis	Color Basis	Religion Basis	Familial Status Basis	Disability Basis	National Origin Basis
2011	15	8		1	1	5	3
2012	16	4			2	12	
2013	15	8	1	1		8	1
2014	16	11			1	6	
2015	13	4				9	2
2016	21	8	1	1	5	12	2
Total	157	73	3	8	18	74	15

Source: HUD, the Office of Fair Housing and Equal Opportunity August 2017

## Local Fair Housing Agencies

The main agency in our area that provides education, outreach and enforcement is the Fair Housing Center of Southeast and Mid Michigan (FHC). The agency focuses on investigative services, testing, advice, advocacy, conciliation, attorney referral and community education. Their budget is largely limited to multi-year federal funding from HUD, which currently makes up 82.3% of their annual budget.

<sup>1</sup> <http://www.fhcmichigan.org/allegation-of-sexual-harassment-leads-to-fair-housing-lawsuit/#more-3664>

## Additional Information

The United Way of Washtenaw County recently provided some financial support to FHC to outreach and education efforts related to the recent HUD rule on criminal backgrounds. This funding supported education to landlords and property managers as well as individuals in the area.

## Contributing Factors of Fair Housing Enforcement, Outreach Capacity and Resources

Each chapter discusses contributing factors that continue, worsen, or otherwise prevent resolution to the fair housing issue discussed in the chapter. These contributing factors help direct the development of goals and strategies to counter the issue.

### **Lack of resources for fair housing agencies and organizations**

Currently the FHC's funding for outreach and enforcement is limited to that of the federal government, specifically HUD. In a stakeholder interview, key staff noted that more resources are always needed, but uncertainty rises due to the current federal political climate. The number of complaints recorded in 2016 was at the highest level in 20 years. And as of August, the rate of complaints coming into FHC is at a rate 2 weeks ahead of 2016 (Table 45).

## Contributing Factors

Below is a list of the Fair Housing Priorities categorized by each a chapter with the summarized list of contributing factors. These factors are included in the chapters with more detail, with the exception of the prioritization - which represents the level of need for each factor.

### Identifying and Prioritizing Contributing Factors to Segregation

Contributing Factor	Prioritization and Justification
<p><b>Community Opposition</b> Community Opposition is common when there are proposals for specific developments looking to add affordable housing or when there are proposed zoning changes to add residential density. While these changes in high opportunity could help offset some of the push of lower income (often African American) households to the east side, they continue to be difficult to implement. In continuation of this vicious cycle, lower income households are then pushed out of the east side as more people relocate to the east side, potentially raising cost of living and rents throughout the east side. It is also important to note that the community opposition is not exclusive to high-opportunity markets and is in play throughout the county.</p> <p>The opposition to affordable housing sometime takes the form of “green or environmental” concerns. When pressed, the conversation usually sources concerns related to safety, the increase in low-income households, and concerns about different races moving into the neighborhood.</p> <p>A smaller, but persistent, way this opposition also plays out is in the location of group group housing that provides support and treatment for persons with disabilities and/or substance abuse issues.</p>	<p><b>High</b> - While support is broad for affordable housing in theory, individual projects at specific locations continue to face opposition, as do efforts to increase residential density.</p> <p>Ongoing education, outreach and development of advocates to support, rather than oppose these developments, will be essential to success.</p>
<p><b>Displacement of residents due to economic pressures</b> A few factors are at play with concerns about displacement. As frequently discussed in the <a href="#">2015 Housing Affordability and Economic Equity Analysis</a>, high housing prices in the Ann Arbor area are pushing many households out of Ann Arbor, often to the east side of the county, specifically in Ypsilanti and Ypsilanti Township. The high cost of housing, due in large part to the presence and dominance of the U of M and its hospital system, impacts renters and homeowners alike.</p>	<p><b>High</b> - As noted in the Housing Affordability and Economic Equity report (2015) there are two markets in play - a high cost/high income market in Ann Arbor and a lower rent/much lower income problem in both the City of Ypsilanti and Ypsilanti Township.</p> <p>To prevent displacement, an emphasis on raising incomes and decreasing the</p>

<p>In some cases, loss of committed affordable units has also caused displacement. Of current concern is the Cross Street Village in the City of Ypsilanti. Cross Street Village is an affordable senior living facility where the property owners have completed the 15-year mandatory affordability period, but are opting out of the 99-year extended affordability period by using the IRS Qualified Contract exemption that allows them to “list” the property for sale. Based on the calculation involved, the property is listed for sale at \$12,050,000, significantly higher than its appraisal of \$4 million. While the affordability period will extend 3 years, current tenants are seeing rent increases and are concerned about how long they will be able to stay. Many are already looking to relocate and are finding few affordable options.</p> <p>The Ypsilanti Housing Commission’s Rental Assistance Demonstration (RAD) conversion is having a positive impact on neighborhoods due to the renovation of all units, including demolition and redevelopment in some cases. These properties moved out of public ownership to a public/private partnership to allow the use of Low-Income Housing Tax Credits to fund renovation and redevelopment. The total affordability period for these properties is 45 years once construction is complete.</p> <p>The Ann Arbor Housing Authority is also in the middle of a full RAD conversion, but the AAHA/City of Ann Arbor are maintaining ownership of the land to control long-term affordability for those properties. The City of Ann Arbor provided a 99 year ground lease to the entity developing the property. In both cases, long-term planning will be needed to maintain affordability at either the 45 or 99 year point.</p>	<p>unemployment rate is the goal for both R/ECAPs and other low opportunity areas and areas with high percentages of residents of color in the county.</p>
<p><b>Lack of community revitalization strategies</b></p> <p>The foreclosure crisis had a particularly negative impact on Ypsilanti Township. In response, the township partnered with Habitat for Humanity of Huron Valley and provided resources to launch revitalization strategies in three neighborhoods: West Willow, Gault Village, and Sugarbrook. The partnership includes funding for acquisition and rehab of foreclosure of lower-quality houses for rehabilitation and ownership for low-income households. In addition, Habitat has provided community development support through neighborhood organization, capacity building and development, and supportive programs, including exterior cleanups, park improvements and more.</p>	<p><b>Low</b> - There are some community revitalization strategies in play in both the City of Ypsilanti and Ypsilanti Township, However, there is a lack of focus on development of neighborhood commercial districts in R/ECAPs and other lower opportunity areas on the east side of the county.</p>



<p>The City of Ypsilanti has created a disposition policy for vacant lots deeded to the city through tax foreclosure and has success putting them into private ownership. That policy is supported by the creation of a Neighborhood Enterprise Zone (NEZ), which uses tax abatement and encourages infill on the southside of the city.</p> <p>Areas lacking any revitalization strategy include the MacArthur Boulevard area of Superior Township and the LeForge Road area, which straddles both Ypsilanti City and Township.</p>	
<p><b>Lack of private investments in specific neighborhoods</b> The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. That said, there has been great improvements through RAD conversion of Ypsilanti Housing Commission properties, and residential investments in rehabilitation of post-foreclosure properties. There are several new prospects in the planning stages, but still limited investment, particularly in the south and southeast neighborhoods.</p> <p>Private investments in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development often with new ownership. Additionally, there is interest in investment along several corridors (i.e. Whittaker Road); however, the Gault Village shopping area- previously a neighborhood center with a grocery and related convenience shopping- is still in transition and is experiencing high degree of vacancy.</p>	<p><b>Medium</b> - Increasing private investment in low-opportunity areas is difficult, as the return on investment is lower.</p> <p>However, coordinating investment with local banks through Community Reinvestment Act plans and priorities can provide support for homeownership, infill, commercial development and other economic development efforts. This could apply to low-opportunity areas throughout the county.</p>
<p><b>Lack of public investments in specific neighborhoods, including services or amenities</b> Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to it's age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.</p> <p>The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City</p>	<p><b>High</b> - With many east side communities not yet recovered from the Great Recession, the limited funding available is in demand. Identifying and applying additional public support and directing it to low-opportunity areas will be important to making sure low-income areas receive public investment in coordination with community needs and interest.</p> <p>One means is to review the use of CDBG priority funds as part of the Urban County's 5 year consolidated plan preparation to encourage its use for placemaking and/or community infrastructure needs in low-opportunity</p>

<p>Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.</p> <p>Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.</p> <p>Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.</p>	<p>areas.</p> <p>This will allow additional public support for these efforts, that are often underfunded due to the imbalanced local government revenues.</p>
<p><b>Lack of regional cooperation</b></p> <p>Positive regional cooperation include the Urban County, the Continuum of Care for homelessness services, and the expansion of the Ann Arbor Transportation Authority to the Ann Arbor Area Transportation Authority, now including the City of Ypsilanti and Ypsilanti Township, While five jurisdictions have adopted the 2015 Housing Affordability and Economic Equity Analysis, there is some tension around implementation of regional goals for the effort. In some cases that includes some communities interest in gentrification more than revitalization, and in other cases, limited investment and engagement in removing exclusionary policies.</p> <p>Areas where regional cooperation could benefit are efforts involving a countywide public education district, coordinated hiring efforts from anchor institutions, and ongoing coordination on affordable housing for the urbanized area. The 2016 failure of the Regional Transit Authority (RTA) Millage presents some broader regional coordination needs. The effort looks to connect 4 counties with transit services that will expand employment opportunities and improve access overall.</p>	<p><b>High</b> - Affordable housing, inequitable educational systems, local-government revenue, transportation - all of these are regional issues that cannot be addressed through actions by single units of government. Coordination and shared values and goals will be essential for progress in some of the areas where institutional racism has been, and continues to be a barrier to success.</p>
<p><b>Land use and zoning laws</b></p>	<p><b>High</b> - Exclusionary zoning practices including large acre lot sizes, large</p>

<p>Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	<p>single-family zoning districts potential over-utilization of Planned Projects (or PUD) and layers of regulation make development more expensive and more exclusive, especially in the Ann Arbor area.</p>
<p><b>Lending discrimination</b></p> <p>The recent history of mortgage lending in Washtenaw County as reported through Home Mortgage Disclosure Act (HMDA). African Americans are denied mortgages for single family, duplex, triplex and quad buildings at a rate often 2-3 times that of whites or Asians. Hispanics are also denied at a much higher rate, than whites or Asians. The smaller number of loan originations does show more fluctuation in the information for Hispanics/Latinos.</p> <p>Anecdotally, there have been numerous stories of EMU professors looking for housing that are immediately directed to the Ann Arbor Housing market by realtors and others, rather than neighborhoods with quality and affordable housing stock within walking or shorter commuting distances in the City of Ypsilanti and Ypsilanti Township. Anecdotal reports from realtors indicate that steering occurs related to school districts, with school district boundaries serving as the modern era “redline” districts.</p>	<p><b>Medium</b> - HMDA data provides a look into loan origination and approval by race and ethnicity. African Americans be turned down more frequently than whites.</p>
<p><b>Location and type of affordable housing</b></p> <p>The City of Ypsilanti and Ypsilanti township host the vast majority of committed affordable housing units for the county, creating areas of disproportionate housing needs and areas of concentrated poverty. For example, in the City of Ypsilanti, more than 95% of the committed affordable units in the city are located South of Michigan Avenue - this includes the 632 units located in the Southside R/ECAP</p>	<p><b>High</b> - When you remove the affordable senior housing units being lost at Cross Street village in the City of Ypsilanti, 95% of the City of Ypsilanti’s affordable units are located south of Michigan Avenue. In the county-wide context, both the City of Ypsilanti and Ypsilanti Township each have a comparable number of committed affordable units to the City of Ann Arbor, However Ypsilanti Township contains not quite half the population of the City of Ann Arbor, and the City of Ypsilanti is one-sixth the size. Combining Ypsilanti City and Ypsilanti Township make up almost 50% of the county’s committed affordable units, but only 20% of the population.</p>

**Private discrimination**

Through both surveys and focus groups, it was affirmed that discrimination is still an issue in particular for people of color and persons with disabilities. In the Ypsilanti Renters focus group, it was posited that one reason for this ongoing discrimination is a lack of diversity among property managers and landlords. This could minimize cultural misunderstandings that can lead to applications being denied and, in some cases, eviction.

**Medium-** The tight housing market amplifies the role discrimination plays in where and how individuals find housing. This is likely to increase in the urbanized area in particular.

## Identifying and Prioritizing Contributing Factors to R/ECAP areas

Contributing Factor	Prioritization and Justification
<p><b>Deteriorated and abandoned properties</b> In the case of the Southside R/ECAP, there is concern, post housing crisis, about an increase in rental properties by non-local landlords. Based on local assessor data, 51% of residential units are owner-occupied and 50% rental. The loss of home ownership also impacts the creation of long-term wealth for African American residents. Focus group participants in areas with high renter occupation spoke to their concern of property value and quality of neighborhood, and hoped to see more owner-occupied homes in their neighborhood. Lower-incomes in the Southside R/ECAP have been problematic for ongoing care and maintenance of properties as well. Recommendations related to supporting home ownership, property upkeep and investment will be included for both R/ECAPS, but the Southside R/ECAP in particular.</p> <p>In comparing in the county, the United States Postal service vacancy data for 2016, the two R/ECAPs are in the top 10% for vacancy rates at the 3 month and 36 month ranges (Table 26). The City of Ypsilanti was able to demolish a number of vacant and condemned houses in the southside R/ECAP in the last 10 years, including a number of condemned and vacant single-family units, as well as a large number of Ypsilanti Housing Commission properties (Parkridge and others) as part of the RAD conversion.</p>	<p><b>High</b> - Lower-income homeowners will need support to maintain their homes over time. As well, maintaining African-American homeownership is important to creation of wealth and intergenerational wealth transfer.</p>
<p><b>Displacement of residents due to economic pressures</b> Lower-incomes overall make the risk of displacement high in both R/ECAPS. Focusing on increasing wages, providing ongoing (re)training, and support for youth will be essential in the long-term, with the goal to support existing residents to own and invest in their neighborhoods, rather than be pressed out.</p>	<p><b>High</b> - R/ECAP residents are some of the most vulnerable to economic pressures in the county. In the southside R/ECAP in particular, there is a great sense of pride and heritage that are important as well. Finding employment, training, education and other supports are essential to help residents keep their current housing..</p>
<p><b>Lack of community revitalization strategies</b> Participants from the Parkridge focus group were very open and transparent about the support they receive from neighbors and the sense of community they have in their neighborhood. With multiple churches, non-profit agencies, and the Parkridge Community Center, the Southside area has a plethora of community initiatives, support, and activities. Coordination among these efforts is often inconsistent, and can suffer from</p>	<p><b>Medium</b> - The Southside R/ECAP benefits from a strong social-service network in the area if not a coordinated strategy.</p> <p>Leforge is lacking engagement, service provision, and a plan to assist residents and further connect it's neighbor Eastern Michigan University, as well as</p>

<p>both overlap and gaps in service. While individual partners may have goals and a vision for their work in the area, there is not a coordinated revitalization strategy.</p> <p>In the Leforge R/ECAP there are less resources. The area is predominantly multi-family housing, with no nonprofit agencies, churches, schools, businesses or other institutions to provide support. No revitalization strategy exists for the area.</p> <p>There is a need for investment and continued engagement with Southside and Leforge residents and local stakeholders to determine the most appropriate strategies as well as an overall community revitalization strategy.</p>	<p>the adjacent community.</p>
<p><b>Lack of private investments in specific neighborhoods</b> Today, there is a lack of public investment in the Leforge R/ECAP, but in the Southside R/ECAP, there is room to grow. Both Peninsular Park and Parkridge Park would benefit from ongoing maintenance and additional amenities. Also, pedestrian improvements are in need at Huron River Drive and Leforge intersections. As mentioned above, increasing communication and engagement with stakeholders and residents is an ongoing goal, and could help push forward the need and desire for investment. To support investment one recommendation will be to dedicate CDBG program income to projects in R/ECAPs.</p>	<p><b>Medium</b> - The combination of community investment strategies as well as encouragement of public and private investment will help support and strengthen the neighborhood.</p>
<p><b>Lack of public investments in specific neighborhoods, including services or amenities</b> Today, there is a lack of public investment in the Leforge area, and in the Southside R/ECAP, there is room to grow. Both Peninsular Park and Parkridge Park would benefit from ongoing maintenance and additional amenities. Also, pedestrian improvements are in need at Huron River Drive and Leforge intersections. As mentioned above, increasing communication and engagement with stakeholders and residents is an ongoing goal, and could help push forward the need and desire for investment. To support investment one recommendation will be to dedicate CDBG program income to projects in R/ECAPS.</p>	<p><b>Medium</b> - The combination of community investment strategies as well as encouragement of public and private investment will help support and strengthen the neighborhood.</p>
<p><b>Land use and zoning laws</b> The Southside R/ECAP was recently down-zoned to a single-family district. While this is a common strategy to try and provide more stability for property owners, it does create problems for those who own a duplex, or who may benefit from additional income of a second unit. Allowing duplexes could also help support infill development, allowing for both</p>	<p><b>Medium</b> - While these changes may be worthwhile, more engagement with both neighborhoods will be necessary to determine the right next steps.</p>

<p>owner-occupancy and rental income in some cases. The Leforge R/ECAP is zoned primarily for multi-family housing. This is not necessarily problematic, but flexibility in zoning to allow for some commercial uses (i.e. stores, childcare and other supportive uses) can assist with the lack of nearby services in the area.</p>	
<p><b>Location and type of affordable housing</b> OCED created an inventory of committed affordable units. These are affordable units that have rent and income restrictions through various subsidies, deed restrictions, zoning or other mechanisms. There are 4,220 committed affordable units in Washtenaw County. Committed affordable units in the City of Ypsilanti and Ypsilanti Township make up almost 50% of these units. More specifically, 15% of the county’s committed affordable units are located in Southside and 2.8% are located in Leforge. Even more specific, of all the committed affordable units in the City of Ypsilanti, 95% of them are located south of Michigan Avenue. The concentration of committed affordable housing in these census tracts is problematic, and is likely contributing to the R/ECAP status in both areas.</p>	<p><b>High</b> - Concentrating much of the committed affordable housing in Ypsilanti in and around the R/ECAPs is one of the key contributing factors to the R/ECAP status. In the county-wide context, both the City of Ypsilanti and Ypsilanti Township each have a comparable number of committed affordable units to the City of Ann Arbor, However Ypsilanti Township contains not quite half the population of the City of Ann Arbor, and the City of Ypsilanti is one-sixth the size. Combining Ypsilanti City and Ypsilanti Township make up almost 50% of the county’s committed affordable units, but only 20% of the population.</p>
<p><b>Private discrimination</b> In several focus groups, it was affirmed that discrimination still occurs, especially related to race and disability. The Fair Housing Center of Southeast and Mid Michigan (FHC) reports an uptick in discrimination complaints from landlords in 2016 as well as in 2017. In 2016, complaints in Washtenaw County were at the highest since 1995. In August of 2017, complaints are already 2 weeks ahead of total complaints the same time in 2016. In focus groups, participants commented on private discrimination related to disability, race, income and sexual orientation. In Washtenaw County, the top two complaints are race and disability discrimination.</p>	<p><b>Medium-</b> The tight housing market amplifies the role discrimination plays in where and how individuals find housing. The ongoing trend of African-Americans being denied mortgages at a higher rate impacts long-term wealth creation in African-American families and communities.</p>
<p><b>Lack of regional cooperation</b> As noted, both R/ECAPs have significant number of youth, but provide minimal services. This has been identified in City of Ypsilanti and county plans, but there has been minimal cooperation to address the need for youth programming in the form of recreation, education, and mentoring. Parkridge Center does benefit from the ongoing partnership with Washtenaw Community College, but often the Center is not well utilized by neighborhood residents. A regional partnership with a focus on service provision and supporting youth is a worthy regional effort.</p>	<p><b>High</b> - As noted, both R/ECAPs have significant number of youth, but minimal services. This has been identified in City and county plans, but there has been minimal cooperation to address the need for youth programming in the form of recreation, education and mentoring. Parkridge Center does benefit from the ongoing partnership with WAShtenaw Community College, but in some cases the utilization by adjacent residents is minimal. A regional partnership and</p>

	focus on service provision and supporting youth is a worthy regional effort.
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## Identifying and Prioritizing Contributing Factors to Disparities in Access to Opportunity

<p><b>Access to financial services</b> Recently, the United Way of Washtenaw County convened a working group on financial services and financial literacy related to low income Washtenaw County residents. The number of check cashing locations (red pins) are clustered around the east side of the county, in lower income areas. In Ann Arbor, the jurisdiction with the largest population, there are only two locations.</p>	<p><b>Medium</b> - Lower-income communities have less banking options than high-income communities. As a result lower-income communities rely on check-cashing or other services, which can total up to \$20,000 in fees over the course of a lifetime.</p>
<p><b>The availability, type, frequency, and reliability of public transportation</b> As mentioned previously, the AAATA largely expanded transit services in 2016. As a result, wait times were reduced from 1 hour to 30 minutes, and in regard to routes in Ypsilanti and Ypsilanti Township, most routes now travel in both directions rather than a one-way loop. While greatly improved, travel times from the following locations to U of M Hospital (for example) usually hover about 1 hour one way:</p> <ul style="list-style-type: none"> <li>● West Willow Neighborhood - minimum of one hour, one way</li> <li>● Southside R/ECAP - between 55 and 60 minutes one way</li> <li>● Leforge R/ECAP - 47-57 minutes depending on route</li> </ul> <p>Two hours of travel time, at minimum, puts a burden on residents with other needs such as running errands, getting to and from childcare and schools, spending time with family, and so on.</p> <p>As to reliability and on-time performance, FY 2016 data provided by The Ride indicates that 90% of trips were on-time at route endpoints. That number decreased to 84% for on-time performance at all timepoints along the route. Currently on fixed-routes, 43% of bus stops have accessibility enhancements, but 100% of the bus fleet contain accessibility features.</p>	<p><b>High</b> - An analysis of 2016 survey of Michigan Works! Job seekers determined that access to a vehicle was more important for obtaining and keeping a job, even over educational attainment. In cases where access to a car is improbably, transit or other reliable options are essential.</p>



<p>The A-Ride service from Ann Arbor Area Transportation Authority also provides shared-ride transportation service for persons with disabilities. This service is available for individuals within ¼ mile of fixed route service and available. Additionally, A-Ride is available for ADA eligible residents of Ypsilanti, Pittsfield and Superior Townships who reside beyond the Base Service Area. These riders may request trips to locations within their township on weekdays between 6:30 a.m. and 6:30 p.m. Additional funding permits:</p> <ul style="list-style-type: none"> <li>• Eligible Pittsfield Township riders to travel within the Ann Arbor City limits</li> <li>• Eligible Ypsilanti Township riders to travel within the Ypsilanti City limits.</li> </ul> <p>Outside of AAATA’s service area, People’s Express serves residents of Saline; Dial a ride is available to residents of Manchester (including accessible transportation); Western-Washtenaw Area Value Express (WAVE), provides affordable transportation to older adults, persons with disabilities and other transit-dependent individuals. The WAVE’s service area includes Chelsea, Dexter and provides an inter-urban express route along Jackson Road. With that said, many rural areas are not covered by dial-a-ride or other paratransit services.</p> <p>As mentioned previously there are no connections east of Washtenaw County to Dearborn, Canton, and the Detroit Area. A four-county Regional Transit Authority (RTA) has been formed, but a 2016 millage effort to fund service to link all four counties (including the links from Washtenaw east to other employment opportunities) failed. Another attempt is expected, although not yet announced.</p>	
<p><b>Lack of private investments in specific neighborhoods</b> The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. However, there has been great improvements in existing single and multi-family commercial stock, including the RAD conversion of Ypsilanti Housing Commission properties and investment in rehabilitation of a variety of properties post foreclosure. There are several new residential developments in the planning stages, but still limit investment, particularly in the southside and southeast neighborhoods.</p>	<p><b>Medium -</b> Increasing private investment in low-market areas is difficult, as the return on investment will be lower.</p> <p>However, coordinating investment with local bank Community Reinvestment Act plans and priorities can provide support for homeownership, infill, commercial development and other economic development efforts. This could apply to low-opportunity areas throughout the county.</p>

<p>Private investment in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development and boosted new homeownership. Additionally there is interest in investment along several corridors, including Whittaker Road. However, the Gault Village shopping area, previously a neighborhood center with a grocery and related convenience shopping, is still in transition and experiencing a high degree of vacancy.</p>	
<p><b>Lack of public investments in specific neighborhoods, including services or amenities</b></p> <p>Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to its age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.</p> <p>The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.</p> <p>Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.</p> <p>Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.</p>	<p><b>High</b> - Review use of CDBG priority funds as part of 5-year consolidated plan preparation to emphasize use for placemaking and/or community infrastructure needs in low-opportunity areas.</p> <p>This will allow additional public support for these efforts, that are often underfunded due to the imbalanced local government revenues.</p>

<p><b>Lack of regional cooperation</b> Positive regional cooperation include the Urban County, the Continuum of Care for homelessness services, and the expansion of the Ann Arbor Transportation Authority to the Ann Arbor Area Transportation Authority, now including the City of Ypsilanti and Ypsilanti Township, While five jurisdictions have adopted the 2015 Housing Affordability and Economic Equity Analysis, there is some tension around implementation of regional goals for the effort. In some cases that includes some communities interest in gentrification more than revitalization, and in other cases, limited investment and engagement in removing exclusionary policies.</p> <p>Areas where regional cooperation could benefit are efforts involving a countywide public education district, coordinated hiring efforts from anchor institutions, and ongoing coordination on affordable housing for the urbanized area. The 2016 failure of the RTA Millage presents some broader regional coordination needs. The effort looks to connect 4 counties with transit services that will expand employment opportunities and improve access overall.</p>	<p><b>High</b> - Affordable housing, unequal educational systems, local-government revenue, transportation - all of these are regional issues that cannot be addressed through actions by single units of government. Coordination, shared values and goals will be essential for progress in some of the areas where institutional racism has been and continues to be a barrier to success.</p>
<p><b>Land use and zoning laws</b> Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment in lieu of taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.</p> <p>Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	<p><b>High</b> - Exclusionary zoning practices including large acre lot sizes, large single-family zoning districts potential over-utilization of Planned Projects (or PUD) and layers of regulation make development more expensive and more exclusive, especially in the Ann Arbor area.</p>
<p><b>Lending Discrimination</b> The recent history of mortgage lending in Washtenaw County as reported through Home Mortgage Disclosure Act (HMDA).</p>	<p><b>Medium</b> - HMDA data provides a look into loan origination and approval by race and ethnicity. African Americans</p>

<p>African Americans are denied mortgages for single family, duplex, triplex and quad buildings at a rate often 2-3 times that of whites or Asians. Hispanics are also denied at a much higher rate, than whites or Asians. The smaller number of loan originations does show more fluctuation in the information for Hispanics/Latinos.</p> <p>Anecdotally, there have been numerous stories of EMU professors looking for housing that are immediately directed to the Ann Arbor Housing market by realtors and others, rather than neighborhoods with quality and affordable housing stock within walking or shorter commuting distances in the City of Ypsilanti and Ypsilanti Township. Anecdotal reports from realtors indicate that steering occurs related to school districts, with school district boundaries serving as the modern era “redline” districts.</p>	<p>be turned down more frequently than whites.</p>
<p><b>Location of employers</b></p> <p>The majority of employers in the county are located in the Ann Arbor and Pittsfield area. The University of Michigan and University of Michigan Hospital employ more people than almost all the other top 20 employers in the county combined. Transit service does link much of the urbanized area to these major employers; however, in several cases in eastside neighborhoods, the commute is one hour one way.</p> <p>The other large job center is in the City of Detroit and its metropolitan region. There is no transit access from Washtenaw County east. Plans for those connections as part of the RTA are on hold until the RTA determines how to move forward after the failed 2016 millage effort.</p>	<p><b>Low</b> - Small businesses are the backbone of the economy. The days of large manufacturing firms taking over old plants and hiring thousands of workers are past. Even the American Center for Mobility will be primarily a leased space with smaller scale business offshoots expected. As such connections to major employers are more essential than trying to attract large-scale employers to the east side.</p>
<p><b>Location of proficient schools and school assignment policies</b></p> <p>The less proficient school systems on the eastern side of the county (YCS and Lincoln Schools) are a frequent deterrent for homebuyers with the income and flexibility to purchase or even rent throughout the region. The AAPS are the primary draw, and further contribute to the high cost of housing in Ann Arbor and surrounding areas. School district lines have become a modern equivalent of redlining, with more African American and students of color attending YCS and Lincoln Schools than other county school districts. The result is a vicious cycle of individuals with higher incomes and education adding to the expense and exclusivity of Ann Arbor, while households with lower incomes find themselves in an underperforming and underfunded school district.</p>	<p><b>High</b>- School district boundaries have become the new “redlining” with realtors emphasizing more successful school districts, and property values matching up clearly with those lines.</p>

<p><b>Location and type of affordable housing</b> The City of Ypsilanti and Ypsilanti township host the vast majority of committed affordable housing units for the county, creating areas of disproportionate housing needs and areas of concentrated poverty. For example, in the City of Ypsilanti, more than 95% of the committed affordable units in the city are located South of Michigan Avenue - this includes the 632 units located in the Southside R/ECAP.</p>	<p><b>High</b> - When you count in the loss of Cross Street Village, 95% of the City of Ypsilanti's units are located south of Michigan Avenue. In the county-wide context, both the City of Ypsilanti and Ypsilanti Township each have a comparable number of committed affordable units to the City of Ann Arbor, However Ypsilanti Township contains not quite half the population of the City of Ann Arbor, and the City of Ypsilanti is one-sixth the size. Combining Ypsilanti City and Ypsilanti Township make up almost 50% of the county's committed affordable units, but only 20% of the population.</p>
<p><b>Private discrimination</b> Through both surveys and focus groups, it was affirmed that discrimination is still an issue in particular for people of color and persons with disabilities. In the Ypsilanti Renters focus group, it was posited that one reason for this ongoing discrimination is a lack of diversity among property managers and landlords. This could minimize cultural misunderstandings that can lead to applications being denied and, in some cases, eviction.</p>	<p><b>Medium-</b> The tight housing market amplifies the role discrimination plays in where and how individuals find housing.</p>

## Identifying and Prioritizing Contributing Factors to Factors for Disproportionate Housing Needs

Contributing Factor	Prioritization and Justification
<p><b>Displacement of residents due to economic pressures</b> A few factors are at play with concerns about displacement. As frequently discussed in the <a href="#">2015 Housing Affordability and Economic Equity Analysis</a>, high housing prices in the Ann Arbor area are pushing many households out of Ann Arbor, often to the east side of the county, specifically in Ypsilanti and Ypsilanti Township. The high cost of housing, due in large part to the presence and dominance of the U of M and its hospital system, impacts renters and homeowners alike.</p> <p>In some cases, loss of committed affordable units has also caused displacement. Of current concern is the Cross Street Village in the City of Ypsilanti. Cross Street Village is an affordable senior living facility where the property owners have completed the 15-year mandatory affordability period, but are</p>	<p><b>High</b> - As noted in the Housing Affordability and Economic Equity report (2015) there are two markets in play - a high cost/high income market in Ann Arbor and a lower rent/much lower income problem in both the City of Ypsilanti and Ypsilanti Township. To prevent displacement, an emphasis on raising incomes and decreasing the unemployment rate is the goal for both R/ECAPs and other low opportunity areas and areas with high percentages of residents of color in the county.</p>

<p>opting out of the 99-year extended affordability period by using the IRS Qualified Contract exemption that allows them to “list” the property for sale. Based on the calculation involved, the property is listed for sale at \$12,050,000, significantly higher than its appraisal of \$4 million. While the affordability period will extend 3 years, current tenants are seeing rent increases and are concerned about how long they will be able to stay. Many are already looking to relocate and are finding few affordable options.</p> <p>The Ypsilanti Housing Commission’s Rental Assistance Demonstration (RAD) conversion is having a positive impact on neighborhoods due to the renovation of all units, including demolition and redevelopment in some cases. These properties moved out of public ownership to a public/private partnership to allow the use of Low-Income Housing Tax Credits to fund renovation and redevelopment. The total affordability period for these properties is 45 years once construction is complete.</p> <p>The Ann Arbor Housing Authority is also in the middle of a full RAD conversion, but the AAHA/City of Ann Arbor are maintaining ownership of the land to control long-term affordability for those properties. The City of Ann Arbor provided a 99 year ground lease to the entity developing the property. In both cases, long-term planning will be needed to maintain affordability at either the 45 or 99 year point.</p>	
<p><b>Lack of private investments in specific neighborhoods</b> The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. That said, there has been great improvements through RAD conversion of Ypsilanti Housing Commission properties, and residential investments in rehabilitation of post-foreclosure properties. There are several new prospects in the planning stages, but still limited investment, particularly in the south and southeast neighborhoods.</p> <p>Private investments in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development often with new ownership. Additionally, there is interest in investment along several corridors (i.e. Whittaker Road); however, the Gault Village shopping area- previously a neighborhood center with a grocery and related convenience shopping- is still in transition and is experiencing high degree of vacancy.</p>	<p><b>Medium -</b> Increasing private investment in low-market areas is difficult, as the return on investment will be lower.</p> <p>However, coordinating investment with local bank Community Reinvestment Act plans and priorities can provide support for homeownership, infill, commercial development and other economic development efforts. This could apply to low-opportunity areas throughout the county.</p>

<p><b>Lack of public investments in specific neighborhoods, including services or amenities</b></p> <p>Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to it's age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.</p> <p>The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.</p> <p>Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.</p> <p>Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.</p>	<p><b>High</b> - Review use of CDBG priority funds as part of 5 year consolidated plan preparation to emphasize use for placemaking and/or community infrastructure needs in low-opportunity areas.</p> <p>This will allow additional public support for these efforts, that are often underfunded due to the imbalanced local government revenues.</p>
<p><b>Land use and zoning laws</b></p> <p>Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment in lieu of taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan</p>	<p><b>High</b> - exclusionary zoning practices including large acre lot sizes, large single-family zoning districts potential over-utilization of Planned Projects (or PUD) and layers of regulation make development more expensive and more exclusive, especially in the Ann Arbor area.</p>

<p>Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.</p> <p>Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	
<p><b>Lending Discrimination</b></p> <p>The recent history of mortgage lending in Washtenaw County as reported through Home Mortgage Disclosure Act (HMDA). African Americans are denied mortgages for single family, duplex, triplex and quad buildings at a rate often 2-3 times that of whites or Asians. Hispanics are also denied at a much higher rate, than whites or Asians. The smaller number of loan originations does show more fluctuation in the information for Hispanics/Latinos.</p> <p>Anecdotally, there have been numerous stories of EMU professors looking for housing that are immediately directed to the Ann Arbor Housing market by realtors and others, rather than neighborhoods with quality and affordable housing stock within walking or shorter commuting distances in the City of Ypsilanti and Ypsilanti Township. Anecdotal reports from realtors indicate that steering occurs related to school districts, with school district boundaries serving as the modern era “redline” districts.</p>	<p><b>Medium</b> - HMDA data provides a look into loan origination and approval by race and ethnicity. African Americans are turned down more frequently than whites.</p> <p>Middle and upper income families (often white) are often steered or request to be look for housing in the Ann Arbor School District.</p>

## Identifying and Prioritizing Contributing Factors to Factors for Publicly Supported Housing

Contributing Factor	Prioritization and Justification
<p><b>Land use and zoning laws</b></p> <p>Land use and zoning laws generally allow for multi-family housing. However, in the City of Ann Arbor, connection fees and development review processes increase the costs of all development, including affordable housing development. Despite this, the City of Ann Arbor also has a payment in lieu of</p>	<p><b>High</b> - Exclusionary zoning practices including large acre lot sizes, large single-family zoning districts potential over-utilization of Planned Projects (or PUD) and layers of regulation make development more expensive and more exclusive, especially in the Ann Arbor</p>



<p>taxes (PILOT) ordinance requiring that all units maintained at 60% AMI pay \$1 per unit a year in taxes. The State of Michigan Rent Control Act limits the tools that local units can utilize to incentivize affordable housing developments.</p> <p>Single-family zoning districts make up the bulk of zoning districts in communities throughout the county. This limits the housing choices, price points and availability of housing for populations most in need. There have been efforts to limit the number of affordable units or use of housing choice vouchers through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	<p>area.</p>
<p><b>Community Opposition</b> Community opposition is common when there are proposals for specific developments looking to add affordable housing or when there are proposed zoning changes to add residential density. While these changes in high opportunity could help offset some of the push of lower income (often African American) households to the east side, they continue to be difficult to implement. In continuation of this vicious cycle, lower income households are then pushed out of the east side as more people relocate to the east side, potentially raising cost of living and rents throughout the east side. It is also important to note that the community opposition is not exclusive to high-opportunity markets and is in play throughout the county.</p> <p>The opposition to affordable housing sometime takes the form of “green or environmental” concerns. When pressed, the conversation usually sources concerns related to safety, the increase in low-income households, and concerns about different races moving into the neighborhood.</p> <p>A smaller, but persistent, way this opposition also plays out is in the location of group group housing that provides support and treatment for persons with disabilities and/or substance abuse issues.</p>	<p><b>High</b> - While support is broad for affordable housing in theory, individual projects at specific locations continue to face opposition, as do efforts to increase residential density.</p> <p>Ongoing education, outreach and development of advocates to support, rather than oppose these developments, will be essential to success.</p>
<p><b>Impediments to mobility</b> Households using Housing Choice Vouchers (HCV) in the area find that market rents limit where they can find rental housing. Fair Market Rent (FMR) rates do not cover the cost of most rentals in Ann Arbor (even when increased to 110% of value),.and also create a detrimental situation on the east side</p>	<p><b>High</b> - Many voucher-holding households are being priced out of Ann Arbor simply due to rents exceeding fair market value of the voucher. As a result, many are pushed east, and concentrated in specific neighborhoods with less access to employment,</p>

<p>single family communities with a large number of voucher rentals. The FMR covers much more than the mortgage payment, creating an artificial market situation in neighborhoods, such as West Willow. Discrimination continues to be reported as a setback for voucher holders in finding rental housing as well.</p>	<p>education and services.</p>
<p><b>Lack of private investments in specific neighborhoods</b> The City of Ypsilanti has not seen any new residential housing construction (outside of rehabilitation and RAD conversion) in more than 10 years. That said, there has been great improvements through RAD conversion of Ypsilanti Housing Commission properties, and residential investments in rehabilitation of post-foreclosure properties. There are several new prospects in the planning stages, but still limited investment, particularly in the south and southeast neighborhoods.</p> <p>Private investments in Ypsilanti Township increased post-recession as several subdivisions that had previously stalled, restarted development often with new ownership. Additionally, there is interest in investment along several corridors (i.e. Whittaker Road); however, the Gault Village shopping area- previously a neighborhood center with a grocery and related convenience shopping- is still in transition and is experiencing high degree of vacancy.</p>	<p><b>Medium</b> - Increasing private investment in low-market areas is difficult, as the return on investment will be lower.</p> <p>However, coordinating investment with local bank Community Reinvestment Act plans and priorities can provide support for homeownership, infill, commercial development and other economic development efforts. This could apply to low-opportunity areas throughout the county.</p>
<p><b>Lack of public investment in specific neighborhoods, including services and amenities</b> Within the City of Ypsilanti, there are a number of amenities including parks, a fairly complete sidewalk network, streetlights, community centers, and similar. Due to it's age and funding constraints, the City of Ypsilanti has deferred maintenance on several of its amenities, such as the sidewalk network, downtown pedestrian improvements, parks, and other infrastructure.</p> <p>The City of Ypsilanti eliminated recreation programming around 2004, and has reduced many maintenance services due to budget constraints over the past 15 years. However, an active community has taken over several roles including the operation and physical replacement of the Rutherford City Pool, the operation of the Senior Center, and a partnership with Washtenaw Community College that provides programming and education at Parkridge Community Center. Ongoing facility maintenance is limited to the availability of grant funding and charitable support rather than general fund. Investments in</p>	<p><b>High</b> - Review use of CDBG priority funds as part of 5 year consolidated plan preparation to emphasize use for placemaking and/or community infrastructure needs in low-opportunity areas.</p> <p>This will allow additional public support for these efforts, that are often underfunded due to the imbalanced local government revenues.</p>

<p>Parkridge Park and Peninsula Park (both R/ECAPs) has been minimal and focused on maintenance and replacement of existing equipment.</p> <p>Ypsilanti Township has maintained its recreational programming and expanded its park and park facilities. In the case of the West Willow neighborhood, a partnership between the Township and Habitat for Humanity of Huron Valley has resulted in improvements to the neighborhood center, the addition of a pavilion as well as some park maintenance.</p> <p>Superior Township has identified the need for additional facilities in and around the MacArthur Drive neighborhood. A small branch of the Ypsilanti District Library is located in the area as well as the Superior Township Community Park, but there are limited facilities to provide recreational and/or educational services to youth.</p>	
<p><b>Lack of regional cooperation</b> Positive regional cooperation include the Urban County, the Continuum of Care for homelessness services, and the expansion of the Ann Arbor Transportation Authority to the Ann Arbor Area Transportation Authority, now including the City of Ypsilanti and Ypsilanti Township, While five jurisdictions have adopted the 2015 Housing Affordability and Economic Equity Analysis, there is some tension around implementation of regional goals for the effort. In some cases that includes some communities interest in gentrification more than revitalization, and in other cases, limited investment and engagement in removing exclusionary policies.</p> <p>Areas where regional cooperation could benefit are efforts involving a countywide public education district, coordinated hiring efforts from anchor institutions, and ongoing coordination on affordable housing for the urbanized area. The 2016 failure of the Regional Transit Authority (RTA) Millage presents some broader regional coordination needs. The effort looks to connect 4 counties with transit services that will expand employment opportunities and improve access overall.</p>	<p><b>High</b> - Affordable housing, unequal educational systems, local-government revenue, transportation - all of these are regional issues that cannot be addressed through actions by single units of government. Coordination, shared values and goals will be essential for progress in some of the areas where institutional racism has been and continues to be a barrier to success.</p>
<p><b>Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs</b> QAP parking requirements often exceed those of local zoning and do not defer to them, creating problems in urban locations, as well as increasing the cost of development. The QAP also has a section that awards points for proposals meeting a</p>	<p><b>Medium</b> - QAP criteria has been problematic for infill locations. Regulations in Ann Arbor make development costly.</p>

<p>community's neighborhood strategic plan, however applicants have frequently noted that it's not clear how to meet this standard.</p>	
<p><b>Source of income discrimination</b> The Fair Housing Center of Southeast and Mid Michigan (FHC) notes that some housing providers and banks do not appropriately consider income, including SSI, Social Security, retirement and other incomes.</p>	<p><b>Medium</b> - FHC has noted that this is a fairly common occurrence, sometimes due to misinformation but other times done more deliberately.</p>

## Identifying and Prioritizing Contributing Factors of Disability and Access Issues

Contributing Factor	Prioritization and Justification
<p><b>Access to proficient schools for persons with disabilities</b> While there is a broader question about access to proficient schools (less available to low-income families of color), all school districts in the county provide special education classes and supports.</p>	<p><b>High</b>- Connects to broader disparity issue in school districts in the county.</p>
<p><b>Access to publicly supported housing for persons with disabilities</b> 30% of HCV are utilized by households with disabilities, and 20% of public housing is used by accessible housing.</p>	<p><b>Medium</b> - Current practice among public and nonprofit affordable housing provides has included addition of barrier free and accessible units with new development or rehabilitation.</p>
<p><b>Access to transportation for persons with disabilities</b> There are gaps in service and availability in some rural areas and on the edges of the AAATA service area.</p>	<p><b>Medium</b> - Current transit and transportation providers are reviewing service</p>
<p><b>Inaccessible sidewalks, pedestrian crossings, or other infrastructure</b> The CIL's litigation against various local jurisdictions around ADA sidewalks and curb cuts has resulted in improved attention to detail and improved accessibility.</p> <p>Most of the urbanized areas of Washtenaw County have been working to implement traffic calming, including road diets, improved crosswalks, midblock crossings and other supports to improve the pedestrian network. However, the prevalence of MDOT roads cutting through what would be walkable communities, often increase speeds to dangerous levels, and does not allow for smaller-scale pedestrian improvements. For example, Washtenaw Avenue passes through four jurisdictions in the County, and has the most heavily used transit route</p>	<p><b>Medium</b> - Ongoing efforts like Reimagine Washtenaw and the CDBG infrastructure program continue to support pedestrian infrastructure on a project by project basis.</p>

<p>(AAATA Route 4) in the County. MDOT has dedicated minimal resources towards adding in sidewalk gaps, installing mid-block crossings or even crosswalks through long sections of the road. This has been inadequate and sometimes dangerous for pedestrians, and particularly people with disabilities who may need to cross the road to get to services, a residence, bus stop, etc.</p>	
<p><b>Lack of affordable in-home or community-based supportive services</b> The AAHC and other housing providers have documented the need for additional in-home supportive services (up to 24 hours). As well, the demand for supportive services is ongoing and particularly paired with the homelessness work in the community.</p>	<p><b>Medium</b> - There is a strong connection between providing supportive housing for individuals and families experiencing homelessness who also have disabilities. However, more support is needed for individuals who need 24 hour assistance.</p>
<p><b>Lack of affordable, integrated housing for individuals who need supportive services</b> Based on focus group responses, it is not common where an individual alone can provide for their housing and support services needs, even when receiving SSI, Medicaid and other government supports. Most families indicated that they provide additional financial support, and assistance with procuring and maintaining supportive services. Families also noted discrimination of apartment managers, providing examples when managers said no to disabled applicants who were looking to live in what would be an integrated setting. This indicates both a supply and a discrimination issue.</p>	<p><b>Medium</b> - As mentioned above, more support services are needed to allow for integrated, and independent living.</p>
<p><b>Lack of assistance for housing accessibility modifications</b> Modifications for tenants of properties in federally subsidized units is more common, in particular those managed by one of the housing commissions and/or Avalon Housing, MAP and other non-profit developers. Focus group participations have noted varying responses in the private sector. The Fair Housing Center of Southeast and Mid Michigan (FHC) noted that in their experience with many local building departments are not enforcing federal fair housing requirements as part of multifamily development, citing a lack of jurisdiction.</p>	<p><b>High</b> - Reinstating the County ADA ramp program and investigating additional supports for modifications for both renters and buyers is needed.</p>
<p><b>Lack of assistance for transitioning from institutional settings to integrated housing</b> Washtenaw County Community Mental Health staff report lack of resources for transition, and are looking to participate in broader discussions on providing additional supports.</p>	<p><b>Medium</b> - Several categories of support listed are connected and would benefit from a coordinated approach to planning and service delivery.</p>
<p><b>Land use and zoning laws</b></p>	<p><b>Medium</b> - Working with providers to identify limitations on location can help</p>

<p>The prevalence of single-family zoning districts makes up the bulk of zoning districts throughout the region and limits the housing choices, price point and availability to populations most in need of housing. In some cases, there have been efforts to limit the number of affordable units or use of HCV through the use of Planned Unit Development (PUD) zoning. In other communities, PUDs have been utilized to encourage affordable housing. In Washtenaw County, similar to the nation, lower-income populations often includes communities of color.</p>	<p>support recommendations to local jurisdictions. Education and advocacy can help residents understand the need for group homes and other similar supportive housing types.</p>
<p>As part of the prevalence of single family districts, there are limitations on group home placement. There are often negative associations with group housing and similar housing types, making it difficult to have them approved even as a conditional or special use.</p>	

### Identifying and Prioritizing Contributing Factors of Fair Housing Enforcement, Outreach Capacity and Resources Contributing Factors

Contributing Factor	Prioritization and Justification
<p><b>Lack of resources for fair housing agencies and organizations</b> Currently the FHC's funding for outreach and enforcement is limited to that of the federal government, specifically HUD. In a stakeholder interview, key staff noted that more resources are always needed, but uncertainty rises due to the current federal political climate. The number of complaints recorded in 2016 was at the highest level in 20 years. And as of August, the rate of complaints coming into FHC is at a rate 2 weeks ahead of 2016.</p>	<p><b>High</b> - The number of complaints recorded in 2016 was at the highest level in 20 years. And as of August, the rate of complaints coming into FHC is at a rate 2 weeks ahead of 2016.  The ability to investigate and enforce is limited by resources.</p>

In light of the contributing factors above, as well as the priorities listed, the goals were developed as a means to directly address the core issues. Implementation or work toward the goals is intended to be a collaborative effort including all Urban County local jurisdiction members, other local units, county departments, non-profit partners, the Ann Arbor and Ypsilanti Housing Commissions, and other partner agencies and neighborhood and community groups. The collaborative approach is essential when tackling difficult and long-standing community problems, especially in an era of uncertain funding and changing priorities.

The goals defined in the AFH Plan represent a critical step toward increased fair housing opportunities. The AFH Plan will inform the County's next Five-Year Consolidated Plan for Fiscal Years 2018 - 2022. Throughout this process, OCED and AAHC remain committed to community participation. The AFFH rule envisions an ongoing dialogue between the public and recipients of HUD funds. Staff looks forward to continuing the AFFH conversation with Washtenaw County residents over the next five years and beyond.

## Fair Housing Goals

Guided by the contributing factors and prioritization of these factors, the following includes the Fair Housing Goals, which will be incorporated into OCED's 5-year consolidated plan. Each goal identifies strategies, its priority, a timeframe and measurement of achievement, as well as the contributing factors and fair housing issues. Responsible Program Participants are also included for each goal, as OCED and AAHC plans to work with the existing network of local units, agencies, and partnerships to reach the goals below.

For prioritization, the subcommittee determined high priority goals being important and attainable within 5 years. Goals prioritized as a low priority address more complex issues, which may require more preparation and time to truly address the fair housing issue it addresses.

**Goal 1: Align development practices and policies to encourage more affordable housing development in high market areas**

**Discussion:** Policy and regulation decisions can either ease or make more difficult the ability to develop affordable housing. These strategies are intended to improve the process throughout zoning, policy, and other regulatory changes.

Strategies	Priority/Timeframe of Action	Measure of Achievement
Zoning:		
1.1 Encourage accessible affordable housing units near transit or other key services at activity centers through zoning changes e.g. Transit-oriented developments (TOD)	<b>Medium/High Priority</b> 1-2 years	Review of ordinances and/or draft ordinances. City of Ann Arbor expecting to draft ordinances changes by spring 2018
1.2 Support local units to implement zoning strategies to develop housing products (i.e. duplexes, accessory dwelling units) in single-family neighborhoods	Low Priority 1-5 years	Issue discussed by relevant governing bodies (board and/or commissions) and/or drafted ordinance changes
Policy:		
1.3 Encourage the use of publicly owned land in high opportunity markets for affordable housing or proceeds go toward affordable housing development	Medium Priority 1-5 years	Review of locations and ownership of public land (could include school, university or other public agencies). Could include identification of parcels for disposition
1.4 Prioritize public subsidies/incentives (i.e. brownfield development) for affordable housing developments in high opportunity markets	Medium Priority 1-5 years	Review and/or changes to policies related to incentives or subsidies.
1.5 For publicly supported housing, coordinate rental inspection process between HUD, MSHDA, and local regulations to avoid duplicative administrative burden	Low Priority 1-5 years	Review requirements and potential overlap between inspecting agencies. Potentially change inspection policy in relevant local units.
<b>Contributing Factors:</b> Lack of affordable, accessible housing in a range of unit sizes; Location and type of affordable housing; Land use and zoning laws; Community opposition		
<b>Fair Housing Issues:</b> Disproportionate Housing Needs; Segregation/Integration		
<b>Responsible Program Participants:</b> Reimagine Washtenaw, City of Ann Arbor, City of Ypsilanti, local units, OCED, WCRBA		



**Goal 2: Coordinate public and private investments in low opportunity areas**

**Discussion:** Low opportunity areas have not received the same public and private investment to provide support and amenities to residents. Strategies below are intended to encourage revitalization without gentrification.

Strategies	Priority/Timeframe of Action	Measure of Achievement
2.1 Prioritize and incentivize infill development for home ownership in lower opportunity markets (City of Ypsilanti Neighborhood Enterprise Zone (NEZ), Youthbuild in YTown)	Medium Priority 1-5 years	Inquiries and/or new infill single-family or duplex development in lower opportunity areas.
2.2 Engage with Community Reinvestment Act Committee in Washtenaw County to align efforts with County housing and economic development priorities	Medium priority Annual	Regular participation by OCED and partner agencies and communities on local Reinvestment Act Committee
2.3 Support and prioritize CDBG funds as follows: <ul style="list-style-type: none"> <li>Placemaking and community infrastructure improvements</li> <li>Commit program income to projects in RECAP areas</li> </ul>	<b>High Priority</b> Year 1; Ongoing	As part of upcoming 5 year consolidated planning process: 1- Review CDBG priority project funding, potentially providing points for placemaking projects in low-opportunity areas 2- CDBG program income annually committed to projects in R/ECAP areas
2.4 Provide resources such as technical assistance, volunteer services, and possible grants that low-income older adult homeowners can use to avoid property code violations (i.e West Willow and Sheriff's Office).	Medium 1-5 years	Track use of sheriff department snow removal service; track number of participants in West Willow senior support program;
2.5 Provide and share models (promising practices) for addressing blight and/or neighborhood stabilization practices in low opportunity areas	Low Priority 1-5 years	Summary document of strategies prepared and available including contact info to relevant local experts.
<b>Contributing Factors:</b> Lack of private investment in specific neighborhoods; Lack of public investment in specific neighborhoods, including services or amenities; Access to financial services; Deteriorated and abandoned properties; Lack of community revitalization strategies		
<b>Fair Housing Issues:</b> Disproportionate Housing Needs; Disparities in Access to Opportunity; RECAPs; Segregation/Integration		
<b>Responsible Program Participants:</b> Housing Bureau for Seniors, Urban County Executive Committee, Local units, City of Ypsilanti, Ypsilanti Township, OCED, Sheriff's Office, Habitat for Humanity of Huron Valley		

**Goal 3: Improve options for housing voucher holders to move to opportunity**

**Discussion:** A concentration of housing choice voucher use on the east side of the county is a result of lower rents coupled with availability of single family houses for rent. These strategies are intended to provide balance in usage while aiding individual households to have a broader choice in where to find housing.

<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
3.1 Support for HUD rule implementation (i.e. administrative fees) to help MSHDA fund a voucher counselor for Washtenaw County and create a Counselor position at the Ann Arbor Housing Commission	<b>High Priority</b> 1-2 years	Local units contact federal representatives (and others) to encourage implementation of rule change.
3.2 Review small-market area rule to see if adjustments would benefit voucher-holders	Low Priority 1-2 years	Options developed and considered by local units and Ann Arbor Housing Commission.
3.3 Review local housing authorities' process for administering Rent Reasonable Tests	Medium Priority 1-2 years	Options for tests reviewed, and potential changes considered and/or adopted.
3.4 Advocate changes in HUD rules to allow increase in voucher amounts in lower poverty areas (payment standards with 110% limit)	Medium Priority 1-5 years	Local units contact federal representatives and/or MSHDA about increasing voucher percentage applied in high opportunity markets. .
3.5 Outreach of "Voucher to Home-Ownership" program in single-family neighborhoods with high concentration of voucher use	Medium Priority 1-5 years	Update to marketing materials. Contact with landlords in single-family neighborhoods to see if they will consider selling; Marketing to voucher holders in same single family neighborhoods
<b>Contributing Factors:</b> Land use and zoning laws; Impediments to mobility; Quality of affordable housing information programs; Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs		
<b>Fair Housing Issues:</b> Disproportionate Housing Needs; Publicly Supported Housing; RECAPs; Segregation/Integration		
<b>Responsible Program Participants:</b> Ann Arbor Housing Commission, Ypsilanti Housing Commission, HUD, MSHDA, OCED, local units		

**Goal 4: Add and preserve affordable housing stock**

**Discussion:** The need to add and preserve affordable housing stock is universally agreed upon among local units. Strategies below support the goals developed from the 2015 Housing Affordability and Economic Equity Analysis.

<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
4.1 Develop strategy to maintain affordability for rental housing that is reaching the end of their affordability period (LIHTC)	<b>High Priority</b> 1-5 years	Inventory completed. Plan developed for intervening when possible..
4.2 Track inventory of committed affordable units in Ann Arbor, Pittsfield Township, City of Ypsilanti and Ypsilanti Township	<b>High Priority</b> Ongoing	Make additions and subtractions annually, and making net changes public.
4.3 Explore strategies to preserve affordability (e.g. community land trusts)	Medium Priority 1-5 years	Explore strategies like community land trusts (specifically Baltimore and other low market areas).
4.4 Explore strategies to create regular funding stream for affordable housing fund(s)	<b>High Priority</b> 1-5 years	Determine options, explore implementation of each with both City of Ann Arbor, Washtenaw County and others.
4.5 Track progress of goals from Housing Affordability and Economic Equity Analysis Report, specifically to: <ul style="list-style-type: none"> <li>● Add 140 units per year in City of Ann Arbor</li> <li>● Add 17 units per year in Pittsfield Township</li> <li>● Add/grow 69 College-educated residents per year in City of Ypsilanti</li> <li>● Add/grow 140 College-educated residents per year in Ypsilanti Township</li> </ul>	<b>High Priority</b> 1-5 years (20 year goal)	Affordable Hourtable/Equity Leadership team creates annual reports for implementation of plan <ul style="list-style-type: none"> <li>● Continue creation of annual work plan</li> <li>● Track successes and challenges</li> <li>● Track overall progress with broad goal as well</li> </ul>
4.6 Encourage local units to request affordable units in new residential developments.	Low priority 1-5 years	Connect with development leads at local units in the urbanized area to support their work to include affordable units in residential development.
<b>Contributing Factors:</b> The availability of affordable units in a range of sizes; Lack of affordable, accessible housing in a range of unit sizes; Location and type of affordable housing; Displacement of residents due to economic pressures; Community opposition		
<b>Fair Housing Issues:</b> Disproportionate Housing Needs; Publicly Supported Housing; Segregation/Integration; RECAPs		
<b>Responsible Program Participants:</b> OCED; City of Ann Arbor; Pittsfield Township; City of Ypsilanti; Ypsilanti Township		

**Goal 5: Provide ongoing education and advocacy around fair housing**

**Discussion:** Frequent turnover of staff and elected officials makes fair housing education and advocacy an ongoing need.

<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
5.1 Educate and advocate on the benefits of integrated and mixed-income communities	<b>High Priority</b> 1-5 years	Connect local units and interested parties to Washtenaw Alliance newsletter which provides advocacy and education on Affordable housing.
5.2 Amplify Fair Housing Center outreach and education efforts through government and nonprofit partners	Low Priority Annually	<ul style="list-style-type: none"> <li>● Provide local units through Urban County Executive Committee information to include on their website regarding Fair Housing</li> <li>● Assist jurisdictions that are new to the Urban County to collect baseline data regarding fair housing issues.</li> <li>● Choose and provide fair housing education each year to UCEC</li> </ul>
5.3 Provide Fair Housing information to new jurisdictions in Urban County Executive Committee, and include in new member orientation	Low Priority Annually	Update orientation materials to include fair housing information.
5.4 Update Urban County Fair Housing policy to reflect needs and goals	<b>High Priority</b> Annually	Review, edit and adopt updated policy.
5.5 Develop guidebook for local units about legal resources for tenants with criminal background	Medium Priority Annually	Research and develop guidebook, and make it available for local units use.
5.6 Provide annual education and training to local government officials about the needs for more affordable housing	Low Priority Annually	Maintain and update county affordable housing website, and make resources available to local units annually.
<b>Contributing Factors:</b> Lack of resources for fair housing agencies and organizations; Quality of affordable housing information programs; Community opposition		
<b>Fair Housing Issues:</b> RECAPs; Access to Opportunity; Segregation/Integration; Disproportionate Housing Needs; Fair Housing Enforcement, Outreach Capacity, and Resources Analysis		
<b>Responsible Program Participants:</b> OCED, The Fair Housing Center for Southeast and Mid Michigan, Urban County Executive Committee, Local units, WHA		

**Goal 6: Work to increase employment opportunities in low opportunity areas**

**Discussion:** While Washtenaw County performs well on many levels as a great place to live, there is a great disparity between those who prosper and those who don't. Addressing the pockets of high unemployment will help address this disparity.

<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
6.1 Partner with relevant agencies to identify skills gap in the labor market's hiring pipeline and connect residents to training and employment opportunities, particularly in RECAPs and areas with high unemployment rates.	<b>High Priority</b> 1-5 years	Assessment of skills gap completed for county, and for census tracts/neighborhoods with high unemployment.
6.2 Explore targeted hiring and/or training programs from anchor institutions to recruit and train residents in RECAPs and areas with high unemployment rates	<b>High Priority</b> 1-5 years	Connect with local anchor institutions to determine if pilot hiring and training program can be developed to hire from target neighborhoods.
6.3 Explore hiring policies to not exclude individuals with criminal backgrounds <ul style="list-style-type: none"> <li>● Assess hiring process in HR (going beyond Ban the Box)</li> </ul>	<b>High Priority</b> 1-5 years	Follow up with relevant HR departments to determine options and/or find ways to implement changes.
6.4 Local governments and agencies work to hire and train staff that reflects racial and ethnic makeup the communities they serve, including bilingual speakers	Medium Priority 1-5 years	Review racial makeup of employees and board/commission members. Identify strategies to market to diverse populations for both hiring and board and committee appointments.

**Contributing Factors:** Location of employers; Community revitalization strategies

**Fair Housing Issues:** Access to Opportunity; RECAPs; Segregation/Integration

**Responsible Program Participants:** Local units, Michigan Works!, Anchor institutions

**Goal 7: Support educational and personal growth of youth in low opportunity areas**

**Discussion:** There is significant disparity between the various school districts in the county. R/ECAPs and other low opportunity areas have high child poverty, and lack recreational and other opportunities of higher opportunity neighborhoods.

<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
7.1 Coordinate services and programs including recreation activities, mentoring, and experiential learning for youth	Medium Priority 1-5 years	Increase youth programming in R/ECAPs and low opportunity areas
7.2 Support efforts to create equitable county-wide public education system	Low Priority 1-5 years	Explore options and long-range strategy for creating an equitable public education system.
7.3 Increase access to quality child care options for lower opportunity residents	1-5 years	Measurements to be established in upcoming Coordinated Funding grant cycle.

**Contributing Factors:** Location of proficient schools and school assignment policies; Access to proficient schools for persons with disabilities; Lack of private investment in specific neighborhoods; Lack of public investment in specific neighborhoods, including services or amenities; Land use and zoning

**Fair Housing Issues:** RECAPs; Segregation/Integration; Disparities in Access to Opportunity

**Responsible Program Participants:** OCED, WISD, YMCA (and agencies with youth programming), Coordinated Funders, Success by 6, County Parks, City of Ypsilanti, Ypsilanti Township

**Goal 8: Boost existing services to improve accessibility and affordability for persons with disabilities**

**Discussion:** These strategies address the need for accessible, affordable housing for persons with disabilities. In order to focus our efforts on the most vulnerable individuals, certain strategies are focused on people with disabilities who are also experiencing homelessness.

<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
8.1 Restart County Accessibility Ramp Program for owner occupants	<b>High Priority</b> 1 year/ maintain 1-5 years	Review program. Number of accessible ramp applications and number of ramps installed.
8.2 Continue to prioritize resources to develop permanent supportive housing for persons experiencing homelessness	<b>High Priority</b> Annually	Continuum of Care prioritizes permanent supportive housing in funding cycles.
8.3 Review HOME RFP prioritization to encourage affordable homeownership and rental housing preservation and development for persons with disabilities	<b>High Priority</b> 1-5 years	HOME RFP is reviewed and recommendations presented/adopted by Urban County Executive Committee
8.4 Integrate fair housing regulations for multi-family development into review process by working with local building departments to develop a checklist	Medium Priority 1-2 years	Checklist developed and shared with relevant departments.
<b>Contributing Factors:</b> Lack of assistance of housing accessibility modifications; Access to publicly supported housing for persons with disabilities; Regulatory barriers to providing housing and supportive services for persons with disabilities; Lack of affordable in-home or community based supportive services; Lack of affordable, integrated housing for individuals who need supportive services; Lack of affordable, accessible housing in a range of unit sizes		
<b>Fair Housing Issues:</b> Segregation/Integration; Publicly Supported Housing; Disability and Access; Disparities in Access to Opportunity		
<b>Responsible Program Participants:</b> Continuum of Care, WHA, AAHC, YHC, OCED, Washtenaw County, CIL, Local units		

**Goal 9: Improve transportation options in low opportunity areas**

**Discussion:** Transportation is essential to employment and education opportunities as well as quality of life. Strategies below capitalize on existing partnerships with local units and organizations, as well as the Ann Arbor Area Transportation Authority (AAATA), in efforts to improve access to transportation.

<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
9.1 Support partnerships between local governments, private employers, anchor institutions, and neighborhood organizations to develop transportation options that connect low income and protected populations living in concentrated areas of poverty with job opportunities	Medium Priority 1-5 years	Exploration of other options is considered through both formal and information means. Additional transportation options provided.
9.2 Collaborate with The Ride service to evaluate how transit meets needs for residents in low opportunity areas	<b>High Priority</b> 1-5 years	Review of recent changes completed by The Ride and adjustments made. The Ride develops operational interpretations and metrics for their recent goal change "People throughout the Area have equitable access to opportunity through AAATA services"
9.3 Encourage planning and implementation for multi-modal transportation with emphasis on non-motorized linkages	Medium Priority 1-5 years	Regional non-motorized plans receive regular updates. County supports grant applications for multi-modal transportation and non-motorized linkages.

**Contributing Factors:** Access to transportation for persons with disabilities; The availability, type, frequency, and reliability of public transportation; Inaccessible buildings, sidewalks, pedestrian crossings, and other infrastructure; Location of accessible housing; Location and type of affordable housing

**Fair Housing Issues:** Disparities in Access to Opportunity; Segregation/Integration; RECAPs

**Responsible Program Participants:** AAATA, WATS, RTA, Anchor institutions, Local units, Neighborhood Associations



**Goal 10: Create and maintain ongoing resident engagement in R/ECAPs and low opportunity areas**

**Discussion:** Outreach for AFH helped engage key segments of the county, but ongoing engagement is essential to fair housing and equity.

<b>Strategies</b>	<b>Priority/Timeframe of Action</b>	<b>Measure of Achievement</b>
10.1 Expand role of Community Action Board resident members to increase two-way flow of communication	<b>High Priority</b> Annually	CAB board members regularly provide updates to community. CAB board members share neighborhood efforts with peers on CAB and Board of Commissioners.
10.2 Connect with residents and stakeholders in areas where outreach was limited, including: Leforge, MacArthur, and Whitmore Lake	Medium Priority 1-5 years	Events held in each community; ongoing communications through Urban County members and neighborhood leaders/ambassadors.
10.3 Support and utilize Washtenaw Public Health neighborhood liaisons	Medium Priority Ongoing	Ensure regular updates from Public Health Neighborhood liaisons are shared with OCED to help inform outreach and program/policy efforts.
10.4 Explore translation services related to outreach for Hispanic/Latino communities, Chinese communities, and other LEP populations	Low Priority 1-5 years	Assess local units' capacity to provide services and materials in languages for our top LEP populations, starting with City of Ann Arbor and Washtenaw County.
<b>Contributing Factors:</b> Lack of community revitalization strategies; Lack of public investment in specific neighborhoods, including services or amenities		
<b>Fair Housing Issues:</b> RECAPs; Segregation/Integration; Disparities in Access to Opportunity; Outreach Capacity and Resources Analysis		
<b>Responsible Program Participants:</b> Community Action Board, Washtenaw County Public Health, OCED, Local units, Neighborhood Association, WICIR		